

VPP APPLICATION INSTRUCTIONS for the CORPORATE WAY TO PARTICIPATE



What follows are instructions for applying to the VPP corporate way to participate. We encourage you to involve employees and managers in completing your application. After OSHA reviews and accepts your written submission, we will schedule an onsite evaluation.

If you are in a state that operates its own OSHA-approved program, check with your state agency to learn specifics regarding its VPP application process.

There is some paperwork required in the application process, but we encourage you to use as much existing material as possible. **Please provide a list/index of all materials you choose to attach to your application.** Most worksites have found that, in the process of applying, they gain a greater understanding of worker protection and discover ways to improve their safety and health management system.

VPP reviewers don't look for a single correct way to meet VPP requirements. They want to see a system that works for you. Some successful safety and health management systems involve substantial written documentation, and others do not. Small businesses, in particular, often are able to implement excellent safety and health processes with relatively little documentation.

If you need more information, you can contact your nearest OSHA VPP Manager or Coordinator through OSHA's Regional and Area Offices. In addition to answering your questions, your Regional VPP Manager or Coordinator can refer you to VPP participants in your area. We encourage you to contact participants. They are happy to share their experience.

We also encourage you to review the *Federal Register* Notice, 74 FR 927, January 9, 2009.

I. General Information

A. Applicant Corporation/Employer

1. Name
 - a) Address
 - b) Mailing Address, if different
2. Corporate Safety & Health Manager – Name
 - a) Title
 - b) Phone Number
 - c) E-Mail Address
3. VPP Contact for OSHA correspondence – Name
 - a) Title
 - b) Phone Number
 - c) E-Mail Address

B. Corporate Sites in the United States

1. Total number of sites in the United States
2. Number of Sites under Federal OSHA Jurisdiction
3. Number of Sites under State Plan Jurisdiction

C. Employees and Contractors

1. Total Number of Employees in the United States (include regular and temporary employees)
2. Average Number of Temporary Employees
3. Average Total Number of Applicable Contractors (see Appendix A, Definitions)
4. Average Total Number of Contractors/Subcontractors within any DGAs you intend to propose

D. Union Information - Provide information for each union separately

1. Union Name and Local #
2. Authorized Bargaining Unit Representative's Name
3. Address
4. Phone Number
5. E-mail Address

E. Type of Work Performed, Products Produced, and Typical Hazards

1. Provide a comprehensive description of the work performed within your corporation and the types of products produced.
2. Provide a description of the types of hazards typically associated with your industry and your sites.

F. Industrial Classification Codes

Provide what you believe to be your corporation's 6-digit North American Industry Classification System (NAICS) code and your 4-digit Standard Industrial Classification (SIC) code.

1. Contact your Regional VPP Manager or Coordinator if you are having difficulty identifying an appropriate code.
2. You can also find NAICS and SIC information on the Bureau of Labor Statistics' website, www.bls.gov. OSHA will verify and ultimately will assign you a NAICS code for purposes of VPP.

II. Corporate Eligibility

A. Commitment to VPP

1. Describe your corporate commitment to VPP, your demonstrated working knowledge and experience of VPP through actual approval and participation, and your plans to implement VPP corporate-wide.
2. Confirm that management commits to meeting and maintaining the requirements of VPP.
3. Provide a list of individual sites and/or proposed Designated Geographic Areas (DGA). Define boundary of any proposed DGA.
4. Provide a schedule (if available) for obtaining VPP approval for each site/DGA. If unknown at the time of submitting the application, indicate as such or provide any tentative plans.

B. Pre-Screening

1. Describe the established internal process used at the corporate level to ensure and verify that sites/DGAs are effectively implementing your corporate safety and health management system policies and procedures.
2. Provide a process description of how you:
 - a) Conduct an audit of your candidate sites/DGAs (see Appendix B for sample process), and
 - b) Review application completeness prior to submission to OSHA.

C. Safety and Health Outreach/Mentoring and SGE Participation

Terms used in this section are further explained in Appendix A Definitions.

1. Describe current and planned outreach activities including providing assistance and information to prospective VPP applicants or involvement in safety and health activities in the community and involvement with organizations such as the National Safety Council, Federal Safety and Health Councils, or organizations that represent VPP participants.
2. Describe current and planned mentoring activities to assist prospective VPP applicants (either internal to the corporation or external, such as another company in your industry or a Federal agency), to improve their safety and health management system.
3. Describe current and planned participation in the OSHA VPP Special Government Employees (SGE) Program. Address your corporate commitment to support employee requests for certification as Special Government Employees and participation as members of a VPP onsite evaluation team.

III. Corporate Commitment to Worker Safety and Health

A. Demonstration of Corporate Commitment

1. Philosophy

Provide a written corporate philosophy and vision that integrates requirements for the worker safety and health management systems.

2. Communication

Provide policy statements, memorandums, and other forms of communication that recognize the importance of safety and health and specify a corporate

commitment to occupational safety and health signed by corporate executives or senior managers.

3. Knowledge of Safety and Health Performance

- a) Describe your system for tracking injury and illness performance at individual sites/DGAs, and how this information is used for decision making.
- b) Describe how corporate executives and senior managers are informed of safety and health performance (e.g., Annual Performance Reports).

4. Responsibility/Organization

- a) Provide documents that describe (e.g., an organizational chart, a functional chart) how safety and health fits into your organization's structure. Describe how safety and health are integrated into your business.
- b) Describe how responsibility for safety and health is assigned at the corporate level, including the highest safety and health officers, positions to whom they report, and the corporate management position that is/will be responsible for implementing VPP across corporate sites/DGAs.
- c) Describe the training/knowledge/experience of VPP possessed by the person(s) responsible for implementing VPP across corporate sites/DGAs (for example, OSHA training courses, prior safety and health experience at a VPP-approved facility, VPP conferences, workshops).
- d) Describe any uniform, corporate-wide policies or guidance documents that prescribe how safety and health line and staff responsibilities are assigned.

5. Accountability

Describe your performance management system that holds senior leadership and management staff and employees accountable for achieving corporate safety and health goals (e.g., performance plans for executives and senior managers that include safety and health elements). If applicable, describe any uniform, corporate-wide policies for managing the performance appraisal system.

6. Resource Management

- a) Describe your process for planning and budget allocation for safety and health management systems corporate-wide. For example, describe how resources are assigned for programs, equipment, dedicated safety and health staff, certified safety professionals, certified industrial hygienists, other licensed health care professionals, or other experts needed based on the hazards of the sites/DGAs.

- b) Describe corporate office resources, consultants, or other resources used to help with your safety and health management system, and how they are used by your sites/DGAs.

