

January 21, 1998

Letter To All Region IV Voluntary Protection Program (VPP) Participants

Dear VPP Participant

Just a reminder that I need the following information by February 15, 1998 for calendar year 1997, your site's injury incidence data. This includes lost workday injury/restricted work activity cases (the total of column 2 from the OSHA 200 log) and injury incidence cases (the combined total of columns 2 and 6 from the OSHA 200 log)

In addition, you must submit the total hours worked, average annual employment, a copy of your 1997 program evaluation, any explanatory information, and any success stories. I need an explanation for any increases in your rates and a descriptive plan of action. I have included a form that you should use to submit your injury/incidence data. This form will also be used to update our records. The same information must be submitted for all applicable contractors' employees on the site.

Please send **two (2) copies** of **all** of the required information (injury/incidence data and annual self evaluation) to my attention at the following address:

Susan J. Sikes, Regional VPP Manager
U S Department of Labor - OSHA
Atlanta Federal Center
61 Forsyth Street, S W - Room 6T50
Atlanta, Georgia 30303

If you have questions, please feel free to contact me or Charlie Anderson.

Sincerely,

SUSAN J. SIKES
Regional VPP Manager

Attachment

Name of Company _____

Site Address _____

Plant Manager _____

Site VPP Contact _____

Telephone Number _____

Fax Number _____

E-mail Address _____

1997 Data

IIC's The total of all injury and incidence cases, with or without lost workdays or restricted activity (The combined total of columns 2 and 6 from the OSHA 200 log)

LWDC's The total of all lost workday cases and workday cases of restricted activity
(Please do not send the total number of actual days away from work)
(The total of column 2 from the OSHA 200 log)

Average annual employment Average number of full time equivalent workers during 1997

Total hours worked Total of actual person hours worked

Year	Average Annual Employment	Total Hours Worked	Injury Incidence Cases	Lost Workday Cases
1997				

Please include an explanation for any increases in your rates and a descriptive plan of action

Also include a copy of your 1997 annual program evaluation as required. These evaluations must include assessments of the effectiveness of **all** elements of your safety and health program and documentation of recommendations completed. Remember to address **all** of the elements under **Management Leadership, Employee Involvement, Worksite Analysis, Hazard Prevention and Control, and Safety and Health Training**. Additional descriptive requirements are listed in the July 12, 1988 VPP Federal Register, Volume 53, No. 133, paragraph f Safety and Health Program Evaluation

EVALUATING YOUR SAFETY AND HEALTH PROGRAM FOR THE VPP

Participation in the VPP includes the following requirement regarding evaluation of your safety and health program

A VPP participant must have a system for evaluating the operation of its safety and health program annually to judge success in meeting the program's goal and objectives so that those responsible can determine and implement changes needed to improve worker safety and health protection

- (A) The system must provide for an annual written narrative report with recommendations for timely improvements, assignment of responsibility for those improvements, and documentation of timely follow-up action or the reason no action was taken
- (B) The evaluation must assess the effectiveness of all required VPP elements and any other of the site's safety and health program
- (C) The evaluation may be conducted by competent corporate or site personnel or by competent private sector third parties who are trained and/or experienced in performing such evaluations

The evaluation should be conducted annually at approximately the same time each year. It should follow the format outlined in the VPP requirements described below. The effectiveness of each element and sub-element should be assessed briefly in narrative form. Recommendations for improvement should follow each narrative. Assignments of responsibility for completing recommended improvements may be made after each recommendation or separately at the end of the evaluation. Subsequent evaluations should begin with a description of the previous year's recommendation(s) and the follow-up actions taken and should include, in the current narrative, an evaluation of the program changes that resulted from the recommendations.

The most comprehensive evaluation that you can conduct should include reviewing your written program, walking through your workplace, and interviewing employees. During this process you should be answering the following questions relating to each element and sub-element of your safety and health program:

- 1 Is it comprehensive?
- 2 Is it operating effectively?
- 3 What improvements can be made to make it even more effective?

