HIOSH INSTRUCTION

DIRECTIVE NO.: CSP 03-01-003	**EFFECTIVE DATE:** December 27, 2014
SUBJECT: Hawaii Voluntary Protection Program (HVPP): Policies and Procedures	

ABSTRACT

Purpose:	This Instruction revises and clarifies the overall framework of policy and procedure for administering the Hawaii Voluntary Protection Program.
Scope:	This Instruction applies HIOSH-wide.
Cancellations:	OSHA Instruction CSP 03-01-002, Hawaii Voluntary Protection Program (HVPP) Policies and Procedures Manual.
State Impact:	Notice of Intent Required. See Chapter 1, Paragraph VII [State Adoption Summary]
Action Offices:	All enforcement branches and HVPP Manager
Originating Agency:	OSHA. States must comply with same or similar.
Approval:	By and Under the Authority of:

Diantha Goo
Administrator, Hawaii Occupational Safety & Health Division

Executive Summary

This Instruction cancels and replaces OSHA Instruction CSP 03-01-002. The purpose of the manual is to provide guidance concerning implementation of the Hawaii Voluntary Protection Program (HVPP), including revised policies and procedures a) affecting HVPP participants covered under the Process Safety Management (PSM) Standard; and b) enabling HIOSH to employ an alternative reapproval process, the Compressed Reapproval Process to Recognize Sustained Excellence (CRP), for qualifying VPP Star participants.

Major Changes

- **Benchmark rates.** This Instruction incorporates changes published in the Federal Register Notice 68 FR 68475, December 8, 2003, that revised the benchmark injury and illness rates used within OSHA's VPP, and now the HVPP.
- **Process Safety Management.** This Instruction modifies procedures for HVPP applications, HIOSH onsite evaluations, and annual participants self-evaluations for applicants/participants subject to OSHA's Process Safety Management (PSM) standard.
- **Compressed Reapproval Process.** This Instruction introduces an alternative onsite reapproval process for HVPP participants who have demonstrated sustained excellence in safety and health systems management.
- **Other.** This Instruction removes template letters that OSHA and HIOSH periodically modifies and are more appropriately disseminated through other means. It includes changes in the VPP recognition process. It also removes temporary instructions no longer applicable, and references to specific VPP affiliates. Minor editorial changes improve readability.

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Chapter I
Introduction

I. Purpose

This instruction revises and clarifies the overall policy framework for administering the Hawaii Voluntary Protection Program (HVPP) and provides guidance on its implementation.

II. Scope

This instruction applies State-wide.

III. Cancellations

A. OSHA Instruction CSP 03-01-002, Voluntary Protection Programs (VPP): Policies and Procedures Manual, March 25, 2003.

B. GOSH on HVPP, any and all dated before April 18, 2008.

IV. Significant Changes and Significant Differences between HIOSH VPP and OSHA VPP

A. HVPP Levels. The major difference between the Hawaii VPP and the OSHA VPP is that Hawaii does not have the Merit or Demonstration levels. Hawai`i VPP consists only of the equivalent to the OSHA Star level. Employers not yet ready for HVPP status can obtain assistance through the regular consultation program and receive recognition through the Hawaii SHARP.

B. STAR-Mentor. Hawaii has discontinued the Star and Star-Mentor levels since the mentoring program is now administered nationally through the Voluntary Protection Program Participants Association (VPPPA).

C. Participation Levels. In addition to fixed worksites, HVPP has been extended to Mobile workforces in both construction and general industry. Hawai`i has not adopted the OSHA Corporate participation level.

D. Fatalities: An applicant must not have any work-related fatalities during the 36 months prior to the application.

E. Assurances. The applicant must assure HIOSH that the employees at the site support HVPP participation; that the applicant, within 90 days, will correct and provide proof of abatement of all hazards related to HIOSH requirements and identified during the onsite evaluation; and that the applicant will correct in a timely manner any other hazards discovered through any means. The applicant must assure that it will provide effective interim protection.

F. Injury and Illness Rate Calculations. Sites must now report combined injury and illness rates. At HVPP site-based establishments, the 3-year total case incidence rate for recordable illnesses and injuries (TCIR) and the 3-year case incidence rate for days away from work, restricted work activity, and/or job transfer (DART rate) must be below at least one of the 3 most recent years of specific industry national and Hawai`i averages for nonfatal injuries and illnesses at the most precise level published by BLS. Qualifying smaller worksites may use an alternative method of calculating rates that allows them to use the best 3 out of the most recent 4 years

injury and illness experience.

G. Contractor Coverage. Requirements for contract worker safety and health at HVPP participant sites have been expanded and new requirements to report contractor illness and injury rates have been added.

H. Process Safety Management. Procedures to evaluate applicants/participants covered under the Process Safety Management (PSM) standard have been modified.

I. Clarification and Strengthening of Program Element Requirements. Employee involvement, worksite analysis, and hazard prevention and control requirements have been revised to include:

1. The requirement for access to and use of licensed occupational health care professionals, and

2. An emphasis on the greater effectiveness of engineering controls within the hierarchy of controls.

In addition, Hawai`i will assess a participant's safety and health management system using the OSHA Form-33, Safety and Health Program Assessment Worksheet.

J. Frequency of Onsite Evaluations. Onsite evaluations of site-based HVPP participants may now be conducted every 3 to 5 years after initial approval, and every 2 years for mobile workforce participants. Additional onsite evaluations may be conducted to reassess the participant's continuing qualification for HVPP following the occurrence of a reportable accident, or other information suggesting that the participants' safety and health management system may not be up to HVPP standards.

K. Termination. Formal termination procedures have now been established, including a site's right to appeal an HIOSH request for withdrawal or termination.

V. References

A. Sections 12–60–2 (Part 2, General Industry) and 12–110–2 (Part 3, Construction), Hawai`i Administrative Rules (HAR), Safety and Health Program requirements for all employers.

B. "Revisions to the Voluntary Protection Programs to Provide Safe and Healthful Working Conditions," *Federal Register* notice 74:927–952, January 9, 2009.

C. OSHA Instruction CSP 03–01–003, Voluntary Protection Programs (VPP): Policies and Procedures Manual," April 18, 2008.

D. "Policies and Procedures Manual for Special Government Employee (SGE) Activity Conducted Under the Auspices of the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Program," OSHA Instruction #CSP 03–01–001, January 4, 2002. Hereafter referred to as the SGE Policies and Procedures Manual.

E. Revised VPP Policy Memorandum #5: Further Improvement to the Voluntary Protection Programs (VPP), June 28, 2011.

VI. Action Information

A. Responsible Office: HIOSH, Administration and Technical Support Branch.

B. Action Offices: HIOSH, Occupational Safety and Occupational Health Branches, and HVPP Manager.

C. Information Offices: HIOSH, Consultation & Training Branch.

VII. Federal Program Change

The Hawaii Occupational Safety and Health Division (HIOSH) has adopted many of the changes in the OSHA VPP: Policies and Procedures Manual, CSP 03–01–003, effective date April 18, 2008 with some differences due to Hawaii law and program structure.

HIOSH is now required to post its entire VPP policies and procedures documentation, including its response to OSHA regarding adoption and whether Hawaii policies will be identical to or different from the Federal on its website.

VIII. Definitions

A. 1–Year Conditional Goal. A target for correcting deficiencies in safety and health management system elements or sub–elements identified by HIOSH during the onsite evaluation of a HVPP participant. Such deficiencies, which indicate that a site no longer fully meets HVPP requirements, must be corrected within 90 days, and the participant must then operate at the HVPP level for 1 year, for the participant's conditional status to be lifted. Failure to meet this requirement will result in termination from HVPP.

B. 90–Day Items. Compliance–related issues that must be corrected within a maximum of 90 days, with effective protection provided to employees in the interim.

C. Annual Evaluation. A participant's yearly self–assessment to gauge the effectiveness of all required HVPP elements and any other elements of the participant's safety and health management system.

D. Annual Submission. A document written by a participant and submitted to HIOSH by February 15th each year, consisting of the following information: Updated names and addresses; the participant's and applicable contractors' injury and illness case numbers and rates, average annual employment and hours worked for the previous calendar year; a copy of the most recent annual evaluation of the participant's safety and health management system; descriptions of significant changes or events; progress made on the previous year's recommendations, 1–Year Conditional goals (if applicable); and any success stories. [See Appendix C for the Annual Submission Format.] Additionally, participants covered by the Process Safety Management Standard (PSM) will be required to respond to applicable questions from the annual VPP PSM questionnaire.

E Applicable Contractor. A contractor whose employees worked at least 1,000 hours for a HVPP participant in any calendar quarter within the last 12 months and are not directly supervised by the applicant/participant.

F. Accepted Application. An application that has been reviewed by the HIOSH Occupational Safety Branch and found to be complete. Also referred to as a completed application.

G. Backup Team Leader. A member of an onsite evaluation team who provides assistance to the team leader and can assume his/her duties when necessary.

H. Compliance Officer (CSHO). A compliance safety or health officer (OSHCO) In the Occupational Safety Branch or an environmental health specialist (EHS) working for the Occupational Health Branch.

I. Contract Employees. Those individuals who are employed by a company that provides services under contract to the HVPP applicant or participant, usually at the HVPP applicant's or participant's worksite.

J. Days Away, Restricted, and/or Transfer Case Incidence Rate (DART rate). The rate of all injuries and illnesses resulting in days away from work, restricted work activity, and/or job transfer. This rate is calculated for a worksite for a specified period of time (usually 1 to 3 years). [See Appendix A.]

K Federal Register. The official Federal government publication, published by the Government Printing Office (GPO), in which OSHA announces the philosophy and criteria for VPP approval and participation in a public notice commonly referred to as the "VPP Federal Register Notice".

L. General Contractor. A construction site owner or site manager who controls construction operations and has contract responsibility for assuring safe and healthful working conditions at a worksite.

M. Injury/Illness Rates. Numerical rates that represent recordable injuries and illnesses at a worksite and that are an important factor when HIOSH assesses an applicant/participant's qualification for HVPP. [See VIII. J. above and VIII.HH. below.)

N. Mentoring. The assistance that a HVPP or VPP participant provides to another worksite to improve that site's safety and health management system or prepare it for HVPP application or participation.

O. Onsite Assistance Visit. A visit to an applicant or participant site by a HIOSH HVPP Manager, or other non–enforcement personnel, to offer assistance to the site including help with their application, conduct a records review, and/or make general observations about the site's safety and health management system.

P. Onsite Evaluation. A visit to an applicant or participant site by a HIOSH onsite evaluation team to determine whether the site qualifies to participate, or can continue participation.

Q. Onsite Evaluation Report. A document written by the HIOSH onsite evaluation team and consisting of the site report and site worksheet [see Appendix D]. This document contains the team's assessment of an applicant/participant's safety and health management system and the team's recommendation regarding approval of the applicant or reapproval of the participant in HVPP.

R. Onsite Evaluation Team. An interdisciplinary group of HIOSH professionals and sometimes other government employees who conduct onsite evaluations. The team normally consists of a team leader, a backup team leader, safety and health specialists, and other specialists as appropriate.

S. Process Hazard Analysis (PHA). For the purposes of this document, a PHA is an organized and systematic effort to identify and analyze the significance of potential hazards associated with the processing or handling of highly hazardous chemicals.

T. Process Safety Management (PSM). A reference to OSHA standard 29 CFR 1910.119 and 1926.64, which covers all employers who either use or produce highly hazardous chemicals exceeding specified limits.

U. PSM Application Supplement. A series of questions designed to establish a basic understanding of a HVPP applicant's PSM policies and procedures. Applicants covered by the PSM Standard must submit responses to the PSM application supplement along with their HVPP application.

V. PSM "Level 1" Auditor. A PSM "Level 1" Auditor is a HIOSH employee with experience in the chemical processing or refining industries.

1. Specific requirements for a PSM "Level 1" Auditor include:

   a. The OSHA Training Institute's (OTI) Courses 3300, Safety and Health in the Chemical Processing Industries, and 3400, Hazard Analysis in the Chemical Processing Industries.

   b. Advanced training such as OTI Course 3410, Advanced Process Safety Management, or other equivalent specialized seminars in PSM.

   c. Prior experience in chemical industry safety. This experience should include experience obtained in any one of the following ways:

      - Through accident investigations in chemical, petrochemical or refinery plants involving fires, explosions, and/or toxic chemical releases;
      - Through previous chemical inspections involving process safety management evaluations; or
      - Through previous chemical industry employment.

2. Special Government Employees may alternatively serve in the capacity of a PSM "Level 1" Auditor upon demonstrating training and experience equivalent to the above requirements.

W. PSM Questionnaire. A document compiled annually using selected questions from OSHA's Dynamic Inspection Priority Lists. The PSM Questionnaire is a supplemental document required from participants covered under the PSM standard as part of their Annual Submission.

X. Recommendations. Suggested improvements noted by the onsite evaluation team that are not requirements for HVPP participation but that would enhance the effectiveness of the site's safety and health management system. (Compliance with HIOSH standards is a requirement, not a recommendation.)

Y. Resident Contractor. A company that provides ongoing, onsite services to a HVPP applicant/participant.

Z. Safety and Health Management System. For the purposes of HVPP, a method of preventing worker fatalities, injuries and illnesses through the ongoing planning, implementation, integration, and control of four interdependent elements: Management Leadership and Employee Involvement; Worksite Analysis; Hazard Prevention and Control; and Safety and Health Training. This is the same as a "safety and health program", which is required of all employers in Hawai`i (see §12-60-2 (general industry), and §12-110-2 (construction), HAR)

AA. Small Business. A company having no more than 250 employees at any one facility, and no more than 500 employees nationwide.

BB. Special Government Employee (SGE). An employee volunteer from a VPP or HVPP participant or corporation, knowledgeable in safety and health management system assessment, formally trained by HIOSH in the policies and

procedures of the HVPP, and determined by HIOSH to be qualified to perform HVPP onsite evaluations, who participates as a team member on HVPP onsite evaluations.

CC. Star Program. The program within VPP designed for sites whose safety and health management systems operate in a highly effective, self-sufficient manner and meet all VPP requirements. Star is the highest level of VPP participation. Hawai`i only has Star level in its HVPP. The two terms are synonymous for Hawai`i.

DD. State Plan. A state-operated occupational safety and health program that has received approval and partial funding from Federal OSHA.

EE. Team Leader. The HIOSH staff person who coordinates the HIOSH onsite evaluation team and ensures that all evaluation activities are performed. [See Chapter 6.II.C.2.]

FF. Temporary Employees. Employees hired on a non-permanent basis by the applicant/participant.

GG. Termination. Formal removal by HIOSH of a HVPP participant from the program.

HH. Total Case Incidence Rate (TCIR). A number that represents the total recordable injuries and illnesses per 100 full-time employees, calculated for a worksite for a specified period of time (usually 1 to 3 years). [See Appendix A.]

II. VPP Activity Log. The monthly log of HVPP activity that is submitted to the Administrator and to the OSHA Honolulu Area Director.

JJ. HVPP Approval Ceremony. An event planned by the approved worksite and normally held at the site, where a representative from HIOSH recognizes the site's achievement, presents the HVPP certificate or plaque, and presents the HVPP flag.

KK. VPP Automated Data System (VADS). An OSHA database that includes information on approved VPP participants (under Federal or state plan jurisdiction) and VPP applicants (under Federal jurisdiction).

LL. HVPP Manager. The HIOSH person directly responsible for the day-to-day operations of the HVPP in the State.

MM. HVPP Participant Representative. The person designated by an applicant or participant is the primary contact regarding HVPP activity at the worksite.

NN. Withdrawal. Decision by the applicant or participant to discontinue pursuing or participating in the HVPP.

OO. Worksite. For HVPP purposes, a worksite is a location where work is performed by employees of an employer. [See Chapter 5.II.B.]

IX. Background

The Occupational Safety and Health Administration (OSHA) on July 2, 1982, announced establishment of the Voluntary Protection Programs (VPP) to recognize and promote effective worksite-based safety and health management systems. In the VPP, management, labor, and OSHA establish cooperative relationships at workplaces that have implemented comprehensive safety and health management systems. Approval into VPP is OSHA's official recognition of the outstanding efforts of employers and employees who have created exemplary worksite safety and health management

systems. OSHA offers assistance to sites committed to achieving the VPP level of excellence.

The enabling legislation for VPP is Section (2)(b)(1) of the OSH Act, which declares the Congress's intent "*to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources --(1) by encouraging employers and employees in their efforts to reduce the number of occupational safety and health hazards at their places of employment, and to stimulate employers and employees to institute new and to perfect existing programs for providing safe and healthful working conditions. . . .*"

HIOSH has also identical enabling legislation in Section 396-2, Hawaii Revised Statute, and has adopted a Voluntary Protection Program called the Hawaii Voluntary Protection Program (HVPP).

X. HVPP Principles

The following principles are embodied in the Hawaii Voluntary Protection Programs:

A. Voluntarism. Participation in HVPP is strictly voluntary. The applicant who wishes to participate freely submits information to HIOSH on its safety and health management system, goes above and beyond compliance with the Hawai`i OSH Law and applicable requirements, and opens itself to agency review.

B. Cooperation. HIOSH has long recognized that a balanced, multifaceted approach is the best way to accomplish the goals of the HIOSH Law. HVPP's emphasis on trust and cooperation between HIOSH, the employer, employees, and employees' representatives complements the agency's enforcement activity, but does not take its place. HVPP staff and HVPP participants work together to resolve any safety and health problems that may arise. This partnership enables HIOSH to remove participants from programmed inspection lists, allowing HIOSH to focus its inspection resources on establishments in greater need of agency oversight and intervention. However, HIOSH continues to investigate valid employee safety and health complaints, fatalities, catastrophes, and other significant events at HVPP participant sites.

C. A Systems Approach. Compliance with the HIOSH Law and all applicable HIOSH requirements is only the starting point for HVPP sites. HVPP participants develop and implement systems to effectively identify, evaluate, prevent, and control occupational hazards so that injuries and illnesses to employees are prevented. Star sites, in particular, are often on the leading edge of hazard prevention methods and technology. As a result, HVPP worksites serve as models of safety and health excellence, demonstrating the benefits of a systems approach to worker protection.

D. Model Worksites for Safety and Health. HIOSH selects HVPP participants based on their written safety and health management system, the effective implementation of this system over time, and their performance in meeting HVPP requirements. Not all worksites are appropriate candidates for HVPP. At qualifying sites, all personnel are involved in the effort to maintain rigorous, detailed attention to safety and health. HVPP participants often mentor other worksites interested in improving safety and health, participate in safety and health outreach and training initiatives, and provide HIOSH with input on proposed policies and standards. They also share best practices and promote excellence in safety and health in their industries and communities.

E. Continuous Improvement. HVPP participants must demonstrate continuous improvement in the operation and impact of their safety and health management systems. Annual HVPP self-evaluations help participants measure success, identify areas needing improvement, determine needed changes, and track the implementation of these changes. HIOSH onsite evaluation teams verify this improvement.

F. Employee and Employer Rights. Participation in HVPP does not diminish employee and employer rights and responsibilities under HIOSH Law.

XI. Categories of Participation

HVPP consists of:

A. Star Program. The Star Program recognizes the safety and health excellence of worksites where workers are successfully protected from fatality, injury, and illness by the implementation of comprehensive and effective workplace safety and health management systems. These worksites are self-sufficient in identifying and controlling workplace hazards.

B. Reserved

C. Reserved

XII. The Elements

To qualify for HVPP, a site must operate a comprehensive safety and health management system that includes four essential elements and their sub-elements. These elements, when integrated into a site's daily operations, can reduce the incidence and severity of illnesses and injuries:

1. Management leadership and employee involvement
2. Worksite analysis
3. Hazard prevention and control
4. Safety and health training

Chapter II
Responsibilities

I. Introduction

This chapter describes HIOSH's responsibilities for managing the HIOSH Voluntary Protection Programs (HVPP). These responsibilities must be carried out by the identified individual or his/her designee.

II. HVPP Manager

The Hawaii Voluntary Protection Program (HVPP) Manager is responsible for the day-to-day management of the HVPP. He/she must develop and maintain a working knowledge of the HVPP and must:

A. Application Processing. Review and process applications to the HVPP in accordance with Chapter 5. In addition:

1. Provide application information and assistance to interested employers, employee groups, and other parties such as trade associations, state and local governments.
2. Obtain from the OSHA website and review the applicant's HIOSH inspection history to determine its eligibility for HVPP.
3. Review all HVPP applications and onsite evaluation reports. Review all evaluation reports and HVPP Team recommendations, to ensure that the HVPP requirements are met and clearly documented. Make recommendations or decisions for participation, as appropriate.
4. Ensure that Onsite Evaluation Team conducting HVPP evaluations have access to resources and expertise as needed to effectively implement the program.

B. Onsite Evaluations.

1. Ensure an onsite evaluation is conducted within 6 months of receipt of a completed application.
2. Schedule onsite evaluations, taking into consideration due dates, deadlines, priorities, and coordination with company officials.
3. Notifies the Compliance Branch Managers to place the site on the Programmed Inspection Removal List so that all CSHOs are aware that programmed inspections may not be conducted. Such removal may occur no more than 75 days prior to the onsite evaluation.
4. Ensure that an onsite evaluation report is drafted onsite, including a preliminary recommendation for the HIOSH Administrator's consideration.
5. Review any requests to extend the period between onsite evaluations for a site and determine whether the extension will be granted.
6. Forward the onsite evaluation report plus recommendation or decision to the HIOSH Administrator.

C. Approval.

1. Ensure completion of onsite evaluation report.
2. Prepare appropriate documentation for the HIOSH Administrator's decisions and signature.
3. Inform applicants and Onsite Evaluation team of the HIOSH Administrator's decisions regarding approval.
4. Forward copies of the following documents to the participant and appropriate labor unions.
    a. HIOSH Administrator's approval or congratulatory letter.
    b. The onsite evaluation report for newly approved participants.

D. Annual Submissions from HVPP Participants (See Appendix C.)

1. Ensure that each HVPP participant's annual submission is received by February 15th of each year. On a case-by-case basis, additional time, not to exceed 45 days, may be negotiated by the HVPP Manager and a company's HVPP representatives. If, after 45 days, the annual submission has not been received, the site may be asked to withdraw from the program.
2. Review the annual submissions and:
    a. Request an explanation from the participant if a substantial increase (or decrease) in rates or some problem with the program evaluation is noted.
    b. If an unresolved serious problem is evident, make arrangements with the company for an onsite assistance visit.
3. As a courtesy, notify the site in writing that the annual evaluation submission has been received. Note any areas of concern.

E. Reapproval.

1. Track current HVPP participants and ensure that onsite evaluations to determine a recommendation for reapproval are scheduled and conducted in accordance with Chapter 6.II.A.
2. Obtain the HIOSH Administrator's approval for any requests to extend with just cause the period between onsite evaluations.
3. Any approved extensions of time between onsite evaluations must be documented and copied to the case file.

F. Withdrawal or Termination. Upon receiving a withdrawal letter from a participant, or upon termination of a participant, the HVPP Manager must:

1. Remove the participant's application, onsite evaluation reports, approval letters, and annual evaluations from the public file.
2. Notify the Enforcement Branch Managers of the withdrawal or termination so that the site may be returned to the programmed inspection list, if applicable, at the time of the next inspection cycle.
3. Notify the HIOSH Administrator in writing of any withdrawals or terminations and the reason(s) for withdrawal.

G. Special Circumstances.

1. Discuss any change in ownership, organization, and union representation (if applicable) with the participant representative, and schedule an onsite visit if needed to evaluate the change's impact. Update the information in the case file.
2. Coordinate and review any formal or non-formal complaints, referrals, fatalities or catastrophes, accidents or incidents, and resultant inspection reports or letters. (See Chapter 8)

H. Ongoing Assistance. The HVPP Manager will be available to assist participants as needed, e.g., when changes occur at the site that may affect continued participation.

I. Maintenance of Participant Files.

The HVPP Manager must maintain a public file of all approved participants in the State and make available to the public on request:

1. HVPP application and amendments.
2. Onsite evaluation reports.
3. HVPP Manager's letter of recommendation and transmittal memo to HIOSH Administrator.
4. Administrator's approval letters.
5. Notification to enforcement staff, including Occupational Health Branch of removal of participant from inspection scheduling system.
6. Participant's annual self-evaluations.
7. Related formal correspondence.

J. Database. With support from the ATS Branch develop and maintain a comprehensive database of HVPP participants' information including, but not limited to, name, location, contact person, telephone number, approval date, HVPP status, TCIR and DART rate, union information if applicable, and number of employees.

K. Training. Coordinate with the OSHA Training Institute (OTI) to develop and deliver training curricula for HIOSH staff and Special Government Employees (SGEs) in the knowledge and skills required to effectively administer the HVPP.

L. Reports. Complete monthly activity reports to the Administrator and OSHA Honolulu Area Director and Significant Incident Report as they occur.

III. Administration and Technical Support Branch (ATS)

ATS is responsible for:

A. Policies and Procedures. ATS must develop, interpret, and revise, as needed, policies and procedures for the administration and management of the HVPP, including the *Federal Register* Notices and the VPP Policies and Procedures Manual.

B. Awards. ATS must ensure that all certificates, plaques and flags are prepared and available for presentation at the awards ceremony.

C. State Plan Changes. HIOSH must submit proposed change supplements relating to HVPP, in accordance with the State Plan Policies and Procedures Manual, STP 2-0.22B.

IV. Administrator

A. Promoting HVPP. In promoting HVPP, the Administrator must:

1. Promote HVPP publicly by:
    a. Giving speeches and presentations and attending HVPP ceremonies.
    b. Ensuring that CSHOs are knowledgeable about HVPP requirements and objectives and encouraging them to identify possible candidates.
    c. Referring likely VPP candidates to the HVPP Manager.
    d. Maintaining communications with HVPP participants about HIOSH standards and policies, training needs and outreach.
    e. Supporting HVPP activity to the greatest extent possible.
2. Encourage HVPP participants, where appropriate, to assist HIOSH with accomplishing its mission, e.g., ask HVPP participants to “sell” the value of safety and health to sites on the Inspection Scheduling System (ISS).
3. Respond completely and promptly to public and media inquiries about HVPP.