7. Corporate Goals and Performance Report

- a) Describe your system for establishing annual performance goals, your tracking system to evaluate the status of these goals, and any types of corporate reports (e.g., annual) issued that describe accomplishments.
- b) Describe any uniform, corporate-wide policies that are implemented across all sites/DGAs that prescribe how safety and health planning or goal setting is performed at site/DGA-level.
- c) Describe any uniform, corporate-wide policies that are implemented across all sites/DGAs that prescribe how VPP self-evaluations are conducted and how the results are evaluated and needed improvements are implemented and tracked.

8. Corporate Environmental, Safety and Health Certifications

Describe, if applicable, any other types of certifications the corporation maintains that demonstrate excellence in environmental, safety and health (for example: accreditation with ISO, the International Organization for Standardization).

IV. Corporate Assurances

VPP corporate applications must include a signed statement affirming the following:

A. Compliance

Applicant will comply with the Occupational Safety and Health Act (OSH Act) and will correct in a timely manner all hazards discovered through self-inspections, employee notification, accident investigations, an OSHA onsite review or enforcement inspection, process hazard reviews, annual evaluations, or any other means. You will provide effective interim protection as necessary to keep employees safe while corrections are being made. Federal applicants also agree to comply with Title 29 of the Code of Federal Regulations (CFR), Part 1960-Basic Program Elements for Federal Employees.

B. Correction of Deficiencies

Applicant will correct any safety and health management system deficiencies related to compliance with OSHA requirements and identified during any OSHA onsite review. The correction deadline will depend on the nature of the deficiency, will be determined by the OSHA VPP Team Leader, and in no instance will exceed 90 days.

C. Oversight and Monitoring

Applicant will maintain a system for overseeing and monitoring safety and health management system implementation at all corporate sites/projects/DGAs. This system must include oversight of process safety management and other highly hazardous operations.

D. Pre-Screening Readiness

1. Applicant will maintain an internal process at the corporate level to ensure and verify that your sites/DGAs are effectively implementing the corporate safety and health management system policies and procedures, including those that address process safety management and other highly hazardous operations.
2. This system will ensure readiness for VPP, so that at least 80 percent of your corporate site/DGA applicants are sufficiently qualified to achieve Star approval at the time of their application.

E. VPP Elements

1. The VPP safety and health management system elements are in place.
2. Following approval, management will continue to meet and maintain the requirements of the elements.

F. Number of Committed Sites/DGAs

Applicant will bring no fewer than 10 sites and/or DGAs into VPP within 5 years of corporate approval, and then will continue to bring sites/DGAs into VPP.

G. Corporate Goal

1. Applicant has established and will maintain a documented, corporate-wide goal for VPP participation.
2. You will communicate this goal to employees organization-wide.

H. VPP Orientation

All employees at VPP applicant and approved sites, including newly hired employees and contractor/subcontractor employees, will have the VPP explained to them before they perform any work. This orientation will include employee rights under VPP and under the OSH Act or 29 CFR 1960.

I. Protection Against Discrimination

Applicant will protect employees engaged in safety and health activities, including those employees specifically given safety and health duties as part of your safety and health management system, from discriminatory actions resulting from their activities/duties, just as Section 11(c) of the OSH Act and 29 CFR 1960.46(a) protect employees who exercise their rights.

J. Employee Access to Information

Employees will have access to the results of self-inspections, accident investigations, and other safety and health management system data upon request. For a unionized workforce, this requirement may be met through employee representative access to these results.

K. Documentation

To enable OSHA to determine initial and continued VPP approval, you will maintain and make available for OSHA review the following information:

1. Your written safety and health management system.
2. All documentation enumerated under Section VI.D.6.d of the January 9, 2009 Federal Register Notice.
3. Any agreements between management and the authorized collective bargaining agent(s) concerning safety and health.

L. Additional Data

Applicant will make available to OSHA any data not listed above that is necessary to evaluate identified deficiencies.

M. Annual Submission

Each year by February 15, you will submit data (see Appendix D) to your designated OSHA VPP Contact that will enable OSHA to evaluate your overall VPP performance and compare that performance to your organization's non-participating sites. This data will include:

1. For the previous calendar year, the single TCIR rate representing injuries and illnesses at all approved sites/DGAs combined.
2. For the previous calendar year, the single TCIR rate representing injuries and illnesses at all non-VPP sites combined.
3. For the previous calendar year, the single DART rate representing injuries and illnesses at all approved sites/DGAs combined.

4. For the previous calendar year, the single DART rate representing injuries and illnesses at all non-approved sites combined.
5. The total number of cases and hours worked for each of the above four rates.
6. Number and percentage of U.S.-based VPP-approved sites/DGAs for the past full calendar year.
7. Number and percentage of U.S.-based employees participating in VPP for the past full calendar year.
8. For the previous full calendar year, a list of VPP applications submitted.
9. For the current full calendar year, a list of projected VPP applications.
10. Any corporate-level safety and health management system policy/procedure changes.
11. Any major changes in corporate management or structure.
12. For the previous full calendar year, information on Special Government Employee (SGE) participation, mentoring, and other outreach activities.
13. Corporate-wide success stories/best practices.

N. Significant Changes

Whenever significant organizational or ownership changes occur at the corporate level, you will provide OSHA within 60 days a new Statement of Commitment signed by management and, when applicable, any authorized collective bargaining agents.

V. Employee Involvement

A. Involvement

Describe any uniform, corporate-wide policies that prescribe how employees should be meaningfully involved in safety and health management systems at your sites/DGAs.

B. VPP Notification

Describe any uniform, corporate-wide policies that prescribe how employee notification takes place or will be conducted at your sites/DGAs.

1. **Orientation:** Describe how employees at participating sites/DGAs, including newly hired employees and contract employees, receive or will receive orientation on the VPP, including employee rights under VPP and under the Occupational Safety and Health (OSH) Act or 29 CFR 1960.
2. **Non-Discrimination:** Describe how employees are notified or will be notified of their rights and the protections afforded to employees given safety and health duties as part of your safety and health management systems from discriminatory actions resulting from their carrying out such duties, as described in Section 11(c) of the OSH Act and 29 CFR 1960.46(a).
3. **Records Access:** Describe how employees are notified or will be notified of their right to access the results of self-inspections, accident investigations, and other safety and health data, upon request. At unionized construction sites, this requirement may be met through employee representative access to these results.

VI. Contractors

- A. Describe the corporate process for selecting contractors/subcontractor to perform jobs throughout the Corporation (all sites/DGAs).
- B. Describe any uniform, corporate-level policies for contractor management and oversight at all corporate sites/DGAs.

VII. Corporate Safety and Health Management System

Describe your written safety and health management system (see definition of this term in Appendix A), including safety and health policies, procedures, and systems that are consistently and uniformly implemented throughout the Corporation (all sites/DGAs).

