

Recognizing Excellence in State Plan States – Discussion of VPP Approval



An snapshot of Kentucky VPP STAR
Lecture given at San Antonio Texas



VPPPA National Conference

JPGiles RN

KY VPP Administrator

August 27, 2009



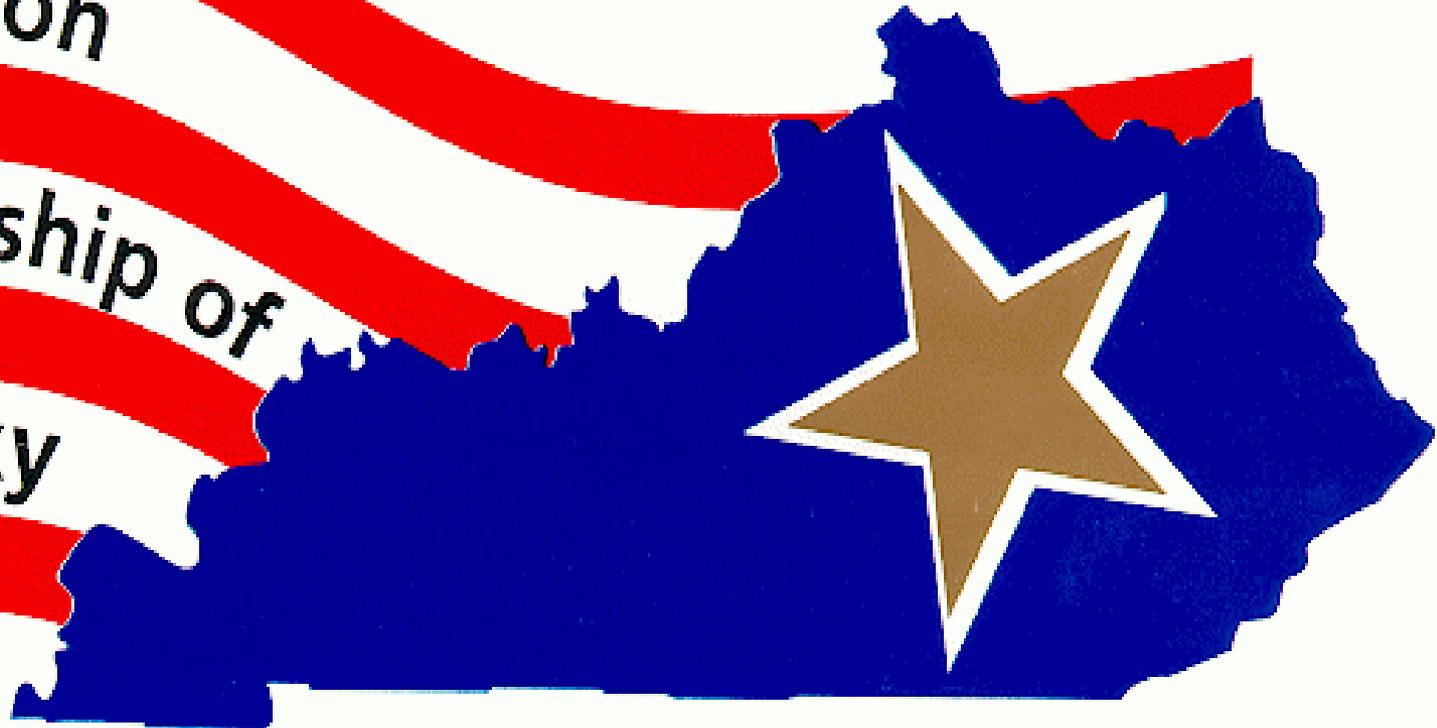
The KY OSH VPP Program

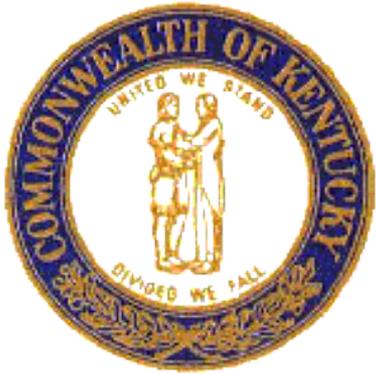
Voluntary

Protection

Partnership of

Kentucky





What is Kentucky VPP?

VPP is Kentucky's highest level of certification and recognition that a company can obtain with regard to occupational safety and health culture, systems, and performance.