B. Ensure that the HVPP Manager and HVPP Team has access to resources and expertise as needed to effectively manage and execute the program.

C. Review all HVPP onsite evaluation reports. Make decisions for participation.

D. Review any requests to extend the period between onsite evaluations for a participant and determine whether the extension will be granted.

E. Review all recommendations for termination or withdrawal and make decision for continued participation.

Chapter III

Requirements for Star, Resident Contractor, and Construction Industry

I. Introduction

This chapter details requirements for the Star programs as well as the unique requirements for the construction industry and for resident contractor at HVPP participants.

II. The Star Program

The Star Program recognizes the very best workplaces that are in compliance with HIOSH regulations and that operate outstanding safety and health management systems for worker protection. All of the HVPP requirements detailed below must be in place and working effectively for at least 1 year prior to Star approval.

A. Term of Participation. There is no limit to the term of participation in Star, as long as a site continues to meet all Star requirements and to maintain Star quality.

B. Injury and Illness History Requirements. Evaluate the applicant/participant's injury and illness history by using a 3-year total case incidence rate (TCIR) and a 3-year days away, restricted, and/or job transfer incidence rate (DART rate). (See Appendix A.) The 3-year TCIR and DART rates must be below at least 1 of the 3 most recent years of specific industry national and Hawaii state averages for nonfatal injuries and illnesses at the most precise level published by the Bureau of Labor Statistics (BLS). Compare rates to a single year.

An alternative rate calculation may be used for eligible smaller worksites using their best 3 out of the most recent 4 years of incidence rates. (See Appendix A.)

C. Enforcement Status/History. Applicants must have no open enforcement cases, including cases in contest, long-term abatements pending, nor open whistleblower investigations. In addition, applicants must not have had any willful citations issued within the past 36 months.

D. Fatalities. Applicants must not have had any fatalities at any worksite within the previous 36 months.

E. Comprehensive Safety and Health Management System Requirements. The following safety and health management system elements and sub-elements must be implemented. For small applicants/participants, at the discretion of the onsite team, some of the requirements may be implemented and documented less formally.

1. Management Leadership and Employee Involvement

a. Management Commitment. Management demonstrates its commitment by:

- Establishing, documenting, and communicating to employees and contractors clear goals that are attainable and measurable, objectives that are relevant to workplace hazards and trends of injury and illness, and policies and procedures that indicate

how to accomplish the objectives and meet the goals.

- Signing a statement of commitment to safety and health.
- Meeting and maintaining HVPP requirements.
- Maintaining a written safety and health management system that documents the elements and sub-elements, procedures for implementing the elements, and other safety and health programs including those required by HIOSH standards.
- Identifying persons whose responsibilities for safety and health includes carrying out safety and health goals and objectives, and clearly defining and communicating their responsibilities in their written job descriptions.
- Assigning adequate authority to those persons who are responsible for safety and health, so they are able to carry out their responsibilities.
- Providing and directing adequate resources (including time, funding, training, personnel, etc.) to those responsible for safety and health, so they are able to carry out their responsibilities.
- Holding those assigned responsibility for safety and health accountable for meeting their responsibilities through a documented performance standards and appraisal system.
- Planning for typical as well as unusual/emergency safety and health expenditures in the budget, including funding for prompt correction of uncontrolled hazards.
- Integrating safety and health into other aspects of planning, such as planning for new equipment, processes, buildings, etc.
- Establishing lines of communication with employees and allowing for reasonable employee access to top management at the site.
- Setting an example by following the rules, wearing any required personal protective equipment, reporting hazards, reporting injuries and illnesses, and basically doing anything that they expect employees to do.
- Ensuring that all workers (including contract workers) are provided equal, high-quality safety and health protection.
- Conducting an annual evaluation of the safety and health management system in order to:
  - Maintain knowledge of the hazards of the worksite.
  - Maintain knowledge of the effectiveness of system elements.
  - Ensure completion of the previous years' recommendations.
  - Modify goals, policies, and procedures.

b. Employee Involvement. Employees must be involved in the safety and

health management system in at least three meaningful, constructive ways in addition to their right to report a hazard. Avenues for employees to have input into safety and health decisions include participation in audits, accident/incident investigations, self-inspections, suggestion programs, planning, training, job hazard analyses, and appropriate safety and health committees and teams. Employees do not meet this requirement by participating in incentive programs or simply working in a safe manner.

- Employees must be trained for the task(s) they will perform. For example, they must be trained in hazard recognition to participate in self-inspections.
- Employees must receive feedback on any suggestions, ideas, reports of hazards, etc. that they bring to management's attention. An applicant/participant must provide documented evidence that employees' suggestions were followed up and implemented when appropriate and feasible.
- All employees, including new hires, must be notified about the site's participation in HVPP and employees' rights (such as the right to file a complaint) under the HIOSH Law. Orientation training curriculum must include this information.
- Employees and contractors must demonstrate an understanding of and be able to describe the fundamental principles of HVPP.

c. Contract Worker Coverage. Contract workers must be provided with safety and health protection equal in quality to that provided to employees.

- All contractors, whether regularly involved in routine site operations or engaged in temporary projects such as construction or repair, must follow the safety and health rules of the host site.
- HVPP participants must have in place a documented oversight and management system covering applicable contractors. Such a system must:
  - Ensure that safety and health considerations are addressed during the process of selecting contractors and when contractors are onsite.
  - Encourage contractors to develop and operate effective safety and health management systems.
  - Include provisions for timely identification, correction, and tracking of uncontrolled hazards in contractor work areas.
  - Include a provision for removing a contractor or contractor's employees from the worksite for safety or health violations. Note: A worksite may have been operating effectively for 1 year without actually invoking this provision if just cause to remove a contractor or contractor's employee did not occur.
- Injury and Illness Data Requirements.

- Nested contractors (such as contracted maintenance workers) and temporary employees who are supervised by host site management are governed by the site's safety and health management system and are therefore included in the host site's rates.
- Management must maintain copies of the TCIR and DART rate data for all applicable contractors based on hours worked at the site. (See Appendix A.)
- Participants must report all applicable contractors' TCIR and DART rate data to HIOSH annually.

- Training. Managers, supervisors, and non-supervisory employees of contract employers must be made aware of:
  - The hazards they may encounter while on the worksite.
  - How to recognize hazardous conditions and the signs and symptoms of workplace-related illnesses and injuries.
  - The implemented hazard controls, including safe work procedures.
  - Emergency procedures.

d. Safety and Health Management System Annual Evaluation. There must be a system and written procedures in place to annually evaluate the safety and health management system. The annual evaluation must be a critical review and assessment of the effectiveness of all elements and sub-elements of a comprehensive safety and health management system. An annual evaluation that is merely a workplace inspection with a brief report pointing out hazards or a general statement of the sufficiency of the system is inadequate for purposes of HVPP qualification.

- The written annual evaluation must identify the strengths and weaknesses of the safety and health management system and must contain specific recommendations, time lines, and assignment of responsibility for making improvements. It must also document actions taken to satisfy the recommendations.
- The annual evaluation may be conducted by site employees with managers, qualified corporate staff, or outside sources who are trained in conducting such evaluations.
- At least one annual evaluation and demonstrated corrective action must be completed before HVPP approval.
- The annual evaluation must be included with the participant's annual submission to HIOSH. Appendix C provides a suggested format.

2. Worksite Analysis. A hazard identification and analysis system must be implemented to systematically identify basic and unforeseen safety and health hazards, evaluate their risks, and prioritize and recommend methods to eliminate or control hazards to an acceptable level of risk. Through this system, management must gain a thorough knowledge of the safety and health hazards and employee risks. The required methods of hazard

identification and analysis are described below.

a. Baseline Safety and Industrial Hygiene Hazard Analysis. A baseline survey and analysis is a first attempt at understanding the hazards at a worksite. It establishes initial levels of exposure (baselines) for comparison to future levels, so that changes can be recognized. Systems for identifying safety and industrial hygiene hazards, while often integrated, may be evaluated separately. Baseline surveys must:

- Identify and document common safety hazards associated with the site (such as those found in HIOSH regulations or building standards, for which existing controls are well known), and how they are controlled.
- Identify and document common health hazards (usually by initial screening using direct-reading instruments) and determine if further sampling (such as full-shift dosimetry) is needed.
- Identify and document safety and health hazards that need further study.
- Cover the entire work site; indicate who conducted the survey, and when it was completed.

The original baseline hazard analysis need not be repeated subsequently unless warranted by changes in processes, equipment, hazard controls, etc.

b. Hazard Analysis of Routine Jobs, Tasks, and Processes. Task-based or system/process hazard analyses must be performed to identify hazards of routine jobs, tasks, and processes in order to recommend adequate hazard controls. Acceptable techniques include, but are not limited to: Job Hazard Analysis (JHA), and Process Hazard Analysis (PHA).

- Hazard analyses should be conducted on routine jobs, tasks and processes that:
  - Have written procedures.
  - Have had injuries/illnesses associated with them or have experienced significant incidents or near-misses.
  - Are perceived as high-hazard tasks, i.e., they could result in a catastrophic explosion, electrocution, or chemical over-exposure.
  - Have been recommended by other studies and analyses for more in-depth analysis.
  - Are required by a regulation or standard.
  - Any other instance when the HVPP applicant or participant determines that hazard analysis is warranted.

c. Hazard Analysis of Significant Changes. Hazard analysis of significant changes, including but not limited to non-routine tasks (such as those performed less than once a year), new processes, materials, equipment and facilities, must be conducted to identify uncontrolled

hazards prior to the activity or use, and must lead to hazard elimination or control.

If a non-routine or new task is eventually to be done on a routine basis, then a hazard analysis of this routine task should subsequently be developed.

d. Pre-use analysis. When a site is considering new equipment, chemicals, facilities, or significantly different operations or procedures, the safety and health impact to the employees must be reviewed. The level of detail of the analysis should be commensurate with the perceived risk and number of employees affected. This practice should be integrated in the procurement/design phase to maximize the opportunity for proactive hazard controls.

e. Documentation and Use of Hazard Analyses. Hazard analyses performed to meet the requirements of c. or d. above must be documented and must:

- Consider both health and safety hazards.
- Identify the steps of the task or procedure being analyzed, hazard controls currently in place, recommendations for needed additional or more effective hazard controls, dates conducted, and responsible parties.
- Be used in training in safe job procedures, in modifying workstations, equipment or materials, and in future planning efforts.
- Be easily understood.
- Be updated as the environment, procedures, or equipment change, or errors are found that invalidate the most recent hazard analyses.

f. Routine Self-Inspections. A system is required to ensure routinely scheduled self-inspections of the workplace. It must include written procedures that determine the frequency of inspection and areas covered; those responsible for conducting the inspections; recording of findings; responsibility for abatement; and tracking of identified hazards for timely correction. Findings and corrections must be documented.

- Inspections must be made at least monthly, with the actual inspection schedule being determined by the types and severity of hazards.
- The entire worksite must be covered at least once each quarter.
- Top management and others, including employees who have knowledge of the written procedures and hazard recognition, may participate in the inspection process.
- Personnel qualified to recognize workplace hazards, particularly hazards peculiar to their industry, must conduct inspections.

- Documentation of inspections must evidence thoroughness beyond the perfunctory use of checklists.

g. Hazard Reporting System for Employees. The applicant/participant must operate a reliable system that enables employees to notify appropriate management personnel in writing--without fear of reprisal--about conditions that appear hazardous, and to receive timely and appropriate responses. The system can be anonymous and must include timely responses to employees and tracking of hazard elimination or control to completion.

h. Industrial Hygiene (IH) Program. A written IH program is required. The program must establish procedures and methods for identification, analysis, and control of health hazards for prevention of occupational disease.

- IH Surveys. Additional expertise, time, technical equipment, and analysis beyond the baseline survey may be required to determine which environmental contaminants (whether physical, biological, or chemical) are present in the workplace, and to quantify exposure so that proper controls can be implemented.
- Sampling Strategy. The written program must address sampling protocols and methods implemented to accurately assess employees' exposure to health hazards. Sampling should be conducted when:
  - Performing baseline hazard analysis, such as initial screening and grab sampling.
  - Baseline hazard analysis suggests that more in-depth exposure analysis, such as full-shift sampling, is needed.
  - Particularly hazardous substances (as indicated by an HIOSH standard, chemical inventory, safety data sheet, etc.) are being used or could be generated by the work process.
  - Employees have complained of signs of illness.
  - Exposure incidents or near-misses have occurred.
  - It is required by a standard or other legal requirement.
  - Changes have occurred in such things as the processes, equipment, or chemicals used.
  - Controls have been implemented and their effectiveness needs to be determined.
  - Any other instance when the HVPP applicant or participant determines that sampling is warranted.
- Sampling Results. Sampling results must be analyzed and compared to at least HIOSH permissible exposure limits (PELs) to determine employees' exposure and possible overexposure. Comparison to more restrictive levels, such as action levels, threshold limit values (TLVs), or self- imposed standards is

encouraged to reduce exposures to the lowest feasible level.

- Documentation. The results of sampling must be documented and must include a description of the work process, controls in place, sampling time, exposure calculations, duration, route, and frequency of exposure, and number of exposed employees.
- Communication. Sampling results must be communicated to employees and management.
- Use of Results. Sampling results must be used to identify areas for additional, more in-depth study, to select hazard controls, and to determine if existing controls are adequate.

- IH Expertise. IH sampling should be performed by an industrial hygienist, but initial sampling, full-shift sampling, or both may be performed by safety staff members with special training in the specific procedures for the suspected or identified health hazards in the workplace.
  - Procedures. Standard, nationally recognized procedures must be used for surveying and sampling as well as for testing and analysis.
  - Use of Contractors. If an outside contractor conducts industrial hygiene surveys, the contractor's report must include all sampling information listed above and must be effectively communicated to site management. Any recommendations contained in the report should be considered and implemented where appropriate. Use of contractors does not remove responsibility for the IH program, including identification and control of health hazards, from the HVPP applicant or participant.

i. Investigation of Accidents and Near-Misses. The applicant/participant must investigate all accidents and near-misses and must maintain written reports of the investigations. Accident and near-miss investigations must:

- Be conducted by personnel trained in accident investigation techniques. Personnel who were not involved in the accident or who do not supervise the injured employee(s) should conduct the investigation to minimize potential conflicts of interest.
- Document the entire sequence of relevant events.
- Identify all contributing factors, emphasizing failure or lack of hazard controls.
- Determine whether the safety and health management system was effective, and where it was not, provide recommendations to prevent recurrence.
- Not place undue blame or reprisal on employees, although human error can be a contributing factor.
- Assign priority, time frames, and responsibility for implementing

recommended controls.

- The results of investigations (to include, at a minimum, a description of the incident and the corrections made to avoid recurrence) must be made available to employees on request, although the actual investigation records need not be provided.

j. Trend Analysis. The process must include analysis of information such as injury/illness history, hazards identified during inspections, employee reports of hazards, and accident and near-miss investigations for the purpose of detecting trends. The results of trend analysis must be shared with employees and management and utilized to direct resources; prioritize hazard controls; and determine or modify goals, objectives, and training to address the trends.

3. Hazard Prevention and Control. Management must ensure the effective implementation of systems for hazard prevention and control and ensure that necessary resources are available, including the following:

a. Certified Professional Resources. Access to certified safety and health professionals and other licensed health care professionals is required. They may be provided by offsite sources such as corporate headquarters, insurance companies, or private contractors. HIOSH will accept certification from any recognized accrediting organization.

b. Hazard Elimination and Control Methods. The types of hazards employees are exposed to, the severity of the hazards, and the risk the hazards pose to employees should all be considered in determining methods of hazard prevention, elimination, and control. In general, the following hierarchy should be followed in determining hazard elimination and control methods. When engineering controls have been studied, investigated, and implemented, yet still do not bring employees' exposure levels to below HIOSH permissible exposure limits; or when engineering controls are determined to be infeasible, then a combination of controls may be used. Whichever controls a site chooses to employ, the controls must be understood and followed by all affected parties; appropriate to the worksite's hazards; equitably enforced through the disciplinary system; written, implemented, and updated by management as needed; used by employees; and incorporated in training, positive reinforcement, and correction programs.

- Engineering. Engineering controls directly eliminate a hazard by such means as substituting a less hazardous substance, by isolating the hazard, or by ventilating the workspace. These are the most reliable and effective controls.
  - Protective Safety Devices. Although not as reliable as true engineering controls, such methods include interlocks, redundancy, failsafe design, system protection, fire suppression, and warning and caution notes.
- Administrative. Administrative controls significantly limit daily exposure to hazards by control or manipulation of the work schedule or work habits. Job rotation is a type of administrative control.

- Work Practices. These controls include workplace rules, safe and healthful work practices, personal hygiene, housekeeping and maintenance, and procedures for specific operations.
- Personal Protective Equipment (PPE). PPE to be used are determined by hazards identified in hazard analysis. PPE should only be used when all other hazard controls have been exhausted or more significant hazard controls are not feasible.

c. Hazard Control Programs. Applicants and participants must be in compliance with any hazard control program required by an HIOSH standard, such as PPE, Respiratory Protection, Lockout/Tagout, Confined Space Entry, Process Safety Management, or Bloodborne Pathogens. HVPP applicants and participants must periodically review these programs (most HIOSH standards require an annual review) to ensure they are up to date.

d. Occupational Health Care Program

- Licensed health care professionals must be available to assess employee health status for prevention, early recognition, and treatment of illness and injury.
- Arrangements for needed health services such as pre-placement physicals, audiograms, and lung function tests must be included.
- Employees trained in first aid, CPR providers, physician care, and emergency medical care must be available for all shifts within a reasonable time and distance. The applicant or participant may consider, based on site conditions, providing Automated External Defibrillators (AEDs) and training in their use.
- Emergency procedures and services including provisions for ambulances, emergency medical technicians, emergency clinics or hospital emergency rooms should be available and explained to employees on all shifts. Also see paragraph h. below.

e. Preventive Maintenance of Equipment. A written preventive and predictive maintenance system must be in place for monitoring and maintaining workplace equipment. Equipment must be replaced or repaired on a schedule, following manufacturers' recommendations, to prevent it from failing and creating a hazard. Documented records of maintenance and repairs must be kept. The system must include maintenance of hazard controls such as machine guards, exhaust ventilation, mufflers, etc.

f. Tracking of Hazard Correction. A documented system must be in place to ensure that hazards identified by any means (self-inspections, accident investigations, employee hazard reports, preventive maintenance, injury/illness trends, etc.) are assigned to a responsible party and corrected in a timely fashion. This system must include methods for:

- Recording and prioritizing hazards, and

- Assigning responsibility, time-frames for correction, interim protection, and follow-up to ensure abatement.

g. Disciplinary System. A documented disciplinary system must be in place. The system must include enforcement of appropriate action for violations of the safety and health policies, procedures, and rules. The disciplinary policy must be clearly communicated and equitably enforced to employees and management. The disciplinary system for safety and health can be a sub-part of an all-encompassing disciplinary system.

h. Emergency Preparedness and Response. Written procedures for response to all types of emergencies (fire, chemical spill, accident, terrorist threat, natural disaster, etc.) on all shifts must be established, must follow HIOSH standards, must be communicated to all employees, and must be practiced at least annually. These procedures must list requirements or provisions for:

- Assessment of the emergency.
- Assignment of responsibilities (such as incident commander).
- First aid.
- Medical care.
- Routine and emergency exits.
- Emergency telephone numbers.
- Emergency meeting places.
- Training drills, minimally including annual evacuation drills. Drills must be conducted at times appropriate to the performance of work so as not to create additional hazards. Coverage of critical operations must be provided so that all employees have an opportunity to participate in evacuation drills.
- Documentation and critique of evacuation drills and recommendations for improvement.
- Personal protective equipment where needed.

4. Safety and Health Training

a. Training must be provided so that managers, supervisors, non-supervisory employees, and contractors are knowledgeable of the hazards in the workplace, how to recognize hazardous conditions, signs and symptoms of workplace-related illnesses, and safe work procedures.

b. Training required by HIOSH standards must be provided in accordance with the particular standard.

c. Managers and supervisors must understand their safety and health responsibilities and how to carry them out effectively.

d. New employee orientation/training must include, at a minimum, discussion of hazards at the site, protective measures, emergency evacuation, employee rights under the HIOSH Law, and HVPP.

e. Training should be provided for all employees regarding their responsibilities for each type of emergency. Managers, supervisors, and non-supervisory employees, including contractors and visitors, must understand what to do in emergency situations.

f. Persons responsible for conducting hazard analysis, including self-inspections, accident./incident investigations, job hazard analysis, etc., must receive training to carry out these responsibilities, e.g., hazard recognition training, accident investigation techniques, etc.

g. Training attendance must be documented. Training frequency must meet HIOSH standards, or for non-HIOSH required training, be provided at adequate intervals. Additional training must be provided when changes in work processes, new equipment, new procedures, etc. occur.

h. Training curricula must be up-to-date, specific to worksite operations, and modified when needed to reflect changes and/or new workplace procedures, trends, hazards and controls identified by hazard analysis. Training curricula must be understandable for all employees.

i. Persons who have specific knowledge or expertise in the subject area must conduct training.

j. Where personal protective equipment (PPE) is required, employees must understand that it is required, why it is required, its limitations, how to use it, and how to maintain it.

III. Reserved

IV. Resident Contractors

Contractors working at a HVPP site may apply to HVPP. The requirements for the resident contractor are identical to those of HVPP generally, with the following additions:

A. The host must be an approved HVPP site before the resident contractor may submit its application. In addition, the resident contractor must have a minimum of 12 months on site before submitting an application.

B. The type of work being conducted by the resident contractor must be evaluated to determine the appropriate industry classification.

1. If the resident contractor is fulfilling a function that would normally be filled by the host (such as general maintenance), then the resident contractor should be assigned the host's industry classification.

2. If the resident contractor is independent and would not normally be associated with the host site's industry or service, then the contractor's own industry classification should be assigned.

C. If the resident contractor has less than 3 years on site, apply the injury and illness history requirements for construction. [See V.A. below.]

D. The resident contractor's participation, once approved, is contingent upon the host site's continued participation in HVPP.

E. A general contractor (GC) of a large construction project at an approved HVPP site can submit a separate application for HVPP. The requirements for construction apply.

F. Replacement of an Approved Resident Contractor. When a HVPP resident contractor at a HVPP site is replaced by a new resident contractor, whether HVPP approval will transfer to the new resident contractor depends on several factors.

1. HVPP status can transfer if 75% or more of the employees remain employed with the new resident contractor and if the new resident contractor:

   a. Submits a new letter of management commitment,

   b. Submits a new self-evaluation, and

   c. Receives a satisfactory HIOSH onsite evaluation within 12 months (6 months is preferred).

2. A new HVPP application is required if fewer than 75% of the employees remain employed with the new resident contractor.

G. Continuing HVPP status of an approved subcontractor to the initial resident contractor depends on the status of the new resident contractor.

1. If HVPP status transfers to the new resident contractor, as in F1.above, the subcontractor maintains its HVPP status.

2. If the new resident contractor is required to submit a new HVPP application, as in F2.above, the subcontractor must withdraw from HVPP and then reapply after approval of the new resident contractor.

V. HVPP Requirements for the Construction Industry

A construction applicant must be the general contractor (GC), owner, or an organization that provides overall management at the worksite, controls site operations, and has ultimate responsibility for assuring safe and healthful working conditions at the worksite. The project must have been in operation for at least 12 months prior to approval. Construction applications cover individual sites only.

A. Injury/Illness History. The applicant/participant's TCIR and DART rate (including all subcontractor employees) from worksite inception until time of application must be below the national and Hawaii state average for the industry classification. In addition, no work-related fatalities must have occurred within the past 36 months prior to the application date.

B. Enforcement History. The applicant/participant applying for HVPP must not have any open enforcement or whistleblower cases at the worksite. Any willful citation issued within the past 36 months from the date of application will disqualify the applicant.

C. Comprehensive Safety and Health Management System Requirements. The requirements for the Construction Industry Star program is identical to those of HVPP generally, with the following additions:

1. Safety and Health Management System Evaluation. The evaluation must be conducted annually and immediately prior to completion of construction. If a construction company does not provide the final evaluation, HIOSH will not consider subsequent VPP applications for other worksites operated by that company.

2. Routine Self-Inspections. These inspections must cover the entire worksite at least weekly, due to the changing nature of construction sites. See §12–110–3(b), HAR for additional requirements.
3. The applicant or participant is responsible for ensuring the correction of any identified hazards, including those created by subcontractors.
4. General Contractors must make subcontractors and their employees aware of the HVPP application or participation and of their rights, roles and responsibilities. Evidence that all subcontractors at the site recognize these conditions is necessary and may include:
    a. The contractual agreement.
    b. A written statement of willingness to cooperate.
    c. Attendance at safety meetings.
    d. Orientation sessions for incoming subcontractor employees.
5. Employee Involvement. Employees at construction sites must be involved in safety and health at the site to the degree practical based on the time they will spend on the site. Examples of short-term involvement include attending daily toolbox talks on safety and health, and participating in daily self-inspections. The more time they spend on site, the more involvement HIOSH expects. The onsite evaluation team will judge the sufficiency of employee involvement through interviews and observations.

Chapter IV
[Reserved]

Chapter V
The Application Process

I. Eligibility and Program Requirements

A. Eligibility. The HVPP accepts applications from all establishments that meet the eligibility criteria, including private and public sector employers, general industry fixed and non-fixed establishments, and construction employers. HVPP accepts applications from owners and site managers who control site operations and have ultimate responsibility for assuring safe and healthful working conditions at the site. HVPP also accepts applications from resident contractors at participating HVPP sites. Applications for participation are subject to the following conditions.

