



Voluntary Protection Programs
What Are The Benefits?
Self-Assessment Checklist
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Application

Overview

What is Green Mountain Voluntary Protection Programs?

Green Mountain Voluntary Protection Programs (GMVPP) is designed to recognize and promote exceptional safety and health management programs. In GMVPP, the Department of Labor's Occupational Safety and Health Compliance Program (VOSHA), management and labor, establish a cooperative relationship at a general industry or public sector workplace that has implemented a strong program.

- ▲ Management agrees to operate an effective program that meets an established set of criteria.
- ▲ Employees agree to participate in the program and work with management to ensure a safe and healthful workplace.
- ▲ The site submits an application to VOSHA that describes its system of worker protection.
- ▲ VOSHA verifies that the program meets VPP criteria, publicly recognizes the site's exemplary program, and removes the site from the programmed (random) compliance inspections.
- ▲ VOSHA also reassesses periodically to confirm that the site continues to meet GMVPP criteria.
- ▲ The GMVPP concept recognizes that enforcement alone can never fully achieve the objectives of the Occupational Safety and Health Act. Good safety management programs that go beyond VOSHA standards can protect workers more effectively than simple compliance.
- ▲ GMVPP participants are a select group of facilities that have designed and implemented outstanding safety and health programs.
- ▲ STAR participants meet all GMVPP requirements. MERIT participants have demonstrated the potential and willingness to achieve STAR program status, and are implementing planned steps to fully meet all STAR requirements. STAR DEMONSTRATION sites test alternative ways to achieve safety and health excellence that may lead to changes in VPP criteria.

Note: VOSHA will continue to investigate valid, formal employee safety and health complaints, and all fatalities and catastrophes.

What Are the Benefits?

Voluntary Protection Programs participants have cited the following benefits:

- ▲ Improved employee motivation to work safely, leading to better quality and productivity
- ▲ Reduced workers' compensation costs
- ▲ Recognition in the community as a leader in promotion of worker safety and increased visibility as a Socially Responsible Business
- ▲ Improvement of programs that are already good, through the internal and external review that is part of the GMVPP application process
- ▲ Reduction of lost workday injuries by 60 to 80 percent of what would be expected of an average site of the same size in the same industry.

Won't this just make me do a lot of paperwork without making my program better?

The GMVPP application process is designed to be rigorous, to assure that only the best programs qualify. But reviewers don't look for a single correct way to meet GMVPP requirements. They want to see a system that works for you. Many successful programs involve considerable written documentation, while others do not.

There is some paperwork required in the application process, but applicants may use as much existing material as possible. The GMVPP coordinator can help you with questions about what might be required.

Will my program qualify?

A self-assessment checklist is included in this information kit. Use the checklist to see if your program meets GMVPP criteria.

How do I apply?

You must submit a written application to the Vermont Department of Labor, Voluntary Protection Programs. The application guidelines are included in the GMVPP information kit. After your written application and all necessary documents have been reviewed, an onsite review will be scheduled.

Where can I get more information?

Green Mountain Voluntary Protection Programs coordinator can help you with any questions you have about self-assessment, the application, or other GMVPP matters.

The GMVPP coordinator can also refer you to other participants in the state so you can contact them about their experience.

Onsite Review

Why does VOSHA need to come to my site?

VOSHA must verify that your safety and health program, as detailed in your GMVPP application, is fully operational and addresses all potential hazards at the site.

Who comes on a GMVPP onsite review?

The review will be arranged at the mutual convenience of all parties concerned. The review team will consist of a team leader, plus safety and health specialists as required by the size of the site and the complexity of the safety and health program.

How long will the team stay?

The time required for the pre-approval review will depend upon the size of the site. Reviews average 4-5 days onsite, unless the site has complicating factors.

Do I have to wait until the end of the review to find out what my chances of being approved are?

If, at the conclusion of the pre-approval review, the applicant needs to take actions to meet one or more of the requirements for approval, reasonable time (up to 90 days) will be allowed for those actions to be taken before a recommendation is made to the Commissioner of the Department of Labor. Where necessary, an onsite visit will be made to verify the actions taken after the pre-approval review visit.

If, in the opinion of the pre-approval review team, the applicant has met the requirements of GMVPP, the team's recommendation will be made to the Director of Cooperative Programs, who, on concurrence, will recommend approval to the Commissioner of Labor.