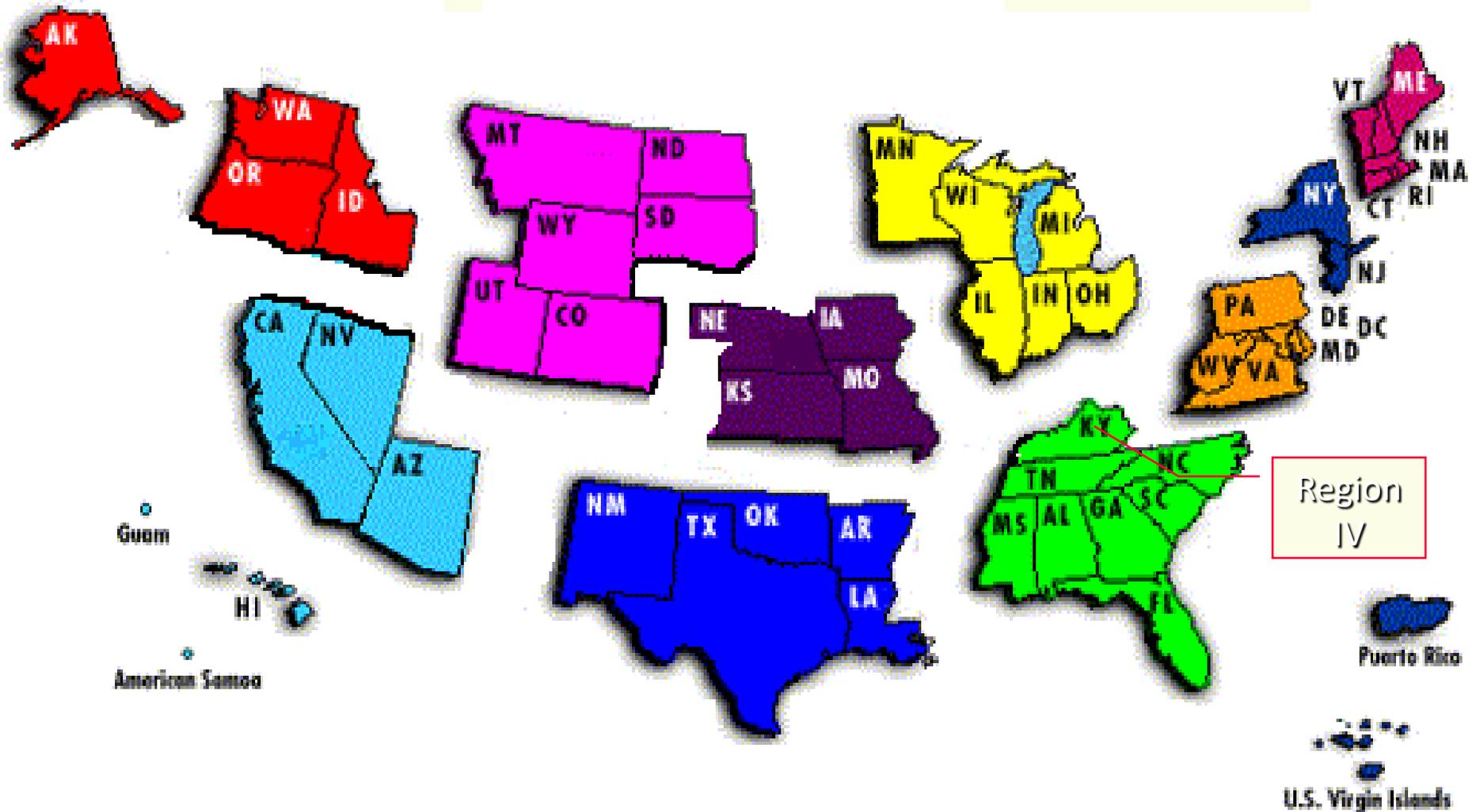


Labor, Management and KY OSH Working Together

VPP's Beginnings

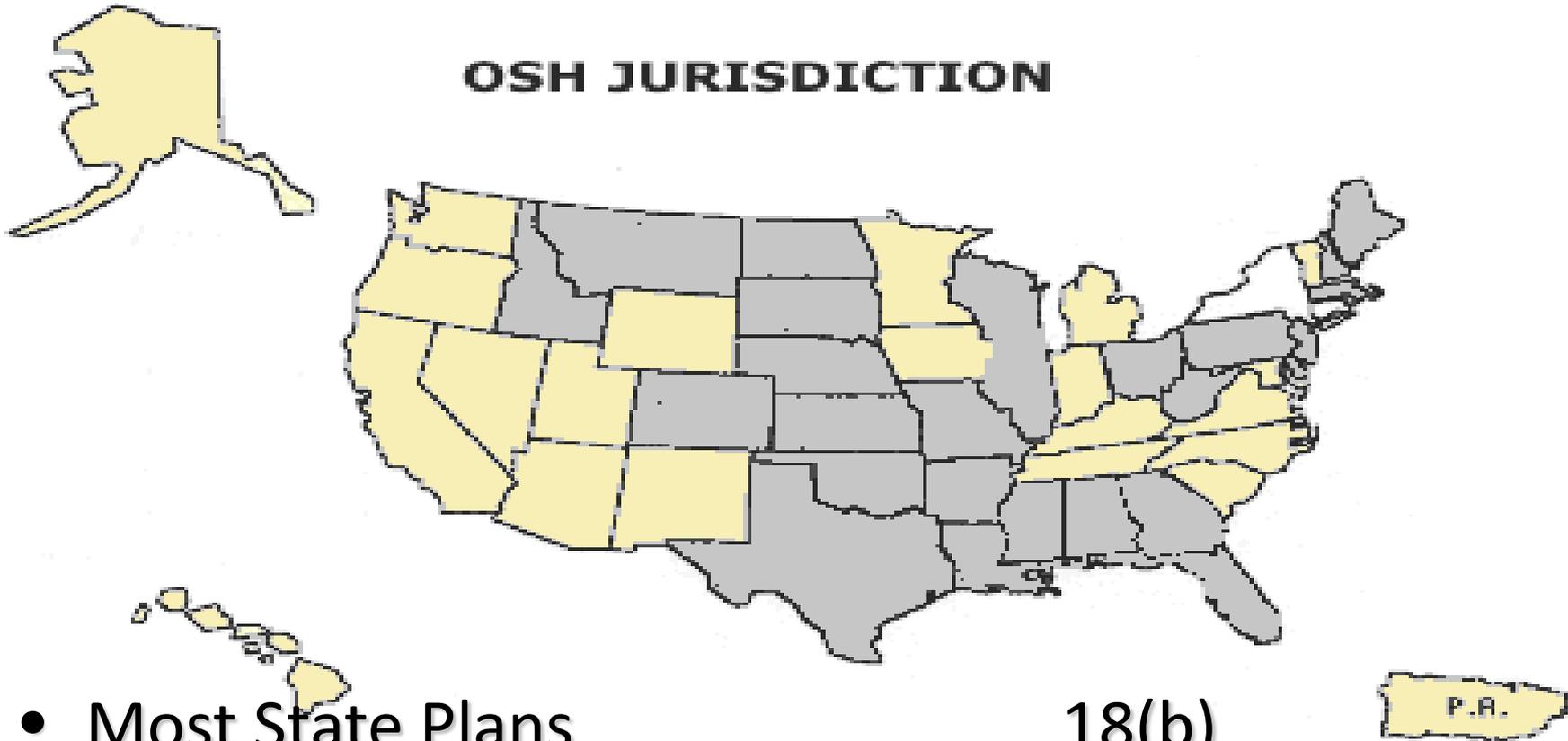
- 1979 - California began experimental program
- 1982 - OSHA formally announced the VPP and approved the first site.
- 1997 – First Kentucky VPP Site was certified in Carrollton at DOW