1. Employees' Support of Participation. Employees must support the site's participation in HVPP. Requirements vary according to whether the site has a recognized employee representative, as explained in the *Federal Register* 65 FR 45650, July 24, 2000.

2. HIOSH Inspection History. If HIOSH has inspected an applicant site in the 36 months preceding the application, the inspection, abatement, and any other history of interaction with HIOSH must indicate good faith attempts by the employer to improve safety and health at the site. This includes verification of correction of all serious violations. In addition, the existence of any of the following at the site precludes the site's participation in HVPP:

    a. Open enforcement or whistleblower investigations.

    b. Pending or open contested citations or notices under appeal at the time of application.

    c. Affirmed willful or 8(e) discrimination violations during the 36 months prior to application.

    d. Unresolved, outstanding enforcement actions such as long term abatement agreements or contests.

    e. A fatality within the past 36 months.

    HIOSH history pertaining to a non-HVPP site of the same company will not adversely affect HVPP participation, unless it is determined that a corporate decision, program, or policy which applies to all company sites does not meet HIOSH standards.

B. Program Requirements. Applicants must understand and agree, through assurances, to fulfill program requirements for participation in the HVPP.

1. Applicants must assure that:

    a. The applicant will comply with the HIOSH Law and HIOSH Administrative Rules, and will correct in a timely manner all hazards discovered through self-inspections, employee notification, accident investigations, an HIOSH onsite review, process hazard reviews, annual evaluations, or any other means. The applicant will provide effective interim protection as necessary.

    b. Worksite deficiencies related to compliance with HIOSH requirements

and identified during the HIOSH onsite review will be corrected within 90 days, with interim protection provided to employees.

c. Employees support the HVPP application.

d. HVPP elements are in place, and the requirements of the elements will be met and maintained.

e. Employees, including newly hired employees and contract employees when they reach the worksite, will have the HVPP explained to them, including employee rights under the program and under the HIOSH Law.

f. Employees performing safety and health duties as part of the applicant's safety and health management system will be protected from discriminatory actions resulting from their carrying out such duties, just as Section 8(e), HRS protects employees who exercise their rights.

g. Employees will have access to the results of self-inspections, accident investigations, and other safety and health management system data upon request. At unionized worksites, this requirement may be met through the employee representative's access to these results.

h. The information listed below will be maintained and available for HIOSH review to determine initial and continued approval to the HVPP:

- Written safety and health management system.
- All documentation enumerated in Chapter 6.IV.A.
- Any agreements between management and the collective bargaining agent(s) concerning safety and health.
- Any data necessary to evaluate the achievement of 1-Year Conditional goals.

i. Each year by February 15, each participating site must send its annual evaluation submission to the HVPP Manager. (See Appendix C.)

j. Whenever significant organizational, ownership, union, or operational changes occur, such as but not limited to a change in management, takeover, or merger, the site will provide HIOSH within 60 days a new statement of commitment signed by both management and any authorized collective bargaining agents, as appropriate.

2. The applicant must demonstrate a willingness to follow through on all assurances.

3. Employees must be aware of the recourse available to them if management fails to fulfill any of these assurances. This may include rescinding their support of HVPP participation or exercising the right to file an HIOSH complaint.

II. Preparing the Application

A. Pre-application Assistance. The HVPP Manager may visit a prospective applicant's site to offer assistance in the application process or before scheduling the onsite evaluation to obtain additional information or clarification of information

provided in the application. Pre-application assistance may also include referrals to the VPPPA Mentoring Program, to VPPPA conferences, and to VPPPA application workshops.

B. Single or Multiple Applications. In most cases, a single HVPP application is sufficient. Exceptions may occur, such as the following circumstances:

If:	***And:***	***Then:***
The applicant operates at a worksite where operations are physically separated but where a single, effective onsite evaluation is still feasible.	All applicant employees are covered by a single safety and health management system.	A single application is required.
The applicant is the General Contractor of a construction worksite where subcontractor employees are also covered by the same safety and health management system.		
Less than 50 percent of the predominant work* performed by employees is performed at off-site location(s), for example, the sales force of a manufacturing company.		A single application is required reflecting the appropriate SIC or NAICS code for the worksite.*
The applicant has multiple operations.		
More than 50 percent of the predominant work* performed by employees is performed at off-site location(s).	The application is to the Mobile Workforce.	A single application is required.
The applicant's operations are separated by distances that would prevent an effective, single onsite evaluation,	All employees may or may not be covered by a single safety and health management system.	More than one application is required.
More than one employer at a single worksite is applying for HVPP (for example, an office building),	N/A	

*Follow the directions in the Standard Industrial Classification Manual or when adopted the North American Industrial Classification System (NAICS) Manual, to determine the predominant work and the appropriate SIC or NAICS code. If questions still exist, contact the Research & Statistics office.

C. Confidentiality. During the application process, prior to program approval, the application and all related information is confidential and therefore must be used solely for HVPP related activities. Only applications of approved participants will be kept in a public file. If an applicant withdraws, the original application and related documents must be returned. The HVPP Manager's marked working copy will be held in the HIOSH Office for 1 year in order to respond to any questions the applicant may have.

III. Application Records

The HVPP Manager must maintain updated application information on the data base and submit monthly HVPP Activity reports to the Administrator and the OSHA Honolulu Area Director.

IV. Procedures for Receipt and Review of Applications

A. The HVPP Manager must process applications as received, except as instructed below:

1. Priority One. The highest priority must be assigned to worksites that are specifically identified by HIOSH for HVPP participation to support agency-wide initiatives outlined in the Strategic Plan. Worksites also may be selected because they represent a potentially useful demonstration of the HVPP concept in non-traditional workplaces. In addition, HIOSH may decide to select particular worksites for special attention because, for example, they have the potential to serve as good role models for key industries or they represent locally successful "turnaround" companies.

2. Priority Two. Second level priority must be given to those worksites whose participation would increase the number of small establishments in the program. A worksite is considered a small employer if it has no more than 250 employees at any one facility, and no more than 500 employees in the corporation nationwide.

3. Priority Three. The third level of priority must be assigned to worksites whose participation in HVPP would increase the industrial diversity of the program. Whenever possible, give priority to worksites in industries other than SIC 28 (Chemicals and Allied), SIC 26 (Pulp, Paper and Allied), SIC 30 (Plastics and Foams), and SIC 22-23 (Textiles and Apparel), because these industries on a national basis are well represented already. In determining the priority for a worksite, however, HIOSH should take into consideration the HVPP sites under its jurisdiction. Thus, it might be appropriate to provide priority to a chemical plant applicant if there are no other representatives of this industry in the State.

4. Priority Four. Fourth level priority must be given to applicants in those industries that already have HVPP participants. Preferential treatment should be provided to those worksites that based on an assessment of the application and other factors appear to have a greater likelihood of achieving Star status during the initial onsite evaluation. (However, applicants that do not meet Star requirements will not be rejected.)

B. Original Application. Upon receipt of an application, the HVPP Manager must ensure that it is date stamped with the date received and reserve it for placement in the public file, should the applicant be approved to HVPP.

C. Acknowledgement and Record of Receipt. The HVPP Manager must notify the applicant by letter or e-mail of receipt of the application within 15 working days. The acknowledgment must also include the name and telephone number of the HVPP Manager or a designee.

D. Review. The HVPP Manager must review (or oversee the review) the application to determine if it includes all required information listed in the most recent HVPP application instructions, if the applicant is eligible for onsite review, to pinpoint any

major deficiencies, and to notify the applicant that the identified deficiencies must be rectified prior to application acceptance. In general, application review should include an examination of the following:

1. General Information. Ensure that the general information includes but is not limited to: the applicant's worksite name, address, key contact personnel and titles, corporate identification, collective bargaining agent contact information, number of employees and contractor employees, type of work performed, and products produced.

2. Injury and Illness Rates. The rates supplied in the application must be examined as follows:

    a. For general industry, the reviewer of the application must calculate the last 3-year total case incidence rate (TCIR) for injuries and illnesses using data from the last 3 complete calendar years. Similarly calculate the 3-year days away, restricted, and/or job transfer (DART) rate. [See Appendix A.]

    b. For construction, calculate rates for the life of the worksite if less than 3 years. At a minimum, the most recent 12 months is required, and the data must include all employees of contractors and subcontractors on the worksite. (On construction worksites, all contractors are considered worksite employees for the purpose of rate calculations, and therefore are included in the applicant/participant's rates).

    c. Evaluate that applicant/participant's injury and illness history by using a 3-year total case incidence rate (TCIR) and a 3-year days away, restricted and/or job transfer incidence rate (DART rate) (a minimum of 1-year rates for construction). (See Appendix A.) The 3-year TCIR and DART rates must be below at least 1 of the 3 most recent years of specific industry national AND state averages for nonfatal injuries and illnesses at the most precise level published by the Bureau of Labor Statistics (BLS). Compare both rates to a single year (national and State).

    An alternative rate calculation may be used for eligible smaller worksites using their best 3 out of the most recent 4 years of incidence rates. (See Appendix A.).

    d. The reviewer must determine if the applicant's injury and illness rates are low enough to warrant an onsite review.

3. Safety and Health Elements: The reviewer must determine if the application describes how the applicant is meeting the HVPP requirements, addressing each of the elements and sub-elements of an effective safety and health management system listed in Chapter III and as outlined below.

    a. Management Leadership and Employee Involvement: The applicant must describe top-level management leadership in the site's safety and health management system. Note: Management must clearly describe its commitment to meeting and maintaining the requirements of HVPP. The applicant must also describe how employees are involved in safety and health.

    b. Worksite Analysis: The applicant must describe methods used to recognize, identify, and analyze hazards. Effective worksite analysis provides the information managers and employees need for a

thorough understanding of all hazardous situations to which they may be exposed.

c. Hazard Prevention and Control: The applicant must describe and give examples of how hazards are addressed, including preventative maintenance, occupational health care program, emergency preparedness, and hazard elimination employing the hierarchy of controls.

d. Safety and Health Training: The applicant must describe its formal and informal safety and health training program for managers, supervisors, and employees. The information must include training protocols and schedules of training.

4. Assurances. The reviewer must determine that the application contains a signed statement of assurances and that all of the required assurances have been included. [See I.B. above.]

5. Additional Attachments. The reviewer must determine if the application contains the required additional attachments, as follows:

a. Copy of top-level safety policy.

b. Organization chart.

c. Most recent annual evaluation.

d. Site map.

e. Signed statement of union support if applicable.

f. VPP PSM Application Supplement, if applicable.

E. Reserved.

F. Reserved

G. Incomplete Applications. If the application is considered incomplete, the HVPP Manager must notify the applicant by letter, noting the missing elements and requesting that the missing information be submitted within 90 days. If the additional information is not provided within that time, the application must be returned to the applicant. It can be resubmitted when completed.

H. Ineligible Applications. If it is clear that the applicant cannot qualify for HVPP, the HVPP Manager must ask the applicant to withdraw the application within 30 days. If the application is not withdrawn, the HVPP Manager must return the application with a letter indicating the reasons the application was denied by HIOSH.

I. Voluntary Withdrawal of an Application. An applicant may withdraw the application by notifying the HIOSH Administrator. The withdrawal is effective on the date the notification is received. Then:

1. The HVPP Manager must:

a. Determine the cause of withdrawal.

b. Return the original application to the applicant within 10 working days. If the application had already been accepted, the HVPP Manager must retain a working copy for 1 year, for use in responding to questions that may arise.

2. The HIOSH Administrator must acknowledge the withdrawal by letter, giving

the official withdrawal date. The letter must include a statement that HIOSH will entertain re-application if circumstances change.

J. Decision to Conduct the Onsite Evaluation. Once an application is accepted, the HVPP Manager must:

1. Notify the site--by letter or e-mail in a timely manner--that an onsite evaluation will be conducted. However, no onsite evaluation may be conducted until all enforcement actions have been closed.
2. Remove the site from any programmed inspection lists, effective no more than 75 days prior to the scheduled onsite review and notify the enforcement branches of the removal by e-mail. Maintain a copy of the e-mail for the public record.

Chapter VI
Onsite Evaluations

I. Purpose

An onsite evaluation consists of a thorough evaluation of a HVPP applicant's or participant's safety and health management system in order to recommend approval or reapproval. Onsite evaluations are carried out by a team consisting of HIOSH staff acting in a non-enforcement capacity and other qualified team members.

II. Preparation for Onsite Evaluations

A. Scheduling Onsite Evaluations. Onsite evaluations must be scheduled according to the priorities described in Chapter 5.IV.A. For new applicants, an onsite evaluation must be conducted within 6 months of the receipt of a completed application. For participants, onsite evaluations must be conducted as follows:

1. Star Participants. The first evaluation must be conducted between 30 and 42 months following initial approval. Thereafter, onsite evaluations must be completed within 60 months of the preceding onsite evaluation.
2. 1-Year Conditional Star Participants. The onsite evaluation must be conducted within 15 months (90 days plus 1 years' experience operating at Star level) after the site was placed on conditional status.
3. Reserved.
4. Reserved.
5. Scheduling Exceptions
   a. Onsite evaluations must be conducted earlier than normal scheduling requirements when:
      - Significant changes have occurred in management, process(es), or product(s) that may require evaluation to ensure the site is maintaining a HVPP quality safety and health management system.
      - HIOSH has learned of significant problems, such as increasing injury and illness rates, serious deficiencies described in the participant's annual evaluation of its safety and health management system, or deficiencies discovered through HIOSH enforcement activity resulting from an employee complaint, fatality, catastrophe, or other event.
   b. An onsite evaluation may be conducted earlier when requested by a site.

B. Arrangements with the Applicant/Participant. Arrangements for the onsite evaluation must be coordinated by the team leader, who must contact the applicant or participant (site representative) to:

1. Set the date for the onsite evaluation and explain the onsite evaluation process.

2. Inform the site representative of the documents that must be reviewed by the onsite evaluation team. OSHA 300 logs may be requested in advance of the onsite evaluation, if appropriate.

3. The HVPP Manager or team leader must inform the employer if a Special Government Employee (SGE) will be used as a member of the Onsite evaluation team. The employer must agree with this arrangement.

4. Employee Representation. Where collective bargaining agents are involved, the team leader must tell the site representative that such agents must be included in the initial and closing conferences and allowed the opportunity to accompany the onsite evaluation team on the site walkthrough. Similar employee involvement must be encouraged at non-collective bargaining sites.

5. Medical Access Order (MAO). The HVPP Manager or team leader must prepare and submit a Medical Access Order (MAO) Request Form to the Occupational Health Branch Manager. This form can be downloaded electronically on the HIOSH Intranet. The HVPP Manager must then direct the applicant or participant to post the MAO in a prominent place at the worksite for at least 15 working days prior to the onsite evaluation.

   If the applicant/participant did not receive the MAO prior to the onsite evaluation, the team leader must direct the applicant or participant to post a copy immediately after the opening conference and to keep it posted for at least 15 working days. The posting must include a notice advising employees to inform management of any objection to their medical records being reviewed, in confidence, by HIOSH employees.

   During the review and evaluation of personally identifiable medical information, the HVPP team members must be careful to not record information with its personal identifiers. If it is necessary to copy or take such information offsite, the HIOSH Medical Records Officer must be notified so that appropriate records may be maintained of the existence and disposition of the records. These records must be maintained in a separate manila envelope within the file, and marked “Confidential – Medical”. As soon as legally possible, the medical information must be destroyed or returned.

C. The Onsite Evaluation Team

1. Team Composition. Team composition is based on the size of the site and nature of the process, and must include at least (a) through (c) below. Applicants/participants who fall under the PSM Standard must also include (d)

   a. Team Leader.

   b. Safety Engineer or Safety Specialist.

   c. Industrial Hygienist.

   d. PSM “Level 1” Auditor

   e. Backup Team Leader.

   f. Additional Safety or Health Specialists, including others with knowledge and skills appropriate to the site.

   g. Special Government Employees (SGEs). Refer to the latest SGE Policies and Procedures Manual for guidance on selecting, requesting, and utilizing OSHA SGEs.

2. Selection of the Team. The team leader must formally request team members. This may be done by e-mailing the proposed onsite evaluation schedule to HIOSH Branch Managers and SGEs.

    a. Basic Qualifications. All team members must have at least the following:

        - Thorough knowledge of HVPP policy.
        - OSHA Course 2450, Evaluation of Safety and Health Management Systems, or other formal classroom training in evaluating safety and health management systems (for HIOSH personnel only).
        - OSHA Course 5450, Special Government Employee Training Course (for SGEs personnel only).
        - Working knowledge and understanding of safety and health management systems.
        - In addition, at least one person (not including SGEs) on the team must have a safety and health job classification, for example, Occupational Safety and Health Compliance Officer, or Environmental Health Specialist (HIOSH).

    b. Team Leader. The team leader must meet the qualifications in a. above, plus have experience on three onsite evaluations, including once as a team member, once as a backup team leader, and once as a team leader in training (with a qualified team leader as backup team leader).

    c. Compliance Officers. HIOSH personnel whose current duties include enforcement responsibilities may be assigned to a VPP onsite team. However, as a general rule, such personnel may not subsequently engage in enforcement activity at the worksite for 2 years or until the worksite is no longer a VPP participant, whichever comes first. The Administrator, on a case-by-case basis, may choose to override this 2-year requirement.

3. Preparing the Onsite Evaluation Team

    a. In Advance. The team leader must supply the team with the following information in advance of arrival at the worksite to be evaluated.

        - HVPP History. For new applicants, team members must be given relevant sections of the application and most recent self-evaluation. For current participants, team members must be given a copy of the participant's last onsite evaluation report. Must also ensure that 1-Year Conditional goals to be evaluated are provided.
        - Inspection History. Team members must be given the inspection history and a summary of past interactions between the applicant and HIOSH.
        - Any Documents Obtained with the Application. If any records were submitted in advance of the onsite evaluation, these should be shared with team members.

- PSM Application Supplement and/or PSM Questionnaire, where applicable.

b. Preparation Required of Onsite Evaluation Team Members. In advance of the onsite evaluation, team members must prepare in the following ways:

- Review. When feasible, team members must carefully review the application and any previous onsite evaluation reports.
- Onsite Evaluation Report Format. Team members must familiarize themselves with the onsite evaluation report format to ensure they understand what information they will be responsible for obtaining during the onsite evaluation. [See Appendices D and E.]
- Interview Questions. Team members must carefully review the interview questions in preparation for conducting onsite interviews. [See Appendix F.]
- Personal Protective Equipment (PPE). Team members must equip themselves with any PPE, such as safety shoes and safety glasses, required for the onsite evaluation (unless they have been informed that PPE will be provided).

c. Onsite. Once the team has arrived at the location, the team leader must hold a strategy meeting with all team members to prepare the team for the onsite evaluation and to make assignments.

III. Conducting the Onsite Evaluation.

This Section describes the standard onsite evaluation process and, at E. below, provides an alternative onsite evaluation protocol for qualifying participants seeking reapproval. For all onsite evaluations, the three primary methods of evaluation are document review, walkthrough, and interviews. Additional activities that must occur are the opening conference, daily briefings, report preparation, and closing conference.

Onsite evaluations include an evaluation of each element and sub-element of the applicant/participant's safety and health management system and HVPP requirements (see Chapter III) by following the procedures in Section III.A.-D. below. At the conclusion of the onsite evaluation, the onsite evaluation team must provide the HVPP Manager with its recommendation, that is, the applicant/participant's suitability for participation or continued participation in HVPP.

For current HVPP participants who demonstrate a sustained commitment to safety and health excellence, as described in section III.E. below, HIOSH may choose to employ a Compressed Reapproval Process to Recognize Sustained Excellence (CRP) onsite evaluation. At the conclusion of the CRP, the onsite evaluation team must provide the HVPP Manager with its recommendation, that is, the participant's suitability for continued participation in HVPP.

A. Opening Conference. The opening conference with the employer and employee representatives will set the stage for the onsite evaluation, letting everyone know what to expect and what assistance the team will need. During this session the

onsite evaluation team should be able to get a sense of the extent of commitment that exists at the worksite. The team leader must convey the following information:

1. Balanced Approach. Describe HIOSH's view of the Voluntary Protection Programs and HVPP's importance to HIOSH's approach to balancing cooperative programs and enforcement.
2. Purpose. Clearly state the purpose of the onsite evaluation.
3. Full Disclosure. Indicate that the onsite evaluation team expects the site will adhere to the signed full disclosure assurances submitted with the application.
4. Schedule. Outline the schedule for the onsite evaluation.
5. Interviews. State that arrangements must be made to conduct private interviews with supervisors, union representative(s), maintenance personnel, recordkeepers, occupational health staff, and randomly selected employees, including contractor employees (if any).
6. Responding to Hazards. Explain the differences between the walkthrough and an enforcement or consultation visit, as well as the hazard correction requirements detailed in V. below.
7. Status. Explain how the onsite evaluation team will keep the site representative updated daily on the progress of the onsite evaluation. When the onsite evaluation is completed, the HVPP onsite evaluation team will discuss its findings with the site representative so that the recommendations are clearly understood.
8. Employee Rights. Outline the rights of employees under the HIOSH Law.

B. Document Review. The applicant/participant's written safety and health management system must describe how each of the requirements outlined in Chapter 3 are being met. The documents listed below are part of the written safety and health management system. The documentation of the system must be site specific. On a case-by case basis for small businesses, some documentation need not be in writing, provided all employees have the same clear understanding of the particular policy. This will be verified by the onsite evaluation team.

8. Injury/Illness Data. The following documents must be reviewed to verify that the applicant/participant is properly and accurately recording injuries and illnesses.

   a. Summary of Occupational Injuries and Illnesses.

      - Review data for the most recent complete 3-year period, current year-to-date, and for any applicable contractors.
      - Recalculate the total case incidence rate (TCIR) and the days away, restricted, and/or transfer case incidence rate (DART rate) using the instructions found in Appendix A.

   b. Incentive Programs. The review of incentive programs must focus on ensuring that any incentive programs in operation are not based solely on providing awards to employees for the reduction or absence of safety or health incidents. Instead, these programs should be innovative, positive, and promote safety awareness and worker participation in safety-related activities. The onsite evaluation will focus on the incentive program's potential impact on the accuracy of

reporting, injury and illnesses data.

c. First Reports of Injury.

d. Accident and Near-Miss Investigation Reports. Verify that all accidents and near-misses are properly reported and investigated, and that all injuries and illnesses resulting from an accident are properly recorded.

e. First-Aid Reports. Verify that the first-aid incidents are properly categorized as such, and are not causing possible over-reporting.

f. Team-selected medical surveillance reports, such as audiometric testing records, respirator fit-test records, etc. [See II.B.5. above.]

g. Any cause for under- or over-reporting, such as lack of training in HIOSH recordkeeping requirements, an incentive program, misdiagnosis of an injury or illness, etc., must be addressed. Discuss any discrepancies or omissions with the recordkeeper. Determine corrective actions, and recalculate the 3-year TCIR and DART rate if necessary.

9. Management Leadership

a. Management's statement of commitment to safety and health.

b. Written goals and objectives for safety and health.

c. Annual safety and health evaluation.

d. Job descriptions.

e. Performance standards and appraisals (these reviews must be performed in a manner that protects confidentiality and anonymity).

f. Resource documents including budget projections.

10. Employee Involvement

a. Safety and health committee minutes, if applicable.

b. Self-inspection forms and records, accident investigations, hazard analyses, and employee reports of hazards.

c. Documents attesting to union support if applicable.

4. Worksite Analysis

a. Baseline safety and industrial hygiene surveys.

b. Self-inspection forms and records.

c. Health hazard assessment and monitoring records (such as industrial hygiene surveys, sampling results, exposure calculations, and summary reports).

d. Hazard analysis forms and reports.

e. Accident/incident investigations to verify that all causes of an accident/incident are identified, undue blame or reprisal is not placed on employees, and recommendations for preventing future occurrence are listed.

f. Hazard reporting system for employees.

g. Annual safety and health management system evaluations, site audits,

and when needed to demonstrate that HVPP criteria are being met, corporate audits that an applicant/participant voluntarily chooses to provide in support of its application.

h. The system for managing contractor safety and health, and related documents.

i. Trends analysis reports of injury/illness, accidents, employee hazard reports, etc.

5. Hazard Prevention and Control

a. Hazard control programs required by HIOSH standards (such as Lockout/Tagout, Hazard Communication, Respiratory Protection, Process Safety Management, Bloodborne Pathogens, Confined Space Entry, Emergency Response, etc.).

b. Preventive maintenance program, maintenance schedule, and examples of work orders.

c. Engineering studies, to verify that any over-exposures to health hazards were adequately addressed and controlled following the hierarchy of controls.

b. Hazard correction/work order and tracking reports.

c. Safety rules, examples of safe work procedures and practices.

d. Disciplinary system, including a review of policy.

6. Training

a. New employee and contractor orientation curricula.

b. Training curricula related to required HIOSH standards.

b. Additional safety and health training curricula to verify that personnel performing hazard analysis and accident investigation are trained to do so. Also to verify that information from hazard analysis, accident reports, etc., are incorporated into training.

c. Training attendance records and tracking method.