REMEMBER A self-evaluation is **NOT** an inspection of the worksite, it is a critical review of **ALL** of the elements of the safety and health program. An evaluation that is merely a workplace inspection with a brief report pointing out hazards or saying that everything is okay is inadequate for purposes of VPP. You should be evaluating your program much like the OSHA VPP evaluation team does. Incomplete self-evaluations are not acceptable. A format for these evaluations is provided in this correspondence. For a more comprehensive description of the VPP requirements in each element and its subelements, please refer to the Star Program requirements in the VPP Federal Register Notice.

**Voluntary Protection Program
Format for Annual Self-Evaluations**

1. **Previous Year Recommendations and Status Report**

Listed below are the 1996 recommendations and their status

A Recommendation

Status

B Recommendation

Status

C Recommendation

Status

D Recommendation

Status

2. Safety Performance Rates (Incidence/injury Data)

IIC's The total of all injury and incidence cases, with or without lost workdays or restricted activity (The combined total of columns 2 and 6 from the OSHA 200 log)

LWDC's The total of all lost workday cases and workday cases of restricted activity (Please do not send the total number of actual days away from work)
(The total of column 2 from the OSHA 200 log)

Total hours worked

Total of actual person hours worked

Year	Work Hours	Injury Incidence Cases	Lost Workday Cases	Injury Incidence Rate	Lost Workday Rate
1995					
1996					
1997					
3 Year Totals & Averages 1995-1997					
1996 BLS Rates for SIC _____					
Percent Above or Below BLS Rate					

- A List Total IIR and LWDI for current year, previous year and current year objectives
- B Discuss safety performance in general terms highlighting major accomplishments or deficiencies
- C List major plans in upcoming year to improve the safety and health program

3. Evaluation of Elements and Sub-elements

In narrative form, assess the effectiveness of each of the elements and sub-elements listed on the next page

Include in each element recommendations for improvement

Follow by the assignment of responsibility for completing each recommendation and a target date for completion

Sample

- 1 Element (i.e., Worksite Analysis) [see next page for list of elements]
Sub-element (i.e., Comprehensive Safety and Health Surveys-Industrial Hygiene)
 - A 1997 Activities - During 1997 all IH services were contracted to outside firms
 Quarterly surveys were conducted and the following items completed
 - Audiometric testing
 - Noise survey
 - Personnel exposure monitoring for lead, asbestos, formaldehyde, wood dust
 - B Evaluation - Narrative evaluation of effectiveness of the element and sub-elements
 - Example Recommendations from reports have been completed The 1997 activities in this area are marginally effective Additional monitoring and training will be required in 1998
 - C Recommendation(s) for improvement - Hire a certified industrial hygienist to manage the IH program
 - D Assignment of responsibility for completing recommendation - Susan Sikes
 - E Target date for completion - 3/15/98

ELEMENTS and SUB-ELEMENTS**1 Management Leadership and Employee Involvement**

- a Policy
- b Goal and Objectives
- c Planning
- d Written Safety and Health Program
- e Management Leadership
- f Employee Involvement
- g Contract Worker Coverage
- h Responsibility, Authority, and Resources
- j Line Accountability
- k Enforcement (i.e., rules, policies, procedures, disciplinary actions)

2 Worksite Analysis

- a Comprehensive Safety and Health Surveys
- b Pre-use Analysis
- c Job Safety or Hazard Analysis, Process Hazard Review
- d Self-inspections
- e Employee Hazard Reporting Systems
- f Accident/incident Investigation System
- g Trend Analysis [for injuries, hazards identified, etc.]

3 Hazard Prevention and Control

- a Access to Certified Safety and Health Professionals
- b Means for Eliminating or Controlling Hazards [This is the place to evaluate all of the individual programs on the site such as PPE, Safety and Health Rules, Lockout/tagout, Confined Space Entry, PSM, etc., as well as engineering and administrative controls]
- c Preventive Maintenance Program
- d Hazard Tracking System(s)
- e Occupational Health Program (include Industrial Hygiene monitoring and P P E)
- f Emergency Response Program and Procedures

4 Safety and Health Training

- a Managers
- b Supervisors
- c Employees
- d All others on the site [including visitors understand what to do in emergency situations]
- e PPE Requirements [known and used effectively]