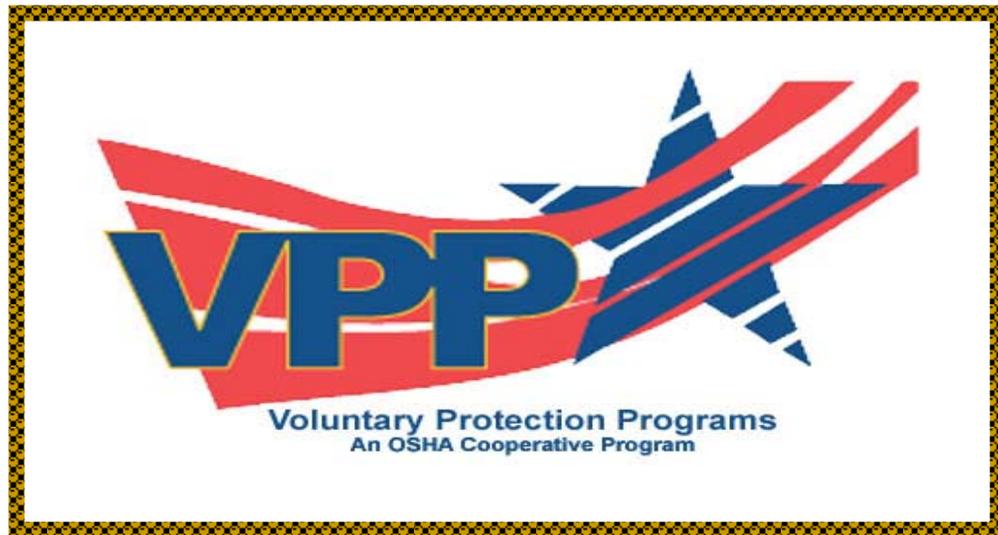


# How to Prepare for and What to Expect During an Onsite VPP Re-Evaluation Visit



**Strengthening Star Quality Workshop**

**National VPPPA Annual Conference**

**Orlando, Florida**

August 2006

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**REGION IV VPP**



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# Training Agenda

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- Introduction
- Common Pitfalls
- Logistics (People and Places)
- Records and Paperwork
- Physical Site Reviews
- The Employees
- Daily and Final Close-outs
- A General Game Plan

# Introduction

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- The **focus is not on a single correct way to meet VPP** requirements, but rather on a system that's **detailed**, **sustainable** within the given culture, and that **works** for the company, while fulfilling the VPP's rigorous requirements.
- Trend analysis of issues should show where programs have gotten better and/or worse.
- Do not reinvent the audit and/or waste time.

# ***Introduction***

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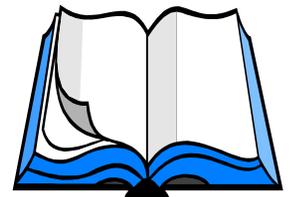
Re-certification evaluations are:

- To review changes that have occurred during the time from the last OSHA review process.
- To see that the changes that have been made do not degrade the integrity of the approved program.
- To see what has changed in a positive fashion and how these changes have impacted the safety and health programs.
- To see if the information matches what was submitted with the annual reports.

# Preparation for the Onsite.....

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- Review of application information and the last three submitted annual reports.  
(These are key to your recertification!!)
- Determine specific areas of interest or concern.
- Review appropriate standards & requirements.



# ***Introduction References***

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OSHA Publications in [www.osha.gov](http://www.osha.gov)

- The Federal Register Notice July 24, 2000 (FRN)  
Section O. Periodic Onsite Evaluations of approved  
Worksites
- CSP 03-01-002 (TED 8.4) VPP Policy Manual  
Chapter 6: Onsite Evaluations

# Common Pitfalls in Recertification



- Having no plan of action
- Not having access to upper management
- Not having quick access to the documents that have changed
- Not having someone familiar with the changes to your EHS program (historically speaking)
- Not having communicated with all stakeholders in the process