7. Any other related documents that support and verify that HVPP requirements are being met.

C. Walkthrough

1. Scope. The onsite evaluation team must walk through the worksite to understand the type of work performed and to gain a sense of overall work conditions. An orientation tour is conducted with the entire onsite evaluation team on the first day of the onsite evaluation. The remainder of the onsite evaluation must include a walkthrough of the entire worksite, unless the size of the worksite or nature of the process does not allow for it, in which case a representative sampling of all major operating areas and supporting activities must be covered.

a. Contractors. The onsite evaluation team must review areas where work is performed by contract employees to ensure that they are provided equally effective protection.

b. Hazard Analysis. The safety and health specialists must examine the

site in sufficient detail to understand the types of hazards that exist and to determine that such hazards are controlled systematically by the safety and health management system.

c. Problem Areas. The onsite evaluation team must examine areas where site reports of the following indicate that uncontrolled hazards may be present:

- Baseline hazard analysis.
- Trends in injuries or illnesses.
- Employee complaints or concerns.
- Recurring accidents.
- Health hazard surveys.
- Site self-inspections.

d. Informal Interviews. During the walkthrough (and at other times, as appropriate) the onsite evaluation team must question randomly selected employees (including contract employees) privately at their work stations about prescribed work procedures, hazards to which they may be exposed, and their knowledge of how to protect themselves from hazards, including how to use and maintain their personal protective equipment. The team must keep track of the number of employees interviewed, but employee names and addresses must not be recorded. [See Appendix F.]

2. General Industry Safety and Health Review

a. The safety specialist/engineer and industrial hygienist must:

- Follow the process flow where possible. Focus on areas where document review and/or interviews indicate that uncontrolled safety and health hazards may be present.
- Look for evidence that hazards are appropriately controlled following the hierarchy of controls. [See Chapter 3.II.E.3.b.]
- Identify and note any uncontrolled hazards that must be corrected. Ensure that a responsible member of management takes notes, as well, and agrees on a reasonable time period for correction.
- If uncontrolled hazards are present, determine the causative deficiencies in the safety and health management system.
- Relate hazards seen in the work areas to safety and health management system improvements that would control the hazards and prevent recurrence.
- Inform the team leader of findings at the end of each day.

3. The safety specialist/engineer and industrial hygienist must follow the procedures above and make every attempt to view all areas of construction covered by the application. If the entire worksite is not viewed, ensure that all types of construction work in progress are seen.

4. Process Safety Review. A process safety review is required at all worksites

producing or using highly hazardous chemicals. The review must be conducted in accordance with the Process Safety Management (PSM) Directive by a PSM "Level 1" Auditor (or SGE equivalent) who must select one or more complete processes and follow the process flow. Elements of the review should include:

a. Review process hazard analysis and operating procedures.

b. Check process lines as necessary to verify documented system protection.

c. Ask questions concerning system failure procedures during informal interviews with appropriate operator, maintenance, and contract personnel.

d. Review training records.

e. Look for evidence that all considerations have been addressed and that management has identified and is controlling all hazards and potential releases.

f. Verify the answers provided by the applicant/participant to the questions found in the PSM application supplement that are most appropriate to the facility's operations (new approvals only).

g. Ask and verify answers for the questions from recent Dynamic Inspection Priority Lists that are most appropriate to the facility's operations.

D. Interviews.

1. Formal Interviews. Private formal interviews are conducted in a private area away from the workstation to ascertain the extent of safety and health involvement and program awareness of managers, supervisors, employees, and contractors.

2. Informal Interviews. Informal interviews are conducted at employees' workstations during the walkthrough and at other times, as appropriate. [See C.1.d. above.]

3. Persons to Be Interviewed

a. Managers. A representative number of managers must be interviewed to ascertain the depth of management leadership in the safety and health management system.

b. Supervisors. A representative number of supervisors must be interviewed.

c. Line Employees. Conduct employee interviews with those individuals involved in the actual process or production at the site to verify aspects of the safety and health management system.

d. Occupational Health Care Professionals.

e. Maintenance Personnel. Maintenance personnel should be interviewed. At chemical plants making or using highly hazardous chemicals, they must be interviewed.

f. Recordkeepers. The person responsible for keeping injury and illness records must be interviewed to ensure that records are properly kept

and that the recordkeeper understands the requirements and interpretations.

g. PSM Coordinator (or equivalent). A person responsible for overseeing PSM processes on site.

h. Contract Employees

- Temporary Employees. Temporary employees who are supervised by the applicant company's employees must be selected for formal interviews to establish the quality of safety and health protection afforded them.
- Other Contract Employees. Contract employees who work under their own company's supervision must be interviewed to determine whether they are aware of all the hazards to which they are exposed, and whether they are protected by a safety and health management system equal in quality to the applicant's. Representatives from each craft should be interviewed, where possible.

4. Selecting Persons to be Interviewed. The selection of persons to be interviewed must be made by the onsite evaluation team, not by the employer. The team must be flexible in choosing the most reasonable method of selection, given the characteristics of the site and any concerns expressed by the employer. Methods for selecting employees for interviews include:

   a. Identifying the most hazardous areas, selecting employees at random from those areas, and conducting informal interviews in these areas during the walkthrough.

   b. For formal interviews, the team leader may select appropriate employees at random from an employee roster or using a random selection protocol.

5. Scheduling Formal Interviews. Formal interviews lasting at least 15 minutes must be conducted in a manner that minimizes disruption. The number of formal interviews is up to the team leader, based upon the size and nature of the site and whether a new applicant or current participant is being evaluated.

6. Use of Interview Questions

   a. The reviewers must assure each interviewee that responses will be treated confidentially, and that no single answer they give will influence the team's recommendation. [See Appendix F for suggested interview questions.]

   b. Notes (without names or addresses) should be made of employees' responses to interview questions and other comments. These notes later will be used to support the team's recommendation and HIOSH's decision.

E. Compressed Reapproval Process to Recognize Sustained Excellence (CRP). For Star participants seeking continued participation and meeting all requirements detailed in 1. Below, HIOSH may choose to employ a CRP evaluation.

1. Eligibility Requirements. To qualify for a CRP evaluation, the participant must meet each of the following requirements and conditions:

a. The participant is in compliance with all Assurances as described in Chapter V, Section I.B.

b. The participant's most recent Annual Evaluation was complete and demonstrated HVPP-quality safety and health excellence.

c. The participant must be in good standing at the Star level, that is, cannot be Star Conditional or under a Rate Reduction Plan.

d. The participant has experienced no work-related fatalities or catastrophes since the most recent HVPP onsite evaluation.

e. The participant has not received willful, repeat, or high gravity serious citations since the most recent HVPP onsite evaluation.

2. Additional Eligibility Requirements. To qualify for a CRP evaluation, the participant must also meet each of the following requirements and conditions. However, these involve a judgment by the HVPP Manager/Coordinator that may disqualify the participant for a CRP.

   a. The participant's most recent 3-year injury and illness rates (TCIR and DART) must meet Star requirements. However, the HVPP Manager/Coordinator may determine that irregularities within rates that otherwise meet this requirement (for example, rates that trend up) warrant a comprehensive onsite evaluation.

   b. The HVPP Manager/Coordinator determines that the participant's HIOSH complaint history and findings since its most recent HVPP onsite evaluation do not indicate the need for a comprehensive onsite evaluation. In making this determination, the HVPP Manager/Coordinator will consider the participant's size, complexity, and work culture.

   c. The participant has notified HIOSH of changes in management, ownership, or bargaining unit status in accordance with the Assurance described in Chapter V, Section I.B.1.j. The HVPP Manager/Coordinator determines that the changes do not warrant a comprehensive onsite evaluation.

3. Notification. The onsite evaluation Team Leader will notify the participant of HIOSH's decision to perform a CRP when making arrangements to perform the evaluation. The Team Leader will also inform the participant that the CRP may be expanded into a comprehensive onsite evaluation if more information is required to make a decision regarding continued HVPP participation

4. Scope. In general, the conduct of a CRP evaluation will parallel the standard onsite evaluation delineated in this Section's first paragraph and A-D above, except:

   a. Opening/Closing Conference. The Opening and Closing Conference should focus on changes since the most recent HVPP onsite evaluation and the information covered in the most recent annual evaluation.

   b. Document Review. The review of the participant's written safety and

health management system should focus on new and changed policies and procedures and highly hazardous operations (e.g., LOTO, Confined Space, PSM).

c. Site Walkthrough.

- The CRP evaluation must include a walkthrough of the entire worksite that pays special attention to any change sin equipment, process flow, and/or operating procedures.
- For participants who produce or use highly hazardous chemicals, as defined in OSHA's Process Safety Management (PSM) regulations, a process safety review must be conducted by a team member qualified to evaluate PSM in accordance with HVPP procedures. The findings of this review must be included on the Onsite Evaluation Worksheet.

d. Employee/Management Interviews. The emphasis should be on conducting informal interviews. Formal interviews should still be conducted with key personnel (e.g. site manager, recordkeepers, union stewards) as well as some employees.

5. Documenting the Onsite Evaluation. Only the HVPP elements identified as Minimum Requirements (MR) in Appendix D, as well as PSM, where applicable, need to be reviewed and documented in the Onsite Evaluation Worksheet. Where appropriate, documentation should mention highly hazardous operations (e.g., LOTO, Confined Space) and new/changed elements within the participant's safety and health management system.

F. Switching from the CRP to the Standard Evaluation Process. The onsite Team Leader may decide to switch from the CRP to the standard evaluation process (as described in Sections A.-D. above) if more information is needed to make a decision regarding a participant's continued participation in HVPP. The Team Leader should inform the HVPP Manager, Administrator, and participant of this decision.

IV. Discussion of Findings

A. Daily Debriefings. At the end of each day, the onsite evaluation team must meet privately to discuss members' findings. The team leader is responsible for organizing the findings and conducting daily briefings with the management and employees.

B. Uncontrolled Hazards

1. Informing Management. As hazards are found and discussed during the walkthrough, the onsite evaluation team must add them to a written list of the uncontrolled hazards identified. This list will be used when the team briefs management at the end of the day.

2. Hazard Correction. HIOSH expects that every effort will be made by the applicant/participant to correct identified hazards before the closing conference. If hazard correction cannot be accomplished before the

conclusion of the onsite evaluation, the onsite evaluation team and site management must discuss and agree upon correction methods and time frames.

a. 90-Day Items. The applicant/participant may be given a maximum of 90 days to correct uncontrolled hazards, as long as interim protection is provided. These "90-day Items" must be corrected before the final onsite evaluation report can be processed. [See also Section XII.]

   Management must provide the team leader with a signed letter indicating how and when the correction will be made. The team leader may decide to return to the site to verify correction.

b. If after repeated attempts to reach agreement, site management refuses to correct a situation that endangers the safety and health of employees, that situation must be referred to the Administrator for review and enforcement action, if necessary.

C. Deficiencies in the Safety and Health Management System. Where the team detects deficiencies in the safety and health management system, even when physical hazards are not present, the onsite evaluation team must document these deficiencies as goals for correction, recommendations for improvement, or both.

1. Goals. If the system deficiency is a requirement for HVPP at the Star level, it must become the subject of a 1-Year Conditional goal. Implementation of goals is mandatory for HVPP participation. Time frames, interim protection, and methods of achieving goals must be discussed and agreed to with management.

2. Recommendations. If improvement of the system deficiency is not necessarily a requirement for HVPP, but will improve worker safety and health at the site, the improvement must be a recommendation. Implementation of recommendations is encouraged but is not mandatory for HVPP participation.

V. Final Analysis of Findings.

When the documentation review, the walkthrough, and employee interviews have been completed, the onsite evaluation team must meet privately to review and summarize its findings. The team leader must facilitate the discussion and assist the team members in drawing conclusions about the quality of the applicant/participant's safety and health management system, based on their findings. In analyzing their findings, the onsite evaluation team must consider the following:

A. In analyzing their findings, the onsite evaluation team must consider the following.

1. Observations made in the work areas.

2. The nature of injuries or illnesses recorded on the Summary of Occupational Injuries and Illnesses and reflected in the First Report of Injury data.

3. The degree to which implementation of written programs has been verified.

4. Responses to formal and informal interviews. The reviewer must look for an overall pattern in the perceptions of managers, supervisors, employees, and contract employees regarding worksite conditions and the safety and health

management system. Employee responses that are supported by information obtained by document review, observation, or other employee interviews should carry the most weight.

5. When the applicant or participant site is very small or in a low-hazard industry, some of the requirements for formality may be relaxed (for example, informal programs or scaled-down documentation), providing that a strong case can be made to support the effectiveness of the safety and health management system.

B. If the team's analysis of findings fails to produce consensus on specific issues or the overall recommendation, the team leader should contact the HVPP Manager for guidance. This should occur before holding the closing conference and sharing the team findings and recommendations with the applicant/participant.

VI. Recommendations for First-time Participation.

In the final private meeting prior to the closing conference, the onsite evaluation team must reach consensus on their recommendation for program participation. If they cannot reach consensus, they should consult with the HVPP Manager or Administrator or both.

A. General Applicants. The onsite evaluation team must decide among the following recommendations:

1. Star. When the onsite evaluation team finds that an applicant's safety and health management system meets all HVPP requirements at Star quality, a recommendation for participation in the Star Program must be made.

2. Withdrawal of Application. The onsite evaluation team must recommend withdrawal of the application if the site does not meet the requirements for the Star Program.

B. Reserved.

VII. Recommendations for Participants.

The onsite evaluation team must decide among the following recommendations:

A. Star Participants

1. Recommendation for Star Reapproval. When the onsite evaluation team has judged that the participant's safety and health management system continues to meet all Star Program requirements, the team must recommend reapproval to the Star Program upon satisfactory completion of any 90-day items.

2. Recommendation for 1-Year Conditional Participation in the Star Program. The onsite evaluation team must recommend conditional Star Program participation for 1 year (dating from the end of the 90-day deferral period) when the site meets the conditions of both a. and b. below:

a. The participant's safety and health management system has fallen below Star quality in one or more requirements and those requirements can be satisfactorily met during a 90-day deferral of decision.

b. 1-Year Conditional Goals. The team leader, with input from the team members and participant representatives, must establish goals to be accomplished in order for the participant to return to full Star status.

3. 3-year Rates Above the National Average:

If:	Then:
The participant's 3-year rates are above the National or state average, and an onsite evaluation has been conducted.	The site must be placed on 1-Year Conditional status. The HIOSH Administrator may *also* allow a 2-year rate reduction plan to provide the site more time to reduce its rates to below the both the national and state average.
The site's 3-year rates are above the National or state average, and an onsite evaluation has not been conducted.	The site must be placed on a 2-year rate reduction plan approved by the HIOSH Administrator.

In both cases, HIOSH and the participant must determine the safety and health management system deficiencies related to the high rates. The 1-Year Conditional goals, rate reduction plans, or both must address the deficiencies, correction methods, and time frames. Quarterly reports to HIOSH are due during the year.

4. Withdrawal. The onsite evaluation team must recommend withdrawal from HVPP if a Star participant is deficient in one or more requirements and any of the following apply:

   a. Agreement cannot be reached on correction.

   b. Correction cannot be accomplished within a 90-day deferral of decision.

   c. The participant has not made good faith effort on agreed-upon corrections.

B. 1-Year Conditional Star Participants

1. Lifting of 1-Year Conditional Status. If all 1-Year Conditional goals have been met and the safety and health management system has been restored to Star quality, then the onsite evaluation team must recommend lifting the 1- Year Conditional status and returning the site to full Star Program participation.

2. Withdrawal. If all 1-Year Conditional goals have not been met, the onsite evaluation team must recommend that the participant withdraw from the program.

VIII. Closing Conference.

The findings of the onsite evaluation team, including its recommendation to the HVPP Manager, must be presented to management and appropriate employee representatives

before the team leaves the worksite. During the closing conference, the team leader must review:

A. Findings**.** Review the team's findings, addressing each of the major HVPP elements as outlined in Chapter 3. Also review the injury and illness rates and how they compare to the industry national and state average.

B. The Onsite Evaluation Team's Recommendation to the HVPP Manager. Discuss and support the onsite evaluation team's recommendation to the HVPP Manager so that the applicant or participant has a clear idea of how the site measures up to the requirements of HVPP.

C. 90-day Items. Review all uncorrected hazards, expected correction methods, and time frames.

D. Goals**.** Review 1-Year Conditional goals and time frames for correction.

E. Recommendations. Review any recommendations made by the onsite evaluation team for improvement of the applicant/participant's safety and health management system.

F. Responsibilities**.** Remind the applicant/participant of its responsibilities under Chapter 5, Assurances, and Chapter 7, Withdrawal Process.

IX. The Onsite Evaluation Report

A. Purpose of the Report**.** The onsite evaluation team must write a report documenting the onsite evaluation to substantiate the team's recommendation to the HVPP Manager and HIOSH Administrator for approval or reapproval of the applicant/participant into HVPP. If the applicant/participant is approved or reapproved, the report and worksheet will become an official record in the public file along with the application, and will provide baseline data for future evaluation purposes. The report must include the following information:

1. Verification of the application information submitted by an applicant.
2. Documentation of the qualifications of the site for participation.

B. Writing the Onsite Evaluation Report**.** All attempts must be made to complete a draft report before leaving the worksite. The draft report must reflect the consensus of the onsite evaluation team. Each team member must complete the sections of the onsite evaluation report assigned by the team leader, following the format in Appendix D.

1. Review of the Draft Onsite Evaluation Report. Once the draft is complete, the team must review it and make any needed changes.
2. Presentation of the Draft Onsite Evaluation Report. If the draft onsite evaluation report is completed onsite, the draft must be presented at the closing conference. If the draft report is not presented at the time of the closing conference, the team leader must advise the applicant approximately when the draft report will be available for review.
3. Applicant/Participant's Comments and Revised Draft Report. After the draft report is presented to the site, the team leader must allow the applicant or participant 30 days to review and comment on the draft report. A revised version of the onsite evaluation report must be prepared by the team leader following receipt of the site's comments.

C. Reserved.

D. Completing the Final Onsite Evaluation Report. The team leader must compile the final report and submit it to the HVPP Manager and/or HIOSH Administrator for processing.

E. Deferral of Final Onsite Evaluation Report Due to Uncorrected Hazards. The final report may be deferred from submission to the HVPP Manager, HIOSH Administrator, or both if uncorrected hazards are still present at the worksite after the closing conference or after the team leaves the worksite.

F. Deferral Period**.** The final report may be deferred for up to 90 days from the closing conference or until the applicant/participant has corrected all uncontrolled hazards identified by the onsite evaluation team, whichever occurs first.

X. Correction of Remaining Hazards

A. Hazard Correction Plan. Within a week of the closing conference, the applicant/participant must document in a letter to the HVPP Manager or his/her designees any hazard correction plans (this can be the list of 90-day items) and dates that have been agreed to. This letter will be kept on file until a correction letter [see X.B.1. below.] is received.

B. Verification of Hazard Correction.

1. When the applicant/participant has corrected the hazards, it must send a signed letter to the HVPP Manager indicating how and when the corrections were made.
2. The team leader, HVPP Manager, or HIOSH Administrator may decide to conduct a return visit to the site to verify the corrections. The findings of this visit must be written in a correction letter and kept on file. The correction letter may be made available to an Onsite evaluation team at a later date.

C. Finalizing the Onsite Evaluation Report. When hazard correction has been verified, the team leader must remove any lists of uncorrected hazards from the final report before submitting the report to the HVPP Manager.

D. Failure to Correct Hazards by End of Deferral Period. If the deferral period has expired, applicant/participant has not corrected the hazards, and the HVPP Manager has made every attempt to resolve the problem in a manner consistent with the cooperative spirit of the HVPP, then:

1. The HVPP Manager must inform the applicant or participant that the matter is being referred to the HIOSH Administrator. The referral, detailing the hazard(s) and the cooperative efforts made by the HVPP Manager to achieve resolution, must be sent to the HIOSH Administrator for concurrence.
2. The HIOSH Administrator must review the situation and make a decision regarding enforcement action. If the HIOSH Administrator decides that all cooperative efforts have failed and that HIOSH must ensure hazard correction, he/she must send a memorandum to the HVPP Manager instructing the HVPP Manager to inform the appropriate enforcement branch to take enforcement action. [See Chapter 8.]
3. For withdrawal, termination, and reapplication procedures, refer to Chapter 7, Sections VII, VIII, and XIV, respectively.

Chapter VII
Participation Decisions and Management

I. Reserved.

II. Preparing a Recommendation Package.

The HVPP Manager must prepare and submit a recommendation to the HIOSH Administrator within 10 working days following the completion of the final onsite evaluation report. All recommendations are to be based on the onsite evaluation, final evaluation report, and team recommendations. It must contain the following documents:

A. A cover memorandum requesting the Administrator's approval, which shall also include:

1. A brief background of the applicant/participant's company
2. Noteworthy aspects of the applicant/participant's safety and health management system.
3. A brief summary of the reasons for non-approval or recommendation for termination or withdrawal.

B. The final onsite evaluation report

C. A copy of the site information sheet

D. Team composition report

E. A draft letter from the HIOSH Administrator to the company official notifying the company of HIOSH's decision for HVPP participation. For applicants/participants with collective bargaining agents, copies of the letter must be prepared for these officials also. The letter must be one of the following types:

1. Approval Letter, New Participant. For initial approvals, the letter must state that the Administrator is pleased to approve the applicant into the HVPP.
2. Approval Letter, Reapproval. For continuing participants, a congratulatory letter thanking the participant for continued excellence in safety and health management.
3. Non-approval Letter. Where the Administrator concurs with the non-approval of initial status and the applicant/participant has not voluntarily withdrawn the application or from participation in HVPP, the letter must state the reasons for non-approval and provide information on re-application procedures.
4. 1-Year Conditional Status. When the participant is being placed on 1-Year Conditional Status, the letter is to state the reason, how the participant may be removed from Conditional Status, and expressing confidence that the participant will soon be a full Star participant.
5. Lifting of 1-Year Conditional Status. Requires a congratulatory letter from the Administrator

F. Recommendation for Termination. See Section VIII. Below.

III. Administrator's Approval and Participation Dates

A. The HIOSH Administrator makes final decisions for the following:

1. Reapprove (or not approve) participation in the Star Program.
2. Place a Star participant on a 1-Year Conditional status.
3. Lifting of a Star participant's 1-Year Conditional status.
4. Withdrawal or termination of participation.
5. Application withdrawal.

B. Effective dates of participation. For new approvals, reapprovals, lifting of a Star-participants 1-Year Conditional status, or placing a Star participant in 1-Year Conditional Star status, the effective date is the date the Administrator's approval letter is signed.

IV. Notification

A. When the HIOSH Administrator's approval or congratulatory letter is signed, staff must immediately:

1. Mail the letter and the final onsite evaluation report to the participant. This mailing constitutes official notification that the site has been approved for participation in HVPP.
2. Notify the HVPP Manager.

B. Upon learning of the approval of an applicant/participant, the HVPP Manager must:

1. As a courtesy, inform the company of the approval and its effective date.
2. Inform the applicant/participant that an official letter of approval or congratulations will be sent by mail immediately, and that the award certificate and flag will be available in approximately 1 month.
3. Inform the applicant/participant that an award ceremony may be held and that HIOSH officials may be requested to make a formal presentation.

V. Award Certificates, Plaques, and Flags.

Newly approved sites are awarded a plaque and flag. Reapproved sites who have not already received the redesigned plaque (containing reapproval plates) are awarded a plaque.

A. Plaques. The HVPP Manager must notify the ATS manager of the approval or reapproval so that the plaques may be printed and procured.

1. HIOSH will present a personalized plaque measuring 15" x 12" to all new participants that recognizes the initial achievement on a main plate, and also includes 10 small screw-on plates to commemorate subsequent reapprovals. Following each reapproval, the HVPP Manager should inform the participant that it is entitled to engrave the reapproval date onto one of the small plates. No other information should be included on the reapproval plates. Engraving

the small plates is the responsibility of the participant.

2. Upon reapproval, HIOSH will present the 15" x 12" plaque with reapproval plates to any participant who has not received this plaque previously.

B. Flags. HIOSH awards newly approved participants the HVPP flag. The ATS Branch must maintain an inventory of flags.

VI. Approval Ceremonies.

Upon notification of approval, a site representative should contact the HVPP Manager to schedule the ceremony.

A. The HIOSH Administrator or the highest level Departmental representative available must make the presentation. The HIOSH Administrator may represent the DLIR Director.

B. The participant may send an invitation to any personnel who were responsible for recruiting the site for HVPP, as well as higher level HIOSH officials. The onsite team may also be included on the invitation list. In addition, the HVPP Manager should suggest other potential invitees such as local political officials, other area companies that might be potential HVPP candidates, and local HVPP liaison.

C. The HVPP site may consult HIOSH HVPP staff for assistance with any press releases, and the HVPP Manager should give the company names and telephone numbers of other HVPP sites that have had good media coverage.

D. It is highly encouraged that HIOSH issue a press release.

VII. Withdrawal.

Participants may withdraw of their own accord or be asked by HIOSH to withdraw from HVPP. In either case, the HVPP Manager must determine the cause of withdrawal and notify the HIOSH Administrator of the reason and date of withdrawal.

A. Participant Decides to Withdraw. Any participant may choose to withdraw at any time after approval, following the procedures in C. below.

B. HIOSH Requests Withdrawal.

1. HIOSH must request that a participant withdraw from HVPP if it is determined that the site is no longer meeting the requirements for HVPP participation.

2. When a Participant's Location Changes.

a. If 75 percent or more of the employees remain with the employer, then the participant can maintain its HVPP status, but must:

- Submit a new letter of management commitment.
- Submit a new self-evaluation including a comprehensive baseline hazard analysis
- Receive a satisfactory HIOSH onsite evaluation within 12 months (6 months is preferred).

b. If fewer than 75 percent of the employees remain with the

employer, then the participant must withdraw and reapply.

C. Withdrawal Process. The participant must write a letter addressed to the HIOSH Administrator and to the attention of the HVPP Manager, stating that it is withdrawing from the program, with the reason(s) for withdrawal, effective on the date of the letter.

1. The HIOSH Administrator must send the participant a letter acknowledging the withdrawal, with a copy to the HVPP Manager. The letter must also state:

   a. That the HVPP flag and plaque are invalid and must no longer be used.

   b. That the company's application, onsite evaluation reports, approval letters, and annual evaluations will be removed from the public file.

   c. That the establishment must be returned to the programmed inspection list, if applicable, at the time of the next inspection cycle.

   d. That HIOSH will consider a reapplication to HVPP if and when eligibility requirements are met. [See IX. below.]