What will the team be doing while it's onsite?

The team performs a review that includes several steps:

- ▲ Initial meeting
- ▲ Document review
- ▲ Walkthrough
- ▲ Formal and informal interviews
- ▲ Daily "end of day" briefings
- ▲ Closing meeting

Initial Meeting

The team will hold a brief introductory meeting with you and your key people. Any company representatives who may be called upon to assist the team should be in attendance. Employees who are accountable for meeting or maintaining GMVPP requirements should also attend.

The team leader will describe the GMVPP approach and what the team expects to accomplish.

You will have the opportunity to point out special accomplishments that may not be a part of the application.

Document Review

Onsite document review will include the following records (or samples of them) if they exist and are relevant to the application or the safety and health program.

Onsite Review (continued)

1. Written safety and health programs
2. Management statement of commitment to safety and health
3. The OSHA 200/300 logs for the site and for all applicable contractor employees on the site, with appropriate back-up documentation
4. Safety and health manual(s)
5. Safety rules, emergency procedures, and examples of safe work procedures
6. The system for enforcing safety rules
7. Reports from employees of safety and health problems and documentation of the responses
8. Self-inspection procedures, reports, and correction tracking
9. Accident incident investigation reports
10. Safety and health committee minutes
11. Employee orientation and safety training programs and attendance records
12. Industrial hygiene monitoring records
13. Annual safety and health program evaluations and site and/or corporate audits, including the documented follow-up activities, for at least the last three years
14. Preventive maintenance program
15. Line supervision accountability documentation
16. Contractor safety and health program(s)
17. Other records that provide relevant documentation of qualifications.

Will VOSHA need access to my employees medical records?

Yes, VOSHA will issue a medical access order, prior to the visit, to allow a specified team member to access the pertinent medical records of employees. This is to insure proper reporting. In the case that an employees' medical records must be accessed, strict confidentiality must be maintained. The order will be issued for posting 15 workdays prior to entry by the VPP team.

Walkthrough

The review team will walk through the facility to assure that the program is fully operational.

They will also be assessing the adequacy of the program to handle potential hazards. If the team notes any

significant hazards during the walkthrough, you will be asked to correct the problem.

The team will have brief, informal interviews with randomly selected employees. The talks will be held near employee workstations so interruption of work can be avoided.

What will happen if the team sees an apparent violation of VOSHA standards?

The Vermont VPP review team will be looking for evidence that your program is creating and maintaining safe and healthful working conditions. Any hazards they may observe will serve as indicators that some aspect of your program may need improvement.

While they won't issue citations, as safety and health professionals, they would not be expected to ignore hazards. They will work with you to determine how and when to correct any hazards they see, and if corrections require more time than the onsite review allows, they will ask to be notified when the corrections have been completed.

Formal Interviews

Formal interviews will be requested with a small number of your employees. These interviews will help to validate employee awareness of and participation in the overall safety and health program.

Each formal interview should last about 20-40 minutes and will be scheduled with the consent of management.

A private space will be requested for these interviews. All questions asked will relate to the site safety and health program.

Experience with interviews to date has been positive and has reflected well on local management.

Self-Assessment Checklist

The items listed below will help you determine your eligibility for Green Mountain Voluntary Protection Programs. Check each item that you currently have or would be willing to implement. When you have completed the checklist, check the score box at the end of this selection to see how you measure up.

When you are ready to submit your application, the Vermont VPP coordinator will be glad to help.

Rates

- ▲ Three-year average Total Case Incidence rate (TCIR) and the incidence rate for recordable, non-fatal injury and illnesses cases, which involve Days Away from Work, Restricted Work Activity, and Job Transfer (DART), that is below at least one of the last three years rates as published by the Bureau of Labor Statistics for industries in your SIC.
- ▲ Site related OSHA 300 logs must be maintained for contractors who accumulate at least 1000 employee hours per quarter, at the job site.
- ▲ If you are a small employer, you may be eligible for alternative rate calculation*
- ▲ Annual injury and illness rate records and employment statistics*

To calculate your TCIR, use the formula $(N/EH) \times 200,000$ where:

N = Sum of the number of recordable non-fatal injuries and illnesses in a given time (one year for an annual rate or 3 years for 3 year combined rate).

