



Safety Culture

How-To Guide to OSHA's Voluntary Protection Programs

Vanessa Jo Roberts | Jan 30, 2020

Often people think of the OSHA Voluntary Protection Programs as a safety initiative for large businesses only. Think again.

When you scroll through the names of companies that have earned a Voluntary Protection Programs (VPP) designation from the U.S. federal government, it's easy to think only big manufacturers and companies with multiple plants need apply.

It reads like a who's who list of household brands: Monsanto, Frito-Lay, Bayer, Sherwin-Williams and Northrop Grumman to name a few.

But VPP, created and run by the Occupational Safety and Health Administration since 1982, encourages worksites of all sizes to apply.

While there are several large manufacturers and federal worksites in the program, there are also companies with as few as six employees, notes an EHS Today article, "*VPP: What it Takes to be a Star.*"

What Are OSHA's Voluntary Protection Programs?

VPP is "designed to change the safety culture of participants," points out Paula White, a former OSHA official, in the article. "The reason the program is successful is because it sells itself. This program makes a difference. It saves lives and reduces costs. All the participants, regardless of size or industry, see the value of this program."

The data backs that up. OSHA data shows that the average VPP worksite has a days away, restricted or transferred case rate that is 52 percent below the DART average for its industry.

VPP Designations: Star vs. Merit vs. Demonstration

There are three program designations—Star, Merit and Demonstration—that the Occupational Safety and Health Administration will give to worksites that pass its analysis and inspection reviews to participate in the Voluntary Protection Programs.

Here's what a company essentially must do to earn each:

- **VPP Star:**
Demonstrate exemplary achievement in the prevention and control of occupational safety and health hazards. The Star designation is prestigious; fewer than 300 of the 20,000 VPP participants achieve it.
- **VPP Merit:**
Develop and implement good safety and health management systems. To qualify, an employer must have a DART rate 35 percent below national averages.
- **VPP Demonstration:**
Operate effective safety and health management systems that differ from the current VPP requirements. OSHA created this third designation to allow it the opportunity to evaluate successful safety approaches that might be distinct from those defined by the 19 VPP requirements.

But most of the sites don't start out with low DART rates, the government agency says. "Reductions in injuries and illnesses begin when the site commits to the VPP approach to safety and health management and the challenging VPP application process," OSHA notes on the *VPP program site*.



Want to check your DART rate to see how you compare to others in your industry? *Use our calculator.*

How Do OSHA's Voluntary Protection Programs Save Money?

So what are these programs and how do they work, you might wonder if you've little experience with VPP.

Through VPP, management, employees and OSHA work together to prevent fatalities, injuries and illnesses.

The effort needed to achieve a VPP designation can take several years, during which time a business might have multiple sessions, training efforts, and reviews with OSHA safety experts to help identify the things it can do to develop top-tier safety and hazard prevention processes.

"The company names on the VPP roster should cause nonparticipants to take notice and wonder whether these progressive companies might be on to something," an *EHS Today article* notes. "Could going the extra mile in the area of employee safety and health and partnering with OSHA actually be a

strategy for success?"

Companies report dollar savings ranging into the millions, decreases in employee turnover and increases in productivity resulting directly from their VPP involvement.

Mobil Chemical, for instance, EHS Today reports, slashed its workers' compensation costs by 70 percent as it was qualifying its plants for VPP between 1983 and 1986. That saved the company \$1.6 million.

In another *instance shared by OSHA*, metal casting facility Clow Valve reduced its on-the-job injuries. In 2000, before it began its efforts to gain VPP designation, Clow had a total recordable incident rate (TRIR) of 40.29, almost double the national average of 21.70 for gray and ductile iron foundries.

"As of December 31, 2010, its TRIR was 9.09 and its DART rate was 5.78," according to OSHA.

Do you know the difference between recordable and reportable injuries? We explain in "OSHA Recordable vs. Reportable Incidents: How to Tell the Difference."

OSHA VPP Checklist: How to Get a Star Rating

A site can apply to participate in VPP if it has maintained a DART rating below its industry's average for three consecutive years.