D. Notification to Enforcement Branches. If applicable, the HIOSH Administrator must notify the appropriate Enforcement Branch Managers that the withdrawn participant is no longer participating in the HVPP and must be returned to the programmed inspection list for the next inspection cycle.

VIII. Termination.

HIOSH may terminate a participant from the HVPP for failure to maintain the requirements of the program. Except where employees appear to be at serious risk, termination by HIOSH must occur only when all efforts for assistance have been exhausted. An example is when HIOSH has identified one or more serious problems and recommended technologically feasible solutions, but the participant has refused.

Termination may also occur when evidence exists that the trust and cooperation among labor, management, and HIOSH, upon which approval was based, no longer exist, or when HIOSH requests a site to withdraw and it does not.

Other possible reasons for HVPP participation ending include: construction work has been completed; or resident contractor participation is no longer possible because the host no longer participates in HVPP. If a resident contractor leaves the hosting HVPP participant's worksite, the resident contractor will no longer be in the HVPP.

HIOSH must handle the termination of a HVPP participant as follows:

A. Notice of Intent to Terminate. The HVPP Manager must notify the participant and union representative(s) in writing of HIOSH's intent to terminate participation in the HVPP.

B. Reconsideration Process. The participant has 30 days from the receipt of the notice to request a reconsideration of the intent to terminate. It must provide to the HIOSH Administrator, through the HVPP Manager, in writing, reasons why it should not be removed from the HVPP.

1. Initial Review by HVPP Manager. Upon review of the participant's justifications for continued participation, the HVPP Manager must determine if

the recommendation for termination is still valid.

2. If the HVPP Manager decides to recommend termination:

   a. Termination Package. The HVPP Manager must send all of the following to the HIOSH Administrator:

      - A memorandum explaining the reason(s) for termination of participation.
      - A copy of the initial intent to terminate letter.
      - A copy of the participant's request for consideration.
      - Any other documents supporting the decision to terminate.
      - A draft termination letter for the Administrator's signature.

   b. Upon review of the termination package, the Administrator may:

      - Either concur and sign the termination letter;
      - Disagree and request additional information from the HVPP Manager and/or the participant. An informal conference may be held to provide further opportunity to present additional facts.

3. Notification of Termination. Once the HIOSH Administrator has signed the termination letter:

   a. The HVPP Manager must be immediately informed of the decision to terminate.

   b. The HVPP Manager must remove the participant from the HVPP Participant's list and return the participant to the programmed inspection list, if applicable, at the time of the next inspection cycle.

   c. The HVPP Manager must notify the Enforcement branches of the participant's termination via memo or e-mail.

   d. The HVPP Manager must remove the company's application, onsite evaluation reports, approval letters, and annual evaluations from the public file.

4. If the HIOSH Administrator finds the participant's request for reconsideration valid, the participant may continue in HVPP.

IX. Reinstatement.

Reinstatement requires reapplication. See table below for time frames.

If:	***And:***	***Then:***
An applicant withdraws its application or a participant withdraws from the program of its own accord.	HIOSH Inspection History conditions and Assurances are met [See Chapter 5].	The site can reapply at any time.
An applicant withdraws its application or a participant withdraws from the program due to an HIOSH enforcement inspection.		The site can reapply when all enforcement activity is closed.
An applicant withdraws its application or a participant withdraws from the program due to withdrawal of union support.		The site can reapply when a new letter of union support is received by the HVPP Manager.
HIOSH terminates a participant.	N/A	The site must wait 3 years to reapply.

Chapter VIII
Enforcement Activity at HVPP Sites

I. Additional HVPP Assessment.

This chapter describes the procedures followed by HIOSH in the event of enforcement activity at a HVPP applicant's or participant's worksite. Two types of enforcement activity trigger additional HVPP assessment:

A. Unprogrammed HIOSH Inspections. Unprogrammed inspections occur in response to all referrals, formal complaints, fatalities, and catastrophes.

B. Other Accidents or Events. Other accidents or events, whether or not injuries or illnesses have occurred and whether or not normal enforcement procedures apply to the situation, may trigger reassessment. HIOSH may reassess the site's safety and health management system if there is reason to believe that a serious deficiency exists that would have an impact on the participant's continued qualification for HVPP.

II. HIOSH Personnel.

As a general rule, a Compliance Officer who served as a HVPP onsite team member may not conduct an enforcement inspection at that HVPP participant for the following 2 years or until the participant is no longer in HVPP, whichever occurs first. The Administrator on a case-by-case basis may choose to override this 2-year requirement.

III. HVPP Activity

A. If the event that triggers enforcement activity occurs during the time between application and onsite evaluation, the onsite evaluation must be postponed until the enforcement case is closed. If there already is an open enforcement case at a site when the Enforcement Branch Manager is notified by a HVPP Manager of a pending onsite evaluation, the Enforcement Branch Manager must inform the HVPP Manager of the enforcement activity so the HVPP evaluation can be postponed.

B. If the event that triggers enforcement activity occurs during the time between the scheduling and the beginning of an onsite evaluation, the HVPP onsite visit must be postponed until the enforcement case is closed.

C. If the event that triggers enforcement activity occurs during the HVPP onsite evaluation, HVPP onsite team members must not switch to an enforcement capacity. They must contact the Enforcement Branch and the HVPP onsite must cease until the enforcement case is closed.

IV. Initiation of Enforcement Activity.

A. When an Enforcement Branch receives a complaint, a referral other than from the onsite team, or is notified of a fatality, catastrophe, or other event requiring enforcement occurring at a HVPP site, the Enforcement Branch Manager must initiate an inspection following normal HIOSH enforcement procedures.

B. When an Enforcement Branch receives a referral from the HVPP onsite team, the

Enforcement Branch Manager must notify the site and the HIOSH Administrator. Enforcement action may be initiated only after the HIOSH Administrator approves such action.

V. Notification.

A. The Enforcement Branch Manager must immediately notify the HVPP Manager of any fatalities, catastrophes or other accidents, or incidents requiring enforcement that occur at a HVPP worksite, as well as when a referral or complaint is received from a HVPP worksite, including informal complaints that receive responses by letter.

B. If the HVPP Manager is the first person to be notified by the participant of an event requiring enforcement, the HVPP Manager must instruct the participant to contact the appropriate Enforcement Branch.

C. Fatalities, catastrophes, and accidents or incidents involving significant publicity: If the event is catastrophic in nature, involves a fatality or multiple fatalities, and/or is highly visible with press coverage, then it is appropriate to contact the DLIR Director's Office. Press inquiries must be referred to the DLIR Director's Office and/or designated DLIR spokesperson.

1. Upon being informed of the event, the HVPP Manager must immediately provide a description of the event, by e-mail and/or telephone, to all of the following:
    a. The HIOSH Administrator. The HIOSH Administrator may inform the OSHA Area Director.
    b. The DLIR Director.
2. The description of the fatality, catastrophe, or other significant event must include the following information:
    a. Participant name.
    b. Current HVPP status.
    c. Number of years in HVPP.
    d. Last evaluation date.
    e. Last approval date.
    f. Date of event.
    g. Involved parties (employee, contractor, or both).
    h. Nature of event if known.
    i. IMIS inspection number.
3. As pertinent information relating to the event and its cause(s) becomes available, the HVPP Manager must update the HIOSH Administrator and DLIR Director.

VI. Inspection Results.

When enforcement activity is complete, i.e. when the citation(s) is/are issued or it is determined that no citation will be issued):

A. The Enforcement Branch Manager must send the HVPP Manager a copy of all

reports resulting from enforcement activity.

B. The HVPP Manager must review any reports of investigations triggered by referrals, formal or non-formal complaints, or letters written by the Enforcement Branch concerning conditions at the HVPP worksite, fatalities/catastrophes, and other accidents or incidents requiring enforcement or involving publicity.

C. The HVPP Manager and HIOSH Administrator must assess whether deficiencies in the participant's safety and health management system led to the event and, if so, must use their professional judgment and discretion to determine one of the following courses of action:

1. In cases where there are no obvious systemic errors in the participant's safety and health management system, the participant was cooperative with the investigation, HIOSH issued no willful violations, all cited hazards were abated, and HVPP elements continue to be in place, a phone call with the participant is sufficient to:

    a. Obtain assurances that site management and unions (if applicable) remain committed to HVPP.

    b. Note any improvements in the site's systems, policies, procedures, and/or hazard controls.

    c. Determine whether the site remains qualified for HVPP participation.

2. In cases where there were minor systemic errors/failures in the participant's safety and health management system or incorrect/inappropriate hazard control(s) selected, and where there were no fatalities, the participant was cooperative with the investigation, HIOSH issued no willful violations, and all cited hazards were abated, but where HVPP elements may not be in place, the HVPP Manager must visit the participant to:

    a. Review conditions pertaining to the event.

    b. Obtain assurances that site management and unions (if applicable) remain committed to HVPP.

    c. Determine if the participant remains qualified for HVPP participation.

3. In cases where the enforcement inspection leads to concerns about major failures in the participant's safety and health management system, or a non-fatal accident occurred indicating that HVPP elements are not in place, or the participant is due for reapproval, an onsite evaluation must be conducted to:

    a. Review all safety and health management system elements.

    b. Obtain assurances that site management and unions (if applicable) remain committed to HVPP.

    c. Determine if the participant remains qualified for HVPP participation.

4. In cases where a willful violation(s) is issued or the worksite is placed in the Severe Violator Enforcement Program, the HVPP Manager will issue a "Notice of Intent to Terminate" within 10 days of the completion of the enforcement inspection. See Chapter 7, Section VIII, Termination.

5. When a fatality is deemed work-related, the HVPP Manager will issue a "Notice of Intent to Terminate" within 10 days of the completion of the enforcement inspection. See Chapter 7, Section VIII, Termination.

VII. Documentation and Submission of Assessment.

The HVPP Manager must prepare a report of findings as follows:

A. If a telephone interview or onsite visit was conducted in the case of VI.C.1. or 2. respectively, above, the HVPP Manager must prepare and submit a simplified report to the HIOSH Administrator detailing the findings and recommendation for participation, withdrawal, or termination.

B. If an onsite evaluation was conducted in the case of VI.C.3. above,

1. The HVPP Manager must prepare and submit a full onsite evaluation report to the HIOSH Administrator detailing the findings and recommendation for participation, withdrawal, or termination.
2. The HVPP Manager must also submit a Significant Event Report (see Appendix B) to the Administrator and to the OSHA Honolulu Area Director. (If a FATCAT report has been submitted, attach it and complete non-duplicative entries on the Significant Event Report.)

VIII. Decision to Continue Participation or Recommend Withdrawal or Termination.

A. In the case of VI.C.1 or 2 above, the HVPP Manager may approve the site's continued participation. The HVPP Manager must forward a memorandum to the HIOSH Administrator describing his/her decision. No further action is necessary. If the HVPP Manager decides to recommend termination, the procedures in Chapter 7 must be followed.

B. In the case of VI.C.3. above, the HVPP Manager must review the onsite evaluation report and the onsite team's recommendation in order to make a recommendation regarding the site's continued participation. The HVPP Manager must forward a memorandum describing his/her recommendation to the HIOSH Administrator.

1. If the HVPP Manager decides to recommend termination, the procedures in Chapter 7 must be followed.
2. If the HIOSH Administrator decides that the site may continue its participation, the HVPP Manager will be notified. After being notified of the HIOSH Administrator's decision, the HVPP Manager must:
    a. Notify the site of the Administrator's decision, and no further action is necessary, or
    b. Reapprove the site according to procedures in Chapter 7, if the purpose of the onsite was also to determine reapproval.

IX. Confidentiality.

Information gathered during the HVPP assessment cannot be used by the Enforcement Branches for any enforcement activity at the worksite unless the worksite has refused to correct hazards found by the HVPP team, the team has recommended enforcement action, and the HIOSH Administrator has initiated such action.

Appendix A - Instructions for Calculating Injury and Illness Rates

I. Definitions

A. Total Case Incidence Rate (TCIR). Total number of recordable injuries and illness cases per 100 full-time employees that a site has experienced in a given time frame.

B. Days Away, Restricted, and/or Transfer (DART) Case Incidence Rate. Number of recordable injuries and illness cases per 100 full-time employees resulting in days away from work, restricted work activity, and/or job transfer that a site has experienced in a given time frame.

II. Review of Rates

New applicants and current participants are required to calculate annual rates and 3-year rates for the last 3 complete calendar years. Use information recorded in the OSHA 300 log.

HVPP onsite teams will calculate the applicant/participant's rates for the previous 3 full calendar years and year-to-date. When reviewing participants, the HVPP onsite teams also will review the rates of each applicable contractor.

III. Contractor Rates

A. Copies of each applicable contractor's hours worked and injury and illness data pertaining to the applicant/participant must be maintained by management. (See glossary for definition of applicable contractor).

B. Injury and illness data for temporary and contractor employees who are regularly intermingled with the owner's employees and under direct supervision by management must be included in the applicant/participant's rates.

IV. Construction Sites

Construction applicants must provide TCIR and DART rates. All employees, including all subcontractors who worked at the worksite, must be included in the calculation. The rates must reflect experience from time of worksite inception until time of application, but must be at least 12 months. The applicant/participant's SIC or NAICS code is determined by the type of construction project, not individual trades.

V. Rate Calculations

A. Annual rates are calculated by the formula (N/EH) x 200,000 where:

N = Sum of the number of recordable injuries and illnesses in the year.

For the TCIR use the total number of injuries plus illnesses.

For the DART rate use injuries and illnesses resulting in days away from work, restricted work activity, and/or job transfer.

EH = total number of hours worked by all employees in the year, including temporary employees and contractors directly

supervised by applicant/participant.

200,000 = equivalent of 100 full-time employees working 40 hours per week, 50 weeks per year.

B. 3-Year TCIR Calculation. To calculate 3-year TCIR, add the number of all recordable injuries and illnesses for the past 3 years and divide by total hours worked for those years. Multiply the result by 200,000.

$$\frac{[(\#inj + \#ill) + (\#inj + \#ill) + (\#inj + \#ill)]}{[hours + hours + hours]} \times 200{,}000$$

C. 3-year DART Rate Calculation. To calculate 3-year DART rate, use the same formula as in B. above, except add the number of all recordable injuries and illnesses resulting in days away from work, restricted work activity, and/or job transfer for the past 3 years.

$$\frac{[(\#DART\ inj + ill) + (\#DART\ inj + ill) + (\#DART\ inj + ill)]}{[hours + hours + hours]} \times 200{,}000$$

D. Rounding Instructions. You must round the rates to the nearest tenth following traditional mathematical rounding rules. For example, round 5.88 up to 5.9; round 5.82 down to 5.8; round 5.85 up to 5.9.

VI. Comparison to National Averages and State Averages

Compare the 3-year TCIR and DART rate to any one of the three most recent years of specific industry national and state averages for nonfatal injuries at the most precise level published by the Bureau of Labor Statistics (BLS). The national and state industry average must be for the same year.

A. These national and state averages, currently broken down by NAICS code, are found in the Table of Incidence Rates of Non-fatal Occupational Injuries and Illnesses by Industry of the BLS Occupational Injuries and Illnesses Bulletin that BLS publishes each year at: http://www.bls.gov/iif/

State averages may be found at: http://www.bls.gov/iif/oshstate.htm#HI

B. To calculate the percent above or below the national or state average use the following formula:

$$\frac{\text{Site rate - BLS rate}}{\text{BLS rate}} \times 100$$

VII. Alternative Calculation for Small Worksites

A. An alternative rate calculation is available to worksites where a single or relatively small number of incidences would cause the worksite's disqualification when using the normal 3-year rate calculation.

B. If the following criteria are met, the TCIR and DART rate calculations can be based on the best 3 out of the most recent 4 complete calendar years' injury and illness incidence experience.

1. Using the most recent calendar year's hours worked, calculate a hypothetical TCIR assuming the employer had two cases for the year.
2. Compare the hypothetical rate to the 3 most recently published years of BLS combined injury/illness Total Case Incidence Rates for the industry.
3. If the hypothetical rate is equal to or higher than the BLS rate in at least 1 of the 3 years, the employer qualifies for the alternative rate calculation method.

The following tables may be used in calculating rates and comparing them to the national and state averages. A separate Table 2 should be used for each applicable contractor, and the information should pertain to the worksite experience only, not the contractor's entire company.

Table 1. Site Employee Recordable Injury and Illness Case Incidence Rates					
Year	**Total Work Hours**	**Total Number of Injuries and Illnesses**	**Total Case Incidence Rate for Injuries and Illnesses (TCIR)**	**Total Number of Injury & Illness Cases Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer**	**Days Away from Work, Restricted Work Activity, and/or Job Transfer Rate (DART Rate)**
3 Years Ago (annual)					
2 Years Ago (annual)					
Last Year (annual)					
3-Year Totals & Rates					
BLS Rates for NAICS code _____: Year 1 (most recently published)					
Year 2 (prior to Year 1)					
Year 3 (prior to Year 2)					
Hawaii state average, Year 1					
Hawaii state average, Year 2					
Hawaii state average, Year 3					
Percent above or below BLS year _____ National Average (select the most advantageous single year: compare both your 3-year rates with that year's average rates)					
Percent above or below State average. (most advantageous single year must be the same year for both national and state averages.					

Table 2. Site Applicable Contractor Recordable Nonfatal Injury and Illness Case Incidence Rates (for work at your site only)					
Year	**Total Work Hours**	**Total Number of Injuries and Illnesses**	**Total Case Incidence Rate for Injuries and Illnesses (TCIR)**	**Total Number of Injury & Illness Cases Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer**	**Days Away from Work, Restricted Work Activity, and/or Job Transfer Rate (DART Rate)**
3 Years Ago (annual)					
2 Years Ago (annual)					
Last Year (annual)					

Appendix B - Activity Reports

I. HVPP Program Data

A. Data Submitted to the OSHA Honolulu Area Office and the Administrator

1. As part of the ongoing process of maintaining current statistics and data on all approved HVPP participants, the HVPP Manager must ensure that the HVPP Activity Report (HVPP Log) is received in the OSHA Honolulu Area Office monthly, no later than the 15th of the month following the report period, with a copy to the HIOSH Administrator. Reports may be emailed or faxed to the attention of the OSHA Honolulu Area Director.
2. The Significant Incident Report is to be submitted to the OSHA Honolulu Area Director, with copy to Administrator, upon completion of the evaluation.

II. Voluntary Protection Programs Automated Database System (VADS)

The Voluntary Protection Programs Automated Database System (VADS) is a database that includes approved VPP participants (Federal and state-plan jurisdiction) and Federal jurisdiction VPP applicants. A record is maintained for each participant with corporate, company, worksite, and onsite information. VADS is maintained by the National Office and is accessible only to authorized users.

VADS contains information on all of the worksites that are now or previously were in the VPP. This data is stored in a three-tiered structure in the system. Once an application to the VPP is accepted, a copy of the application's general information section must be submitted to the National Office so that a record can be created in VADS to store pertinent data for the specific worksite, such as name of worksite, location, SIC or NAICS code, rates history, onsite history, etc.

III. Data Charts

On a monthly basis, DCSP generates monthly aggregate data charts/statistics that reflect current totals of all approved VPP sites (Federal and State). The data charts reflect the growth of VPP since its inception, the size (# of employees) of VPP participants, VPP participants by region, union and non-union participants, industry types in the VPP, and other pertinent information about the program.

Attachment I: HVPP Log

State of Hawaii, Hawaii Voluntary Protection Program Log for Month of Click here to enter text.

Date Submitted: 4/24/2014

Submitted By: Click here to enter text.

APPLICANTS/PARTICIPANTS DATA									Onsite Evaluation Data		
Name	City	SIC	NAICS	Status	Date Rec'd[1]	Date Read	Date Accepted	Delay Code	Onsite Date	90-Day Item Date	# of SGEs Used

Problematic Applications[2]	Total No.
Unread >3 Months	
Total Unread	
Total Returned	
Total Complete	
Onsite Not scheduled within 6 months	

* **APPLICATION STATUS CODES**

1 = Received/Unread; 2 = Received/Incomplete, 3 = Returned, 4 = Received/Complete

* ***REASON FOR DELAY CODES**

R = Delay in Scheduling of Pre-Approval Onsite Requested by Applicant

A = Administration Delay (e.g., Received several applications at same time; Insufficient staff; Delay in securing SGEs

O = Other (Explain here _____)

NOTE: Applicants/Participants remain on log each month until 90-day items are verified as completed.

[1] Date Received is when a substantially complete application is received by HIOSH. If an application is returned as incomplete, the date received is when the application is re-submitted as completed.
[2] Unlikely to meet 6 month requirement for onsite visit.

INSTRUCTIONS FOR COMPLETING THE HVPP ACTIVITY REPORT (HVPP LOG)

Column 1 -- enter the name of the applicant.

Column 2 - enter the city of the applicant

Column 3 -- enter the 4 digit Standard Industrial Classification (SIC) code of the applicant

Column 4 – enter the 6-digit North American Industry Classification System (NAICS) code of the applicant.

Column 5 -- enter the application status code from the list

Column 6 -- enter the date HIOSH received the application

Column 7 -- enter the date the application was read/reviewed for eligibility.

Column 8 -- enter the date the applicant was determined to be eligible for an onsite.

Column 9 -- enter any Delay Codes – if the onsite is scheduled more than 6 months from the date the application was received, enter the appropriate Delay Code

Column 10 – enter the date the onsite is scheduled (Note any changes to the scheduled onsite date in the subsequent months' reports.

Column 11 -- enter the date any 90-day items are due.

Column 12 -- enter the number of SGEs used on the onsite evaluation.

Attachment 2: Significant Incident Report

Date Submitted: Click here to enter a date. Prepared By: Click here to enter text.

Site Name:		State:	HAWAII	Investigation Type:
Site Address:		SIC/NAICS:		Accident ☐ Referral ☐ Complaint ☐ Other ☐
Last Approval Date:		Union (Y/N):		Classification:
Mishap Date:		# Employees:		Fatality ☐ Incident ☐ Catastrophe ☐
Investigation Date:		# Applicable Contractors:		
IMIS Reference #:		Years in HVPP:		
Lead Investigator:		Citations (Y/N):		
Area Office:		HVPP Program @ Time:		
Onsite Evaluation Date:		Press Coverage (Y/N):		
Citations:		# of Injuries:		
		# of Fatalities:		
		HVPP Report (Y/N):		
		Persons Affected:		
Mishap Description:		Recommendations/Comments:		
		Program Recommendation:		

Onsite Evaluation Date: The date of the HVPP evaluation conducted in response to the event. This includes the date of the phone call if that is what is done.
Citations: We are interested in the nature of the citations, i.e. Serious, Willful, Other-Than Serious, for example 2 Serious and 1 Other-Than-Serious.
Persons Affected: The answer can be employee, contractor or both.
Recommendation/Comments: This section is very important and is used to describe the rationale for the basis for your recommendation for participation.
Program Recommendation: Several choices they are: Continued Star, Conditional, and Withdrawal

Appendix C - Format for Annual Submissions

HIOSH requires each HVPP participant to perform annually a self-evaluation of its safety and health management system. This self-evaluation, reflecting the previous calendar year's experience, must be submitted to the HVPP Manager by February 15 of each year. Participants will find it useful to review the VPP Federal Register Notice, 74 FR 927, January 9, 2009, which includes annual submission requirements, safety and health management system requirements applicable to all participants, plus additional requirements unique to the participant's chosen way to participate.

The annual self-evaluation is not a compliance audit. It is a critical review to assess the effectiveness of all four HVPP elements and their sub-elements, and to analyze participant and contractor injury and illness data and trends. It should include a review of written programs, a walk-through of the workplace, and interviews with employees. During this process, participants should answer the following questions relating to each element and sub-element of their safety and health management system:

1. Is it comprehensive?
2. Is it operating effectively and meeting established goals and objectives?
3. Are there problems that require the development and implementation of solutions in order to maintain excellent worker protection and continued VPP eligibility?
4. What improvements can be made to make it even more effective?
5. What goal modifications should be made for the upcoming year?

HIOSH expects the evaluation to include participant and applicable contractor injury and illness data, progress toward 1-Year Conditional Star goals (if applicable), and success stories. HIOSH uses the submitted information to update records and statistics, showcase successes related to implementation of the HVPP requirements, and demonstrate that participants are committed to continuous improvement of worker safety and health at their facilities.

Additionally, participants that fall under OSHA's Process Safety Management (PSM) standard must provide responses to all applicable questions found in the PSM Supplement B questionnaire. The responses must cover all PSM operations within the site/DGA.

HIOSH encourages participants to use the following suggested format in preparing their annual self-evaluation submission:

Revised Suggested Format for Participant's Annual Submission

Table A-1 Participant Summary Sheet			
To be completed by all VPP Participants			
HVPP Participant Name Address Phone		**Calendar Year**	**Date Submitted**
Corporate Information (if different from above)	Name Address Phone		
Site/DGA Manager Name Phone E-Mail Fax	**Site/DGA HVPP Contact** Name Phone E-Mail Fax		**NAICS Code** **HVPP Status**
Does the site have Pressure Vessels?		**Does the site fall under the OSHA PSM Standard? (If yes, you must complete PSM Supplement B.)**	
To be completed by Site-Based Non-Construction Participant (1)			
Number of Employees	**Hours Worked**	**TCIR**	**DART Rate**
Summary - All Applicable Contractors of a Site-Based Non-Construction Participant (2)			
Total Number of Applicable Contractor Employees	**Hours Worked Onsite of All Applicable Contractor Employees**	**Combined Applicable Contractor TCIR**	**Combined Applicable Contractor DART Rate**
To be completed by Site-Based Construction or Mobile Workforce Participant (3)			
Total Number of All Site/DGA Employees Including All Contractor Employees	**Hours Worked of All Site/DGA Employees Including All Contractor Employees**	**Combined TCIR**	**Combined DART Rate**

(1) Site-based Non-Construction Participants: Enter the average number of employees employed at the site and the total hours worked by the participant's own employees (including temporary and contractor employees regularly intermingled with and directly supervised by participant employees) at the approved site. Injury and illness data should correspond with information normally found in the appropriate column of the participant's OSHA 300 (A) Summary of Work-Related Injuries and Illnesses and optional worksheets.