Program descriptions must contain pertinent information that clearly explains the management and administration of the program, such as responsibilities and types of documentation maintained.

Include those systems applicable to operations considered highly hazardous (e.g., LOTO, Confined Space, PSM) and those considered non-routine.

Please provide a list/index of any supporting documentation you choose to attach with the written description of the program.

A. Worksite Analysis

For each element listed in this section, describe any corporate policies or procedures which pertain to or prescribe the way the element should be conducted across your corporation's sites/DGAs. Indicate if you do not have a corporate-wide policy for any particular element,

1. Hazard Analysis of Routine Jobs, Tasks, and Processes
2. Hazard Analysis of Significant Changes
3. Self-Inspection
4. Employee Reports of Hazards
5. Accident and Incident Investigations
6. Trend/Pattern Analysis

B. Hazard Prevention and Control

Applicants and participants must be in compliance with any hazard control program required by an OSHA standard, such as PPE, Respiratory Protection, Lockout/Tagout, Confined Space Entry, Process Safety Management (PSM), Bloodborne Pathogens, etc. VPP applicants and participants must periodically review these programs (most OSHA standards require an annual review) to ensure they are up-to-date.

For each element listed in this section, describe any corporate policies or procedures which pertain to or prescribe the way the element should be conducted across your corporation's sites/DGAs. If you do not have a corporate-level policy regarding an element, indicate that there is no corporate-wide policy for the element.

Participants who are covered by the PSM standard must additionally submit answers to all applicable questions found in the VPP PSM Application Supplement A. (Other Supplements will be used during annual self-evaluations and OSHA onsite approval/reapproval visits.)

1. Engineering Controls
2. Administrative Controls
3. Work Practice Controls
4. Personal Protective Equipment
5. Safety and Health Rules
6. Preventive/Predictive Maintenance

7. Occupational Health Care Program
8. Emergency Preparedness
9. Written Safety and Health Programs (e.g. Hazard Communication, Lockout/Tagout. See Appendix C, Corporate VPP Application Checklist)

C. Safety and Health Training

1. Describe any uniform, corporate-wide policies pertaining to the formal and informal safety and health training provided for managers, supervisors, employees, and contractors/subcontractors.
2. Describe how you have implemented your safety and health training policies.
3. Describe any safety and health training programs administered from the corporate level, and any conferences/seminars/workshops implemented regarding safety and health.
4. Describe which courses, if any, are mandatory for managers, supervisors, or employees.

Appendix A

DEFINITIONS

The following definitions apply to use of these terms within OSHA's Voluntary Protection Programs (VPP).

1-Year Conditional Goal. A target for correcting deficiencies in safety and health management system elements or sub-elements identified by OSHA during the onsite evaluation of a Star participant. Such deficiencies, which indicate that a site no longer fully meets Star requirements, must be corrected within 90 days, and the participant must then operate at the Star level for 1 year for the participant's conditional status to be lifted. Failure to meet this requirement will result in termination from VPP.

2-Year Rate Reduction Plan. A strategy employed whenever a Star participant's 3-year rates rise above the national average and call into question the participant's continuing VPP qualification. The plan is developed jointly by the participant and OSHA and must be approved by the Regional Administrator. It must identify and address any safety and health management system deficiencies related to the high rates, correction methods, and timeframes, and must include quarterly participant progress reports.

90-Day Items. Compliance-related issues that must be corrected within a maximum of 90 days, with effective protection provided to employees in the interim.

Annual Self-Evaluation. A participant's yearly self-assessment to gauge the effectiveness of all required VPP elements and any other elements of the participant's safety and health management system.

Annual Submission. A document written by a participant and submitted to OSHA by February 15th each year, consisting of the following information: Updated names and addresses; the participant's and applicable contractors' injury and illness case numbers and rates, average annual employment and hours worked for the previous calendar year; a copy of the most recent annual self-evaluation of the participant's safety and health management system; descriptions of significant changes or events; progress made on the previous year's recommendations; Merit or 1-Year Conditional goals (if applicable); any success stories; and any other information required by OSHA. In addition, participants covered by the Process Safety Management Standard (PSM) are required to respond to applicable questions from the annual VPP PSM questionnaire. Participants who have been approved within a Designated Geographic Area (DGA) must submit a list, including addresses, of all active worksites plus a second list of any work projects scheduled or projected to begin during the upcoming year.

Applicable Contractor. An employer who has contracted with a General Industry, Maritime, or Federal Agency (non-construction) site-based applicant/participant to provide specified services and whose employees:

1. Worked at least 1,000 hours at the VPP site-based applicant/participant's worksite in any calendar quarter within the last 12 months.
2. Are not directly supervised in day-to-day activities by applicant/participant's management.

The concept of applicable contractor does not include temporary employees or other contractor employees who are regularly intermingled with a site-based applicant/participant's employees and under direct supervision by management. Moreover, construction applicants/participants do not break out this category of employee. Therefore, applicable contractor reporting requirements do not apply to applicants/participants whose main activity is construction, regardless of the chosen way to participate.

Accepted Application. An application that has been reviewed by the Regional Office -- or the National Office for certain corporate and Demonstration Program applications -- and found to be complete. Also referred to as a completed application.

Backup Team Leader. A member of an onsite evaluation team who provides assistance to the team leader and can assume his/her duties when necessary.

Combined Workforce. An applicant/participant's regular workforce employees, including temporary employees, plus all contractor/subcontractor employees. Mobile workforce applicants/participants and all construction applicants/participants must use combined workforce data when calculating and reporting injury and illness rates.

Compliance Officer. A Federal compliance safety or health officer (CSHO).

Compressed Approved Process. A VPP onsite evaluation procedure that OSHA may choose to employ for site-based Star participants seeking reapproval and meeting specified criteria. A CAP evaluation examines all the VPP elements assessed during a standard onsite evaluation but places particular attention on changes since the last evaluation and the most recent annual self-evaluation.

Contract Employees. Those individuals who are employed by a company that provides services under contract to the VPP applicant/participant, usually at the VPP applicant/participant's worksite.

Corporate Participation. See Way to Participate, below. A category of participation available to large corporations that provides streamlined application and approval procedures. To qualify, the corporation must (1) commit to bringing into VPP multiple site-based facilities and/or worksites within Designated Geographic Areas (DGAs); (2) utilize a standardized safety and health management system organization-wide; and (3) employ pre-screening processes at all applicant facilities/DGAs before applying for VPP approval and ongoing oversight once approved.

Days Away, Restricted, and/or Transfer Case Incidence Rate (DART rate). The rate of all injuries and illnesses resulting in days away from work, restricted work activity, and/or job transfer. This rate is calculated for an individual worksite, all worksites within an applicant/participant's Designated Geographic Area (DGA), or all worksites of an employer for a specified period of time (usually 1 or 3 years).

