



Air
Land
Sea
Space
Cyberspace

Innovation. In all domains.

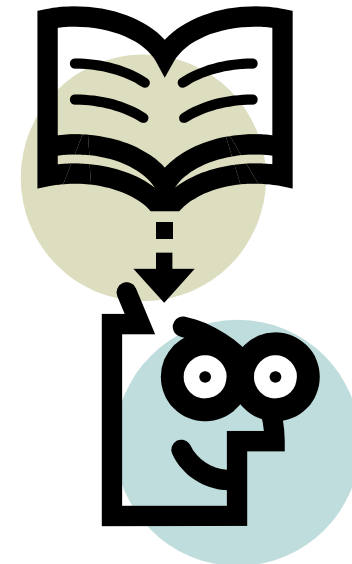
OSHA Region IX VPP Conference

VPP – The First Step

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Research VPP

- Review reference information from:
 - Federal OSHA
 - VPP Approved State OSHA
 - VPP Star sister sites
 - Industry and professional associations
- Sources:
 - VPP web pages – Federal and state
 - Direct contact with VPP Coordinator; consulting group
 - VPP conferences and training
 - Internal – VPP sister sites
 - SGE or mentor
 - Professional publications
- Look for key information:
 - Contacts
 - Requirements
 - Interpretations
 - High profile items
 - Site concerns



Is Your Site Eligible for VPP?

- Injury / Illness Performance? Two rates:
 - Recordable incident rate
 - Days away from work, restricted or transferred (DART) rate
 - Include temporary and directly supervised contract workers in rates
 - Site average of most recent 3 years for each rate must be at or below the most recent industry national average as published in BLS for the most specific SIC or NAICS code
 - Find rates at: <http://www.bls.gov/iif/oshwc/osh/os/ostb1917.pdf>
- OSHA inspection within 36 months prior to application?
 - Good faith effort to abate findings; no open inspections
 - No pending or open, contested citations
 - No notices under appeal at time of application
 - No affirmed willful violations

Eligibility, continued

- Unionized?
 - Union officer supports VPP (in writing)
 - No strike within past year
- Structural requirements: In place for at least 1 year prior to OSHA site assessment?
 - 4 elements comprised of 32 sub-elements
 - Management Leadership / Employee involvement
 - Management : visible engagement, accountable
 - Employees: at least three meaningful means of involvement
 - Work Site Analysis
 - Hazard Prevention & Control
 - Safety and Health Training

EHS Management Approval to Proceed?

- Identify strengths and soft spots
- Discuss:
 - primary action areas,
 - potential resources,
 - budget and timeline considerations
- Review information to be presented to Site Manager

What are Your Resources?

- Manpower
 - Internal: Site and company – EHS professional(s) on-site? If not, readily available?
 - External: OSHA, mentor
- Budget
 - Rough out estimate of costs
- Cost elements to consider:
 - Man-hours – EHS and other company personnel
 - Implementation
 - Training – who needs what; how present, materials
 - Use of consultant?
 - Communications – design, obtain, distribution
 - Morale events – materials, prizes, incentives
 - Achievement awards
 - Meals
 - Facility repairs / improvements
 - Celebration: flag ceremony
- Who is providing funding?
 - EHS or operations
 - Site or corporate

Draft a Preliminary Timeline

- Base timeline on milestones
- Set preliminary goal (month/year) for obtaining VPP Star
- Work backwards from goal to set milestones
- Consider:
 - Resources and when available
 - Does budget cycle impact?
 - Other site/company initiatives
 - Allow for changes or other circumstances:
 - Shutdown, possible layoffs, re-organization
 - New facility or operation coming on-line
 - New standards or company policies

Meet with Site Executive / Manager for Buy-In

- Invite Site Operation Manager and EHS Manager
- Come prepared with:
 - Short description of VPP and why important to site
 - Proposed timeline
 - Rough draft budget
 - Describe Site Manager's role and what is needed from him or her
- Leave with:
 - Manager's commitment to engage with VPP
 - Concurrence with preliminary timeline and budget
 - Manager or direct report resource to facilitate implementation
- Follow-up:
 - Thank you for support
 - Soft copy of material reviewed at meeting
 - VPP introductory reference material

Notifications & Project Mentor

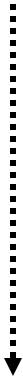
- Notify regional and corporate management
- Meet and engage with OSHA VPP Coordinator
 - Invite Site Manager, Operations Manager, Sr. Manager Facilitator, EHS manager
- Identify a Mentor – Consider these factors:
 - Knowledge of your company v. outside viewpoint
 - Availability – local v. able to travel
 - Experience with VPP – internal only v. various companies
 - Recommendations from others
 - Mentored sites
 - OSHA VPP Coordinator
 - Professional association
 - Industry and EHS peers
 - Successful implementations
 - Personality style – compatible
 - Paid consultant v. volunteer
 - “One size fits all” viewpoint – formula v. flexible approach

Conduct Gap Analysis

- This is a self-audit to assist with planning
- Use OSHA gap analysis or preferred company tool
- Work with mentor, experienced internal source and/or SGE
- May want to involve other knowledgeable parties – EHS, production ...
- Revise project timeline and resources if needed; e.g., identified previously unknown risk
- Meet with EHS and Site managers
 - Update on status
 - Obtain approval to proceed based on final timeline and resource allocation

GO FOR IT!

- Form VPP Project Team



- Attain VPP Star
- Celebrate
- Sustain