(2) Summary of Applicable Contractors of Site-Based Non-Construction Participants: All data in these cells must reflect the combined employee numbers and hours worked of **only applicable contractors' employees** at the approved site. Applicable contractor data **must not** be combined with participant employee numbers and site hours unless contractor employees are regularly intermingled with and directly supervised by participant employees.

(3) Site-Based Construction and Mobile Workforce Participants: All data must reflect the combined workforce of participant employees and all contractor/subcontractor employees.

Table A-2 Union Information	
Union Name	
Union Local Number	
Union Representative for the Site/DGA	
Address	
Phone	
E-Mail	
Fax	

Section B: Injury & Illness Rate Information

Injury and illness rate information for the previous calendar year must be received by the HVPP Manager at:

DLIR-HIOSH
830 Punchbowl Street, Room 423
Honolulu, Hawaii, 96813

Attention: HVPP Manager

no later than February 15th of each year, along with your annual self-evaluation.

(1) Site-based Non-Construction Participants: Use Table B-1 below to submit data for your own site employees including temporary employees and any contractor employees regularly intermingled with and directly supervised by your employees. On the Participant Summary Sheet (see Section A, Table A-1), you will record some of the data you record in Table B-1.

(2) Site-based Non-Construction Participants with Applicable Contractors: Use Table B-2. Provide a **separate Table B-2 for each applicable contractor** (an applicable contractor is a contractor whose employees worked 1,000 hours or more at your site in any calendar quarter). Report applicable contractor injury and illness experience only for work at your site. Do not combine this data with your own site employee data. The NAICS code should reflect the applicable contractor's primary work activity at your site, and not necessarily the participant's NAICS code. On the Participant Summary Sheet (see Section A, Table A-1) you will record combined data for all applicable contractors.

(3) Site-Based Construction and Mobile Workforce Participants: Use Table B-1. Submit combined work hours and combined injuries and illnesses of **all employees.** This must include your own employees including temporary employees plus all contractor/subcontractor employees. Use this combined data to calculate your site or DGA TCIR and DART rate. On the Participant Summary Sheet (see Section A, Table A-1) you also will record combined data.

Table B-1 **VPP Participant's Recordable Non-Fatal Injury and Illness Case Incidence Rates**						
1	2	3	4	5	6	7
Year	Total Number Employees	Total Work Hours	Total Number of Injuries & Illnesses	Total Case Incidence Rate for Injuries and Illnesses (TCIR)	Total Number of Injury & Illness Cases Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Days Away from Work, Restricted Work Activity, and/or Job Transfer Rate (DART Rate)
Most recent published BLS rate for NAICS code _____						
Percent above or below National Average						
Most recent published BLS state rate for same NAICS code						
Percent above or below State Average.						
Participant's 3-Year TCIR and DART rate						

Table B-2 **Applicable Contractor Recordable Nonfatal Injury and Illness Case Incidence Rates** **(for use by site-based non-construction participants)** **(for the applicable contractor's work at your site only)**						
Name of Applicable Contractor						
NAICS Code for applicable contractor's work at your site						
1	2	3	4	5	6	7
Year	Total Number Employees*	Total Work Hours	Total Number of Injuries & Illnesses	Total Case Incidence Rate for Injuries and Illnesses (TCIR)	Total Number of Injury & Illness Cases Involving Days Away from Work, Restricted Work Activity, and/or Job Transfer	Days Away from Work, Restricted Work Activity, and/or Job Transfer Rate (DART Rate)
Most recent published BLS rate for NAICS code _____						
Percent above or below National Average						
Most recent published BLS state rate for						

same NAICS code			
Percent above or below State Average.			

* Estimated average number of applicable contractor employees.

Calculating Rates for Tables B-1 and B-2

Annual rates are calculated by the formula **(N/EH) x 200,000** where:

N = Total number of recordable nonfatal injuries and illnesses during the calendar year. ***Site-based non-construction participants***: This number will be the total injuries and illnesses of your site employees including temporary employees and any contractor employees regularly intermingled with and directly supervised by your employees. ***Site-based construction participants and mobile workforce participants***: This number will be total injuries and illnesses of your own employees **plus** all contractor/subcontractor employees.

For the TCIR use the total number of injuries and illnesses.

For the DART rate use injuries and illnesses resulting in days away from work, restricted work activity, and/or job transfer.

EH = Total number of hours worked by employees during the year. ***Site-based non-construction participants***: This number will be hours worked by your site employees including temporary employees and any contractor employees regularly intermingled with and directly supervised by your employees. ***Site-based construction participants and mobile workforce participants***: This number will be hours worked by your own employees including temporary employees and contractors directly supervised by applicant/participant **plus** all contractor/subcontractor employees.

200,000 = equivalent of 100 full-time employees working 40 hours per week, 50 weeks per year.

BLS data: Insert the TCIR and DART rates for your industry from the Bureau of Labor Statistics (BLS) Table of Incidence Rates of Nonfatal Occupational Injuries and Illnesses by Industry. Find the table at www.BLS.gov or obtain from your HVPP Manager. Compare your rates to the most recently published BLS average rates for your industry, both national and state: Calculate the percent above or below the BLS national average and State average for your TCIR and DART rates using the formula: [(Site rate - BLS rate) ¸ BLS rate] x 100.

When Participant Rates Have Increased

If your 1-year site/DGA TCIR or DART rate has increased since last year, you must identify and describe the contributing factors and corrective actions you have taken. Include this information in the narrative evaluation of each related element and sub-element. See Section D below.

If your 3-year site/DGA TCIR or DART rate now exceeds the highest rate of the last 3 years published by the BLS statistics for your NAICS code, you must submit a rate reduction plan based on your findings. Contact the HVPP Manager to discuss the terms of your rate reduction plan.

Section C: Significant Events or Changes

Describe the impact of any significant event, the change that occurred, and the steps taken to ensure or restore employee safety and health e.g. change in management, corporate buy-out, complaint, accident, catastrophe, fatality, etc.

Section D: Narrative Evaluation of Safety and Health Management System

In narrative form, describe the effectiveness of each of the four elements (and their sub-elements) of your safety and health management system. They are:

1. Management Leadership and Employee Involvement
    a. Management Commitment to Safety and Health Protection and to VPP Participation
    b. Policy
    c. Goals, Objectives, and Planning
    d. Visible Top Management Leadership
    e. Responsibility and Authority
    f. Line Accountability
    g. Resources
    h. Employee Involvement
    i. Contract Employee Coverage
    j. Written Safety and Health Management System
2. Work site Analysis
    a. Hazard Analysis of Routine Jobs, Tasks, and Processes
    b. Hazard Analysis of Significant Changes, New Processes, and Non-Routine Tasks - Including pre-use analysis and new baselines
    c. Routine Self-Inspections
    d. Hazard Reporting System for Employees
    e. Industrial Hygiene Program
    f. Investigation of Accidents and Near-Misses
    g. Trend/Pattern Analysis
3. Hazard Prevention and Control
    a. Certified Professional Resources
    b. Hazard Elimination and Control Methods - Engineering Controls - Administrative Controls - Work Practice Controls and Hazard Control Programs - Safety and Health Rules and Disciplinary System - Personal Protective Equipment
    c. Process Safety Management (if applicable)
    d. Occupational Health Care Program
    e. Preventive/Predictive Maintenance
    f. Tracking of Hazard Correction
    g. Emergency Preparedness

4. Safety and Health Training
    a. Managers
    b. Supervisors
    c. Employees
    d. Emergencies
    e. PPE

For each sub-element also include a description of:

- Improvements made since the previous year and completion of the previous year's recommendations.
- Any deficiencies identified, recommendations for improvement, the person(s) responsible for fulfilling each new recommendation, target dates for their completion, and the data/information reviewed to assess the effectiveness of the sub-element.

Section E: Summary Chart of Merit or 1-Year Conditional Goals

Please fill in the table below, using as many rows as necessary to summarize all of the goals currently awaiting completion of implementation, either from the previous year or the current year.

Goal	Status
Goal 1:	
Goal 2:	
Goal 3:	

Section F: Best Practices and Success Stories

Please describe any success stories related to the implementation of HVPP requirements. Include anecdotal as well as statistical evidence of improvements, non-routine safety and health activities, outreach, etc.

Appendix D - Onsite Evaluation Report Format

Site-Based Participation Evaluation Report

Company Name
City, State

Onsite Evaluation Date

Month – Start/End Date, 20XX

HVPP Evaluation Team

Name, Title

Name, Title

Name, Title

Name, Title

Name, Title

Name, Title

EXECUTIVE SUMMARY

I. Purpose and Scope of Review

An onsite review was conducted from <**Date**>, at the <**Organization**> in **<City, State>**. The purpose of the evaluation was to determine the site's **<eligibility or continued eligibility>** for site-based participation in the Hawaii Occupational Safety and Health Division's (HIOSH) Hawaii Voluntary Protection Programs (HVPP). The HVPP Evaluation Team consisted of:

Name, Title/Special Government Employee (SGE), Office, City, State

Name, Title/Special Government Employee (SGE), Office, City, State

Name, Title/Special Government Employee (SGE), Office, City, State

Name, Title/Special Government Employee (SGE), Office, City, State

Name, Title/Special Government Employee (SGE), Office, City, State

II. Methods of Data Collection

The information for this report was obtained from the site's HVPP application, documentation reviewed onsite, interviews with employees and management personnel, annual evaluation reports, and physical observations of the facility(ies).

III. Employees at the Worksite

There are **<XXX>** employees working on site. In addition, there are **<XXX>** contractor employees onsite performing maintenance, capital projects, guard services, janitorial services, etc. Employees at the site are represented by the **<insert union name(s) and local(s)>**. (Employees at the site are not represented by a collective bargaining agent.) Formal interviews were conducted with **<XX >**site employees and **<XX>** contract employees. Informal interviews were conducted with **<XXX>** site employees and **<XXX>** contract employees.

IV. The Worksite

The site is properly classified under North American Industrial Classification System (NAICS) code <XXXXXX>. **Provide a description of the site, e.g., size, location, operation, buildings, etc. Describe the site's processes, productions, and applications.** Housekeeping at the facility was considered by the VPP Evaluation Team to be **<please select one: poor, fair, good or excellent>**.

V. Worksite Hazards

The hazards at the site include, but are not limited to **<state hazards>.** The site **<does or does not>** use chemicals considered to be highly hazardous and in sufficient quantity to place the site under the Process Safety Management (PSM) Standard.

VI. Injury and Illness Rates

The three-year Total Case Incidence Rate (TCIR) and Days Away/Restricted/Transferred Case Incidence (DART) rate for the period <**20XX-20XX>** are **<XX>** and **<XX>,** respectively. The site TCIR is **<XX%> <above/below>,** and the DART rate is **<XX%> <above/below>** the 20XX Bureau of Labor Statistics (BLS) industry average for NAICS code <**XXXXXX>** for 20XX; and the site TCIR is **<XX%> <above/below>,** and the DART rate is **<XX%> <above/below>** the 20XX Bureau of Labor Statistics (BLS) Hawaii state industry average for NAICS code <**XXXXXX>** for 20XX

Team leader must verify that a comparison has been conducted against the site's injury and illness rates reviewed during the evaluation and the site's injury and illness rates reported in its annual self- evaluation.

Year	Hours	Total # of Cases	TCIR Rate	Number of Cases Involving Days Away from Work, Restricted Activity or Job Transfer	DART Rate
20XX					
20XX					
20XX					
Total					
Three-Year Rate (20XX-20XX)					
BLS National Average for 20XX (NAICS XXXXXX)					
BLS Hawaii State Average for 20xx (NAICS XXXXXX)					
20XX YTD					

VII. HIOSH Activity

There has been no HIOSH inspection activity or fatalities at this site within the past **<XX>** years. The site maintains an excellent relationship with HIOSH.

VIII. Elements of the HVPP Review/Program Changes

The VPP Evaluation Team has examined each of the required elements of the site's safety and health management programs. All VPP requirements have been met and all OSHA standards are appropriately covered.

Bullet summary information of VPP Elements.

- Management Leadership and Employee Involvement
- Worksite Analysis
- Hazard Prevention and Control
- Safety and Health Training

<For Reapproval evaluations>, discuss significant program or site changes since the last visit. A bulleted list is acceptable. [*For Star reapproval evaluations recommending One-Year Conditional, add the following sentence*: Refer to Section XI for discussion of safety and health management program corrections.]

<**Incentive Programs**>The site utilizes an incentive program which meets the requirements of Memorandum #5: Further Improvements to the Voluntary Protection Programs (VPP) dated 6/29/11[3]. **OR** The site does not utilize an incentive program.

IX. Areas of Excellence

All elements of the participant's safety and health management system met the high quality expected of HVPP participants (or describe the program requirements that you considered an area of excellence). *NOTE: Do not characterize the safety and health management programs as meeting the high quality expected of VPP participants if the team is recommending One-Year Conditional reapproval.*

X. Recommendation for Participation

The HVPP Evaluation Team recommends **<Site name, City, State>** be approved for participation in the Hawaii VPP Star Program (*add if relevant* but placed on One-Year Conditional status *or* but required to develop an agreed upon Two-Year Rate Reduction Plan).

XI. Goals (if applicable)

- 1-Year Conditional goals (if relevant)
- Two Year Rate-Reduction Plan (if relevant)

[3] https://www.osha.gov/dcsp/vpp/policy_memo5.html

Site-Based Participation Evaluation Report

Company Name

City, State

Onsite Evaluation Date

Month – Start/End Date, 20XX

Section I: Management Leadership & Employee Involvement	Yes or No	How Assessed: Interview	Observation	Doc Review
A. Written Safety & Health Management System				
A1. *Are all the elements (such as Management Leadership and Employee Involvement, Worksite Analysis, Hazard Prevention and Control, and Safety and Health Training) and sub-elements of a basic safety and health management system part of a signed, written document? If not, please explain.* •				
A2. *Have all HVPP elements and sub-elements been in place at least 1 year? If not, please identify those elements that have not been in place for at least 1 year.* •				
A3. *Is the written safety and health management system at least minimally effective to address the scope and complexity of worksite hazards? If not, please explain.* **MR⊘** •				
A4. *Have any HVPP documentation requirements been waived (as per FRN, VOL. 74, NO. 6, 01/09/09 page 936, IV, A.4.)? If so, please explain.* •				

Section I: Management Leadership & Employee Involvement	**Yes or No**	**How Assessed** Interview	Observation	Doc Review
B. Management Commitment & Leadership				
B1. *Does management overall demonstrate at least minimally effective, visible leadership with respect to the safety and health management system (as per FRN, VOL. 74, NO. 6, 01/09/09 page 936, IV. A.5. a-h)? Provide examples.* **MR⊘** •				
B2. *How has the site communicated established policies and results-oriented goals and objectives for employee safety to employees?* •				
B3. *Do employees understand the goals and objectives for the safety and health management system?* •				
B4. *Are the safety and health management system goals and objectives meaningful and attainable? Provide examples supporting the meaningfulness and attainability (or lack thereof if answer is no) of the goal(s). (Attainability can either be unrealistic/realistic goals or poor/good implementation to achieve them.)* •				
B5. *How does the site measure its progress towards the safety and health management system goals and objectives? Provide examples.* •				

Section I: Management Leadership & Employee Involvement	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
C. Planning				
C1. *How does the site integrate planning for safety and health with its overall management planning process (for example, budget development, resource allocation, or training)?* •				
C2. *Is safety and health effectively integrated into the site's overall management planning process? If not, please explain.* •				
C3. *For site-based construction sites, is safety included in the planning phase of each project?* **MR⊘** •				

Section I: Management Leadership & Employee Involvement	**Yes or No**	**How Assessed** Interview	Observation	Doc Review
D. Authority and Line Accountability				
D1. *Does top management accept ultimate responsibility for safety and health? (Top management acknowledges ultimate responsibility even if some safety and health functions are delegated to others.) If not, please explain.* **MR⊘** •				
D2. *How is the assignment of authority and responsibility documented and communicated (for example, organization charts, job descriptions, etc.)?* •				
D3. *Do the individuals assigned responsibility for safety and health have the authority to ensure that hazards are corrected or necessary changes to the safety and health management system are made? If not, please explain.* **MR⊘** •				
D4. *How are managers, supervisors, and employees held accountable for meeting their responsibilities for workplace safety and health? Are annual performance evaluations for managers and supervisors required?* •				
D5. *Are adequate resources (equipment, budget, or experts) dedicated to ensuring workplace safety and health? Provide examples.* **MR⊘** •				
D6. *Is access to experts (for example, Certified Industrial Hygienists, Certified Safety Professionals, Occupational Nurses, or Engineers), reasonably available, based upon the nature, conditions, complexity, and hazards of the site? If so, under what arrangements and how often are they used?* •				

Section I: Management Leadership & Employee Involvement	**Yes or No**	**How Assessed** Interview	Observation	Doc Review
E. Contract Employees				
E1. *Does the site utilize contractors? Please explain.* •				
E2. *Were there contractors/sub-contractors onsite at the time of the evaluation?* •				
E3. *When selecting onsite contractors/sub-contractors, how does the site evaluate the contractor's safety and health management system and performance (including rates)?* •				
E4. *Are contractors and subcontractors required to maintain an effective safety and health management system and to comply with all applicable HIOSH and company safety and health rules and regulations? If not, please explain.* •				
E5. *Does the site's contractor program cover the prompt correction and control of hazards in the event that the contractor/sub-contractor fails to correct or control such hazards? Provide examples.* **MR⊘** •				
E6. *How does the site document and communicate oversight, coordination, and enforcement of safety and health expectations to contractors?* •				
E7. *Have the contract provisions specifying penalties for safety and health issues been enforced, when appropriate? If not, please explain.* •				
E8. *How does the site monitor the quality of the safety and health protection of its contract employees?* •				
E9. *Do contract provisions for contractors require the periodic review and analysis of injury and illness data? Provide examples* •				
E10. *If the contractors' injury and illness rates are above the average for their industries, describe the site's procedures that ensure that all employees are provided effective protection on the worksite? If yes, please explain.* •				
E11. *Based on your answers to the above items, is the contract oversight minimally effective for the nature of the site? (Inadequate oversight is indicated by significant hazards created by the contractor, employees exposed to hazards, or a lack of host audits.) If not, please explain.* **MR⊘** •				

Section I: Management Leadership & Employee Involvement	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
F. Employee Involvement				
F1. *How were employees selected to be interviewed by the HVPP team?* •				
F2. *How many employees were interviewed formally? How many were interviewed informally?* •				
F3. *Do employees support the site's participation in the HVPP?* **MR⊘** •				
F4. *Do employees feel free to participate in the safety and health management system without fear of discrimination or reprisal? If so, please explain.* **MR⊘** •				
F5. *Are employees meaningfully involved in the problem identification and resolution, or evaluation of the safety and health management system (beyond hazard reporting). (As per FRN page 936 IV, A.6.) For site-based construction sites, does the company encourage strong labor-management communication in the form of supervisor and employee participation in toolbox safety meetings and training, safety audits, incident investigations, etc.?* •				
F6. *Are employees knowledgeable about the site's safety and health management system? If not, please explain.* •				
F7. *Are employees knowledgeable about the HVPP? If not, please explain.* •				
F8. *Are the employees knowledgeable about HIOSH rights and responsibilities? If not, please explain.* •				
F9. *How were employees informed of the safety and health management system, HVPP and HIOSH rights and responsibilities? Please explain.* •				
F10. *Did management verify employee's comprehension of the site's safety and health management system, HVPP and HIOSH rights and responsibilities?* •				
F11. *Do employees have access to results of self-inspection, accident investigation, appropriate medical records, and personal sampling data upon request? If not, please explain.* •				

Section I: Management Leadership & Employee Involvement	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
G. Safety and Health Management System Evaluation				
G1. *Briefly describe the system in place for conducting an annual evaluation.* •				
G2. *Does the annual evaluation cover the aspects of the safety and health management system, including the elements described in the* ***Federal Register****? If not, please explain.* **MR⊘** •				
G3. *Does the annual evaluation include written recommendations in a narrative format? If not, please explain.* •				
G4. *Is the annual evaluation an effective tool for assessing the success of the site's safety and health management system? Please explain.* •				
G5. *What evidence demonstrates that the site responded adequately to the recommendations made in the annual evaluation?* •				
G6. *Is the annual evaluation conducted by competent site, corporate or other trained personnel experienced in performing evaluations?* •				

Section I: Management Leadership & Employee Involvement

90-Day Items:
1. 2.

Best Practices:
1. 2.

Comments including Recommendations: *(optional)*
1. 2.

Documents Referenced, Programs Reviewed: *(optional)*
1. 2.

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
A. Baseline Hazard Analysis				
A1. *Has the site been at least minimally effective at identifying and documenting the common safety and health hazards associated with the site (such as those found in HIOSH regulations, building standards, etc., and for which existing controls are well known)? If not, please explain.* **MR⊘** •				
A2. *What methods are used in the baseline hazard analysis to identify health hazards? (Please include examples of instances when initial screening and full-shift sampling were used. See FRN page 937, B.2.b)* •				
A3. *Does the company rely on historical data to evaluate health hazards on the worksite? If so, did the company identify any operations that differed significantly from past experience and conduct additional analysis such as sampling or monitoring to ensure employee protection? If so, please describe.* •				
A4. *Does the site have a documented sampling strategy used to identify health hazards and assess employees' exposure (including duration, route, and frequency of exposure), and the number of exposed employees? If not, please explain.* **MR⊘** •				
A5. *Do sampling, testing, and analysis follow nationally recognized procedures? If not, please explain.* •				
A6. *Does the site compare sampling results to the minimum exposure limits or are more restrictive exposure limits (PELs, TLVs, etc.) used? Please explain.* •				
A7. *Does the baseline hazard analysis adequately identify hazards (including health) that need further analysis? If not, please explain. For site-based construction sites, does the hazard analysis include studies to identify potential employee hazards, phase analyses, task analyses, etc.?* •				
A8. *Does industrial hygiene sampling data, such as initial screening or full shift sampling data, indicate that records are being kept in logical order and include all sampling information (for example, sampling time, date, employee, job title, concentrated measures, and calculations)? If not, please explain the deficiencies and how they are being addressed.* •				
A9. *For site-based construction sites, are hazard analyses conducted to address safety and health for each phase of work?* •				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
B. Hazard Analysis of Significant Changes				
B1. *When purchasing new materials or equipment, or implementing new processes, what types of analyses are performed to determine impact on safety and health, and are these analyses adequate?* •				
B2. *When implementing/introducing non-routine tasks, materials or equipment, or modifying processes, what types of analyses are performed to determine impact on safety and health, and are these analyses adequate?* •				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
C. Hazard Analysis of Routine Activities				
C1. *Is there at least a minimally effective hazard analysis system in place for routine operations and activities?* **MR⊘** •				
C2. *Does hazard identification and analysis address both safety and health hazards, if appropriate? If not, please explain.* •				
C3. *What hazard analysis technique(s) are employed for routine operations and activities (e.g., job hazard analysis, HAZ-OPS, fault trees)? Please explain.* •				
C4. *Are the results of the hazard analysis of routine activities adequately documented? If not, please explain.* •				
C5. *For site-based construction sites, are hazard analyses conducted to address safety and health hazards for specialty trade contractors during each phase of work?* •				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
D. Routine Inspections				
D1. *Does the site have a minimally effective system for performing safety and health inspections (i.e., a minimally effective system identifies hazards associated with normal operations)? If not, please explain.* **MR⊘**				
•				
D2. *Are routine safety and health inspections conducted monthly, with the entire site covered at least quarterly (construction sites: entire site weekly)?* **MR⊘**				
•				
D3. *For site-based construction sites, are employees required to conduct inspections as often as necessary, but not less than weekly, of their workplace/area and of equipment?* **MR⊘**				
•				
D4. *Does the site incorporate hazards identified through baseline hazard analysis, accident investigations, annual evaluations, etc., into routine inspections to prevent reoccurrence?*				
•				
D5. *Are employees conducting inspections adequately trained in hazard identification? If not, please explain.*				
•				
D6. *Is the routine inspection system written, including documentation of results indicating what needs to be corrected, by whom, and by when? If not, please explain.*				
•				
D7. *Did the HVPP team find hazards that were not found/noted on the site's routine inspections? If so, please explain.*				
•				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
E. Hazard Reporting				
E1. *Is there a minimally effective means for employees to report hazards and have them addressed? If not, please explain.* **MR⊘** •				
E2. *Does the hazard reporting system have an anonymous component?* •				
E3. *Does the site have a reliable system for employees to notify appropriate management personnel in writing about safety and health concerns? Please describe.* •				
E4. *Do the employees agree that they have an effective system for reporting safety and health concerns? If not, please explain* •				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
F. Hazard Tracking				
F1. *Does a minimally effective hazard tracking system exist that result in hazards being controlled? If not, please explain.* **MR⊘** •				
F2. *Does the hazard tracking system result in hazards being corrected and provide feedback to employees for hazards they have reported? If not, please explain.* •				
F3. *Does the hazard tracking system result in timely correction of hazards with interim protection established when needed? Please describe.* •				
F4. *Does the hazard tracking system address hazards found by employees, hazard analysis of routine and non-routine activities, inspections, and accident or incident investigations? If not, please explain* •				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
G. Accident/Incident Investigations				
G1. *Is there a minimally effective system for conducting accident/incident investigations, including near-misses? If not, please explain.* **MR⊘** •				
G2. *Is the accident/incident investigation policy and procedures documented and understood by all? If not, please explain.* •				
G3. *Is there a reporting system for near-misses that include tracking, etc.? If not, please explain.* •				
G4. *Are those conducting the investigations trained in accident/incident investigation techniques? Please explain what techniques are used, e.g., Fault-Tree, Root Cause, etc.* •				
G5. *Describe how investigators discover and document all the contributing factors that led to an accident/incident or a near-miss.* •				
G6. *Were any uncontrolled hazards discovered during the investigation previously addressed in any prior hazard analyses (e.g., baseline, self-inspection)? If yes, please explain.* •				

Section II: Worksite Analysis	**Yes or No**	**How Assessed**		
		Interview	Observation	Doc Review
H. Trend Analysis				
H1. *Does the site have a minimally effective means for identifying and assessing trends?* **MR⊘** •				
H2. *Have there been any injury and/or illness trends over the last three years? If so, please explain.* •				
H3. *Did the team identify trends that should have been identified by the site? If so, please describe.* •				
H4. *If there have been injury and/or illness trends, what adequate courses of action have been taken? Please explain.* •				
H5. *Does the site assess trends utilizing data from hazard reports and/or accident/incident investigations to determine the potential for injuries and illnesses? If not, please explain.* •				
H6. *Are the results of trend analyses shared with employees and management and utilized to direct resources, prioritize hazard controls and modify goals to address trends? If not, please explain.* •				

Section II: Worksite Analysis

90-Day Items:

1.