OSHA's Regional Offices and KY-OSH Program



State Vs Federal Plan

OSH JURISDICTION



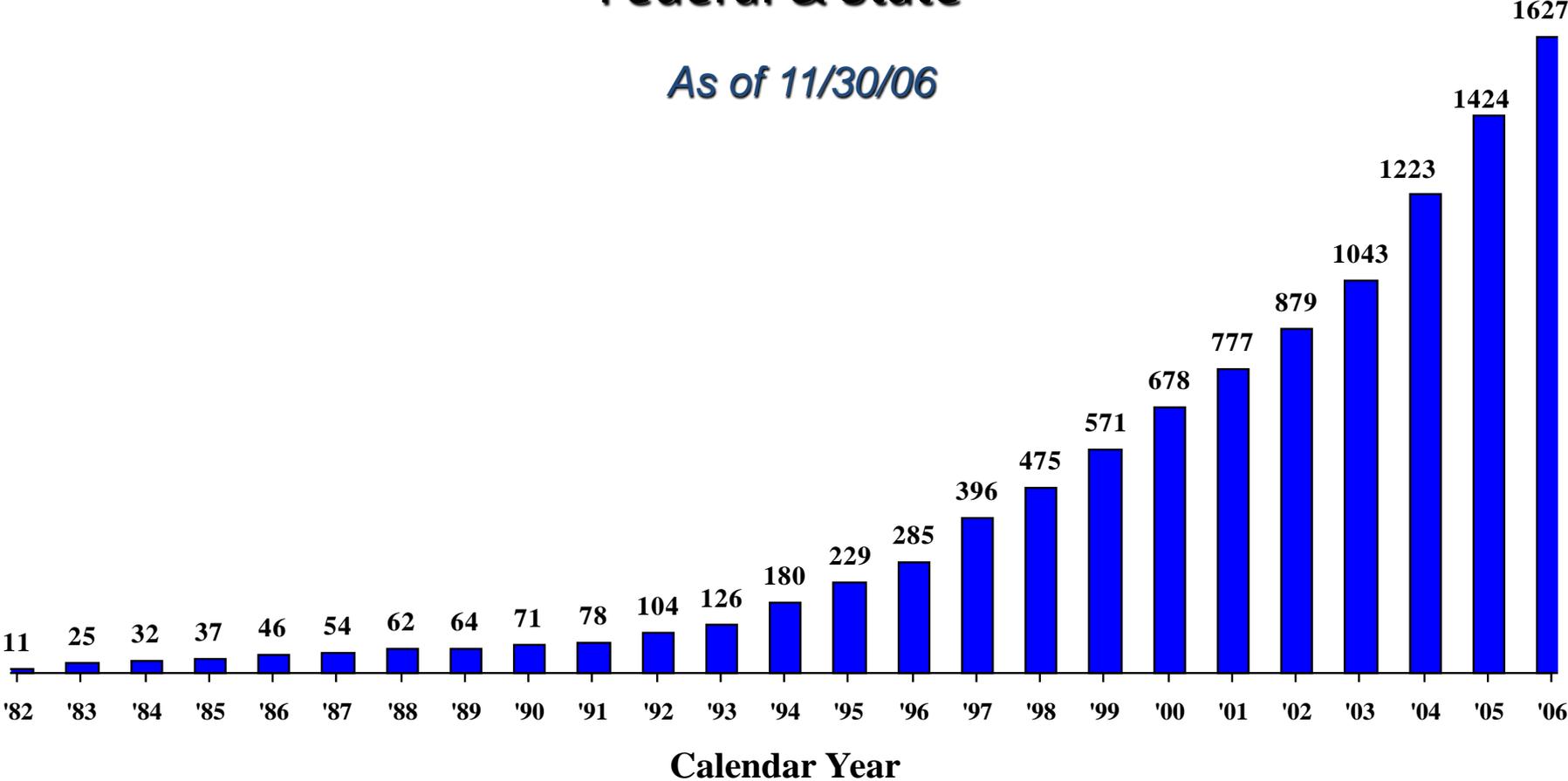
- Most State Plans
- Kentucky's Plan

18(b)
23(g)

Growth of VPP

Federal & State

As of 11/30/06



Source: OSHA, Office of Partnerships & Recognition

The Onsite Review Process

(All Phases include extensive employee interviews)

- VPP intro training from VPP Administrator or other staff
- VPP Pre-assessment Visit and/or walkthrough
- Perception survey assessment tool (**cultural aspects check**)
- Document Review (**programs check**)
- Auditors practice session for hazard ID
- PSM Review (*if applicable*)
- Hazard I.D. & Systems Application Review (**physical hazards check**)

Tough but also fair?

- The VPP process is designed to be rigorous, so that only the best programs qualify. Kentucky's Star VPP certification has been called "the most rigorous and detailed in the United States to obtain".
- The focus is not on a single correct way to meet VPP requirements, but rather a system that's detailed, sustainable within the given culture, and that works.
- There is some paperwork required in the application process, but use of existing material is always encouraged, where possible.

