

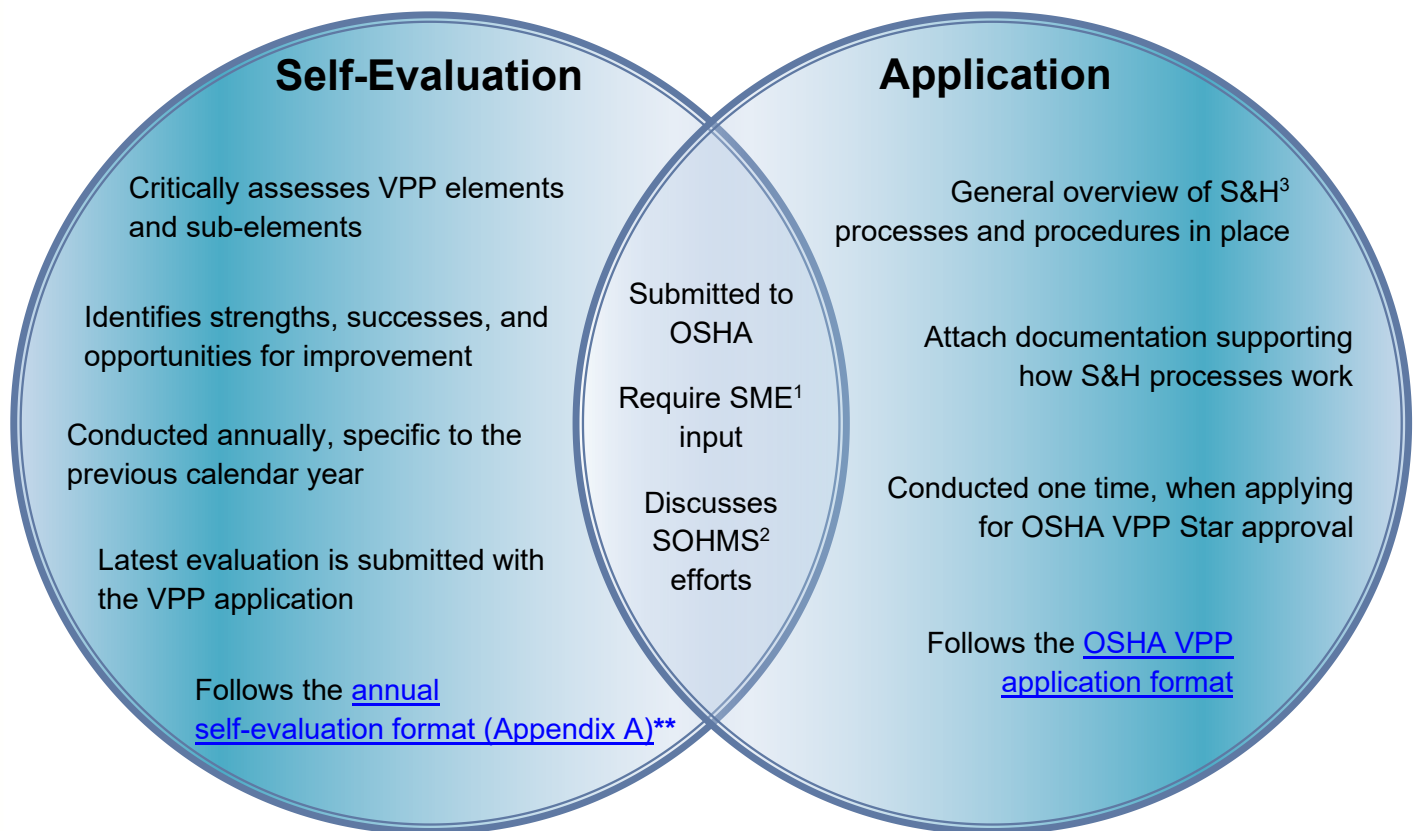
# VPP Annual Self-Evaluation vs. VPP Application

## What is the Difference?

There are always questions regarding the differences between the Occupational Safety and Health Administration's (OSHA's) Voluntary Protection Programs (VPP) annual self-evaluation and a VPP application. Often, organizations take the information in their VPP application and duplicate it in their annual self-evaluation, causing the two documents to mirror one another – this is **not** correct. If these documents are not completed properly, OSHA may reject one or both when you apply for OSHA VPP Star approval and require you to revise them.

These documents have a specific purpose and require different information in each one. This quick reference guide explains the differences between these two documents so you can ensure each of your documents contains the correct information.

### VPP Annual Self-Evaluation vs. VPP Application



1 SME – Subject matter expert

2 SOHMS – Safety and occupational health management system

3 S&H – Safety and health

\*\* **Note:** Some OSHA VPP regions have a specific self-evaluation format for you to follow

## VPP Annual Self-Evaluation

Follow these tips when conducting your self-evaluation:

- Share a copy of [CSP 03-01-005](#) with anyone contributing to the VPP self-evaluation; have them review any information related to the specific sub-elements they are focused on, and Appendix A
- List activities or changes that impacted your VPP efforts or overall workplace S&H in **Section C, Significant Events and Changes**. Include activities, such as: on-site OSHA assessments; leadership changes (both to management or bargaining units); significant OSHA-recordable injuries or illnesses; and substantial staffing or resource changes. Describe the impact of the event(s) on your SOHMS and the actions your organization took to mitigate these impacts.
- Document any one-year conditional goals or merit goals from an OSHA on-site evaluation in **Section E, Summary Chart of Merit or 1-Year Conditional Goals**. This section is only for merit goals or one-year conditional goals from a previous on-site OSHA evaluation. Do not include your organization's annual S&H goals and objectives.
- Compile best practices and success stories in **Section F, Best Practices and Success Stories**. Examples include: events that support VPP efforts; safety stand down days; effective new employee involvement initiatives; successes in previously lacking programs or processes; new hazard controls effectively reducing exposures; or mentoring another worksite for VPP.