Directorate of Cooperative and State Programs (DCSP). The OSHA Directorate responsible for coordinating and overseeing OSHA's VPP and other cooperative programs, located in OSHA's National Office.

DCSP Regional Coordinator. A DCSP VPP staff member who is assigned to coordinate VPP-related regional activities, including the review and processing of reports and resolution of policy issues.

Demonstration Program. The program within VPP that enables employers with VPP-quality safety and health protection to test alternatives to current VPP eligibility and performance requirements. If a Demonstration Program is judged successful, its alternative ways to achieve safety and health excellence may lead to changes in VPP criteria.

Federal Register. The official Federal government publication, issued by the Government Printing Office (GPO), in which OSHA announces the philosophy and criteria for VPP approval and participation in a public notice commonly referred to as the VPP *Federal Register* Notice or the *Federal Register* Notice.

General Contractor. A construction site owner or site manager who controls construction operations and has contractual responsibility for assuring safe and healthful working conditions at a worksite.

Injury/Illness Rates. Numerical rates that:

1. Represent an applicant/participant's nonfatal recordable injuries and illnesses at an individual worksite or within a Designated Geographic Area.
2. Are an important factor when OSHA assesses an applicant/participant's qualification for VPP.

Mentoring. The assistance that a VPP participant provides to another employer to prepare that employer for VPP application and/or to improve that employer's safety and health management system.

Merit Goal. A target for improving one or more deficient safety and health management system elements for a participant approved to the Merit program. A Merit goal must be met in order for a participant to achieve Star status.

Merit Program. The program within VPP designed for employers that have demonstrated the potential and commitment to achieve Star quality, but that need to further improve their safety and health management system and/or injury and illness performance. OSHA

gives a Merit Program participant specified Merit goals that it must meet in order to achieve Star status and continue within VPP.

Mobile Workforce Participation. See Way to Participate, below. A category of participation available to employers whose work is characterized by short-term operations and employees who move physically from one work project to another; or resident contractor operations performed at two or more fixed worksites. Distinguishing features of mobile workforce participation include a Participation Plan unique to the applicant/participant and a Designated Geographic Area (DGA).

Onsite Assistance Visit. A visit to an applicant/participant by an OSHA VPP Manager, Compliance Assistance Specialist, or other non-enforcement personnel, to offer assistance including, for example, help with the VPP application, a records review, and/or general observations about the employer's safety and health management system.

Onsite Evaluation. A visit to an applicant/participant worksite or headquarters by an OSHA onsite evaluation team to determine whether the applicant/participant qualifies for initial approval, continued participation, or advancement within VPP.

Onsite Evaluation Report. A document written by the OSHA onsite evaluation team and consisting of the site report and site worksheet. This document contains the team's assessment of an applicant/participant's safety and health management system and its implementation, a review of injury and illness rates, and the team's recommendation regarding approval of the applicant or reapproval of the participant to VPP.

Onsite Evaluation Team. An interdisciplinary group of OSHA professionals and sometimes other government employees who conduct onsite evaluations. The team normally consists of a team leader, a backup team leader, safety and health specialists, and other specialists as appropriate.

Outreach. Assistance and information a VPP participant provides to prospective VPP applicants, other employers, employer and employee organizations, and the general public, for the purpose of promoting safety and health principles and practices and VPP. Outreach activities include, but are not limited to:

1. Conducting VPP workshops at conferences.
2. Conducting safety and health training workshops.
3. Holding community safety days.
4. Serving as an advocate for VPP within the business community.
5. Participation in OSHA Strategic Partnerships, OSHA Challenge, and Alliances.
6. Making presentations on safety and health topics at conferences and other venues.

Participation Plan. A unique, written strategy submitted to OSHA by a mobile workforce applicant as part of its VPP application. A participation plan:

1. Explains how the applicant's safety and health management system protects employees who move from one worksite/project to another.
2. May include a discussion of safety and health management system elements that differ in substance or emphasis from the basic VPP system requirements.
3. Must include a proposed Designated Geographic Area (DGA) for VPP participation.

A Sample Participation Plan is included in the Mobile Workforce Application Instructions on OSHA's VPP website.

Pre-screening. An internal process, applicable to the mobile workforce and corporate ways to participate, to ensure and verify that sites/DGAs:

1. Are effectively implementing the applicant/participant's safety and health management system policies and procedures.
2. Meet all applicable VPP requirements, including, following approval, the requirement to continuously improve. For the corporate way to participate, applicant sites are expected to meet VPP Star requirements.
3. For the corporate way to participate, that sites/DGAs have completed the VPP application before submitting it to OSHA

Often used in conjunction with the term "oversight," as in "pre-screening and oversight," to indicate the continuing need, following VPP approval, for corporate/DGA monitoring of participating sites to ensure they maintain and improve their safety and health management systems.

Process Hazard Analysis (PHA). For the purpose of VPP, a PHA is an organized and systemic effort to identify and analyze the significance of potential hazards associated with the processing or handling of highly hazardous chemicals.

Process Safety Management (PSM). A reference to OSHA standard 29 CFR 1910.119 and 1926.64, which covers all employers who either use or produce highly hazardous chemicals exceeding specified limits.

PSM Level 1 Auditor.

1. An OSHA employee with experience in the chemical processing or refining industries. A PSM Level 1 Auditor is responsible for evaluating employer PSM operations during OSHA VPP visits (or inspecting PSM operations during OSHA enforcement inspections).
2. Specific requirements for a PSM Level 1 Auditor include:
 - a. OSHA Training Institute (OTI) Course 3300, Safety and Health in the Chemical Processing Industries.
 - b. OTI Course 3400, Hazard Analysis in the Chemical Processing Industries.

- c. Advanced training such as OTI Course 3410, Advanced Process Safety Management, or other equivalent specialized seminars in PSM.
- d. Prior experience with chemical industry safety. This should include experience obtained in any one of the following ways:
 - Through accident investigations in chemical, petrochemical, or refinery plants involving fires, explosions, and/or toxic chemical releases;
 - Through previous chemical inspections involving process safety management evaluations; or
 - Through previous chemical industry employment.
3. Alternatively, Special Government Employees may serve as PSM Level 1 Auditors on VPP onsite evaluation teams upon demonstrating training and experience equivalent to the above requirements.

PSM Supplements.