Current Kentucky VPP Sites

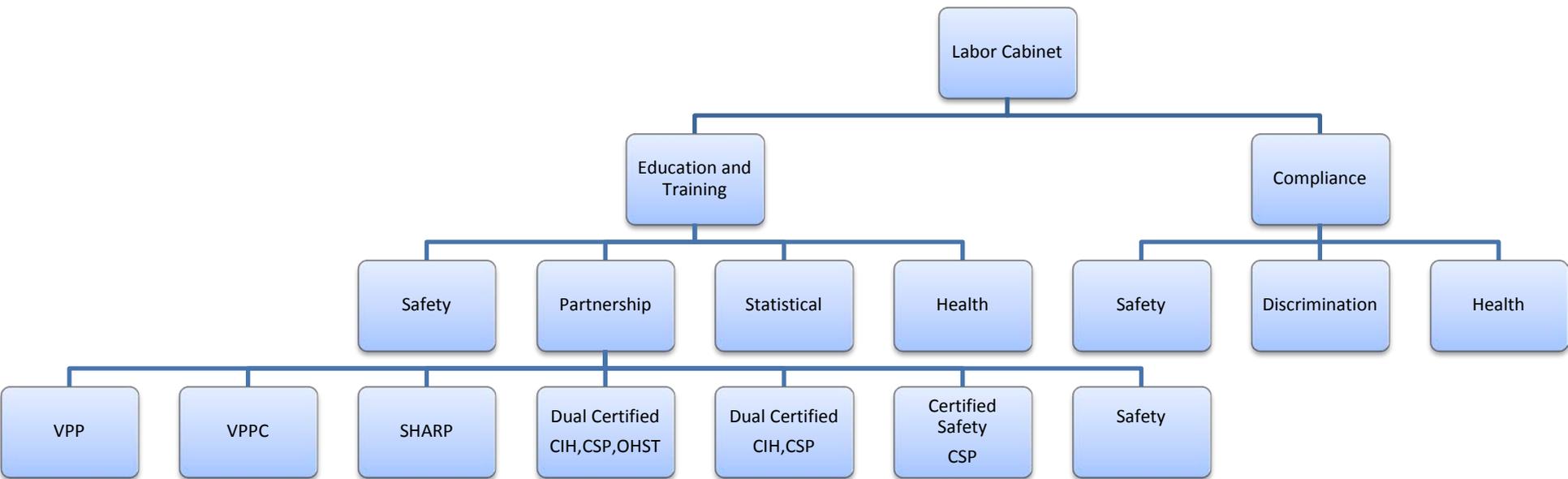
- **Dow Corning**, Carrollton
 - Certified 8-28-1997
- **GE Aircraft Engines**, Madisonville
 - Certified 3-2-1998
- **GE Lamp Plant**, Lexington
 - Certified 12-10-2002
- **Hunter Douglas Corporation**, Owensboro
 - Certified 02-28-2005
- **Performance Pipe**, Williamstown
 - Certified 06-18-2005
- **International Paper**, Bowling Green
 - Certified 7-10-2006
- **L'Oreal (USA)**, Florence
 - Certified 8-18-2006
- **GE Aviation Infrastructure**, Erlanger
 - Certified 6-24-2008
- **Raytheon Missile Systems**, Louisville
 - 6-26-2008
- **GE Energy Service and Repair Center**, Louisville
 - 6-2010

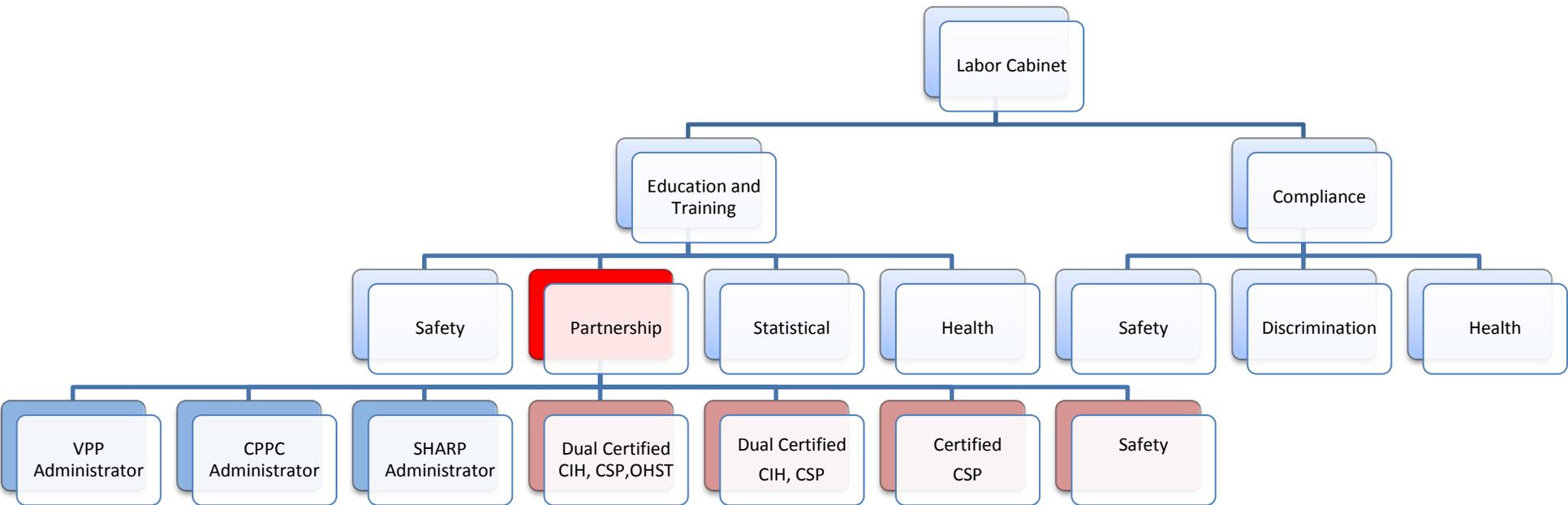
Resources and Depth of Commitment



Kentucky commits to the furtherance of the sites that are willing to pursue the goal of VPP through training efforts in multiple different areas of expertise from auditing skills to accident investigation.