2.

7. Best Practices:

1.

2.

Comments including Recommendations: *(optional)*

1.

2.

Documents Referenced, Programs Reviewed: *(optional)*

1.

2.

		How Assessed		
Section III: Hazard Prevention and Control	**Yes or No**	Interview	Observation	Doc Review
A. Hazard Prevention and Control				
A1. *Does the site select at least minimally effective controls to prevent exposing employees to hazards?* **MR⊘** •				
A2. *When the site selects hazard controls, does it follow the preferred hierarchy (engineering controls, administrative controls, work practice controls [e.g., lockout/tagout, bloodborne pathogens, and confined space programs], and personal protective equipment) to eliminate or control hazards? Please provide examples, such as how exposures to health hazards were controlled.* •				
A3. *Describe any administrative controls used at the site to limit employee exposure to hazards (for example, job rotation).* •				
A4. *Do the work practice controls and administrative controls adequately address those hazards not covered by engineering controls? If not, please explain.* •				
A5. *Are the work practice controls (e.g., lockout/tagout, bloodborne pathogens, and confined space programs) recommended by hazard analyses implemented at the site? If not, please explain.* •				
A6. *Are follow-up studies (where appropriate) conducted to ensure that hazard controls were adequate? If not, please explain.* •				
A7. *Are hazard controls documented and addressed in appropriate procedures, safety and health rules, inspections, training, etc.? Provide examples.* •				

		How Assessed		
Section III: Hazard Prevention and Control	**Yes or No**	Interview	Observation	Doc Review
Disciplinary System				
A8. *Are there written employee safety procedures including a disciplinary system? Describe the disciplinary system?* •				
A9. *Has the disciplinary system been clearly communicated and enforced equally for both management and employees, when appropriate? If not, please explain.* •				
Emergency Procedures				
A10. *Does the site have minimally effective written procedures for emergencies?* **MR⊘** •				
A11. *Did the site explain the frequency and types of emergency drills held (including at least an evacuation drill annually)?* •				
A12. *Is the emergency response plan updated as changes occur in the work areas e.g., evacuation routes or auditory systems?* •				
A13. *Did the site describe the system used to verify all employees' participation in at least one evacuation drill each year?* •				
Preventative/Predictive Maintenance				
A14. *Does the site have a written preventative/predictive maintenance system? If not, please explain.* •				
A15. *Did the hazard identification and analysis (including manufacturers' recommendations) identify hazards that could result if equipment is not maintained properly? If not, please explain.* •				
A16. *Does the preventive maintenance system detect hazardous failures before they occur? If not, please explain. Is the preventive maintenance system adequate?* •				
Personal Protective Equipment (PPE)				
A17. *How does the site select Personal Protective Equipment (PPE)?* •				

		How Assessed		
Section III: Hazard Prevention and Control	**Yes or No**	Interview	Observation	Doc Review
A18. *Did the site describe the PPE used at the site?* •				
A19. *Where PPE is required, do employees understand that it is required, why it is required, its limitations, how to use it, and how to maintain it? If not, please explain.* •				
A20. *Did the team observe employees using, storing, and maintaining PPE properly? If not, please explain.* •				
Process Safety Management (PSM)				
A21. *Is the site covered by the Process Safety Management standard (29 CFR 1910.119)? If yes, please answer questions A22-A25 below. Additionally, please complete either the onsite evaluation supplement A or B, and the onsite evaluation supplement C. If not, skip to section B.* **MR⊘** •				
A22. *Which chemicals that trigger the Process Safety Management (PSM) standard are present?* **MR⊘** •				
A23. *Which process(es) were followed from beginning to end and used to verify answers to the questions asked in the PSM application supplement, the PSM Questionnaire, and/or the Dynamic Inspection Priority Lists?* **MR⊘** •				
A24. *Verify that contractor employees who perform maintenance, repair, turnaround, major renovation or specialty work on or adjacent to a covered process have received adequate training and demonstrate appropriate knowledge of hazards associated with PSM, such as non-routine tasks, process hazards, hot work, emergency evacuation procedures, etc.? Please explain.* **MR⊘** •				
A25. *Is the PSM program adequate in that it addresses the elements of the PSM standard and the PSM directive? Please explain.* **MR⊘** •				

Section III: Hazard Prevention and Control	**Yes or No**	How Assessed: Interview	Observation	Doc Review
B. Occupational Health Care Program				
B1. *Describe the occupational health care program (including availability of physician services, first aid, and CPR/AED) and special programs such as audiograms or other medical tests used.* •				
B2. *How are licensed occupational health professionals used in the site's hazard identification and analysis, early recognition and treatment of illness and injury, and the system for limiting the severity of harm that might result from workplace illness or injury? Is this use appropriate?* •				
B3. *Is the occupational health program adequate for the size and location of the site, as well as the nature of hazards found here? If not, please explain.* •				
C. Recordkeeping				
C1. *Are HIOSH required recordkeeping forms being maintained properly in terms of accuracy, form completion, etc.? If not, please explain.* **MR⊘** •				
C2. *Is the recordkeeper knowledgeable of 29 CFR 1904, HIOSH's recordkeeping standard?* **MR⊘** •				
C3. *What records were reviewed to determine compliance with the recordkeeping standard?* •				
C4. *Do the injury and illness rates accurately reflect work performed by contractors/sub-contractors at the site evaluated? Please explain.* **MR⊘** •				
C5. *Was there any evidence of recordable injuries/illnesses not being reported due to management pressure, production concerns, incentive programs, etc.? If yes, please explain.* •				

Section III: Hazard Prevention and Control

90-Day Items:

1.

2.

I. Best Practices:

1.

2.

Comments including Recommendations: (optional)

1.

2.

Documents Referenced, Programs Reviewed: (optional)

1.

2.

Section IV: Safety and Health Training	Yes **or No**	How Assessed: Interview	Observation	Doc Review
A. Safety and Health Training				
A1. *What are the safety and health training requirements for managers, supervisors, employees, and contractors? Please explain.* •				
A2. *Is the training delivered by qualified instructors?* •				
A3. *Does the training provided to managers, supervisors, and non-supervisory employees (including contract employees) adequately address safety and health hazards?* **MR⊘** •				
A4. *Does the company/site operate an effective safety and health orientation program for all employees including new hires? Please explain.* •				
A5. *How are the safety and health training needs for employees determined? Please explain.* •				
A6. *Does the site provide minimally effective training to educate supervisors and employees (including contract employees) regarding the known hazards of the site and their controls? If not, please explain.* **MR⊘** •				
A7. *Are managers, supervisors, and non-supervisory employees (including contract employees) taught the safe work procedures to follow in order to protect themselves from hazards during initial job training and subsequent reinforcement training?* •				
A8. *Who is trained in hazard identification and analysis?* •				
A9. *Is training in hazard identification and analysis adequate for the conditions and hazards of the site? If not, please explain.* •				
A10. *Does management have a thorough understanding of the hazards of the site? Provide examples that demonstrate their understanding.* •				
A11. *Do managers, supervisors, and non-supervisory employees (including contract employees) and visitors on the site understand what to do in emergency situations? Please explain.* •				

Section IV: Safety and Health Training

90-Day Items:
1. 2.

Best Practices:
1. 2.

Comments including Recommendations: *(optional)*
1. 2.

Documents Referenced, Programs Reviewed: *(optional)*
1. 2.

HVPP Participant and Onsite Evaluation Team Data Sheet

HVPP Participant Information:		
Company Name: Click here to enter text.		
Site Address: Click here to enter text.		
Mailing Address: Click here to enter text.		
Site Manager Name: Click here to enter text.		
Site Manager Phone: Click here to enter text.	Site Manager E-mail Address: Click here to enter text.	
HVPP Contact Name: *if same as Site Manager, state "same as above"*		
HVPP Contact Phone: Click here to enter text.	HVPP Contact E-mail Address: Click here to enter text.	
Small Employer (<250 employees onsite AND <500 employees corporate-wide: Yes ☐ No ☐		
NAICS Code: Click here to enter text.	No. of site employees:	No. of site contract employees:

Union Information	
Union Name & Local No.:	Click here to enter text.
Site Representative:	Click here to enter text.
Mailing Address:	Click here to enter text.
Telephone Number:	Click here to enter text.

Union Information	
Union Name & Local No.:	Click here to enter text.
Site Representative:	Click here to enter text.
Mailing Address:	Click here to enter text.
Telephone Number:	Click here to enter text.

Onsite Evaluation Team Information:		
Evaluation Start Date: Click here to enter a date.	Evaluation End Date: Click here to enter a date.	
Type of Visit: Initial Approval: ☐ Reevaluation: ☐	Participation: Site-based: ☐ Mobile Workforce: ☐	
MAO Requested: Yes ☐ No ☐ If Yes, Date: Click here to enter a date.	MAO Rec'd Before Onsite: Yes ☐ No ☐	Date MAO Rec'd: Click here to enter a date.
90 Day Items: Yes ☐ No ☐	Date 90 Day Items Completed: Click here to enter a date.	

TCIR/DART 3-Year Rate Change (Onsite vs Annual Submission: Yes ☐ No ☐	If Yes, Explain: Click here to enter text.
Team Members	*Discipline of Members*
Team Leader (TL): Click here to enter text. Back-Up Team Leader: Click here to enter text. Team Member 2: Click here to enter text. Team Member 3: Click here to enter text. Team Member 4: Click here to enter text. Team Member 5: Click here to enter text.	Team Leader: Click here to enter text. Back-Up Team Leader: Click here to enter text. Team Member 2/or indicate if SGE: Click here to enter text. Team Member 3/or indicate if SGE: Click here to enter text. Team Member 4/or indicate if SGE: Click here to enter text. Team Member 5/or indicate if SGE: Click here to enter text.

PARTICIPANT AREAS OF EXCELLENCE/BEST PRACTICES CHECKLIST

☐	Ergo Program	☐	Confined Space Program	☐	LO/TO Program
☐	PSM	☐	Hazard Analysis	☐	Contractor Program
☐	Medical Program	☐	Self-Inspections	☐	Accountability
☐	Industrial Hygiene	☐	Employee Involvement	☐	Tracking of Hazards
☐	Pre-Job Analysis	☐	Other:		

STRATEGIC PLAN

High Hazard Industries

☐	Landscaping – 078	☐	Oil/Gas – 138	☐	Fruits/Vegetables 203
☐	Concrete/Gypsum/Plaster – 327	☐	Blast Furnace/Steel Production – 331	☐	Ship/Boat Building/Repair – 373
		☐	Wholesale Storage – 422		

Hazards

☐	Ergo	☐	Lead	☐	Silica
☐	Amputations – Construction	☐	Amputations – General Industry		

Appendix E – Onsite Evaluation Report User Guide

HVPP Site Report and Site Worksheet: A User Guide

Hawaii Voluntary Protection Program
Hawaii Occupational Safety & Health Division

December 27, 2014

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1.1 Overview of the Revised HVPP Site Report and Worksheet

The Office of Partnerships and Recognition, in coordination with OSHA Regional Office staff, recently conducted a process improvement project to develop a new format for the Voluntary Protection Programs (VPP) Site Report. The goal of this project was to reduce the time required to both prepare and review the report while ensuring adequate documentation of the VPP onsite evaluation. Hawaii has adopted this format.

The new format divides the original HVPP report into two separate sections:

- The ***HVPP Site Worksheet*** is a worksheet to be used on-site by the evaluation team to document their findings. The purpose of the HVPP Site Worksheet is to provide the technical basis and rationale that support an evaluation team's findings and the resulting program participation recommendation.
- The ***HVPP Site Report*** is a summary of the findings and recommendations from the HVPP on-site evaluation and is to be used by OSHA senior management to review the team's findings and recommendations. The HVPP Site Report is designed to reflect the overall findings from the evaluation in a *short and concise* narrative format. The Site Report contains a summary of the evaluation, documentation of the site's injury and illness experience, and recommendation for program participation.

The revised HVPP Site Worksheet and HVPP Site Report replace the previous long-form narrative report. The major changes include:

- Streamlining the HVPP Site Worksheet to enable yes/no answers to many of the questions and use of bullet points to document findings, rather than lengthy explanations.
- Replacement of the narrative report with a brief section that describes key program elements and the site evaluation team's recommendations.

Both the HVPP Site Worksheet and the HVPP Site Report are to be maintained in the site's public file and presented to the employer.

1.2 Technical Requirements

HVPP on-site evaluation teams are required to complete the HVPP Site Report and Worksheet using a laptop computer. The minimum technical specifications required to operate these programs effectively are:

- A Pentium III or equivalent CPU running at 600 MHz speed or faster (many are 900+)
- At least 256 MB RAM (Random Access Memory)
- At least a 10 GB hard drive
- Microsoft Word
- Access to e-mail from a remote location.

In addition, on-site evaluation teams should have access to a cellular (mobile) phone or pager. Additional items that evaluators have found to be useful, but not considered essential, include:

Computer projector (for example, InFocus LP 130)

Personal Desk Assistant (for example, a Palm Pilot) for scheduling and outreach/contact information.

Digital camera with the capability to load photos easily onto computer. (Note: This is often requested so that evaluators can provide pictures of success stories. However, if photos are to be published, for example, in OSHA's *Job Safety & Health Quarterly*, the camera must be capable of high-resolution shots, with a minimum 300 dpi at 5x7 inches or larger. Such cameras are relatively expensive. A good alternative is a 35mm camera for hard copy prints, which can then be scanned and stored electronically.)

* * * *

Section 2

HVPP Site Worksheet

The HVPP Site Worksheet requires evaluators to review the key topic areas related to a site's safety and health management system and its working conditions. The HVPP Site Worksheet has been streamlined from previous versions in several key ways:

- The number of areas to be addressed and the number of questions to be answered have been reduced as a result of consolidation and an attempt to reduce the redundancy of questions.
- Many of the questions are presented in a yes/no format, with a detailed response usually required only for those questions for which site evaluators answered "no."
- Evaluators provide supplementary descriptive information in bullet form, rather than in narrative format.

The reduction in key topic areas in the HVPP Site Worksheet has resulted in four major sections devoted to the following topics:

- Section I – Management Leadership and Employee Involvement
- Section II – Worksite Analysis
- Section III – Hazard Prevention & Control
- Section IV – Safety and Health Training.

The previous section entitled "A General Review of Safety and Health Conditions" is now part of the HVPP Site Report and is no longer a stand-alone section in the HVPP Site Worksheet.

At the end of each major section, an additional page has been included to enable evaluators to provide further information and discussion on such topics as Merit Goals, 90-Day Items, Best Practices, Recommendations, and Documents Referenced.

The HVPP Site Worksheet's modular format allows evaluators to further break up the document to facilitate the on-site evaluation and reporting of findings. Key sections now contain several subsections of questions that address various aspects of the general topic. Each subsection is clearly identified and given a letter and a number to facilitate easy reference by the on-site evaluators. For example, Section I, Management Leadership and Employment Involvement, consists of the following six subsections:

- Subsection A – Written Safety and Health Management System
- Subsection B – Management Commitment and Leadership
- Subsection C – Planning
- Subsection D – Authority and Line Accountability
- Subsection E – Contract Workers
- Subsection F – Employee Involvement.

Evaluators should be consistent in their use of the format when addressing the questions in each of the four topic sections. Please remember:

- Evaluators are required to complete ***all*** questions.

- Some of the questions will instruct evaluators to support their yes/no answers or explain why they believe that site performance in a particular area is adequate. **It is important that evaluators answer the entire question.**
- Although evaluators are not required to provide comments for “yes” answers, they may wish to do so in order to highlight best business practices or document a unique or meaningful application that might benefit another site.

2.1 Minimum Requirements (MR)

The previous *Policies and Procedures Manual,* VPP TED 8.1a contained a checklist for the purpose of determining if the applicant/site met de-minimus requirements. The **MR** designator in the Site Worksheet allows the agency to eliminate that checklist.

Minimum Requirements (MR) represent those elements of a site’s safety and health management system that **must be in place** and at least **minimally effective** in order for a site to be considered for participation in the Merit Program. If a site fails to meet even one MR, then it is not eligible for participation in the H and should be asked to withdraw its application. Requirements that are considered MR will have the symbol: **MR**.

Section 4 of this document contains additional guidance intended to help you make a judgment on many of the questions identified as Minimum Requirements.

2.2 Instructions for Completing the HVPP Site Worksheet

		How Assessed		
Section I: Management Leadership & Employee Involvement	**Yes or No**	Interview	Observation	Doc Review
A. Written Safety & Health Management System				
A1. *Are all the elements (such as Management Leadership and Employee Involvement, Worksite Analysis, Hazard Prevention and Control, and Safety and Health Training) and sub-elements of a basic safety and health management system part of a signed, written document? (For Federal Agencies, include 29 CFR 1960.) If not, please explain.*				
A2. *Have all HVPP elements and sub-elements been in place at least 1 year? If not, please identify those elements that have not been in place for at least 1 year.*				
A3. *Is the written safety and health management system at least minimally effective to address the scope and complexity of the hazards at the site? (Smaller, less complex sites require a less complex system.) If not, please explain. MR.*				
A4. *Have any HVPP documentation requirements been waived? If so, please explain.*				

To complete these subsections, evaluators should follow the steps listed below.

1. Read the question and answer “Yes” or “No” in the first column based upon the findings from the evaluation.
2. If the question asks you to explain your “Yes” or “No” answer, please respond in bullet-point format.
3. If the Yes or No column is shaded, then the evaluator is required to provide a detailed answer to the question. Please present your analysis in bullet-point format.
4. In the section entitled “How Assessed,” identify the source(s) of information used to answer the question. If you:

- Used information obtained during interviews, put an X in the **Interview** column.
- Used personal observation, put an X in the **Observation** column.
- Reviewed documents, put an X in the **Doc Review** column. Evaluators must identify the documents reviewed.

There are various ways to identify the documents reviewed. One is to assign numbers to all of the documents reviewed in connection with a particular section of the HVPP Site Worksheet. When you use a document to answer a question, put the number assigned to that document in the "Doc Review" column. For example, if you used an employee manual to answer a question, and you had identified the employee manual as Document 1, you would put a "1" in the "Doc Review" column. Then, at the end of the section, you would list the number and the title of each document in the Documents Referenced box. Another potential method is to list the documents reviewed in the bulleted area below the question. Either method is acceptable.

Once the evaluators have completed the six subsections, they must complete the summary and recommendations section, as described below.

2.3 Instructions for Completing the Summary and Recommendations Section

At the end of each section, there is a summary and recommendations section. Instructions for its completion are presented below.

Section I: **Management Leadership & Employee Involvement**
90-Day Items *(Delete this item for final transmittal to National Office)*
1. 2.

Best Practices
1. 2.

Comments including Recommendations *(optional)*
1. 2.

Documents Referenced *(as appropriate)*
1. 2.

1. The **90-Day Items** section should be used to document those actions that the site needs to take before OSHA can approve the site into the program. 90-Day Items should be limited to (a) compliance issues and (b) program element modifications that can be easily accomplished and that do not involve the "year-in-practice" requirement. Sites must demonstrate that they have addressed the items listed here within a 90-day period starting from the conclusion of the on-site visit. *Once the applicant site has completed these items, this section should be removed from the final report that is transmitted to the National Office. The report listing these items, however, should be kept in the evaluator's working file.*
2. The Site Evaluation Team can use the optional **"Best Practices"** box at the end of each Worksheet Section to recognize (and thus praise) one or more aspects of the site's safety and health management system where the site is performing particularly well.
3. The **Comments including Recommendations** section, which is optional, provides evaluators the opportunity to document additional comments about the site's safety and health management system. Recommendations should be made in those areas where the site's element is already at Star quality, but still has room for improvement. An appropriate recommendation is one that helps improve the element's reliability, effectiveness, or efficiency. Like the 90-Day items, these recommendations should be removed from the report that is sent to the National Office. The report listing evaluators' comments and recommendations, however, should be kept in the working file.
4. In the **Documents Referenced** section, evaluators must list the documents that were reviewed in addressing the elements of this section.

Team members and the Team Leader must ensure that goals, items, comments, or recommendations provided at the end of a Worksheet Area do not contradict any of the Site Evaluation Worksheet answers. For example, if the Worksheet has a question that has been answered "Yes" without further explanation, but the goals, items, comments, or recommendations indicate that the answer should have been "No" with an explanation, the inconsistency should be resolved to make the Site Evaluation Worksheet as accurate as possible.

2.4 Working with the HH Site Worksheet Computer Files

In analyzing the data from the pilot test of the VPP Site Worksheet, OSHA found that there were a number of "best practices" used by VPP evaluators that enabled them to use the Worksheet in an efficient manner. These best practices resulted in a significant reduction in the time required to complete the Worksheet. Following are summaries of these best practices**.**

2.4.1 Dividing the HVPP Site Worksheet Files among Team Members

One of the best practices used by evaluators in the pilot program was to split the worksheet files and divide responsibility for their completion among team members. The method used to do this is described below.

To reduce the size of the HVPP Site Worksheet computer file, increase the ease of its use, and reduce potential computer malfunctions, the HVPP Site Worksheet has been broken into a series of folders and files. Each area has a folder. Each section of the Worksheet has been saved as a unique file within the appropriate area folder. For example, Section I, Subsection A and Section I, Subsection B are saved as two separate and distinct files. Both files are saved in the Section I folder. In addition to the area folders, there is a folder that contains the entire Worksheet in one big file.

To successfully work with these files, on-site evaluators should use the following procedures to divide responsibilities for completion of the HVPP Site Worksheet:

1) The Team Leader should give all team members either a disk containing the full HVPP Site Evaluation Worksheet if they will be able to complete the Worksheet on their own computers, or a hard (paper) copy of their assigned sections if computer resources are insufficient.

2) Before individual team members separate to conduct the evaluation, the entire team should meet and briefly review their assignments. This is to ensure that all team members understand which sections they are responsible for, and what information is needed to complete their assigned portion of the Worksheet.

3) When working with the files on the computer, team members should complete only their assigned sections. They should save their work under a different file name, such as "Section I-B, Company XYZ, Billings, MT," to prevent its being mixed up with the original document. This can be done by using the "Save as" function under the "File" menu on the word processing software. Change the name of the file in the "File name" window that appears. If two team members are assigned to different sections of the same file, both should answer only their questions and then save their work with their own unique titles. The team leader will be able to open both files to copy and paste the information together as necessary (see instructions below for copying and pasting information).

2.4.2 Compiling the Final HVPP Site Evaluation Worksheet

The following suggestions for compiling the HVPP Site Worksheet sections into the final Worksheet are based on interviews with some of the team leaders.

1) The Team Leader should get the disk or hardcopy back from each team member after the site evaluation. Working alone to minimize group work (and thus person hours), the Team Leader should consolidate the different sections of the worksheet into a single document. To do this:

   Open a blank MS Word document. Set the margins so that top and bottom are 1" and left and right are .5".

   Insert the File titled "Cover Pages." To insert a file:

   Put the cursor where you want to insert the file (in this case, at the top of the document).

   Click on the Insert menu at the top of the document.

   Click on File (to see this option you may have to expand the menu by clicking on the arrows at the bottom).

   A browser window will appear. Use the browser to find the file you want to insert from its current location (in this case, most likely the A-drive, which is the floppy disk, or the C-drive if the file is already on the hard drive).

   Double click on the file you want to insert.

   Make all necessary changes to the cover pages of the HVPP Site Worksheet.

   Repeat the steps involved for inserting a file for all of the additional tables, gathered from the disks received from each team member.

   Save the final document (you should also save as you go!).

2) Since each team member may make additions to the “Additional Comments” file, the Team Leader should be prepared to copy and paste modifications in order to include all comments in the final report. To copy and paste sections of the document:

Highlight the section of the document you would like to copy. For sections of tables, highlight all the relevant cells or text, being sure to include the cells on the far right of the table, if necessary. If pasting into a blank document, be sure to set the margins for the top and bottom at 1” and the left and right margins at .5”. This will ensure that the formatting remains consistent between the documents.

After highlighting a section, click on the Copy icon on the tool bar, or click on Copy under the Edit menu. If Copy is not given as a choice immediately, you may need to click on the extended-menu button (the double arrows at the bottom of the menu) to find it.

Place the cursor where you would like the information pasted. Click on the paste icon from the tool menu, or click on Paste from the Edit menu.

The Team Leader can edit the report sections either before compiling them or after consolidating them.