1. *PSM Supplement A.* Also known as the PSM Application Supplement or the static list. A series of questions designed to establish a basic understanding of a VPP applicant's PSM policies and procedures. Applicants covered by the PSM Standard must submit responses to all questions on the PSM Application Supplement when they submit their written VPP application.
2. *PSM Supplement B.* Also known as the PSM Annual Questionnaire. A document compiled annually by OSHA that uses selected questions from OSHA's Dynamic Inspection Priority Lists, also known as the dynamic question lists. The selected questions change from year to year. The PSM Questionnaire must be completed and submitted each year by VPP participants covered under the PSM standard as part of their annual submission to OSHA.
3. *PSM Supplement C.* Also known as the PSM Onsite Evaluation Questionnaire. Questions selected by the VPP Onsite Evaluation Team Leader and PSM Level 1 or equivalent team members from OSHA's dormant PSM Inspection Priority Lists, also known as the dynamic question lists. The questions are selected just prior to commencing a VPP onsite evaluation and presented to the VPP applicant/participant during the evaluation. Normally, each applicant/participant covered by the PSM standard will receive a different set of questions at the time of the preapproval onsite evaluation and then during each subsequent onsite reevaluation.

Recommendations. Suggested improvements noted by the onsite evaluation team that are not requirements for VPP participation but that would enhance the effectiveness of the applicant/participant's safety and health management system. (Compliance with OSHA standards is a requirement, not a recommendation.)

Resident Contractor. For the purpose of VPP, resident contractor refers to a company that:

1. Provides ongoing, long term onsite services to a host employer.
2. Normally will occupy a recognizable, delineated work area within the host employer's site.

Safety and Health Management System. For the purposes of VPP, a method of preventing employee fatalities, injuries and illnesses through the ongoing planning, implementation, integration, and control of four interdependent elements: Management Leadership and Employee Involvement; Worksite Analysis; Hazard Prevention and Control; and Safety and Health Training.

Site-Based Participation. See Way to Participate, below. A category of VPP participation characterized by fixed, ongoing or long-term work operations at a single facility. It is available to employers of private-sector fixed worksites in general industry and the maritime industry; Federal-sector fixed worksites; and certain long-term construction worksites. These employers must control site operations and have ultimate responsibility for assuring safe and healthful working conditions. Site-based participation also is available to resident contractors at site-based VPP participants; and to resident contractors who are part of a larger organization approved under the corporate way to participate and who operate at a non-participating fixed worksite.

Small Business. A company having no more than 250 employees at any one facility, and no more than 500 employees nationwide.

Special Government Employee (SGE). An employee volunteer from a VPP participant or corporation who is knowledgeable in safety and health management system assessment, formally trained by OSHA in the policies and procedures of the VPP, and determined by OSHA to be qualified to perform VPP onsite evaluations. An SGE may participate as a team member on VPP onsite evaluations. The OSHA directive governing the VPP Special Government Employee Program is CSP 03-01-001, Policies and Procedures Manual for Special Government Employee (SGE) activity conducted under the auspices of the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Program, Jan. 4, 2002.

Star Program. The program within VPP designed for participants whose safety and health management systems operate in a highly effective, self-sufficient manner and meet all VPP requirements. Star is the highest level of VPP participation.

State Plan. A state-operated occupational safety and health program that has received approval and partial funding from Federal OSHA. The states that operate approved State Plans are commonly referred to as State Plan states.

Team Leader. The OSHA staff person who coordinates the OSHA onsite evaluation team and ensures the performance of all evaluation activities.

Temporary Employees. Employees hired on a non-permanent basis by the applicant/participant. Temporary employees are grouped with regular hires for purposes of calculating employer injury and illness rates.

Termination. OSHA's formal removal of a VPP participant from the program. Alternatively, the act of ending a Demonstration Program.

Total Case Incidence Rate (TCIR). A number that represents the total nonfatal recordable injuries and illnesses per 100 full-time employees. This rate is calculated for an individual worksite, all worksites within an applicant/participant's Designated Geographic Area (DGA), or all worksites of an employer for a specified period of time (usually 1 or 3 years).

VPP Activity Log. The monthly log of VPP activity that is submitted to DCSP by the Regional Offices.

VPP Annual Data Spreadsheet. The yearly report prepared by the Regional VPP Manager and submitted electronically to DCSP that provides information on the annual TCIR and DART rates of participants.

VPP Application Status Report. A monthly report prepared by the Regional VPP Manager and submitted to DCSP that provides information on VPP applications, including the number of applications pending in the Region and the number of applicants whose onsite evaluation has not yet begun.

VPP Approval Ceremony. An event planned by the approved participant and normally held at the participant's approved work location or headquarters, where a representative from OSHA recognizes the participant's achievement and, for initial program approvals, presents the VPP plaque and VPP flag.

VPP Automated Data System (VADS). A database that includes information on approved VPP participants (under Federal or State Plan jurisdiction) and VPP applicants (under Federal jurisdiction).

VPP Manager. The OSHA employee directly responsible for the day-to-day operations of the VPP in a particular OSHA Region.

VPP Participant Representative. The applicant/participant employee designated as the primary contact with OSHA for matters concerning VPP.

Way to Participate. One of three primary ways an employer may seek VPP approval. These are: site-based, mobile workforce, and corporate. The principles and features of VPP-quality safety and health management systems are generally consistent for all three ways to participate. There are some differences, however, in the VPP requirements for system details and implementation and the manner in which OSHA evaluates applicants/participants.

Withdrawal. Decision by an applicant/participant to discontinue its VPP application process or its approved participation.

Worksite. For VPP purposes, a worksite is a location where work is performed by employees of an employer.

Appendix B

Sample VPP Process

This appendix provides the process used by one multi-facility corporation (referred to as XYZ Corporation) in preparing its sites for VPP application. This corporation also uses comprehensive checklists to evaluate sites' implementation of the corporate-wide safety and health management system. Sample checklists also are provided.

1.0 PURPOSE

To provide a step-by-step procedure for XYZ Corporation sites to certify and maintain their VPP certifications.

2.0 PROCESS

2.1 INITIAL DECISION

2.1.1. The VPP process begins with the decision by the site management and employees/union to pursue VPP certification. This pursuit includes a thorough review of the programs, physical site, and management systems, and may entail substantial upgrading of any one or all of these. It will ultimately result in the preparation and submission of a VPP application. The Corporate VPP Managers in the Corporate Safety Office or the nearest OSHA Regional (or State) Office can assist the XYZ site with questions about the application guidelines.

The site should contact the appropriate VPP manager and their divisional HR Director/VP to obtain the proper authorization to pursue VPP and ensure the proper resources are allocated.

2.1.2. The VPP Coordinator for the site will help coordinate a structured plan of action. A review of the site's safety performance will include a comparison of the site total case (TCIR) and days away and restricted (DART) incidence rates for the most recent 3 years against the most recently published BLS rates for the site SIC.