# ***Re-evaluation Notes***

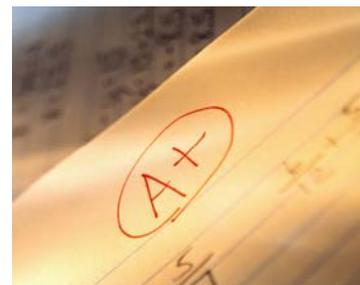
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- ✓ Prepare your unions, managers, and hourly (and the culture) for the recert
- ✓ The majority of your people must be onboard with VPP
- ✓ Get people involved, the opportunities are there
- ✓ Establish a VPP coordinator (probably full time at some point) to spearhead the process of preparation (must be passionate about safety, committed to VPP, good communicator, know the people and the plant, self starter, and tireless)

# ***Re-evaluation Notes***

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- ✓ Prepare the team room (possibly use story boards), tables for documents which are identified and keyed to the VPP Report Format.
- ✓ Make sure that employees escorts are prepared and the maintenance department is ready and prepared to get any 90 day items addressed while the team is **still onsite** if possible.





# Lexington Lamp Plant

Dist. 200000  
200,000 sq. ft. - 18 acre site  
207 employees... 270 Hourly, 3 Salaried  
Union Plant - IBEW Local 1427  
Built in 1947, expanded two times  
OS9000, 1995... VPP Star, 2001



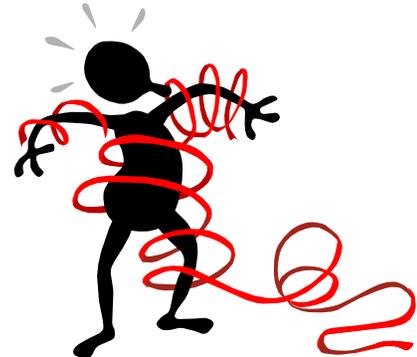
Man standing, presenting to the group.

Man sitting at the table, listening.

# ***OSHA Pre-visit Discussions With the Team Leader***

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- Review what changes were made to your program
- Discuss general logistics and proposed itinerary, dates of onsite
- Interviews- Discuss the types:  
    purpose, who, when, where, logistics
- Team visit preparation discussions
- Who will be on the team, team needs, lunches, use of SGE's, team breakout room
- Walk the site, make observations
- Final closing conference preparations



# Logistics

## KY VPP Re-certification Agenda

- **Monday ( 1:00pm )**
- Orientation
- Meeting Introductions
- Overview of Plant Operations- organizational structure, processes, products, etc.
- Plant Layout
- Plant Rules
- **Tuesday Morning**
- Injury/Illness Trend Analysis
- Other Safety/ Health Related Trend Analyses
- Contractor and Construction Activity Onsite *(if any)*
- S/H Meeting Schedule *(annual and for the week of our visit)*
- S/H Training Schedule *(annual and for the week of our visit)*
- S/H Inspection/Audit Schedules *(annual and for the week of our visit)*
- Scheduled Emergency Drills *(planned during our visit)*
- Planned Area/Dept. Inspections *(we would like to observe at least two of these)*
- **Tuesday Afternoon**
- Employee Roster *(name, title, shift, dept., tenure, committee affiliations)*
- Handouts, presentations and explanations with the following information:
- 10 Greatest S/H Hazards to Employees by Severity
- 10 Greatest S/H Hazards to Employees by Number of Employees Exposed
- 10 Greatest S/H Hazards to Employees in Non-routine Tasks
- Any new committees established over the last 3 years?
- What is the purpose of each of these committees?
- Any Committees Disbanded? Reason?
- Has employee involvement increased or decreased over the last 3 years? Why?
- What significant changes have occurred in equipment or processes over last 3 years? Why?
- What engineering or administrative controls have been implemented?
- Any new S/H initiatives started in last 3 years? Reason? Results?
- What has been the most effective method, thus far in keeping employees focused on safety?
- Over the Last 3 years, what has had the greatest impact on S & H at this facility?
- **Wednesday**
- Employee Interviews *(representative of above categories)*
- Review Records for the last 3 years and YTD as follows:
- Injury/Illness Records
- Incident Reports/Investigations
- Written Programs *(that have changed over the last 3 years)*
- Company Internal Inspection Records
- Company Outside Audits
- Contractor Internal Inspection Records
- Contractor Outside Audits
- Year 2000 and 2001 YTD print-out of Hazards Identified, Resolution, or Status
- Critiques of Emergency Drills, Responses, etc.
- Respirator Program / Change-out Schedules, etc. *(if applicable)*
- IH Monitoring Schedule and Results of Monitoring
- Contractor Safety Programs
- **Thursday**
- Continuation of Wed. items and any items raised during interviews, etc.
- Observe Spot Inspections in Company Work Areas *(and Contractor Areas if applicable)*
- PSM Reviews – Spot Check of CMRs and PHAs, etc. *(if applicable)*
- LOTO Procedures and Spot Check of LOTO Practices
- Spot check of Haz. Comm. issues
- **Friday (if needed)**
- Completion of items under review
- KY VPP Team Meeting *(private meeting to prepare for the close-out meeting)*
- VPP Re-certification Summary Close-out Meeting *(open meeting)*