Our stated goal is that the sites should be self sufficient with regard to OSHA type audits and reviews; and that the facility will be at the level of mentor to promote the VPP process in their community and industry and to help others progress to self sufficiency in their integrated safety and health programs.





Mentor

The requisite information



- VPP in Kentucky is called Kentucky Star or Kentucky Construction STAR
- There is no Merit program in Kentucky Currently
- Run through the Partnership Branch under Danny Vernon
- We only use Kentucky Labor Cabinet consultants*
 - (no federal or state SGEs at the current time)
- The longest STAR participant has been Dow Corning Carrollton.
- 6 Companies have demitted from our program since the programs inception
 - (all under my time as VPP Administrator)

How do we differ from the federal VPP program?



- First things first.....

I have never been allowed to participate in / observe a “federal audit”, thus I can only tell you second hand about their style of audit and systems.

I can however relate to you what others, that have experienced such an audit, see as differences. Both styles of VPP have merit and both have a place in the system.

It would be presumptuous of me to say more about the federal system but I do know my system very well...

How does Kentucky deal with VPP Evaluation?



- We prescreen with cultural surveys
- We strictly scrutinize the OSHA logs, near misses, etc. a priori (not just the application but all records for 4 years)
- We use specific auditors with a well honed set of skills
- We do not use SGEs currently
- We spend much more time in education and building of teams and knowledge bases
- While following the federal guidelines we have our own internal compass to follow with regard to when we think a site is ready for certification and our expectations of the sites with regard to integrated and unified safety and health programs.

How does Kentucky deal with VPP Evaluation?



- We require two full evacuations per year, per shift (no excuses)
- We strongly suggest interns during VPP run-ups
- We strongly encourage participation in federal SGE program in the first three years after achieving STAR status
- We strongly encourage statistical validation with Six Sigma or other tools to prove VPP works
- We require the use on NFPA 70E and emphasis on FR PPE
- We train the audit teams to be self sufficient and to show proficiency
- We teach basic skills to allow them to grow in safety and health at the facilities (Auditor training I, root cause analysis, accident investigation skill sets,...)

How does Kentucky deal with VPP Evaluation?



- We let the audit teams show their proficiency and coach them when they miss items
- We let them collect the data and prove their systems
- We take away a self generated list of findings and allow them to submit a final version within two weeks
- We verify, with two KY Partnership personnel, all findings and do a physical review not just a paper validations (Criteria level: 20+/-4 → 40+/-4 → 95+/-4)
- While the benefit of the doubt is given to all in the process we must ensure interim protections and completion of corrections.
 - {We trust but we must verify}



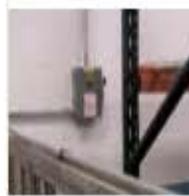
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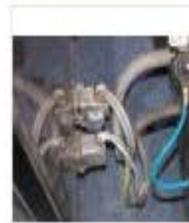
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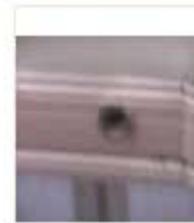
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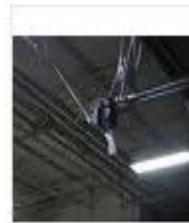
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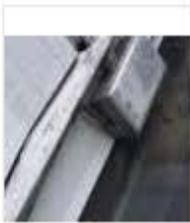
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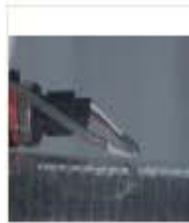
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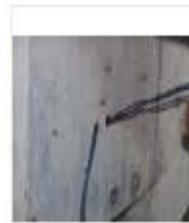
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B-25



TV Steel Company
P.O. Box 1000

Example of the Culture Survey

VPP Perception Survey of Site Safety

This survey is a confidential document. *Please do not sign the survey it is for statistical use only.* Every answer counts toward your site's evaluation and the final report toward VPP or VPP recertification. If you should have any questions as to the meaning of a question ask the Kentucky OSHP VPP representative at the time of the survey.

		Rarely	Seldom	Often	Always
1	This company believes safety is as important to the company as production.				
2	Employees correct hazards as they are recognized or report it to their supervisor for correction				
3	Supervisors actively look for safety hazards				
4	Management measures the safety efforts of supervisors				
5	Supervisors face consequences for poor safety performance				
6	Management recognizes and rewards good safety efforts				
7	My supervisor coaches me on appropriate safety working practices and procedures.				
8	My supervisor regularly observes employees to make sure they are working safely.				
9	I receive positive feedback from my supervisor for working safely				
10	I receive adequate training about how to do my job safely				
11	My supervisor regularly promotes the importance of safety on the job				
12	Managers and supervisors exhibit safe working practices in their daily				

1) How has the culture changed in the last 3 years with regard to safety?

- ✎ Culture here has gotten better and the teammates on the floor have taken more ownership
- ✎ More overall awareness and Safety training and VPP training
- ✎ Safety has been a top priority. Now we seem to have much input / control by our teammates on the floor
- ✎ The safety policies are more line driven than they were 3 years ago. Teammates are being asked for more ideas and involvement in investigations
- ✎ More emphasis on being proactive than reactive than 3 years ago
- ✎ Yes, More safety tooling has been placed on our machines and training people more often. It has definitely gotten better
- ✎ No change
- ✎ "Joyce Parker was a big change for the better"!
- ✎ Major shift toward employee involvement...before it was the safety person's job... now it's everybody's job
- ✎ Since all the teammates have gotten involved it has gotten better
- ✎ It has gotten better...Forklifts, oil spills, loto testing, and proficiency has improved dramatically.

