

Preparing for a VPP On-Site Review

STAGES

1. Getting ready for VPP (criteria broken down into categories)
2. Acceptance into the VPP Review Process
3. Planning for an On-Site Review
4. During the On-Site Review
5. Closeout
6. After the Review...Follow-Up

1. Getting Ready for VPP

- a. Management Commitment
 - i. Management and Union Support Letters
 - ii. On-Site Regulator support
 - iii. Financial and Staff Support
- b. Safety-ensure this is the way of doing business...not just talk
- c. Employee involvement
 - i. Demonstrate safety culture...illustrate initiatives, progressive and uniform discipline, safety committees, issues identification, etc.
- d. Strong Safety Programs
 - i. Outline the S&H Program documents. Ensure these are up to date and accurately address the present hazards.
- e. History of Continuous Improvement
 - i. Improvement Plans
 - ii. Company Goals
 - iii. Corrective Action Plans/Systems
- f. Program Evaluations
 - i. Assessment Programs
 - ii. Annual Evaluations
 - iii. Corporate/Regulator Assessments
- g. Compliance
 - i. OSHA/DOE/PAAA violations and corrective actions-describe these and the actions taken to correct issues.
 - ii. Provide examples of compliance through work processes.
- h. Benchmark/Work with VPP Mentors
 - i. Use the resources through VPPPA, State Plan States Area VPP Directors, local VPP Sites, and regulators for assistance.
- i. Application-New Applicants
 - i. Review the Handbook/Manual for required sections and information.
 - ii. Contact on-site regulators and federal personnel for assistance with application.
 - iii. Use applications from other star sites as a template.
 - iv. Enlist a mentor to review your application.
- j. Application-Current VPP Sites

- i. Conduct a gap analysis of the application as submitted and current processes. Provide this delta in the Smart Book for the review team.

2. Acceptance into the VPP Review Process

- a. Application submitted to regulator (New Applicants). Follow the process outlined by your regulator. This method could be unique depending upon the VPP program that applies to your site (OSHA-Federal, OSHA State Plan State, DOE, etc.)
- b. Application evaluation by regulator (New Applicants)
 - i. Address any outstanding issues/questions raised by regulators.
 - ii. Provide updated application with corrections and additional information.
- c. Schedule on-site review (negotiations between regulator and company)
 - i. Set up a point of contact at your company for the review team.
 - ii. Identify Expectations (dates, length of stay, areas to be reviewed, equipment needed, etc.)
 - iii. Identify review team personnel (security clearances, badges, match escorts to reviewers, make travel accommodations, training arrangements, and arrange other logistics for the team).
 - iv. Be specific as possible (interviews and walkthroughs, scheduled or unscheduled or both)

3. Planning for an On-Site Review

- a. 12 Months Out
 - i. Review programs to ensure they have been in place for one year.
 - ii. Develop/maintain safety culture activities (culture shift could take up to three years to obtain effective and sustained results)
 - iii. Conduct a safety culture survey or some type to determine areas for improvement in the safety culture-this includes ALL employees...not just workers in the field but all levels of management and staff as well. Include questions about participation in safety-related activities. Studies have shown that the more the employees are involved in activities, committees, conferences, etc., the less likely they are to have an incident.
 - iv. Develop a communication plan for preparing employees for the review. This would include methods of communicating the tenets, schedules, initiatives, senior management/staff/craft briefings, and assessments.
- b. 6 Months Out
 - i. Engage VPP Core Team...if you are a new applicant, you may need to develop this. If this is included in your employee committee teams, dedicate personnel for the review and start focused meetings for the review. Identify areas and personnel to be included in this team. Keep the group small and manageable. Size should be limited to 4 to 7 persons.

- ii. Roll out the communication plan. Begin monthly communications on VPP, the company goals, the tenets, and project specific activities to get the employees involved.
- iii. Communicate the Safety Improvement Plan. This includes the items identified during the annual review, the focused assessments, and the annual **company goals** (ISMS Performance Metrics, Corporate Indicators, Personal Safety Plan items, etc.)
- iv. Begin conducting mini-assessments using the tenets. Break down each area and conduct focused reviews. These should be completed in three months to provide the company time to implement corrective actions, initiatives, and necessary communications prior to the team's arrival. Remember, not all actions need to be completed. Self-identification is a key element in continuous improvement.
- v. Outline the path forward for improvement areas identified. Prioritize these. Not all will need to be completed. Choose items that will provide the most benefit and safety significance as a higher priority item.

c. 3 Months Out

- i. Roll out safety initiatives...focused on the tenets. Schedule completion of activities to be completed a few weeks prior to the team's arrival to allow for maximum momentum of the initiative.
- ii. Provide interview questions to personnel. These are established for Supervision, Employees, Recordkeepers, Maintenance Personnel, and S&H Committee Members. Give examples of how employees can answer the questions with company specific information.
- iii. Complete the VPP Gap Tool (mini assessments of all the VPP tenets)
- iv. Provide updates to **company goals** to all employees. Describe progress and how employees can and have contributed to the achievement of these goals.
- v. Order VPP Core Team apparel (if applicable) so that the team is readily identifiable.
- vi. Determine Issues Coordination Team (Fix It Team)
 - 1. This group will be the personnel to respond to issues/concerns and provide information to the team during the on-site review.
 - 2. The fix-it team must establish a communication method to inform the VPP Escorts when an action has been completed.
 - 3. If an issue cannot be fixed, the process for improvement, compensatory measures, Stop Work actions must be documented and reported back to the escorts to communicate to the review team.