2.2 PREPARATIONS AND APPLICATION SUBMITTAL

2.2.1. An initial onsite comprehensive review will be conducted by a VPP Manager or Corporate Safety representative to assess and establish a baseline for the site. The review will include a detailed examination of the written safety programs to ensure they are site-specific and reflect the current processes of the site. The VPP manager and/or Corporate Safety representative will advise the site on the proper presentation of the written programs and documentation. This is most commonly referred to as the Binder System. Interviews will be conducted of site management and employees to assess the level of knowledge and interest in safety and VPP. In addition, a detailed inspection will be conducted of the

physical site. Areas of concern will be identified and the VPP manager and/or Corporate Safety representative will assist the site in determining the best course of action to address any issues.

2.2.2. The Binder System is a foundation to the VPP application and certification maintenance process. Simply put, this system is a well-organized, systematic method of presenting and maintaining all documentation of necessary written programs, inspections and corrective actions, and training. It is composed of a set of 3-ring binders, each devoted to a safety-related subject area. A detailed guideline has been included at the end of this APM to assist the site in this process. (It should be noted that this is a guideline. If a binder is listed and does not apply to your site then it is not required that it be included. The site may also choose to expand and include a binder not listed in the guideline.) The main purpose of the Binder system is to provide the site with a method to quickly and efficiently access documentation needed to create the VPP application. It will also serve the site during the OSHA onsite review as well as during future Corporate Safety evaluations.

2.2.3. The VPP application is constructed by the site with guidance from the VPP Manager. It is vital that the site follows the appropriate application format for their OSHA Region or State Plan. While similar, each State Plan or Region follows its own format. The VPP Manager or OSHA Contact can advise the site as to the proper format.

Once the VPP application is completed, and prior to submission to the nearest OSHA Region (or State Plan) Office, it must be reviewed by the appropriate Corporate VPP Manager to ensure that it is ready for OSHA's review. This is to ensure, as well, that all appropriate documents, exhibits, and/or attachments are properly included.

Upon final review by the appropriate VPP Manager, two (2) copies of the VPP application should be prepared and submitted to the nearest OSHA Region (or State Plan) Office. This review process could take up to forty-five (45) days.

2.3 ONSITE REVIEW

2.3.1. Upon final review and acceptance by OSHA, an OSHA VPP representative will contact the site to set up a mutually agreeable onsite evaluation date. OSHA must visit the site to verify that the safety and health management system described in the VPP application are fully operational and address all potential hazards at the site. This evaluation will include a thorough review of the OSHA logs and back-up medical documentation; an appraisal of written site-specific programs, an assessment of the site's physical conditions, interviews of management and employees, both formally and informally, and the preparation of a draft report.

2.3.2. The onsite portion of the review typically takes about four (4) days. The OSHA onsite team consists, at a minimum, of a Team Leader, Safety Specialist, and an Industrial Hygienist, and if a PSM-covered process, a PSM Specialist. The Team will hold a brief introductory meeting with the site's key management and employee representatives. Employees who are accountable for meeting or maintaining VPP requirements should also attend. During the opening conference, the site should give a brief overview of the site layout and processes, the safety system, and highlight any particular achievements.

2.3.3. Normally one to two days of the onsite week will consist of program reviews, while one to two days are devoted to the physical inspection. Employee interviews are conducted off and on all week. The onsite team normally has lunch with representatives of the site, featuring a "best practice" safety presentation conducted by non-management personnel.

2.3.4. Before leaving, the Team will have a closing meeting to discuss its findings and recommendations. If Team members think that additional work needs to be done before approval into VPP, they may make 90-day recommendations for the work to be completed.

If Team members determine that a major component of one or more of the required elements is missing, the Team will recommend Merit rather than Star level certification, and recommend Merit Goals that the site must complete.

General recommendations may be made regarding enhancements/improvements in the safety and health management systems.

2.4. CONDUCT

2.4.1. Conduct during the VPP onsite should be maintained at a professional level at all times. It is important to remember that the OSHA team is at the site because they were invited to be there. OSHA is not there on a compliance or complaint review. As part of the VPP commitment, we agree to work with OSHA to resolve any issues or concerns that may arise during the onsite review. If a disagreement occurs, instead of engaging the OSHA team, refer to the VPP manager or Corporate Safety representative assisting with your onsite for guidance in resolving the issue.

2.4.2. OSHA uses the employee roster to select employees for the formal interviews. The site needs to provide OSHA with an accurate list of employees including identifying specific employees such as committee members, union officials, etc. This will help the onsite team ensure they have a chance to interview the VPP leadership of the site. If a selected employee has concerns about talking with OSHA let the team leader know and he or she may choose to make another selection.

2.5 FOLLOW-UP

2.5.1. The site must follow up to ensure that all 90-Day items are completed on time and OSHA is notified of the completed items. This will ensure the final report is not delayed. If a site is recommended for Merit then the OSHA onsite team will establish specific Merits Goals that must be completed within an 18-24 month period. Completion and status of these goals must be communicated to the appropriate VPP Manager and OSHA. Once the Merit Goals are completed OSHA will then coordinate an onsite visit to verify completion of the Merit Goals and to ensure all other VPP criteria has been maintained before upgrading the site to VPP Star level.

2.6. CERTIFICATION

2.6.1. The OSHA VPP team's onsite report is reviewed at Region and National level before the site is notified of its official certification at Star or Merit level in a letter from the Assistant Secretary of Labor, USDOL. State Plans have a similar state-level review and notification process.

2.6.2. When notified of the official certification, the site should contact its VPP Manager and Corporate Communicator to arrange for a celebration event during which OSHA will present the Star or Merit certificate and flag to the site.

2.7 RECERTIFICATION

2.7.1. The first recertification of a VPP Merit site will be conducted within 24 months (OSHA recommends 18 months) of approval. The site may request an earlier reevaluation if it believes it has met Star requirements.

2.7.2. Recertification of a VPP Star site is normally conducted on a 3 to 5 year schedule, depending on the strength of the Star program at the site and the policy of the Region or State Plan. Sites should expect their first recertification during the third year following approval.

2.7.3. Recertifications normally follow the same process as the original onsite. This includes a complete review of the written, site-specific safety programs, tracking systems, management systems, physical inspection of the site, and employee interviews. The recertification onsite is 3-4 days with a team of at least three (3) members.

2.8 ANNUAL REPORT

2.8.1. Each Merit and Star site must file an annual VPP report to OSHA by February 15th of each year. Each Region or State Plan has a format specific to their program. The VPP Manager, Corporate Safety Team member, or OSHA representative will advise you as to which format to utilize. A copy of the Annual Report should be forwarded to the appropriate VPP Manager for review. The

Annual Report informs OSHA of the site's updated TCIIR and DART rates, changes in key personnel or processes, safety activities, accomplishments, and goals. It also demonstrates the site's continued commitment to VPP and safety.