SENIOR  
CHIEF

# OSHA 300,300a, 301 and RCA's

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- Review of Total Case Incidence Rate (TCIR) & Days Away Restricted and/or Transfer (DART) Case Incidence Rate.

\*Be aware that they can and will ask for a root cause analysis (RCA) to see how you analyze the incidents, and your conclusions as to why you had problems.

- IH or Team Leader usually reviews OSHA Log & medical records (make sure there are no overt recordkeeping mistakes).

Sometimes records are tough to find or retrieve.



## **Written Program Elements Checklist For KY VPP Visits** (Attachment C)

In the evaluation of Written Programs we are looking for an explanation of the elements as outlined below at a minimum:

- A. Purpose of the Program?**
- B. Company Policy and Scope?**
- C. Associated Hazards:** *What? Where?*
- D. Hazard Controls:**
  - 1. *Engineering?*
  - 2. *Administrative?*
  - 3. *Work Procedures/PPE?*
- E. Rules and Procedures:** *SOPs? OSH Standards requirements? Non-routine tasks?*
- F. Assignment of Responsibilities for:**
  - 1. *Managers*
  - 2. *Supervisors*
  - 3. *Employees*
- G. Training:** *Who? What? How (classroom /on the job)? How Often? Certifications?*
- H. Records:** *Forms, training module descriptions and other related documentation?*
- I. Verification/ Monitoring:**
  - 1. *Audits: By whom? How often?*
  - 2. *Inspections: By whom? How often?*
  - 3. *Program and related Paperwork Reviews? By whom? How often?*
- J. Corrective Actions/Improvements:** *Reporting, Recording, and Tracking Systems, etc...?*
- K. Overall Responsibility for the Program:**
  - 1. *Name/Title/Committee Members?*
  - 2. *Responsibility to act?*
  - 3. *Authority to act?*
  - 4. *Accountability of actions?*
  - 5. *Monitoring of actions?*

# ***Bureaucrats Love Paper***

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## Safety and health documentation

- Importance and updating, latest revisions
- Determine what to use, collection and display
  - Which documents to use
  - Key off of VPP Report Format's Four Sections

# ***How Does the Facility Look?***

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- Compliance / Safety Audit : unit and work area inspections
- Housekeeping and cleanup throughout
- Review old findings to ensure nothing was left uncorrected. Are there any old findings tags to capture?



**Adhesive Seal  
Welcomes OSHA**



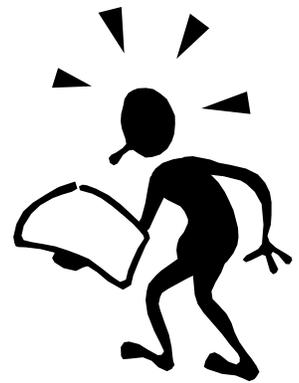
**Recertification  
Audit  
December 6-10**



# Help your employees prep for the specific type of audit process!

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- Quality
- Housekeeping / 5S
- Total Risk Management
- Safety / Focused Safety
- Maintenance



