Building an OSHA VPP Application

Are you interested in Star approval for your SMS?

The Occupational Safety and Health Administration (OSHA) has a process to evaluate your safety management system (SMS) against its performance-based Voluntary Protection Programs (VPP) criteria. This process involves an application review, and once the application is accepted, an onsite evaluation conducted by safety and health (S&H) experts, resulting in OSHA granting your site VPP Star approval, if successful. To apply for Star approval, you must first prepare a VPP application following OSHA's template. This one pager reviews the main sections of the application and provides tips on building a comprehensive VPP application.



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APPLICATION COMPONENTS

The application includes four sections. Involve managers and employees in writing each section. Identify a single person to oversee and coordinate the application to ensure consistency.

SECTION I: GENERAL INFORMATION	SECTION II: EMPLOYEE SUPPORT FOR VPP PARTICIPATION	SECTION III: ASSURANCES	SECTION IV: VPP S&H MANAGEMENT SYSTEM
Provide background information on your organization (e.g., site information, number of full-time employees and contract employees, union information, type of work performed, injury and illness data)	 Option 1: Draft a statement of commitment from your union(s) or other employee representation Option 2: Have employee representatives sign the application itself OSHA only requires one of these; however, it is a best practice to do both 	Provide a list of signed assurances to affirm your organization will meet OSHA's expectations – the application template includes the full list of these assurances	Read the statements throughout this section to understand the needed information Write responses for each VPP sub-element by describing the S&H processes, programs, and procedures in place at your organization DO NOT explain how you assess each sub-element like you would in the annual VPP self-evaluation**

^{**}For more information regarding the differences between the VPP application and the annual VPP self-evaluation, see the SMCX quick reference guide, "VPP Annual Self-Evaluation vs. VPP Application".



SUPPORTING DOCUMENTATION

Read through each written response in Section IV, VPP S&H Management System. Identify the documentation to show how you support your S&H processes and procedures (e.g., hazard logs to support Employee Reports of Hazards, inspection checklists to support Self-Inspections, site-specific programs to support Hazard Prevention and Control).

Create an index of the documents you attach to support your application. Provide completed examples of checklists, forms, and other documents to show how you exercise your established processes and procedures (i.e., not blank forms). You do not need to

Don't Miss This Information in Your Supporting Documentation



Process Safety Management

If process safety management (PSM) applies to your organization, complete three separate supplements, labeled A, B, and C – OSHA will send you supplement C



Annual VPP Self-Evaluation

Provide a copy of your most recent annual self-evaluation - review OSHA's <u>annual</u> <u>evaluation format</u>, or reach out to your <u>OSHA VPP Regional Manager</u> for a region-based format

NOTE: Some OSHA regions require two self-evaluations

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attach every piece of documentation supporting your SMS. OSHA can ask for additional documentation, as needed, after you submit the application.

SUBMITTING YOUR APPLICATION TO OSHA

Before submitting your VPP application, be sure to:

- ✓ Conduct a final review of the application from start to finish, making sure all statements and information are a true and accurate depiction of your S&H processes and procedures
- ✓ Attach the index of supporting documentation, including an annual VPP self-evaluation reach out to your OSHA Regional VPP Manager regarding the format and number of self-evaluations
- ✓ Acquire all the necessary approvals and signatures
- ✓ Submit a Letter of Intent to File for OSHA VPP Approval to your Designated Agency Safety and Health Official (DASHO) view the SMCX One Pager, <u>Developing an OSHA VPP Letter of Intent</u> for additional information
- ✓ Inform your OSHA Regional VPP Manager of your plans to apply for Star approval determine if they prefer electronic or mail submissions
- ✓ Submit the application and wait for OSHA to request additional information and/or accept your application and move forward with the onsite evaluation.

For additional information on the SMCX's services, please visit the SMCX-hosted website at: https://www.smscx.org/.

