



Occupational Healthcare Program

OSHA VPP

January 2025

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This presentation outlines Occupational Health Care Program (OHCP) requirements for the purposes of Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) implementation.

The presentation provides information on the background and importance of an OHCP, required documentation, and the various levels of employee knowledge. It concludes with an action checklist and supplemental details to help with OSHA VPP implementation and sustainment efforts.

Objectives

- In this presentation, you will learn to:
 - Summarize the background and importance of an OHCP
 - List OHCP-related documentation
 - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding the OHCP
 - Identify OHCP actions to implement and sustain OSHA VPP

This presentation is beneficial to safety and health (S&H) professionals, OSHA VPP representatives, industrial hygiene (IH) professionals, medical professionals, health care claims representatives, recordkeepers, and others with responsibilities under the OHCP.

Background & Importance

- Included in the HP&C criteria for VPP
- Ensures OH professionals assess employee health
- Confirms necessary health services are available for personnel
- Includes training for OH care professionals and employees
- Requires readily available emergency services



HP&C = hazard prevention & control
OH = occupational health

OH care focuses on employee health for the prevention and treatment of illnesses and injuries. It also includes health-related services (e.g., pre-placement examinations, audiograms, lung function tests).

The top image shows an OH physician. The bottom image shows an emergency entrance to a medical facility. Images retrieved from Microsoft Images.

Documentation

- OHCP procedures
- OHCP assessments
- Program training records
- IH reports
- Personal sampling or surveys
- Employee health and surveillance records
- Committee, council, and working group meeting minutes
- Board licenses and certifications for physicians, OH nurses, audiologists, and other OH staff



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Image retrieved from Microsoft Images



Make sure you provide completed examples of forms and documents to your assessment team. Don't just show them blank forms! They want to see the documents you filled out to thoroughly assess the processes within your SOHMS.

Written procedures are essential to manage, track, and complete exams and training requirements. These include how to schedule exams, how to track missed exams, how employee return to work, and how to assess the OHCP program.

Examples training records include: first aid, cardiopulmonary resuscitation (CPR), and automated external defibrillators (AEDs). This can also include training provided by OH care professionals to employees based on employee exposures (e.g., lead, hearing conservation, respiratory protection).

Best practice: Include OH professionals on safety committees, councils, or in working groups, especially those involving employees returning to work.

NOTE: OSHA assessment team members have a medical access order to review work-related medical records. This includes medical records protected by the Health Insurance Portability and Accountability Act (HIPAA) and Privacy Act. They review IH reports and personal sampling records to ensure you identify and evaluate health hazards, and that appropriate OH actions are met for employee exposures to potential health hazards.

The image shows a doctor completing a patient chart. Image retrieved from Microsoft Images.

Leadership/Management Knowledge

- Leaders and managers should be knowledgeable of:
 - OH professional services
 - Employee medical surveillance process(es)
 - Certification exam process(es)
 - Procedures for reporting work-related injuries
 - Medical treatment procedures for injured employees
 - First aid and CPR/AED programs, if applicable
 - Procedures for returning an injured employee to work



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Image retrieved from Microsoft Images



Leaders and managers need to know about site-specific medical surveillance programs, including the process for identifying, scheduling, and tracking employee testing and certifications.

They should also know how to address employees requiring medical assistance, to include following local procedures to complete a medical referral form, providing the injured employee appropriate forms, notifying the chain of command, and initiating the mishap investigation. Supervisors should know who the workers' compensation assistance point of contact.

Leaders and managers assist employees when they return to work following an injury or illness. If the employee cannot return to full duty, then the employee may work in another capacity (e.g., light duty) as approved by the physician. Their supervisor must be aware of any restrictions to assign work tasks. Leadership should work with OH care professionals to develop an employee return-to-work program if one does not exist.

Image retrieved from Microsoft Images.

Key Personnel Knowledge

- OH and IH personnel should know:
 - Roles and responsibilities of IH, safety, and OH staff
 - Staff qualifications, licensure, or certifications
 - Types of health/medical surveillance and certification programs in place
 - How medical surveillance data is communicated to employees and management
 - Health hazard recognition
 - OHCP audit and evaluation procedures
 - Health hazard-related training provided to employees, if needed



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Image retrieved from Microsoft Images



OH personnel may include: occupational medicine physicians, nurses, physician assistants, nurse practitioners, paramedics, audiologists, medical technicians, and administrative staff.

IH personnel may include: industrial hygienists, technicians, and administrative staff.

Key personnel must be able to explain the process for enrolling personnel in medical surveillance programs, the process for maintaining and updating medical records, and the process of distributing medical surveillance information to employees and management.

Key personnel must conduct periodic audits and evaluations of existing programs and procedures. Ask them to explain the process, how the assessments are executed, what is done with the results, and how to compare the process with acceptable standards of practice and OSHA requirements.

More information on OSHA clinicians is available at: <https://www.osha.gov/dts/oom/clinicians>

The image shows a hazard symbol. Image retrieved from Microsoft Images.