Let your teams know what you want from them

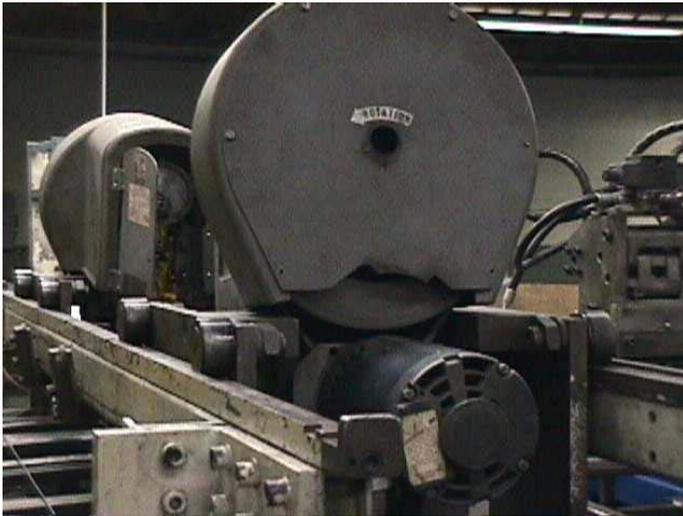
# Hazard Identification

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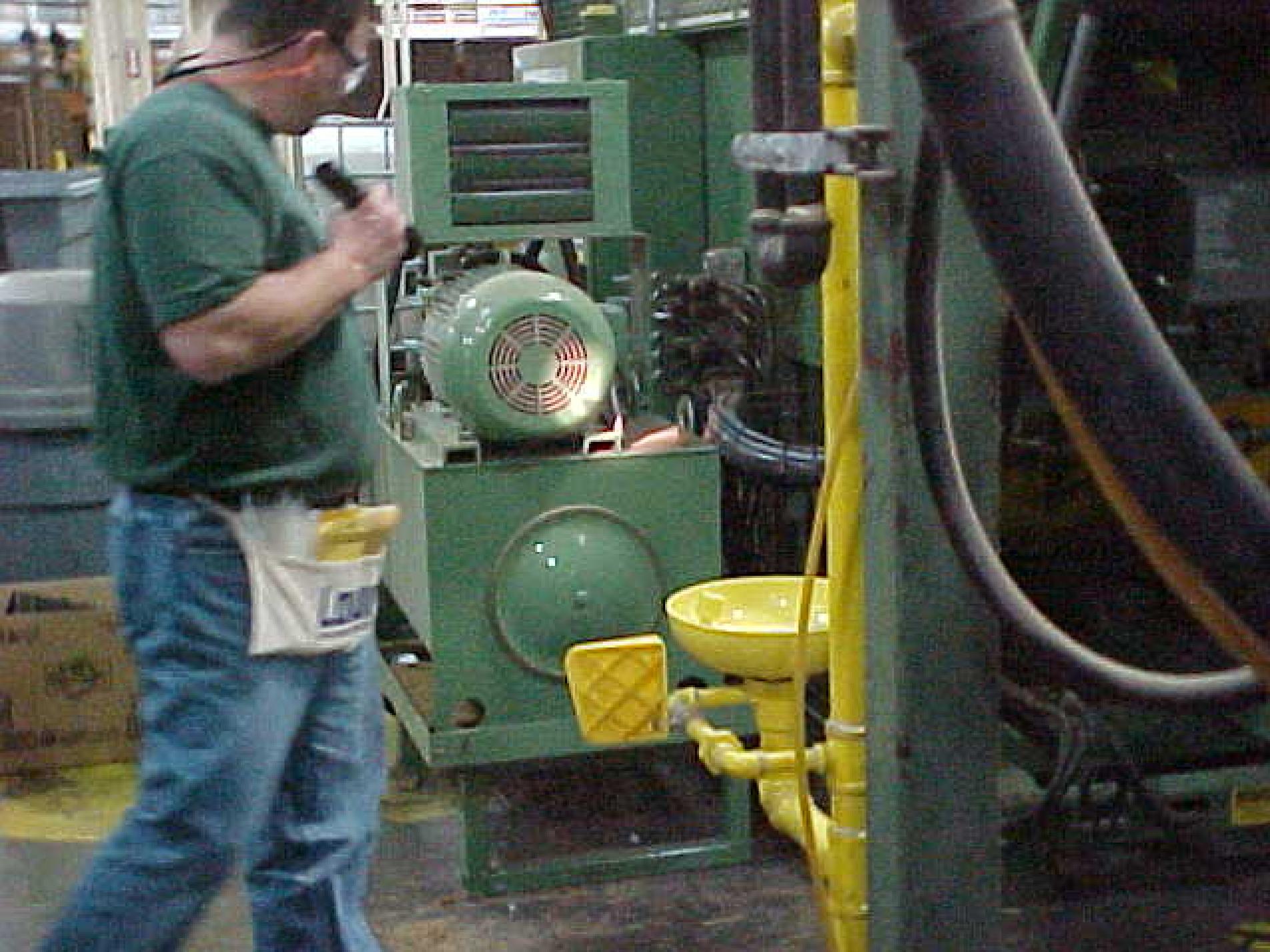
- Rotational
- Translational
- Pinch points
- Electrical
- Mechanical
- Pneumatic / Hydraulic
- Stored Energy
- Radiation Sources
- Work Areas and Environmental
- Slips and Trips
- Traffic
- Material Handling
- Acts and Practices