3) General Remarks and Quotes...

- 🔗 “VPP is an awesome program...We need to work on line ownership”
- 🔗 “Jimmy reviews the findings and then these are followed up by management”
- 🔗 We have a better open-door policy and are now encouraged to bring issues to management
- 🔗 “Within the last week we had 14 items added to the safety list to fix. That is a great turn around for us. Things are headed in the right direction and we all feel it”
- 🔗 A+ for supervisors toward safety lately.
- 🔗 Lines have been shut down for safety like never before. We are going to be the safest we can be and management is onboard with us.
- 🔗 This place has improved at all levels in awareness and actions.
- 🔗 Response time to safety has improved.
- 🔗 Raised awareness with the emphasis on VPP.
- 🔗 Improved safety results.
- 🔗 Lots more communication on safety.

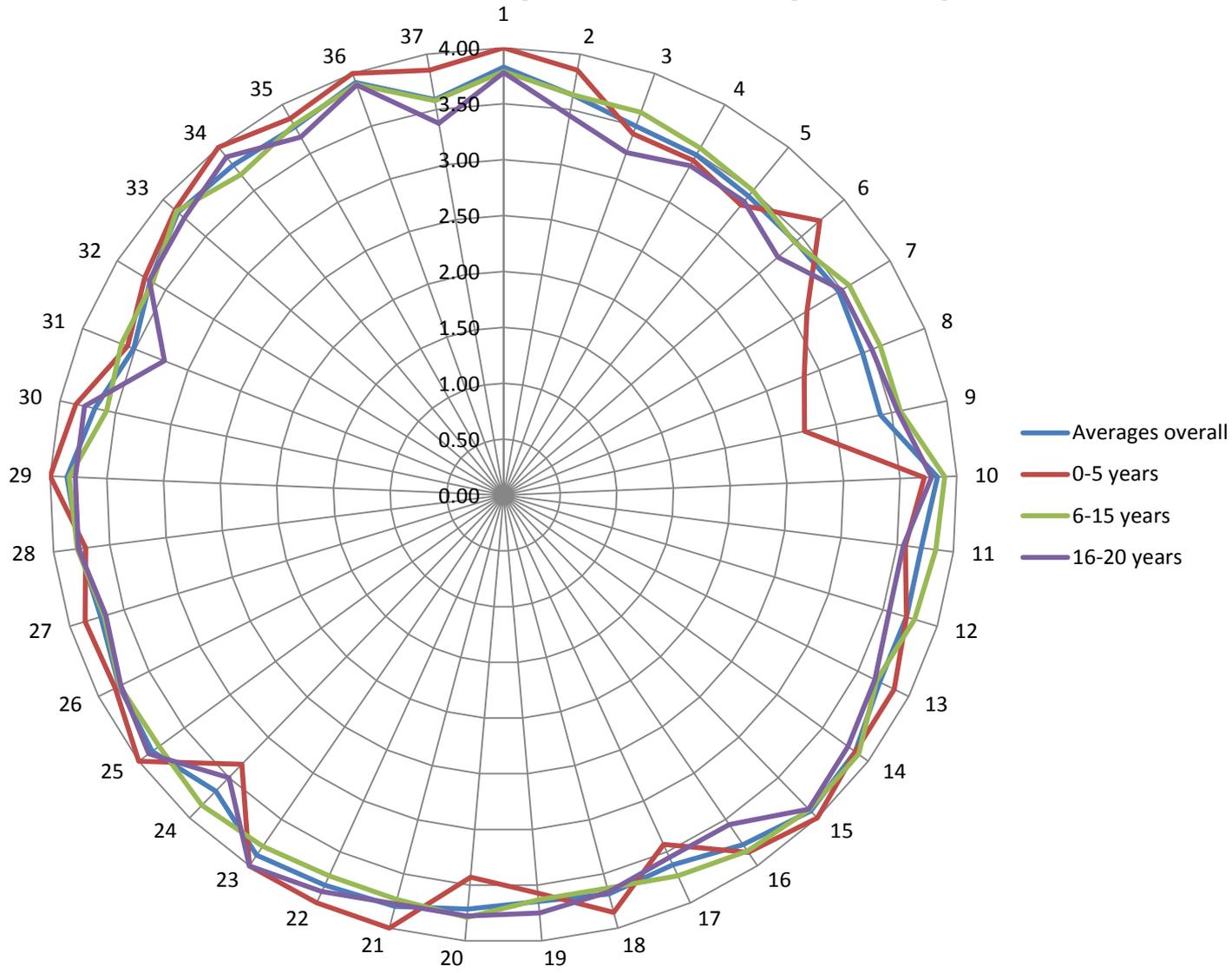
Rating range, mean, sample variance

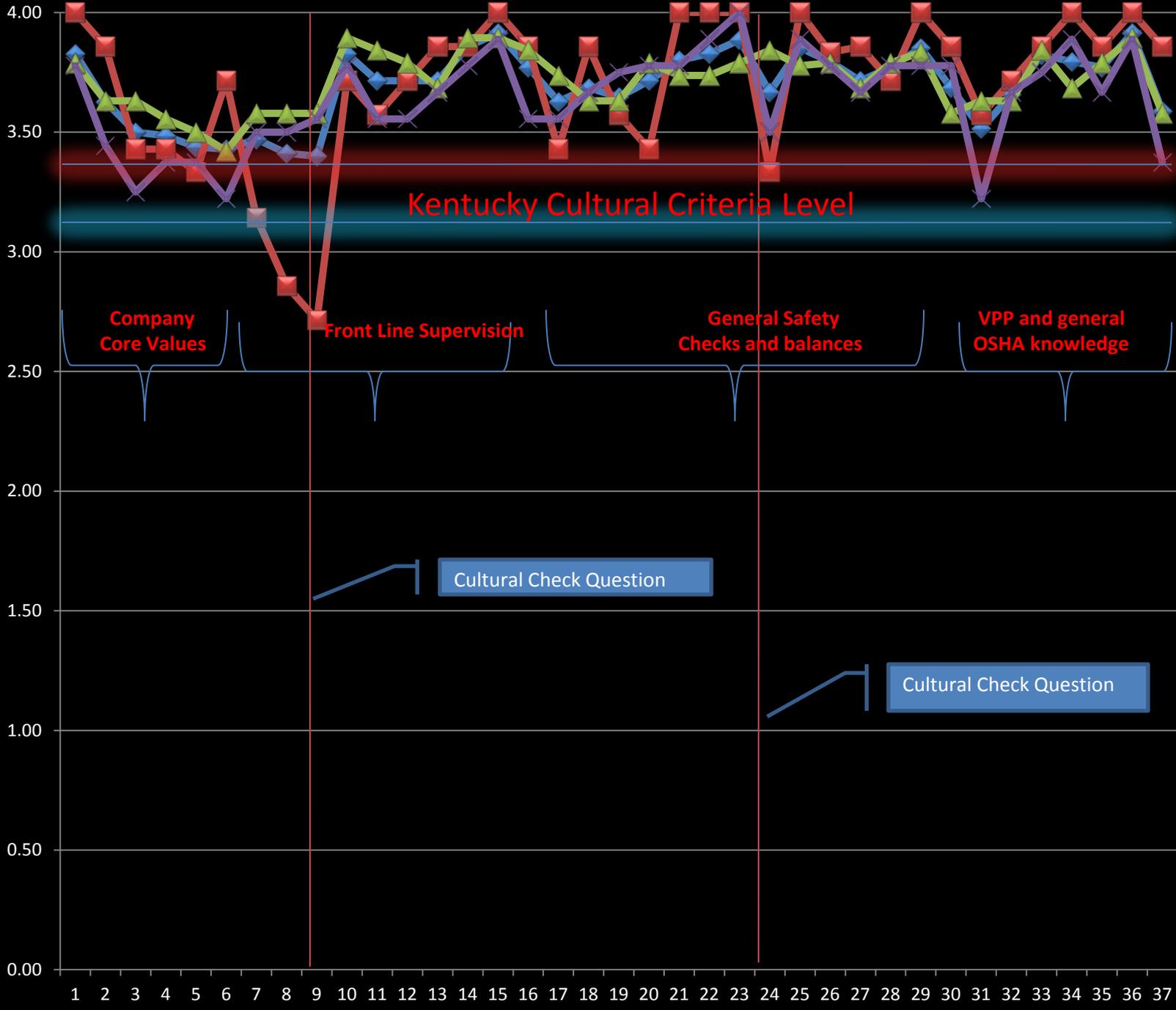


Count	12
Min	59
25th	80
Median	87
75th	90
Max	98
Mean	84.25

Minimum	59
First Quartile	21
Second Quartile	7
Third Quartile	3
Fourth Quartile	8
Maximum	0
Fourth Quartile -	0
Third Quartile -	0
Second Quartile -	0
First Quartile -	0
Average	84.25