EH = total number of hours worked by all employees in a given time (either one year for an annual rate or 3 years for a 3 year combined rate).
one year

200,000 = equivalent of 100 full-time workers working 40-hour weeks, 50 weeks per year

To calculate the DART rate, use the same formula as above, except:

N = sum of the number of injuries and illnesses resulting in lost workdays, restricted work activity and/or job transfer in a given time frame.

**Call the Vermont VPP Coordinator for any questions concerning rate calculations, or if more information is needed.*

Management Commitment

- ▲ A managerial commitment to worker safety and health protection
- ▲ Top management's personal involvement
- ▲ Safety and health concerns integrated into management's overall planning cycle
- ▲ Safety and health protection managed in the same ways and with the same priority as productivity and quality are managed
- ▲ A written comprehensive safety and health management system appropriate to the size of your site and your industry that address all the elements in this checklist
- ▲ A results-oriented safety and health policy, which is clearly communicated with all employees at the site
- ▲ Clearly assigned safety and health responsibilities with documentation of accountability from top management to line supervisors to site employees
- ▲ Adequate authority to carry out assigned responsibilities, including access to safety and health professionals, and other experts as needed
- ▲ Necessary resources to meet responsibilities
- ▲ Selection and oversight of contractors to insure quality protection for all contract employees equal to that provided for your own employees.
- ▲ Employee involvement in activities (at least three ways) that have a major effect on your safety and health program
- ▲ Formal, signed statement from all collective bargaining agents indicating support for your application to VPP

Self-Assessment Checklist (continued)

- ▲ Annual safety and health program evaluations with written narrative reports, recommendations for program changes, action plans, and verification procedures

Worksite Analysis

- ▲ A method such as comprehensive safety and industrial hygiene surveys to identify existing or potential hazards in your workplace
- ▲ A pre-use analysis procedure for new processes, materials, or equipment to determine potential hazards
- ▲ Routine industrial hygiene monitoring of toxic substances and noise
- ▲ Monthly self-inspections with written documentation and hazard correction tracking
- Routine hazard analysis procedures which result in improved work practices or training for employees
- ▲ A written hazard reporting system whereby employees pass on their observations or concerns to management without fear of reprisal
- ▲ Accident/incident investigations with written documentation
- ▲ Method of documenting all identified hazards until they are controlled or eliminated
- ▲ Analysis of injuries, illnesses and hazards to identify trends and implement program adjustments

Hazard Prevention and Control

- ▲ Access to certified safety and health professionals
- ▲ An effective system of eliminating or controlling hazards. This system must emphasize engineering solutions for safety and health hazards. In the event an engineered solution cannot be implemented,

administrative controls adequate for the hazards at the workplace, can be incorporated

- ▲ Written safety rules and practices that are understood and followed by all employees
- ▲ A consistent disciplinary system applied to all employees who disregard the rules
- ▲ Written rules for use and maintenance of personal protective equipment
- ▲ Written plans to cover emergency situations
- ▲ A hazard correction tracking procedure
- ▲ Onsite or offsite medical and emergency services
- ▲ First-aid and CPR trained personnel on staff during all shifts
- ▲ Use of occupational health professionals in hazard analysis as appropriate
- ▲ Documented ongoing monitoring and maintenance of workplace equipment

Safety and Health Training

- ▲ Managerial, supervisory, and employee training, with emphasis on safety and health responsibilities
- ▲ Training in the use and maintenance of personal protective equipment
- ▲ Emergency preparedness drills, including annual evacuations
- ▲ Documentation of all training received, including assessment procedures

Review

- ▲ Your written safety and health programs and all documentation relating to the programs must be available for VOSHA review.

Self-Assessment Checklist (continued)

Concurrence

- ▲ Formal, signed statements from any collective bargaining agents indicating their support of your application to Green Mountain Voluntary Protection Programs. Where no collective bargaining agent in effect, authorized, employees understand the GMVPP and support participation.

Score box:

If you checked each item or could within a few months, in all areas addressed in this self-assessment checklist, you may be ready to apply for participation in Green Mountain Voluntary Protection Programs.