# Rotational

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# ***Communicate With the Stakeholders***

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Refocus on VPP criteria and elements

- VPP is a very employee centered/involved program
- VPP information, communication, awareness, OSHA rights
  - Interviews-types to be employed and determination of who, when, where and preparation
  - Employee presentations-Areas of Excellence
- Union involvement in re-certifications
- Contractors, Temps
- Management at all stratified levels

# OSHA Team Member's Escort preparation

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- They are the site diplomats
- What they do and their selection is important
  - Access to documentation
  - Should have knowledgeable and committed employees to fill these roles
  - Involve them in the planning and the resolution stages to give them ownership in safety

# Evaluation Techniques - Formal Interview

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- OSHA will select a managerial, supervisory and at least one hourly representative from each major operating department:
  - Selection of alternates for absences.
  - Select from each shift if possible.
- Select contractors, especially mechanical & construction.

# Evaluation Techniques - Formal Interviews

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- Formal interviews are private one-on-one opportunities to determine employees' perception of:
  - Management commitment.
  - Responsibilities.
  - Knowledge of hazards & rules.
  - Empowerment.
  - Overall assessment of system.



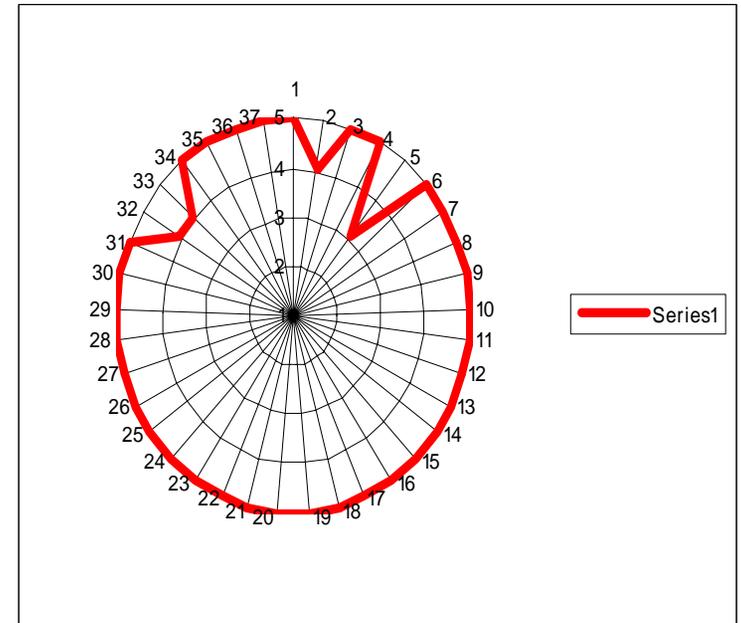
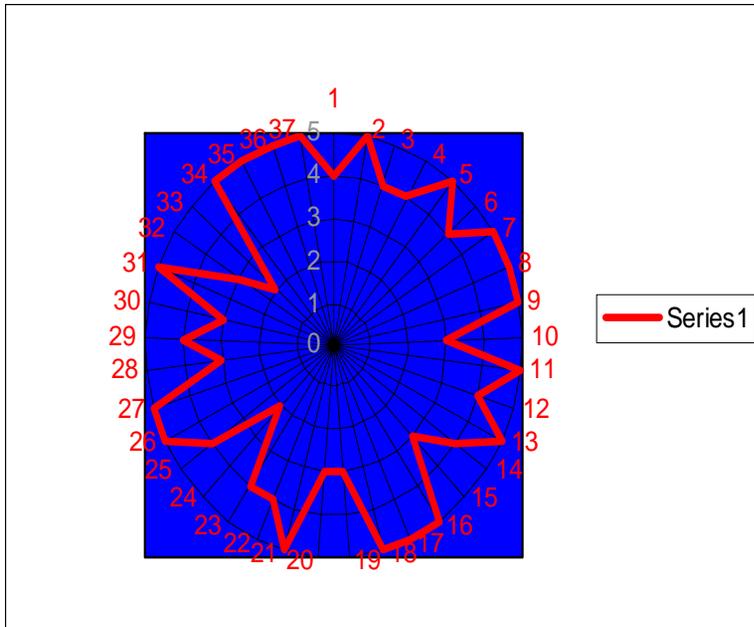
## VPP Perception Survey of Site Safety