2.4.3 Single File Version

Team Leaders who do not wish to utilize the multiple file method may use a single file version. We do not recommend cutting and pasting the tables in this version. You are more likely to be successful if you keep just one master file and have team members take turns filling out their assigned sections on the master file.

3. HVPP Site Report

The HVPP Site Report replaces the previous Site Report. The purpose of the HVPP Site Report is to provide the reviewers with a brief summary of the evaluators' findings upon completion of the site visit. The HVPP Site Report is to be prepared after the HVPP Site Worksheet has been completed.

The HVPP Site Report addresses ten basic topics and two conditional areas:

- Purpose and Scope of Review
- Method of Data Collection
- Employees at the Worksite
- The Worksite/Program Changes (for Reapprovals)
- Worksite Hazards
- Injury and Illness Rates
- OSHA Activity
- Elements of HVPP Review
- Areas of Excellence (if applicable)
- Recommendation
- Merit Goals (if applicable)
- OSHA Log Recordkeeping

An example of a completed HVPP Site Report is located at the end of this section.

3.1 Preparing the HVPP Site Report

To complete the HVPP Site report, evaluators should follow the steps listed below.

1. First compile the information (from the HVPP Site Worksheet) required for completion of the HVPP Site Report.
2. Once this information has been gathered and documented in the HVPP Site Worksheet, present the information in paragraph form, as illustrated in the HVPP Site Report Example in Section 3.3 below. Use the HVPP Site Report Example as a model for developing a complete report.

3.2 OSHA Log Recordkeeping

Evaluators must review the HVPP site's OSHA injury and illness logs as part of a complete on-site visit and include this analysis in the HVPP Site Report. To ensure that the OSHA injury and illness logs are thoroughly reviewed, evaluators must address the following issues:

- Prepare the Total Case Incidence Rate (TCIR) and Days Away from work, Restricted and

Transferred (DART) activity case incidence rate calculation table.

- Analyze the TCIR and DART rate.
- Compare the data contained in the site's OSHA injury and illness logs with the data presented in the site's HVPP application.

The requirements for preparing each of these analyses are described below.

3.2.1 TCIR and DART Rate Calculation Table

Based on a review of the site's OSHA injury and illness logs, evaluators should first complete the TCIR and DART rate table. An example follows:

Year	Hours	Total # of Cases	TCIR	Number of Cases Involving Days Away from Work, Restricted Activity or Job Transfer	DART Rate
1999	185,445	2	2.2	2	2.2
2000	216,212	2	1.9	1	0.9
2001	195,444	1	.1	0	0
Total	597,791	7		5	
Three-Year Rate (1999-2001)			2.3		1.7
BLS National Average for 2001 (NAICS 123456)			8.6		4.2
BLS State Average for 2001 (NAICS 123456)			5.4		5.4
2002 YTD	43,315	0	0.0	0	0.0

3.2.2 Analysis of the TCIR and DART Rate

In this section, site evaluators should present the site's TCIR and DART rate and the percentage above or below the BLS National Average AND State Average for the appropriate SIC/NAICS code.

The analysis of the TCIR and DART rate in the above example should be presented as follows:

- The Total Case Incidence Rate (TCIR) is 2.3 (73% below the 2001 BLS nationwide industry average and 57% below the statewide average for NAICS 123456).
- The Days Away from Work, Restricted Activity and Job Transfer (DART) Case Incidence Rate is 1.7 (60% below the 2001 BLS nationwide industry average and 69% below the statewide average for NAICS 123456).

3.2.3 Comparison of OSHA Injury and Illness Logs to Site's HVPP Application

Compare the site's OSHA injury and illness logs to the site's HVPP application to determine

whether the logs accurately reflect the injury and illness experience at the site. Also identify the individual responsible for maintaining the OSHA injury and illness log and verify that this individual understands OSHA's recordkeeping requirements.

3.2.4 Temporary Employees

To fully evaluate the injury and illness experience of temporary employees at the worksite, include the following information:

- Whether temporary employees were at the worksite at the time of the site visit.
- Whether injuries or illnesses experienced by temporary employees under the direct supervision of the site were recorded on the site's OSHA injury and illness log.
- The number of temporary employee injuries recorded on the OSHA injury and illness log for the current year.

Review applicable contractor injury and illness data and make a judgment about whether the

contractors at the site are experiencing the same quality level of safety and health protection as regular employees, and/or whether the site is transferring hazardous activities to applicable contractors in order to "hide" the hazards.

3.3 HVPP Site Report Example

The following is an example of the HVPP Site Report. Note that this example does not include the required analysis of the OSHA logs.

I. Purpose and Scope of Review

A VPP onsite evaluation recommending Star approval was conducted at Infinitium USA, L.P., Linden Technical Center, Linden, New Jersey from February 8 through February 10, 2002. The OSHA VPP Review Team (Team) consisted of: Tom Jones, Team Leader; Jim Jones, Industrial Hygienist; Mary Jones, Safety Specialist; Lisa Jones, Ph.D., a Chemical Engineering Specialist; and Michael Jones, VPP SGE.

II. Data Collection Methods

The information for this report was obtained from the site's VPP application; documentation reviewed on-site, interviews with employees, and a walk-through of the plant. All areas of the plant were covered in at least one walk-through.

III. Employees at the Worksite

There are 254 employees currently working on-site. In addition, 76 contractor employees are located on-site performing maintenance functions, implementing capital improvements, providing guard services, and staffing the cafeteria. The collective bargaining agents representing the employees onsite are the Independent Laboratory Employees Union, Inc. and the United Cafeteria Workers of America. Formal interviews were conducted with 20 employees and 10 contractors. In addition, informal interviews were conducted with 30 employees and 9 contractors.

IV. The Worksite or Program Changes (for Reapprovals)

The site is properly classified under the Standard Industrial Classification (SIC) code 2860 for *industrial organic chemicals – not elsewhere classified*. The site is a corporate research and development center built in 1998. It consists of four buildings: an office complex, a maintenance building, a blending operation, and a pilot plant. The buildings are spread across 75 acres. Nonhazardous organic chemicals are combined in the blending plant to produce a saline solution for use with contact lenses. The pilot plant bottles and packages this solution for shipping. The

site is not covered under OSHA's Process Safety Management (PSM) standard.

V. Worksite Hazards

The hazards located on this site are skin irritant chemicals; confined space hazards for the storeroom areas; uncontrolled hazardous energy sources from maintenance conveyers; sanitation process hazards, including exposure to sanitation chemicals; elevated noise levels; and material handling hazards, such as truck operations and extensive conveyers.

VI. Injury and Illness Rates

The three-year Total Case Incidence Rate (TCIR) and Days Away from Work, Restricted Activity or Job Transfer (DART) case incidence rate for the period (1996-1999) are 0.3 and 0.1, respectively. The site TCIR is 92 percent below, and the DART rate is 94 percent below the 2001 BLS national industry average for SIC 2860.

The site experienced no fatalities in over 10 years.

VII. OSHA Activity

There has been no OSHA inspection activity at the site in any of the last three years. The site has a positive relationship with the local OSHA office. The site contacted the OSHA Regional Office regarding participation in the VPP program.

VIII. Elements of VPP Review

The OSHA VPP Review team examined each of the required elements of the site's safety and health management system and, in accordance with their application, found them to be consistent with the high quality of VPP programs. The site meets all VPP requirements and all OSHA standards are appropriately covered. For specifics on the individual site program elements, consult the VPP Site Worksheet.

IX. Areas of Excellence (if applicable)

There are two program elements of this site that are exemplary and could be used as models for other sites in the same industry. These are:

- ***Trend Analysis*** – The use of a safety and health database has resulted in trend analysis above and beyond what most sites in this industry address. They are able to pinpoint not only basic trends, but also potential interactive trends (particular locations and time of day, particular supervisors with a given piece of equipment on a particular shift) and have used this ability to target training, discipline, and corrective actions.
- ***Machine Guarding*** – The machine guarding for the site is excellent. The guarding for the 200 Ton Press is particularly good. Such presses are difficult to guard effectively, but this site has found a rail, shield, and control panel system that is very effective.

X. Recommendation for Participation

The OSHA VPP Review Team recommends participation of the Infinitium USA, L.P., Linden Technology Center, Linden, NJ, in the OSHA VPP Star Program.

Section 4

Site Worksheet Minimum Requirement Guidance

This section will help evaluators to interpret HVPP Minimum Requirements (MRs) found on the HVPP Site Worksheet. Not every MR on the Site Worksheet is covered here; some items already have guidance written into the question. Instead, this section covers the MRs that require additional guidance to determine whether a site has met the MR and what other elements or sub-elements may have bearing on the MR.

Below is a definition of Minimum Requirement, followed by guidance for selected MRs. The specified sections and subsections are references to the Site Worksheet.

4.1 HVPP Minimum Requirement Defined

A Minimum Requirement is a basic element or sub-element that the HVPP considers critical to workplace safety and health. A Minimum Requirement must be at least minimally effective for the site to avoid regular or ongoing exposure of employees to serious workplace hazards.

A site is not "minimally effective" on an aspect of HVPP if the site does not have one or more of the required elements of the program in operational status or ready for implementation. As a result employees may be exposed to a serious hazard or hazards. In some cases, the site may have the element, but it is so ineffective that it is as if the element did not exist.

4.2 Section I. Management Leadership and Employee Involvement

4.2.1 Section I, Subsection A. Written Safety and Health Management System

A3. *Is the written safety and health management system at least minimally effective to address the scope and complexity of the hazards at the site? (Smaller, less complex sites require a less complex system).*

- This question is intended to elicit an overall professional judgment regarding the adequacy of the written program given the size and complexity of the site and its hazards.
- Things to consider include: size of the site, complexity of the site's work, and complexity of the hazards at the site.
- As the worksite's size increases, it needs more formal communication and written documentation to reduce the likelihood of important elements being overlooked due to miscommunication or misunderstanding.

4.2.2 Section I, Subsection B. Management Commitment and Leadership

B1. *Does management overall demonstrate at least minimally effective, visible leadership with respect to safety and health? Provide examples.*

- Establishing clear lines of communication with employees.
- Setting an example of safe and healthful behavior.
- Creating an environment that allows for reasonable employee access to top site management.
- Ensuring that all workers at the site, including contract workers, are provided equally high quality safety and health protection.

- Clearly defining responsibility in writing, with no unassigned areas. Each employee, at any level, must be able to describe his/her responsibility for safety and health.
- Assigning commensurate authority to those who have responsibility.
- Affording adequate resources to those who have responsibility and authority. This includes such resources as time, training, personnel, equipment, budget, and access to information and experts, including appropriate use of certified safety professionals (CSP), certified industrial hygienists (CIH), other licensed health care professionals, and other experts as needed, based on the risks at the site.
- Holding managers, supervisors, and non-supervisory employees accountable for meeting their safety and health responsibilities. In addition to clearly defining and implementing authority and responsibility for safety and health protection, management leadership entails evaluating managers and supervisors annually, and operating a documented system for correcting deficient performance.

4.2.3 Section I, Subsection D. Authority and Line Accountability

D1. *Does top management accept ultimate responsibility for safety and health in the organization? (Top management acknowledges ultimate responsibility even if some safety and health functions are delegated to others.) If not, please explain.*

- The reliance on administrative controls makes it necessary that top management accept ultimate responsibility. Without this acceptance, the administrative controls can easily fail.
- HIOSH believes that if a top manager attempts to delegate too much authority, safety and health efforts likely will fail. There will be insufficient management leadership, which is necessary for successful injury and illness prevention.
- It is also a problem when top managers delegate authority to persons who lack sufficient power or resources to ensure an effective safety and health management system.

D3. *Do the individuals assigned responsibility for safety and health have the authority to ensure that hazards are corrected or necessary changes to the safety and health management system are made? If not, please explain.*

- Responsibility without commensurate authority to effect necessary changes often results in uncontrolled hazards or hazards with inferior/ineffective hazard controls.
- Typically you'll find this situation when management has delegated responsibility to a safety and health person or someone with line function, but the person is unable to effect meaningful change.

D5. *Are adequate resources (for example, equipment, budget, or experts) dedicated to ensuring workplace safety and health? Provide examples.*

- Consistent with the definition of minimally effective, the key issue here is whether the lack of resources results in employees being exposed to serious uncontrolled hazards.

4.2.4 Section I, Subsection E. Contract Workers

E5. *Does the site's contractor program cover the prompt correction and control of hazards in the event that the contractor fails to correct or control such hazards? Provide examples.*

- If a site is failing to correct serious contractor-created hazards that either the original

contractor or another contractor created and this results in exposing (any) employees to uncontrolled hazards, it is not minimally effective. This is more common in construction, for example, when a carpenter is exposed to hazards created by a mason and no one does anything about it, because "they" didn't create the problem and the mason is nowhere to be found.

- Your answer here may have bearing on your response to the Minimum Requirement at Section I, Subsection B, B1. (See also *FRN* at III.F.5.d.)

E11. *Based on your answers to the above items, is the contract oversight minimally effective for the nature of the site? (Inadequate oversight is indicated by significant hazards created by the contractor, employees exposed to hazards, or a lack of host audits.) If not, please explain.*

- Guidance here is provided within the parenthetical portion of the question.
- Your answer here may have bearing on MR I.B.B1. (See also *FRN* at III.F.5.d.)

4.2.5 Section I, Subsection F. Employee Involvement

F3. *Do employees support the site's participation in the HVPP Process?*

- To be minimally effective, overall, employees must be aware of the HVPP program and must support the site's participation.
- It is understood that some small number of employees may not support the participation, but the key consideration is whether there is sufficient support that the program can be effectively implemented. Sufficient employee support is essential if administrative hazard controls are to be effective, because employees often must perform certain actions diligently. Without employee support, it is likely that administrative controls will be compromised and employees exposed to uncontrolled hazards.

F4. *Do employees feel free to participate in the safety and health management system without fear of discrimination or reprisal? If not, please explain*

- The issue is whether employees can participate in activities in the safety and health management system without fear that their participation may lead to adverse consequences.
- For example, there should be no reprisals for participating in an accident investigation or for reporting a hazard or near miss.

F9. *Do employees have access to results of self-inspection, accident investigation, appropriate medical records, and personal sampling data upon request? If not, please explain.*

- It is not minimally effective if the employer refuses to provide such information when requested by employees, or otherwise deliberately prevents access to such records.
- See CFR 1910.1020 for appropriate records.

4.3 Section II. Worksite Analysis

4.3.1 Section II, Subsection B. Baseline Hazard Analysis

B1. *Has the site been at least minimally effective at identifying and documenting the common safety and health hazards associated with the site (such as those found in HIOSH regulations, building standards, etc., and for which existing controls are well known)? If not, please explain.*

- A baseline survey and analysis is a first attempt at understanding the hazards at a worksite. It establishes initial levels of exposure (baselines) for comparison to future levels, so that changes can be recognized. Systems for identifying safety and industrial hygiene hazards, while often integrated, may be evaluated separately. Baseline surveys must:
- Identify and document common safety hazards associated with the site (such as those found in HIOSH regulations or building standards, for which existing controls are well known), and how they are controlled.
- Identify and document common health hazards (usually by initial screening using direct reading instruments) and determine if further sampling (such as full-shift dosimetry) is needed.
- Identify and document safety and health hazards that need further study.
- Cover the entire worksite; indicate who conducted the survey, and when it was completed.
- The original baseline hazard analysis need not be repeated subsequently unless warranted by changes in processes, equipment, hazard controls, etc.
- Refer back to the definition of minimally effective provided above.
- Your response to this item may have bearing on your answer to the Minimum Requirement at Section I, Subsection A, A3.

4.3.2 Section II, Subsection C. Hazard Analysis of Routine Activities

C1. *Is there at least a minimally effective hazard analysis system in place for routine operations and activities?*

- The requirement is NOT for hazard analyses to be done routinely, but to be performed on routine activities.
- Task-based or system/process hazard analyses must be performed to identify hazards of routine jobs, tasks, and processes in order to recommend adequate hazard controls. Acceptable techniques include, but are not limited to, Job Hazard Analysis (JHA) and Process Hazard Analysis (PrHA).
- Hazard analyses should be conducted on routine jobs, tasks and processes that:
  - Have written procedures.
  - Have had injuries/illnesses associated with them or have experienced significant incidents or near-misses.
  - Are perceived as high-hazard tasks, for example, tasks that could result in a catastrophic explosion, electrocution, or chemical overexposure.
  - Have been recommended by other studies and analyses for more in-depth analysis.
  - Are required by a regulation or standard.
  - Any other instance when the HVPP applicant or participant determines that hazard analysis is warranted.
- A good hazard analysis describes where it is happening (environment), who or what it

is happening to (exposure), what precipitates the hazard (trigger), the outcome should it happen (consequence), and other contributing factors.

- Your response to this item may have bearing on your answer to the Minimum Requirement at Section I, Subsection A, A3.

4.3.3 Section II, Subsection E. Routine Inspections

E1. *Does the site have a minimally effective system for performing safety and health inspections (a minimally effective system identifies hazards associated with normal operations)? If not, please explain.*

- Here the parenthetical provides guidance: A minimally effective system will identify hazards associated with normal operations at the site.
- A good inspection should verify that existing controls are still in place and effective.
- A dynamic work environment where conditions change frequently may need more frequent inspections.

4.3.4 Section II, Subsection F. Hazard Reporting System

F4. *Does a minimally effective tracking system exist that results in hazards being controlled?*

- A documented system must be in place to ensure that hazards identified by any means (self-inspections, accident investigations, employee hazard reports, preventive maintenance, injury/illness trends, etc.) are assigned to a responsible party and corrected in a timely fashion. This system must include methods for:
  - Recording and prioritizing hazards.
  - Assigning responsibility, time frames for correction, interim protection, and follow-up to ensure abatement.
- The Section I Minimum Requirements at D4 and D5 may influence your response to this MR.

F6. *Is there a minimally effective means for employees to report hazards and have them addressed?*

- To be minimally effective, employees must be free to report a hazard and must be able to have their concerns addressed, that is, reported hazards controlled.

4.3.5 Section II, Subsection G. Accident/Incident Investigation

G1. *Is there a minimally effective system for conducting accident/incident investigations?*

- An investigation system is not minimally effective if
  - it does not include investigation of incidents (including near misses) where significant hazards are present.
  - investigations of accidents and incidents are conducted but do not include a reasonable attempt to identify contributing factors.

4.3.6 Section II, Subsection I. Trend Analysis

I1. *Does the site have a minimally effective means for identifying and assessing trends?*

- The trend analysis is not minimally effective if the evaluation team finds easily observable trends that indicate serious uncontrolled hazards.
- Your response to MR II. I4 may have bearing.

4.4 Section III: Hazard Prevention and Control

4.4.1 Section III, Subsection A. Hazard Prevention and Control

A1. *Does the site select at least minimally effective controls to prevent exposing employees to hazards?*

- The concern here is not whether the site followed the hierarchy of controls, but whether the selected controls protect employees from exposure to serious hazard.

A10. *Does the site have minimally effective written procedures for emergencies?*

- The issue here is whether the site has a procedure for dealing with foreseeable emergencies.
- If no emergency plan exists, or the plan is so limited that it does not address foreseeable emergencies (TED 3-16 3h), it is not minimally effective.

4.5 Section IV. Safety and Health Training

4.5.1 Section IV, Subsection A. Safety and Health Training

A4. *Does the site provide minimally effective training to educate employees regarding the known hazards of the site and their controls? If not, please explain.*

- If, in general, the employees are not knowledgeable about serious hazards at the site and their controls, then the training cannot be considered minimally effective.

Appendix F
Recommended Interview Questions

I. Purpose. Interviews are an important tool in assessing the effectiveness of a site's safety and health programming. These questions are intended to guide the HIOSH reviewer during oral employee interviews. To begin, explain the purpose of the interview and the reason for HIOSH's presence at the site. Make employees aware that interviews are kept confidential and that the employee's responses will not in themselves determine company approval or disapproval.

II. General Employee Interview Questions

A. How long have you worked here?

B. Tell me about your job. What do you do during a typical day?

C. What are the safety and health hazards of your job?

D. How do you protect yourself from those hazards? What kind of personal protective equipment do you wear? Were you provided training?

E. What type of safety and health training have you received?

F. What happens if management disobeys a company safety rule? If an employee disobeys?

G. How do you respond in the event of a fire, hazardous waste spill, alarm, or medical emergency?

H. What does HVPP (or VPP) mean to you?

I. What is one method of reporting a safety or health concern? What was the last unsafe practice you reported and/or corrected?

J. How do your supervisors demonstrate their involvement in safety and health?

K. Have you ever seen anyone testing the air, noise levels, or conducting other surveys for possible health hazards? Do you know what the results were or what they meant?

L. Have you or anyone you know ever been injured or experienced a job related illness? What is the procedure when someone is injured?

M. How are you involved in the safety decision-making process?

N. Is safety and health valued in your organization?

O. What is one objective in your department's safety program?

P. How does management support your involvement in safety?

Q. What are your rights under HIOSH Law?

R. Is there anything else you think we should know about the safety and health program here?

III. Supervisors

A. How long have you worked here? When did you become a supervisor?

B. What do you see as your role in safety and health?

C. To what kinds of hazards are you and/or your employees exposed?

D. Has the company's upper management provided adequate resources for safety and health programming, such as funding, time, and technical support?

E. What do you do when you discover a hazard in your area?

F. What do you do when an employee reports a hazard in your area?

G. Do you provide employee training in safety related topics? (If so, please describe.)

H. Please give some examples where you had to use the disciplinary system for infractions of safety and health rules.

I. When was the last emergency drill? What is your role in drills?

J. How are you held accountable for ensuring safe and healthful working conditions in your area?

K. At high hazard chemical plants only: Is maintenance satisfactory, particularly on release prevention equipment? Is there adequate supervision provided for work performed on all shifts?

L. Do you have contract employees working in your area? If so, how do you control and address safety or health hazards relating to or created by them?

M. Are there routine or unannounced inspections? Who participates?

IV. Administrators and Executives

A. How long have you been with (company)?

B. Describe the type of safety and health hazards at this site.

C. How does management ensure that employee exposure to those hazards is eliminated or controlled?

D. How do you demonstrate leadership in and commitment to safety and health?

E. What benefits will a HVPP partnership provide for your company?

F. What do you think are your facility's best practices in safety and health?

G. How do you address the competing pressures of production and safety?

H. How do you hold your supervisors accountable for safety and health?

Have you ever had to discipline a supervisor for not following the rules?

I. How are you held accountable for your safety and health responsibilities?

V. Recordkeepers

A. Who is responsible for recordkeeping?

B. Is your site recordkeeping centralized? Is it computerized?

C. Do you have a completed Summary of Occupational Injuries and Illnesses for the last 3 calendar years? Do you have the supplemental documentation for each case entered on the log?

D. Which form do you use as the supplementary record: OSHA's First Report of Injury, a State workers' compensation form, an insurer's form, or other?

E. What is the process by which injury and illness information gets to the recordkeeper? After an injury or illness occurs, how long does it take to enter it on the log?

F. What type of reference material do you refer to for guidance on keeping illness and injury records?

G. Who decides whether or not a case is recordable?

H. How do you determine whether or not a case is work related?

I. Do you record any cases on the OSHA forms that are not compensable under workers' compensation?

J. How do you distinguish between an injury and an illness? Between medical treatment and first aid?

K. When does a case involve lost workdays? What constitutes restricted work activity?

L. What is your process for monitoring applicable contractor logs?

M. How do you safeguard the confidentiality of medical records?

N. How do you assure that any work restrictions are applied appropriately?

O. How have you assured timely and clear communications with the health care professional?

VI. Occupational Health Care Professionals

A. What are your qualifications and licenses?

B. What procedures are in place to ensure that health care services are delivered consistently and effectively?

C. What type of audit procedures do you use to compare your process with acceptable standards of practice and OSHA requirements?

D. Are employees provided timely access to services?

E. How do you assure that work restrictions or work removal are followed?

F. How are you made aware of the job hazards at this facility? Are you included in identification of workplace hazards, or development of restricted duty jobs, or other onsite issues?

G. What kinds of health surveillance programs are in place?

H. How do you communicate health surveillance data to employees and management to reduce future risk?

I. Explain how you evaluate the effectiveness of your occupational health care program.

VII. Maintenance Personnel

A. Is there a scheduled preventive maintenance program? How is it carried out?

B. At sites covered by Process Safety Management (PSM): Does the preventive maintenance program include:

1. Critical instrumentation and controls?
2. Pressure relief devices and systems?
3. Metals inspection?
4. Environmental controls, scrubbers, filters, etc.?

C. At PSM sites: Does the design, inspection, and maintenance activity include procedures to prevent piping cross-connections between potable water systems and non-potable systems?

1. How are these procedures carried out?
2. How are systems monitored and inspected to find any cross-connections?

D. Do maintenance personnel participate in safety functions?

E. Is there a priority system for safety/environmental related maintenance items? Is it being followed?

F. Does the preventive maintenance program include onsite vehicles, sprinkler systems, detection/alarm equipment, fire protection and emergency equipment?

G. Do you have input concerning safety and ease of maintenance for new equipment and machinery purchases?

H. Do you have an inventory of spare parts critical to safety and environmental protection?

I. Are you trained in the control of hazardous energy and the proper use of locks and tags?

J. Is there a system in place to track requests for repairs?

K. What methods are used to monitor the condition of critical equipment?

L. What is the ratio of scheduled versus unscheduled maintenance work?

M. What has the trend been like over the past few years?

VIII. General Questions for Onsite Evaluations to Determine Reapproval

A. Describe any changes in your job or in the handling of safety issues since the last HIOSH onsite evaluation.

B. How familiar are you with HVPP? Has your awareness increased since the last visit?

C. Do you have any increased knowledge of your rights under the program, including your right to receive upon request results of self-inspections or accident investigations?

D. Do you feel that the HVPP partnership has had a positive impact on your job and your safety?

E. Have you noticed any changes in safety and health conditions here since the site's approval in HVPP?