Application

Your Green Mountain Voluntary Protection Programs application must address each of the following items below. Use of the numbering below helps speed review of your application. Where existing policies, guidelines, forms, etc., describe your programs, you are encouraged to enclose them and add the appropriate number used in the numbering system for this application.

A. General Information

1. **Company Name:**

Home Address:

Site address (if different):

Site Manager:

Title:

Site Voluntary Protection Programs Representative (name and title):

Representative's address if different from site:

Phone number:

2. **Corporate Name** (if different from Company Name:)

Corporate Voluntary Protection Programs representative (if applicable) name and address:

Phone number:

3. **Collective Bargaining Agent(s):**

Agent(s), address(es), Phone number(s)

4. **Numbers of Employees At Site:**

Regular _____

Temporary _____

Contract _____

5. **Type of Work Performed and Products Produced at Site:**

6. **Industry SIC**

* Note: The BLS is currently changing from the SIC to North American Industry Classification System (NAICS), please check with the GMVPP coordinator for your proper code, if you don't know.

Site _____

Contractor(s) _____

7. **Total injury and illness incidence rate at site for each of the last three complete calendar years and average of those years.¹**

Site Rates: (Rates must be below the average of your SIC code).

20____ (N ____) EH) ____ x 200,000 = _____

20____ (N ____) EH) ____ x 200,000 = _____

20____ (N ____) EH) ____ x 200,000 = _____

Total _____) 3 = three-year average _____

8. **Total days away, restricted work duty, and job transfer case rate at site for each of the last three complete calendar years and average of those years.¹**

20____ (N ____) EH) ____ x 200,000 = _____

20____ (N ____) EH) ____ x 200,000 = _____

20____ (N ____) EH) ____ x 200,000 = _____

Total _____) 3 = three-year average _____

Application (continued)

Contractor Injury/Illness Rates:²

20____ (N ____) EH) ____ x 200,000 = _____

B. Management Commitment and Employee Involvement

Management Leadership

1. **Commitment:**

- (a) Attach a copy of your site's established safety and health policy, goals and objectives.
- (b) Section F contains a sample statement regarding management commitment to safety and health and to participation in Voluntary Protection Programs. Submission of such a statement is required for VVVP participation.

2. **Organization:**

Provide a description of how the safety and health function fits into the overall management organization. Attach a copy of your organizational chart.

3. **Responsibility:**

Describe how your company assigns safety and health responsibilities to line and staff. Provide examples of specific responsibilities.

4. **Accountability:**

Describe the accountability system you use for line managers and supervisors. Appropriate examples may include job performance evaluations, warning notices, contract language, etc. Explain how the system is documented.

5. **Resources:**

Describe personnel, equipment and other resources devoted to your safety

and health program. Identify any external resources available, such as certified safety/health professionals, corporate/private consultants, risk management professionals, etc.

6. **Goals and Planning:**

Describe how planning for safety and health fits into your overall management planning process. Identify specific safety/health goals and objectives, describe how these can be met.

7. **Annual Evaluation of Your Safety And Health Program:**

Safety and health program self-evaluation: Provide a copy of last year's (the last 3 years, if available) comprehensive review and evaluation of your entire safety and health program.

1. Include assessments of the effectiveness of the areas listed in these application guidelines should be included.
2. Describe how the results of the self evaluations are prepared and used to improve the safety and health management systems of your workplace.

Employee Involvement

8. **Three Ways**

Describe at least three meaningful ways employees are involved in the safety and health program, providing specific information about decision processes that employees impact such as hazard assessment, hazard analysis, safety and health training or evaluation of the safety and health program.

9. **Contract workers:**

Describe your program for ensuring that all contract workers who do work at your site are provided the same safe and healthful working conditions and the same quality protection as your regular

Application (continued)

employees. Describe the process used for contractor selection.

10. **Employee Notifications:**
Describe the method(s) used to ensure that all employees, including new hires as they arrive, will be notified about participation in Green Mountain Voluntary Protection Programs, their rights to register a complaint with VOSHA, and their right to obtain self-inspection and accident investigation results upon request. (Various methods may include one or a combination of the following: bulletin boards, tool box or work group meetings, and new employee orientation.)
11. **Site Plan:**
Attach a site map or general site lay-out.