Review **Section D, Narrative Evaluation of Safety and Health Management System** – it is where you document a narrative for each VPP sub-element:

- DO NOT repeat the information included in your VPP application
- Avoid generalities as much as possible
- Get SMEs involved to write narratives for each VPP sub-element
- Make sure the information is **specific to the calendar year assessed** (e.g., focus on calendar year 2024 when writing the self-evaluation in early 2025)
- Keep each narrative simple, direct, and brief
- Describe changes and problems you encountered throughout the year
- Discuss continuous improvement efforts you put into place during the year
- Ask yourself, “Is our system/process effective?” for each VPP sub-element, if not, write a recommendation for improvement
- Provide status updates for any recommendations listed in last year's self-evaluation

## VPP Application

Follow these tips when writing your VPP application:

- Share a copy of [CSP 03-01-005](#) with anyone contributing to the VPP application; have them review it so they understand the VPP requirements
- Ensure your OSHA-recordable injuries and illnesses on OSHA Forms 300 and 300A match the numbers you use to calculate your 3-year total case incidence rate (TCIR) and days away, restricted, and transferred (DART) case rate
- Create a list of all supporting documentation you plan to submit with the application
- Attach a site map and indicate your location(s) and surrounding facilities
- Ensure the information in the application is accurate—the OSHA assessment team refers to this information during their on-site assessments
- Assign one person to compile the information for the application, review the full application for accuracy and duplication, and make sure it reads consistently throughout

Review **Section IV. VPP Safety and Health Management System** – it is where you prepare a summary of the process(es) you have in place for each sub-element

- Read the description for each sub-element
- Get SMEs involved to write summaries for each sub-element
- Provide an overview of the process(es) and procedure(s) in place to support each sub-element
- Keep the wording general, clear, and concise
- Use job titles instead of peoples' names
- Make sure the summary supports the sub-element description
- Consider asking SMEs to prepare a list of documentation they have in place to support each sub-element (use completed examples, not blank forms)
- Discuss your process and approach for conducting the VPP annual self-evaluation in the “Self-Evaluation” section of the application, not your annual safety evaluation or routine safety inspection processes

## VPP Annual Self-Evaluation Guidance

### Annual Self-Evaluation Narrative:

#### Emergency Preparedness

**2024 Activities:** Explain what you accomplished in 2024 to support the sub-element. What improvements or changes were put into place since last calendar year? Were there any changes to your process(es) or new programs, policies, or procedure put into place this year? What data was reviewed to assess this sub-element? Were there any obstacles encountered and why do you think you have/had an issue? Do you have any self-identified deficiencies you need to work on? How will you improve this sub-element next year? Provide status updates for any recommendations listed in the 2023 annual self-evaluation for the specific VPP sub-element. Explain the status of this recommendation – are you still working on it and, if so why, and what's your plan? If you aren't working on it, is what you implemented effectively working or do you have to set a new goal to tweak it or re-evaluate it?

**Evaluation of Sub-Element:** How do you rate this sub-element at your organization? Is it effective? Effective, but needs improvement? Ineffective? Explain why you think it's effective/ineffective?

**Recommendations for Improvement:** If you have an opportunity for improvement or think the sub-element is ineffective, write an action here. If you don't have any, write "None".

**Assignment of Responsibility:** Who is responsible for the recommendation for improvement? List the job title here. If you don't have any, write "None".

**Target Date:** When do you anticipate completing the recommendation for improvement? An estimated guess is okay.

## VPP Application Guidance

### Sub-Element and Description:

**SUB-ELEMENT:** Emergency Preparedness

**DESCRIPTION:** Describe your emergency planning and preparedness system. Provide information on emergency drills and training, including evacuations.

#### Details in the CSP:

You may have an Emergency Manager, the Fire Department, or others who help with drills, planning, and training. The CSP for Emergency Preparedness provides this information:

*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 OSHA 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 all employees have an opportunity to participate in evacuation drills, documentation and critique of evacuation drills and recommendations for improvement, and personal protective equipment where needed.*

#### Summary:

Touch upon each item discussed in the CSP when preparing the summary for the VPP application – describe the whole process for emergency preparedness from start to finish, including putting together emergency procedures, exercising and critiquing procedures, ensuring employee participation and sharing results, and how the results are used for continuous improvement.

#### List Supporting Documentation:

Copies of your procedures, documentation showing you review procedures at least annually, accountability forms (depends on how you do this for what you provide), critique forms, emails to supervisors and leadership sharing drill results.

For additional information on the SMCX's services, please visit the SMCX-hosted website at:

<https://www.smcx.org/>.