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 OSHV VPP representative at the time of the survey.

		Rarely	Seldom	Sometimes	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 job activities					
13	Employees observed working in an unsafe manner are coached immediately on safe practices / counseled regarding their work activities.					
14	Supervisors believe safety has the same or greater value as that of production.					
15	This company provides employees with the supplies and equipment needed to work safely					
16	Discipline for safety violations is fair and consistently applied to all employees.					
17	Unsafe working conditions are corrected immediately					
18	New employees receive adequate safety training before they start work.					

# VPP Perception Survey Results

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# Informal Interviews

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- Will usually be done at the workstation
- Give the employees room to talk freely
- Give them time to talk to the team members from OSHA
- Ask for their genuine concerns and valuable input regarding site hazards
- Include them in the correction process if possible to help them gain ownership in safety

# *Game Day!*

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Team meeting/introductions, assignments and strategy discussion

## Entry at site

- Badge in / sign in procedures, orientation
  - Plant layout / org charts / general info / incidentals

## Opening conference

- Who should attend: Committees, Unions, Plant Management (Upper and Middle), visitors
- Welcome, introductions and safety for visitors review
- Site history and overview of purpose, nature, and scope of business
- Safety and health program overview, commitment to VPP, Your Plant's VPP history
- Program changes, areas of improvement
- Team windshield tour

# *Daily Activities May Not go Exactly as Planned*

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- Be flexible, it is a partnership!
- Document reviews (get bottlenecked)
- Interviews (take time and privacy)
- Walk-arounds (require knowledgeable people)
- Get the daily briefings then plan for the next day
- Worksheet preparation (is slow sometimes)



# ***The Closing Bell***

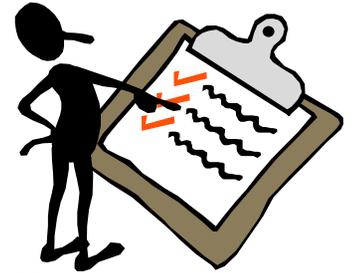
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## Closing Conference

- Review onsite activities and interviews
- Review of best practices, and significant observations
- The Team VPP recommendation
  
- Report finalization, (joint venture, again)  
90-day items, team recommendations

# The Recertification Game Plan

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- Know who is coming to the audit
- Review your annual reports
- Review all past internal and external audits to make sure everything was completed / fixed to best practice levels
- Communicate with all stakeholders
- Gather the appropriate documents (organize)
- Involve everyone in the process and get them thinking VPP
- Do a physical audit and training for the auditors before game day arrives