C. Worksite Analysis

1. **Baseline Hazard Analysis:**
Describe the method used for baseline hazard analysis to identify hazards associated with your specific work environment, for example air contaminants, noise, or lead. Identify the safety and health professionals involved with the baseline hazard assessment and subsequent surveys. Explain any rationale and strategies for industrial hygiene surveys if required
2. **Pre-use Analysis/Analysis of Significant Changes:**
Explain how, prior to activity or use, new equipment, materials, and processes, as well as significant changes, are analyzed to identify uncontrolled hazards, and the actions needed to eliminate or control these hazards. Such conditions might include non-routine tasks, or the introduction of new processes, materials, equipment and facilities.

3. **Hazard Analysis of Routine Jobs, Tasks and Processes:**
Indicate how your system of hazard analysis is used to spot potential safety and health hazards of routine jobs, tasks, processes and/or phases. Examples are industrial hygiene surveys, comprehensive safety reviews and/or project safety reviews at the time of design. Provide procedures and any sample forms used in conducting job hazard analysis.
4. **Self Inspections:**
Describe your worksite safety and health inspection procedures. Include information about inspection schedules and industrial hygiene sampling and monitoring. Indicate who performs inspections and how any necessary corrections are tracked. (You may attach sample forms and internal time frames for correction.) Where applicable to health hazards, summarize the testing and analysis procedures used and qualifications of personnel who conduct them.
5. **Employee Reports of Hazards:**
Describe how employees notify management of uncontrolled safety or health hazards. Explain procedures for follow-up and tracking corrections. An opportunity to use a written form to notify management about safety and health hazards must be part of your reporting system.
6. **Accident/Incident Investigations:**
Describe and attach any forms and procedures for investigating accident, incidents, near misses, first aid cases, and other incidents. What training do investigators receive? How do you determine which accidents/incidents warrant investigation? How are the results used? Investigations should focus on root causal factors.

Application (continued)

- 7. Pattern Analysis:**
Describe the system you use for safety and health data analysis. Indicate how you collect and analyze data from all sources, including injuries, illnesses, near misses, first aid cases, work order forms, incident investigations, inspections, and self audits. Describe how the results are used.

D. Hazard Prevention and Control

- 1. Professional Expertise:**
Provide details concerning your use of trained professionals in the evaluation prevention and control of workplace hazards.
- 2. Engineering Controls:**
Describe and provide examples of engineering controls your company has initiated, to eliminate or control hazards by reducing their severity, likelihood of occurrence, or both. Engineering controls include, for example, reduction in pressure or amount of hazardous material, reduction in noise produced, fail-safe design, leak before burst, fault tolerance/redundancy, and ergonomic design changes.

Although not as reliable as true engineering controls, this category includes protective safety devices such as guards, barriers, interlocks, grounding and bonding systems and pressure relief valves to keep pressure at a safe limit.
- 3. Administrative Controls:**
Describe ways you limit daily exposure to hazards by adjusting work schedules or work tasks, for example, job rotation.
- 4. Work Practice Controls:**
Describe and provide examples of your work practice controls. These include,

for example, workplace rules, safe and healthful work practices, specific programs to address VOSHA standards, and procedures for specific operations. Identify site specific programs such as lockout/tagout, hazard communication, confined space, fall protection, machine guarding, process safety management, etc.

- 5. Personal Protective Equipment:**
Describe and provide examples of required personal protective equipment your employees use.
- 6. Safety and Health Rules:**
Describe your general safety and health rules. Demonstrate that there is a disciplinary system for equitably enforcing these rules for managers, supervisors, and employees.
- 7. Emergency Preparedness:**
Describe your company's emergency planning and preparedness program. Provide information on emergency drills and training, including evacuations.
- 8. Preventive/Predictive Maintenance:**
Describe your written system for monitoring and maintaining workplace equipment to predict and prevent equipment breakdowns that may cause hazards. Provide a brief summary of the type of equipment covered.
- 9. Hazard Correction Tracking:**
Describe your system for reporting and tracking hazards, and the method used to insure correction in a timely manner.
- 10. Occupational Health Program:**
Describe both the onsite and offsite health services and availability of qualified health care professionals. Indicate the coverage provided by employees trained in first aid, CPR and

Application (continued)

other paramedical training. What training have these employees received? Are their certifications current? What type of equipment is available to them?