Our Plant Plant Perception Survey Group Scores 2008



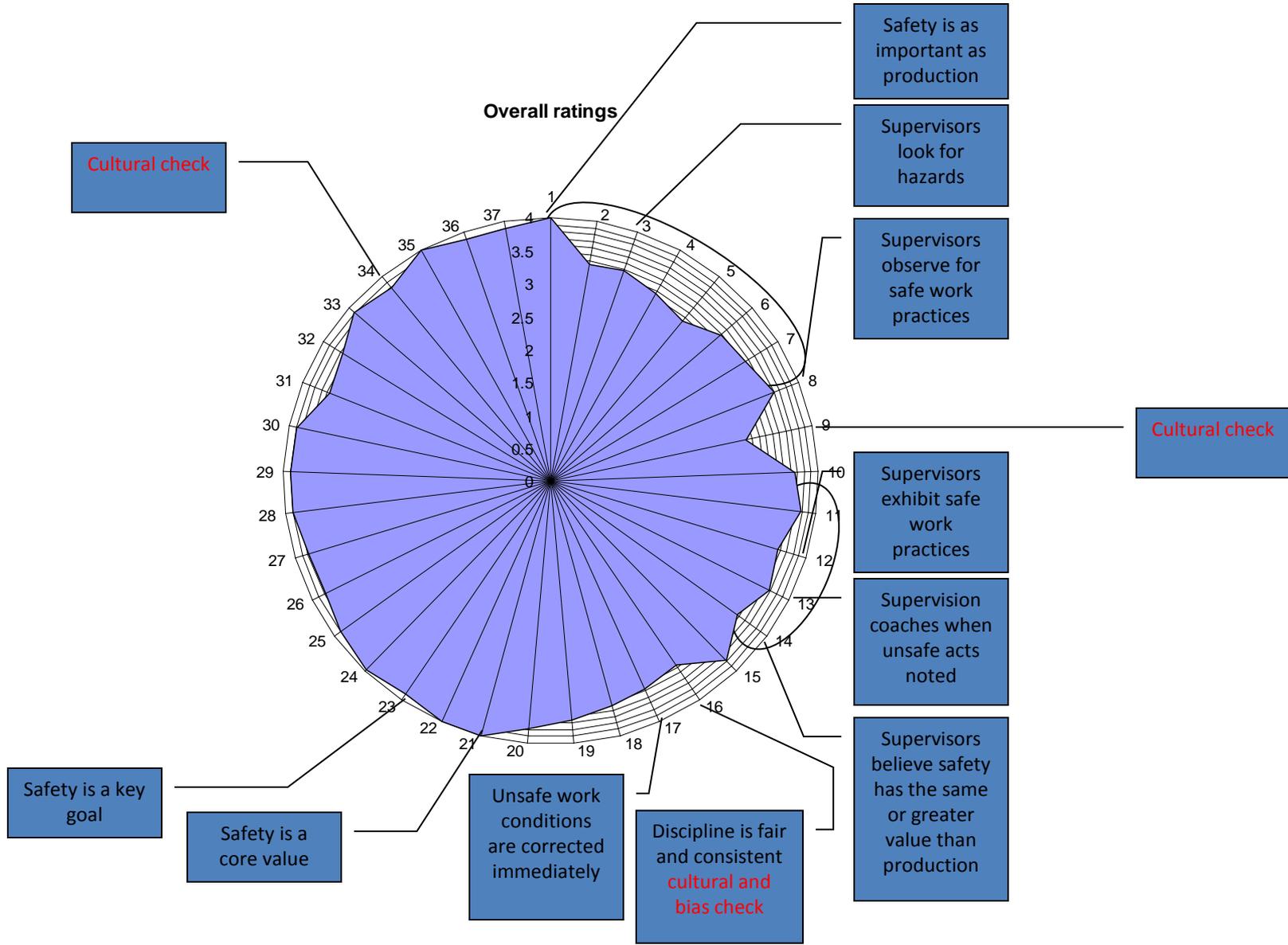


- ◆ Averages overall
- 0-5 years
- ▲ 6-15 years
- × 16-20 years

Cultural Check Question

Cultural Check Question

Total Plant Rating



What makes us Unique



- I posed the question.....
 - If you* had to explain to others the differences in the Kentucky STAR program and other state or federal VPP programs, what would you say to those who have not been through the Kentucky system?
- * corporate ESH professional, SGEs, out of state STAR VPP holders of a current KY VPP STAR with experience out of state or in federal VPP in your other facilities

The answers varied....



- You guys blew me away the first day
- It does not compare to other VPP evaluations
- Level of participation
- Affixing ground up foundations
- Manpower utilization
- Depth of review
- Educational time spent
- Commitment to mentoring and outside participation
- The auditors were incredible (they were gifted at their tasks, very professional, deeply knowledgeable, and committed to making us better)

Pros and Cons



Pros



- Self sufficiency
- Pride of ownership
- Depth of teams
- Desire to continue and make a zero injury status
- Community outreach
- Sharing of information

Cons



- Time, monies allocated, resources by the company
- The employees are more vocal
- The unions have more to say and play a bigger role
- When we loose management we loose family and knowledgeable people. We must retrain and regain lost ground or we fall to our knees in safety when our people leave for better jobs.
- If the big hitters leave a cultural crash can occur

What Makes Kentucky VPP Different?



Resources and Depth of Commitment



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Kentucky VPP's Vision Statement



- The Kentucky VPP STAR program has always attempted to be one of the best VPP programs across the country.
- We strive not to have the most companies flying the VPP STAR flag, nor to impose the greatest number of rules, nor to be the hardest to follow, but to address the long term potential injuries / issues that plague workplaces with high severity injuries and high workers compensation costs, both of which impact the sustainability of the facility, the employees safety and health, and ultimately the employees quality of life.
- The programs required under this philosophy are listed below as requirements of the Kentucky VPP STAR and may not be requirements in other state plans or Federal VPP sites.

These Additional Requirements are:



- An ergonomics program and active ergonomics committee
- Adherence to the current NFPA 70E (and NFPA 70E site characterization analysis)
- At least two full shift evacuations per shift, per year for internal and external hazard preparedness
- A cultural perception survey with a statistically significant number of employees prior to progressing into the site analysis phase (Phase I and Phase II VPP STAR Review Processes)

Additional Requirements Continued:



- That during the first three years of obtaining a VPP STAR certification the facility will actively work toward having at least one Special Governmental Employee certified, through the Federal OSHA system, from their site.
- That, at or before the second re-certification, a project (or projects) will be started; and in most cases completed ,whereby a company will set goals for their safety targets in specific areas of the facility, collect data on the process(es), analyze the data, draw conclusions, and refine their safety programs with an eye toward making world class safety programs and thus prove the case for the VPP program's significance to the company's employees safety and improve the company's bottom line through monies saved in safety. Many companies use Six Sigma methodology as their preferred tools but many methods are acceptable as long as the projects are working toward a better safety and health program at the facility accompanied by self sufficiency in safety and health.

The VPP STAR program feels that these small but significant differences make a difference in the quality and commitment to safety over the long term of the VPP Partnership and that our STAR facilities will become some of the safety leaders in their industries through best practices and techniques.



Success Stories

- The reluctant manager
- Bonding the best of the best to the worst of the worst (networking and more networking)
- Buy in by unions and corporations to change via our detailed processes
- Transplants from our Kentucky sites in and out of state have changed us for the better

Best Practices

- “A best practice is a technique or methodology that, through experience and research, has proven to reliably lead to a desired result.”¹
- “An iterative (meaning repetitive) development process, which progresses in incremental stages, helps to maintain a focus on manageable tasks and ensures that earlier stages are successful before the later stages are attempted.”¹
- “A best practice tends to spread throughout a field or industry after a success has been demonstrated.”¹

What are best practices

- Different to all levels of knowledge
- Different to all industries
- Maybe not the standard
- Above and beyond the expected envelope of operations
- VPP mentor level of operations

Best Practices

- Dow Corning's "Balance of consequence"
- Raytheon's use of "Six Sigma for EHS"
- GE's tracking system "Gensuite / Powersuite"
- L'Oreal's "MESUR" system of coaching
- Performance Pipes "Behavioral Based Safety"