Sample XYZ Corporation Checklists

A. Review of XYZ Corporation Management Systems

OSHA RECORDKEEPING (APM-131)

- ___ Location is following current federal guidelines for OSHA Recordkeeping.
- ___ OSHA 300 is posted from February 1 – April 30.
- ___ OSHA 300/200 entries are consistent with medical, first aid, accident investigations, & medical reports.
- ___ OSHA Form 301/101 or equivalent form is on file for each entry on the log.
- ___ OSHA poster is displayed in a readily accessible area of the site.

ACCIDENT INVESTIGATIONS (APM-121)

- ___ Location has written Accident Investigation Procedure with assigned responsibilities.
- ___ Recordable, first aid, property damage and near miss injuries/events are all investigated.
- ___ Root causes are identified in each accident investigation report.
- ___ Corrective actions to eliminate root causes are identified in each accident investigation report.
- ___ Accountability is assigned for implementing each corrective action, with timetables.
- ___ Tracking system exists to ensure that corrective actions are made in timely manner.
- ___ Individuals involved in accident investigation are trained.
- ___ Investigation report indicates when corrective measures were taken and by whom.

SAFETY & HEALTH PROGRAM PLANNING (APM 341)

- ___ Location has a current Safety Action Plan (SAP).
- ___ Management has set goals and activities to improve safety & health performance.
- ___ Above goals and activities are reviewed quarterly and updated annually.
- ___ Trends of injuries & illnesses by dept., job title, nature of injury, etc., have been analyzed.
- ___ A site-specific action plan is being followed to reduce injuries & illnesses where trends are high.
- ___ Site has written procedures for doing JHAs and SOPs with assigned responsibilities.
- ___ Job hazard analyses (JHAs) have been conducted for the most hazardous jobs.
- ___ Written safe operating procedures (SOPs) based on JHAs are in place.
- ___ JHAs and SOPs are reviewed when accidents occur and revisions made if determined to be necessary.
- ___ Individuals involved in writing/reviewing JHAs/SOPs have been trained.
- ___ Site has written procedures for inspections with assigned responsibilities.
- ___ Individuals involved in inspections have been trained in inspection techniques.
- ___ Supervisors are personally involved in periodic self-inspections.
- ___ Routine self-inspections with written reports are conducted at least monthly.
- ___ Tracking system exists to ensure findings from JHAs and inspections are adequately addressed to conclusion.
- ___ Site has written procedures for pre-use analysis of new equipment and chemicals.
- ___ Evaluation of equipment and processes (new) prior to use is documented.

MANAGEMENT COMMITMENT (APM 341)

- ___ Top management periodically participates in safety meetings and inspections.
- ___ Top management reviews accident reports and safety committee minutes.

VPP Corporate Application Instructions

- ___ Production meetings are opened with discussion of safety performance and activities.
- ___ Crew safety meetings are held regularly for all departments, with written minutes kept.
- ___ Safety and health rules specific to the location are written, posted and communicated to all employees.
- ___ Specific safety & health responsibilities have been assigned for all levels of management.
- ___ Annual evaluations (all management levels) are based upon performance of these specific responsibilities.
- ___ Disciplinary action is taken for safety and health infractions and this is documented.

EMPLOYEE INVOLVEMENT (APM 341)

- ___ Location has joint management-employee safety committee that meets regularly.
- ___ Written minutes of safety committee meetings are kept and action items tracked for follow-up until completed.
- ___ Safety committee members are trained in all safety and health functions they are expected to perform.
- ___ Safety committee members participate in walk-around inspections, JHA/SOP completion/review and accident investigations.
- ___ Location has system for employees to notify management of hazards with adequate, timely and documented response.
- ___ Tracking system exists to ensure adequate and timely responses to employee safety concerns.

SAFETY & HEALTH TRAINING (APM-383)

- ___ Location has an annual schedule for training that ensures all OSHA-required topics are covered.
- ___ Training pertinent to the location as identified in APM #383 is provided.
- ___ New employee orientation is conducted and documented.

- ___ Tracking system exists to ensure all supervisors and employees get pertinent training.
- ___ Documented training is provided on all specific topics, substances, etc. upon transfer to a new position.
- ___ Make-up sessions are held for employees who miss scheduled OSHA-required training.
- ___ Documentation exists for class content (lesson plans or minutes) & understanding (tests, observation).
- ___ Record of employee attendance at training is maintained with signatures (sign-off forms, rosters). Tracking system exists to ensure all supervisors and employees get pertinent training.
- ___ Employee feedback about the training is obtained using evaluations or other methods.
- ___ The training program is evaluated and updated at least annually based on employee feedback, observation of training effectiveness and new or revised regulations.

B. Review of an XYZ Corporation Safety Program

PERSONAL PROTECTIVE EQUIPMENT (APM-351)

- ___ Location has a written certified hazard assessment that identifies the PPE required for each job, task, or area.
- ___ The hazard assessment identifies the location, date, and signature of the certifying person.
- ___ Each employee (new, transferred, when PPE requirements change, or at least annually) who is required to wear PPE is trained in the limitations, use, care and disposal of the PPE.
- ___ Written certification is maintained that the employee understood the training, which identifies the subject of the training, the date conducted, trainer's signature, and the names of the employees trained.
- ___ Location has an inspection system that ensures that all defective PPE is removed from service.

Appendix C

Application Checklist for VPP Corporate Way to Participate

The checklist below serves a dual purpose:

- It provides guidance for applicants on the type of information to provide in the VPP Corporate application for each VPP element and sub-element.
- The checklist should also be used by the Corporate Office/Headquarters to inform candidate sites/DGAs applying for VPP of the information it has provided to OSHA in the VPP Corporate application. This coordination will eliminate duplication of effort and ensure only necessary information is provided at the corporate level and at the site/DGA level.

For elements below, provide detailed, specific information that clearly explains how the requirements are being satisfied. Include information such as responsibilities, tracking, reporting, and recordkeeping. Submit with the application sample documents such as memorandums, charts, brief reports, or any other forms of written communication that demonstrate corporate fulfillment of requirements for these elements.

In most cases, listing of key elements and a brief description of each or including a table of contents is adequate. Do not submit lengthy written programs or procedures. OSHA may review the complete written policy/plan/program/procedure during the Agency’s evaluation of the applicant/participant’s standardized safety and health management system. This evaluation normally takes place at corporate headquarters, where safety and health records are maintained.