- vii. Establish Escort List and Expectations for escorts
 - 1. Cell phones
 - 2. Vehicles
 - 3. Release from regular work duties during the review
 - 4. Knowledge of work areas and site locations
 - 5. Sampling of Subject Matter Experts assigned to team members based upon the criteria each member will review.
- viii. Update all progress reports and completion dates of tasks. This includes the Safety Improvement Plan and company goals.
- ix. Identify Program Experts
 - 1. Assessments
 - 2. Conduct of Operations
 - 3. Work Control
 - 4. Emergency Preparedness
 - 5. Occupational Medicine
 - 6. Industrial Hygiene
 - 7. Occupational Safety
 - 8. Ergonomics
 - 9. Subcontractors
 - 10. Union Representatives
 - 11. Discipline Policies
 - 12. Injury/illness Reporting Process
 - 13. Training
 - 14. Corrective Action Systems
- x. Develop the Brag Book
 - 1. Safety Initiatives
 - 2. Posters, Banners, Photos
 - 3. Achievements, Milestones, Best Practices
 - 4. Examples of employee involvement
- xi. Develop the Smart Book
 - 1. Organizational Charts
 - 2. Maps
 - 3. Contact Information for Escorts
 - 4. Schedules for meetings/events (during the review)
 - 5. Interview Schedules (add this in just prior to team arrival)
 - 6. Annual Reviews-VPP/ISMS/S&H System
 - 7. Previous regulator reviews (DNFSB, State/Federal agencies, NRC, etc.)
 - 8. Safety and Health Improvement Plan with results to date
 - 9. Annual Company Goals

d. 1 Month Out

i. Space Planning

- 1. Establish a specific room for the review team. This area should be private for meetings and discussions of the team. Decorate this room and show off your star status! Create

posters, banners, and other communications. Include initiatives, give aways, etc. for them to review while writing the report.

2. In-Brief and Close Out Meeting Rooms-make these large enough to accommodate the team, management, labor, and employees who want to attend.
3. Establish rooms for interviews at site locations. These rooms need to be dedicated to the review and private.

ii. Planning-Communications

1. Communicate with workers regarding upcoming On-Site Review (*what they need to know, what they need to do*)
2. Establish communications between Company point of contact and review team.
3. Keep senior management informed. Provide a weekly update of progress and issues from the communications with the review team.
4. Provide an overview of interview questions to employees.
5. Provide VPP tips to the employees with examples of how your company is implementing the tenets of VPP.
6. Ensure that employees understand that the VPP review is not an audit but a cooperative program where companies and regulators work together to improve safety and health.

iii. Equipment/Information Planning

1. Generate books for each team member with the updated VPP assessment information (gap tool/annual review). If you know what each assessor will review, you can tailor the book with the information that supports that tenet for your company.
2. Generate a procedure/document list for all team members. If electronic access is available, copies may not be necessary. Print those critical documents that will be reviewed by the team for easy access.
3. Provide all the necessary supplies for the team at ready access. Provide computers, printers, fax, phones, white boards, paper, pens, staplers, and other supplies.
4. Provide the Smart Book for each team member.
5. Provide the Brag Book (only one needed) for the team.

iv. Planning Logistics

1. Set up conference calls to review with regulators and VPP Core Team to ensure that all preparations are made prior to the team's arrival.
2. Determine date for in-brief meeting with regulators.
3. Determine formal interviews required by the review team and set this schedule (Senior management, labor management, on-site regulators, workers, etc.)

4. Determine if the team will have working lunches. Regardless, provide information where food/beverages can be obtained both on and off site.
5. Provide the review team with site specific information on site access, badges, Personal Protective Equipment needed, computer access, policies on cameras and phones, transportation needs, etc.
6. Generate a list of meetings, committee meetings, events, work schedules, and training to be conducted during the on-site review.

4. During the On-Site Review

- a. In-Brief...one chance to make a first impression. Keep it short...one to two hours long. Use Senior management down to worker level employees to demonstrate star status. Briefly review the tenets and highlight your safety culture, best practices and why you are a star site.
- b. Have fun...this is your chance to shine.
- c. Cover Safety issues in the in-brief...start with a safety topic, describe exits and emergency procedures, and area facilities.
- d. Provide time for the review team lead to address the company during this in-brief.
- e. Provide visuals during the in-brief and in the room.
- f. Be responsive to the team. Provide supplies, information, documents, and other assistance in a timely manner.
- g. Address issues as they are identified...use the Fix It Team for this. Stop Work if necessary. Communicate actions taken to the team.
- h. Communicate items during the review that were self-identified. Remember, this is a review and **NOT an AUDIT**. Self-identification demonstrates that your review and resolution process works.

5. Closeout

- a. Provide a room for the review team to describe their findings, comments, and overall observations.
- b. Listen carefully to the review team message. Remember, this is free review of your programs and systems to help you to improve.
- c. Don't expect immediate success. VPP is continuous improvement.
- d. Accept criticism as valuable input for future improvement...it is not just about a flag.

6. After the Review...Follow-Up

- a. Keep up the continuous improvement.
- b. Review the report from the team and provide a factual accuracy review. Use the VPP Core Team for this activity.
- c. Include the improvement opportunities identified in your company goals and S&H improvement actions.

- d. Provide the status of improvements to these items in the annual VPP/ISMS/System review.
- e. Be self-critical and plan for the improvement. Ask the review team for suggestions to the improvement items identified in the report.
- f. Use mentors and other sites as a benchmark for improvements.
- g. Celebrate Your Success!