A Timeline of the Evolution of the Voluntary Protection Programs

1979 — Experimental VPP program begins in California.

1982 — OSHA announces the VPP officially and approves the first Star worksite.

1998 — OSHA expands the VPP to allow federal worksites to participate.

Today, there are roughly 20,000 VPP sites across the nation.

A company applies by submitting a detailed safety and protection practices report to OSHA for consideration. *(One way to help consolidate and more easily manage your safety documentation and reporting is to use EHS software programs. Find out how these work in "5 Safety-Forward Reasons to Adopt EHS Software.")*

There are four chief elements that all programs must have: hazard prevention and control; worksite analysis; training; and management commitment and worker involvement.

If the agency agrees to consider your site, it will send a team of inspectors to review the safety and environmental health practices of the facility. Leading up to that review, as noted, a business's employees might already have spent many hours revising its safety programs and instituting practices in the four areas to meet the VPP requirements.

The final VPP designation reviews are not like compliance inspections. *(To learn about those, read our article, "What to Expect When You're Inspected.")* Even when you have invited OSHA to your site, it can

be overwhelming to have a dozen or more inspectors roll up to spend a week reviewing every aspect of your safety, health and environmental program.

The OSHA team will look at 19 factors, which you will have provided details of in your report:

- **Management commitment and planning:** Do you have goal-oriented objectives and established policies to keep your workers safe?
- **Accountability:** Do you document your procedures and hold managers and supervisors responsible for maintaining safety best practices?
- **Disciplinary program:** Do you have a written environmental, health and safety program that all employees are aware of?
- **Injury rates:** Do you have a three-year average rate for both total and lost time restricted cases below your industry's national average?
- **Employee participation:** Do you provide meaningful ways for employees to participate in your program?
- **Self-inspections:** Have you established monthly inspections that track hazards?
- **Employee hazard reporting system:** Do you have a written reporting system that employees can take part in, from initial discovery through completion?
- **Accident and incident investigations:** Do you have written procedures for finding and tracking an accident or incident at your site through to correction?
- **Job safety analysis and process reviews:** Do you review all your jobs and processes to identify potential hazards?
- **Safety and health training:** Are you providing employee training of personal protective equipment use, emergency response, hazard awareness and potential hazard effects?
- **Preventive maintenance:** Do you have a written program for continuously monitoring and repairing equipment?
- **Emergency programs and drills:** Do you have a documented emergency response program and do you run unannounced drills?
- **Health program:** Have you conducted baseline health and surveys, samples and tests in all areas of the facility?
- **PPE:** Have you established training, care, use and replacement procedures for your protective equipment?
- **Safety and health staff participation during changes:** Does your process ensure that the EHS team analyzes potential hazards when new processes, equipment or materials are introduced?
- **Contractor safety:** Have you established procedures for the selection, training and enforcement of safety practices for contract staff?
- **Medical program:** Do you have physician services and employees trained in first aid and CPR?
- **Resources:** Does the company have access to certified safety professionals and industrial hygienists?
- **Annual evaluation:** Do you review the organization annually against the status of the 19 elements from the preceding year?

To maintain the VPP designation, a business must submit the last item, the annual evaluation to OSHA each year, and also participate in a re-certification evaluation by the agency every three to five years.

Why Should an Organization Value VPP?

A chief advantage of VPP is that it creates an environment that allows for continuous learning and improvement, explains Bill Shaw in an article for *BIC Magazine*.

"It's not just lip service or a saying—it's all in the 'doing,' " he says.

Air Force Maj. Gen. Dwyer Dennis agrees. He oversaw a VPP effort at Hanscom Air Force Base, when he was commander of the 551st Electronic Systems Wing.

"The importance of VPP cannot be overstated," Dennis *wrote of the program*. "It is a comprehensive way to ensure we achieve environmental, safety and health excellence. We encourage all our employees to be accountable for achieving this goal as a life sustaining skill, not only for the workplace but in all aspects of our lives."

Has your business considered or begun work toward achieving the OSHA Star designation? What tips do you have for other companies?

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