11. **Process Safety Management:**

If your worksite is subject to the Process Safety Management Standard, describe your company's process safety management systems and assess the level of compliance against the standard's requirements.

E. Safety and Health Training

Describe formal and informal safety and health training programs for managers, supervisors, and employees. Include supervisors' and employees' training schedules, protocols, and information on such subjects as: hazard communication, personal protective equipment and handling of emergency situations, etc. Sample attendance lists and tracking methods, if any, should also be attached.

F. Statement of Commitment/Assurances

1. Union statement: If your site is unionized, the authorized collective bargaining agent(s) must sign a statement to the effect that they either support the GMVPP application, or that they have no objection to the site's participation in GMVPP. The statement should be submitted with the application and must be on file before an onsite visit can be scheduled. Expressions of commitment for non-union employees are also required.
2. Management statement: Please read the following statement carefully and either place on your stationery and sign, or attach a letter which provides the same assurances in your words.
3. **We agree that:**

- (a) All VPP elements are in place, and management commits to meeting and maintaining the requirements of the elements and the overall VPP.
- (b) All employees, including newly hired employees and contract employees when they reach the site, will have the GMVPP explained to them, including employee rights under the program and under the Occupational Safety and Health (OSH) Act.
- (c) We will comply with the Occupational Safety and Health Act. All hazards discovered through employee notification, self-inspection, VOSHA onsite review, accident investigations, process hazard reviews, annual evaluations, or any other means or report, investigation or analysis will be corrected in 90 days, with interim protection provided as necessary.
- (d) If employees are given health and safety duties as part of our safety and health program, we will ensure that those employees will be protected from discriminatory actions resulting from carrying out such duties, just as section 11(c) of the OSH Act protects employees for exercise of rights under the act.
- (e) Employees will have access to the results of self-inspections and accident investigations upon request.

4. **We agree to provide the following documentation for VOSHA review on site:**

- (a) Written safety and health programs
- (b) All documentation enumerated under III.J.4 of the July 24, 2000 Federal Register Notice
- (c) Any agreements between management and collective bargaining agent(s) concerning the functions of any joint labor-management safety and health committee and its organization and any other employee involvement in the safety and health program

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- (d) We will retain these records until VOSHA communicates its decision regarding initial GMVPP participation. We will likewise retain comparable records for the period of GMVPP participation to be covered by each subsequent evaluation until VOSHA communicates its decision regarding continued approval.
 - (e) We agree to make available for evaluation purposes any data necessary to evaluate the achievement of goals not listed above, (such as Merit or 1 Year Conditional Star goals).
5. **We will provide VOSHA each year:**
- (a) By February 15th our DART rates and our TCIR rates for the prior year, the total number of cases from which the rates were derived, hours worked, estimated average employment for the past full calendar year, and a copy of the most recent annual evaluation of the site's safety and health program
 - (b) In addition, we will maintain and send our combined injury and illness incidence and lost and restricted workday case numbers and rates, hours worked, and estimated average employment for all contractors' employees who worked at least 1000 hours in any one quarter on our site during the year.
6. **We understand** that we may withdraw our participation at any time or for any reason should we so desire.

NOTES:

1. Total case incident rates (TCIR) are calculated $(N/EH) \times 200,000$ where:

N = Number of recordable injuries and illnesses in a given time frame (one year for annual, 3 years for combined). NOTE: If the site has temporary or contractor employees who are under direct supervision of site management, those employees must be included in rate calculations.

EH = Total number of hours worked by all employees in a given time frame at the site (1 year for annual and 3 years for combined).
200,000 = Equivalent to 100 full-time employees working 40-hour weeks, 50 weeks per year.

Days away, restricted work activity, job transfer incident rates, (DART) are calculated with the same equation where:

N = Sum of the number of all recordable injuries plus illnesses resulting in days away from work, restricted work activity, and/or job transfer in a given time. NOTE: If the site has temporary or contractor employees who are under direct supervision of site management, those employees must be included in rate calculations.

2. Copies of each applicable contractor's, (those whose employees have worked at least 1000 hours in a quarter in the past year, but were not directly supervised by site management) injury and illness data, pertaining to the site must be maintained by site management.

Signature
Manager of the applicant worksite
(You may add the signatures of others as you wish)