ELEMENT	SUGGESTED FORMAT	YES	NO
Corporate Eligibility			
Commitment to VPP	Describe policy. Attach a list of sites/DGAs and a schedule (timetable) for achieving VPP approval		
Pre-screening Processes (Site/DGA and Application)	Attach process description and table of contents or outline main sections		
Outreach/Mentoring	Attach a list of current and/or planned outreach and mentoring activities.		
Special Government Employee (SGE) Participation	Attach a list of current and/or planned SGE participation.		
Corporate Commitment to Safety and Health			

ELEMENT	SUGGESTED FORMAT	YES	NO
Philosophy	Provide written philosophy.		
Communication	Provide examples of written communication that describes corporate commitment to worker safety and health.		
Knowledge of Safety and Health Performance	Summarize policy for reporting safety and health performance to senior managers. Attach table of contents of reports and other types of information.		
Responsibility/Organization:	Provide organization chart/list/policy that establishes responsibilities for safety and health.		
Accountability	Define responsibilities of managers and employees and provide examples of performance standards.		
Resource Management	Describe policy and process for planning allocation of budget.		
Corporate Goals and Performance Report	Attach table of contents from report such as strategic plan, annual report, etc.		
Corporate Environmental, Safety and Health Certifications and Awards	List all relevant certifications and awards.		
Employee Involvement and Contractor Safety and Health			
Employee Involvement	Summarize policy and provide examples.		
Notification: VPP Orientation Protection Against Discrimination Records Access	Summarize policy. Attach any examples of notification documents.		

ELEMENT	SUGGESTED FORMAT	YES	NO
Contractor Safety and Health	Summarize policy, responsibilities. List specific rules/regulations.		
Worksite Analysis			
Hazard Analysis of Routine Jobs, Tasks, and Processes	Describe responsibilities, frequency, documentation, corrective actions, inspection forms, tracking.		
Hazard Analysis of Significant Changes,	Describe responsibilities, frequency, documentation, corrective actions, inspection forms, tracking.		
Routine Self-Inspections	Describe responsibilities, frequency, documentation, corrective actions, inspection forms, tracking.		
Hazard Reporting System for Employees	Summarize process, attach sample forms if used.		
Investigation of Accidents and Near-Misses	Describe responsibilities, procedure and investigation guidelines, investigation forms, follow-up. Attach sample forms if used.		
Trend/ Pattern Analysis	Summarize process. Attach sample analysis report or outline of key sections.		
Hazard Prevention and Control			
Engineering Controls	Describe policy. List/describe key elements.		
Administrative Controls	Describe policy. List/describe key elements.		

ELEMENT	SUGGESTED FORMAT	YES	NO
Work Practice Controls and Hazard Control Programs	Describe program and responsibilities. List/describe key elements.		
Personal Protective Equipment (PPE)	Describe program and responsibilities. List/describe key elements.		
Safety and Health Rules	Describe awareness, enforcement, disciplinary procedures.		
Preventive/Predictive Maintenance	Describe program and responsibilities. Attach table of contents. List/describe key elements.		
Occupational Health Care Program	Describe program and responsibilities. Attach table of contents. List/describe key elements.		
Emergency Preparedness	Describe program and responsibilities. List/describe elements of Emergency Action Plans. List/describe elements of Emergency Evacuation Procedures.		
Safety and Health Written Programs			
Recordkeeping and Posting	Describe policy and responsibilities. List records maintained and posting requirements.		
Hazard Communication	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		

ELEMENT	SUGGESTED FORMAT	YES	NO
Bloodborne Pathogens	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Employee Exposure Assessment/Industrial Hygiene	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Confined Space Entry	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Trenching and Excavation	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Elevated Work and Fall Protection	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Mobile Equipment and Material Handling	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Respiratory Protection	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Hearing Conservation	Describe policy and responsibilities.		

ELEMENT	SUGGESTED FORMAT	YES	NO
	Attach table of contents. List/describe key elements.		
Personal Protective Equipment	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Asbestos and Lead Management	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Fire Prevention and Protection	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Hot Work Permitting	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Electrical Safe Work Practices	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Spill Release and Prevention	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Emergency Evacuation Plan	Describe policy and responsibilities. Attach table of contents.		

ELEMENT	SUGGESTED FORMAT	YES	NO
	List/describe key elements.		
Ergonomic Awareness and Injury Prevention Program	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Process Safety Management	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Lockout/Tagout	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
Fleet Safety	Describe policy and responsibilities. Attach table of contents. List/describe key elements.		
List any others below:			
Safety and Health Training			
Managers	Describe policy. Attach list of all required training.		
Supervisors	Describe policy. Attach list of all required training.		
Employees and Contractors/	Describe policy.		

VPP Corporate Application Instructions

ELEMENT	SUGGESTED FORMAT	YES	NO
Subcontractors	Attach list of all required training.		

Appendix D: Required Annual Corporate Submission

Annual Corporate Safety and Health Report

Form Approved

OMB# 1218 – 0239

Expires 06-30-2011

Public reporting burden for this collection of information is voluntary and is estimated to average 40 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate, or any other aspect of this collection of information, including suggestions for reducing this burden to the Office of Partnerships and Recognition, Department of Labor, Room N-3700, 200 Constitution Avenue, N.W., Washington, DC 20210.

Corporation:

Contact Person:

Contact Phone:

Contact Email:

Quantitative Information

Number and list of applications submitted during the most recent calendar year:

Number and list of projected applications for this calendar year:

Number and List of sites/DGAs approved through the VPP Corporate Way to Participate during the most recent calendar year:

TCIR/DART Rates for all VPP sites/DGAs combined for the most recent calendar year:

TCIR/DART Rates for all non-VPP sites/DGAs combined for the most recent calendar year:

VPP Corporate Application Instructions

TCIR/DART Rate: Percentages above/below the BLS average for your dominant NAICS code:

Number and percentage of US-based sites/DGAs in VPP:

Number and percentage of US-based employees covered by VPP:

Cost savings that can be ascribed to VPP participation (formula is as follows):

$(C / 200,000) \times H = n$ where:

H = total hours worked at VPP sites/DGAs

C = Collective DART rate for non-VPP sites/DGAs

n = Number of expected DART cases for VPP sites/DGAs

Then:

$(n - a) \times \$39,000 = x$ where:

n = Number of expected DART cases for VPP sites/DGAs

a = Actual DART cases for VPP sites/DGAs

x = Total \$ saved in DART injuries at VPP sites/DGAs

Qualitative Information

Please cite any Corporate-level S&H policy/procedural changes (including to VPP):

Were there any major changes in Corporate Management/Structure? If yes, please describe:

Please list any/all SGE and/or mentoring activities performed during the most recent calendar year:

VPP Corporate Application Instructions

Please list any Corporate-wide success stories or best practices:

Please describe how VPP Corporate participation is benefiting your organization (include any time/cost savings, increased S&H awareness, etc.):

Please provide any feedback that you have regarding how OSHA could improve the VPP Corporate experience:

Other Issues/Concerns/Comments: