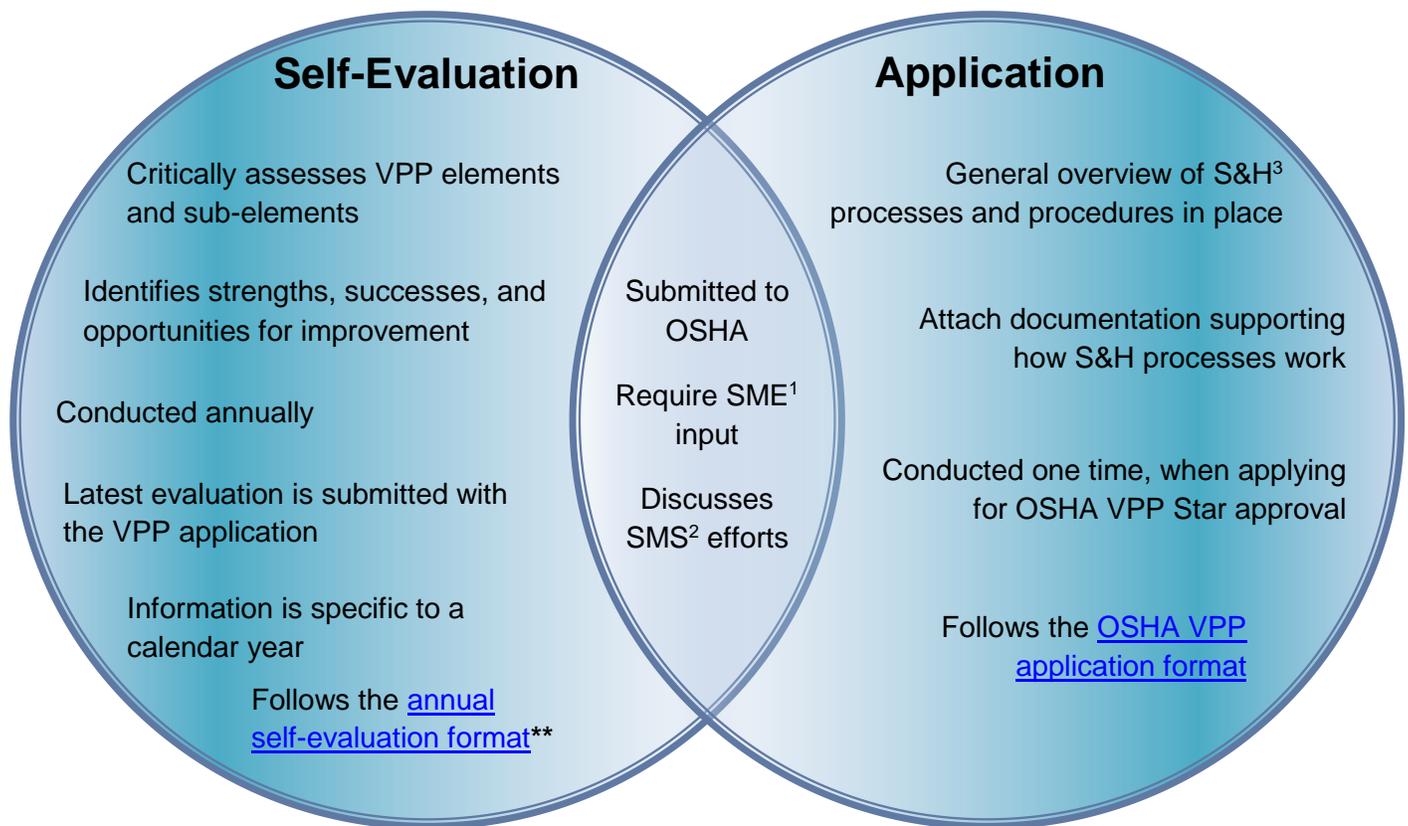# VPP Annual Self-Evaluation versus VPP Application
What is the Difference?

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 VPP application. If these documents are not done correctly, OSHA may reject these documents when you apply for OSHA VPP Star approval and require you to revise them.

Oftentimes, organizations take the information in the VPP application and duplicate it in the annual self-evaluation, causing the two documents to mirror one another. These documents have a specific purpose, requiring different information within each. This quick reference guide clarifies the differences between the two documents to ensure each document contains the correct information.

VPP Annual Self-Evaluation vs. VPP Application

Self-Evaluation

Critically assesses VPP elements and sub-elements

Identifies strengths, successes, and opportunities for improvement

Conducted annually

Latest evaluation is submitted with the VPP application

Information is specific to a calendar year

Follows the annual self-evaluation format**

[Overlap]

Submitted to OSHA

Require SME[1] input

Discusses SMS[2] efforts

Application

General overview of S&H[3] processes and procedures in place

Attach documentation supporting how S&H processes work

Conducted one time, when applying for OSHA VPP Star approval

Follows the OSHA VPP application format

1 SME – Subject matter expert
2 SMS – Safety management system
3 S&H – Safety and health
** **Note:** Some OSHA VPP regions have a specific self-evaluation format for you to follow

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VPP Annual Self-Evaluation

Follow these tips when conducting your self-evaluation:

- List activities or changes that could have 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 actions your organization took to manage the impact of these events on S&H.

- Note any 90-day items and conditional goals you have resulting 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 from a _previous_ on-site OSHA evaluation. Do not list 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 to support VPP efforts; safety stand down days; effective new employee involvement initiatives; successes in programs that were once lacking; new hazard controls that effectively reduce exposures; or mentoring another worksite for VPP.

- Consider adding a section called **Previous Year Recommendations and Status Report** (not required, but recommended). If you completed an annual self-evaluation last year, list the recommendations for improvement from the previous annual self-evaluation and provide a status on each to help demonstrate how you monitor actions taken for past recommendations.

Review **Section D, Narrative Evaluation of Safety and Health Management System** – it is where you prepare 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 that relate to their jobs

- Make sure the information is **specific to the calendar year assessed** (e.g., focus on calendar year 2019 when writing the self-evaluation in early 2020)

- Keep each narrative simple and brief

- Describe changes and problems you encountered throughout the year

- Discuss continuous improvement efforts you put into place

- Remember this is a critical evaluation – for each VPP sub-element, ask yourself "is this effective?" – if not, write a recommendation for improvement

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 truthful – the OSHA assessment team refers to this information during their on-site assessments

- Assign one person to pull together all the information for the application, review it for accuracy and duplication, and make sure it reads consistently throughout

Review **Section IV. VPP Safety and Health Management System** – this 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 the summaries for each sub-element – share the sub-element and description with them

- 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 (completed examples) they have in place to support each sub-element

- 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

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VPP Annual Self-Evaluation Guidance

Annual Self-Evaluation Narrative:

Emergency Preparedness

2019 Activities: *Explain what you have done in 2019 to support the sub-element. Were there any changes to your process? Describe any obstacles you are encountering and why you think you have an issue.*

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

Recommendations for Improvement: *If you have an opportunity for improvement or you 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 having the recommendation for improvement done? A guess is okay.*

Previous Year Recommendations and Status Report (*optional, but recommended*):

Recommendation: *Add a recommendation you listed in your 2018 annual self-evaluation.*

Status: *Provide a status update. Did you implement it? Is it still ongoing and why?*

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 that 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 that 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.smscx.org/.