Key Personnel Knowledge

- OH personnel additionally should know:
 - Procedures to provide timely health care services
 - Roles in employee return to work, work restrictions, or work removal
 - Roles in emergency care and first aid programs, as applicable
 - What makes an injury or illness OSHA recordable



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Image retrieved from Microsoft Images



Roles and responsibilities and the availability of first aid and emergency care services differs by location. Trained OH personnel are familiar with medical facility requirements and the procedures at your organization.

Key personnel conduct pre-placement, periodic medical surveillance, and certification examinations based on IH recommendations or human resource requirements. They should understand their roles in these processes. If applicable, they should understand their responsibilities related to notifying others (varies per location) when a work-related injury or illness occurs for OSHA recordkeeping purposes.

For additional information, visit:

- Medical and first aid: <https://www.osha.gov/SLTC/medicalfirstaid/>
- Medical screening and surveillance: <https://www.osha.gov/SLTC/medicalsurveillance/>
- OSHA recordable incidents: <https://www.osha.gov/recordkeeping/>

The image shows a group of OH personnel discussing S&H. Image retrieved from Microsoft Images.

Workforce Knowledge

- Employees should know:
 - Health hazards in their work area
 - Local emergency procedures
 - Locations of first aid kits and AEDs
 - Why they are included in health surveillance programs
 - Results of IH surveys conducted in their work area and the location of results
 - Signs and symptoms of work-related illness
 - Procedures for reporting injuries or illnesses and seeking medical attention



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Image courtesy of Kadena AFB



AFB = Air Force Base

Employees need to know about the health hazards in their work areas and how to protect themselves against these health hazards, including any surveillance programs they are enrolled in.

Employees must also be familiar with local procedures in the event of a work-related injury or illness requiring medical attention. They should know how to report an injury/illness and where to seek medical attention.

Employees should know about life-saving equipment in their workplace, like AEDs and first aid kits, as well as the organization's policy on using this equipment to support the OHCP.

Employees must also know the signs and symptoms of any work-related illnesses they could encounter due to exposure to a particular hazard. Not only should employees be able to identify these signs and symptoms in themselves, but also whether their coworkers are experiencing a work-related illness.

Supervisors should explain IH surveys and the results to help employees further understand health hazards and how to prevent work-related illnesses.

The image shows an air sampling pump on a worker. Image retrieved from Kadena AFB at: <http://www.kadena.af.mil/News/Article-Display/Article/770021/bio-conducts-air-sampling-survey-during-afqc>

Action Checklist

- ☐ Develop an OHCP
- ☐ Develop OH care-related procedures
- ☐ Establish a multi-disciplinary team approach
- ☐ Train employees
- ☐ Conduct medical surveillance and surveys
- ☐ Conduct an OHCP assessment



Follow this action checklist to implement and sustain VPP expectations for the OHCP. Keep in mind, any SOHMS is about continuous improvement. Once you complete the items on this list, make sure you are continually reviewing and improving your OHCP! Each of these action checklist items will be covered in more detail on the following slides.

The image shows a medical professional and patient. Image retrieved from Microsoft Images.

OHCP

- Use licensed health care professionals to assess employee health status
- Include provisions and arrangements for needed health services
- Discuss employee training for first aid, CPR, and AEDs
- Ensure emergency medical care is within a reasonable time and distance
- Explain emergency procedures and services to employees on all shifts



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Image retrieved from Microsoft Images



The slide shows several components to include in your OHCP, as provided in the OSHA Cooperative and State Programs (CSP) 03-01-005 at:

<https://www.osha.gov/enforcement/directives/csp-03-01-005>

Developing the OHCP requires coordination between several organizations:

- Medical facility (e.g., medical services, training, hazard recognition/evaluations)
- Human resources (e.g., pre-placement and certification exam requirements, link point for workers' compensation)
- Safety (e.g., medical surveillance scheduling, safety inspections, mishap investigation, trend analysis)
- Fire department (e.g., emergency response, AED program management)
- IH (e.g., baseline/periodic surveys, sampling, health hazard evaluations)

An OSHA letter of interpretation provides clarification on a reasonable time and distance for emergency medical care (<https://www.osha.gov/laws-regs/standardinterpretations/2007-03-23>), stating:

- Where serious accidents are possible (e.g., falls, suffocation, electrocution, amputation), emergency care is available within no more than 3-4 minutes from the workplace.
- Emergency care can be an employee trained in first aid, but if no employees are trained, then emergency medical services must respond in 3-4 minutes.
- In workplaces (e.g., offices) where the possibility of serious work-related injuries is less likely, a longer response time of up to 15 minutes may be reasonable.

Image retrieved from Microsoft Images.

OH Care Procedures

- Develop and implement procedures for OH care tasks:
 - Evaluate fitness for duty
 - Schedule and track medical surveillance exams
 - Care for injured or ill workers
 - Manage occupational injury and illness cases
 - Communicate health surveillance/IH monitoring results
 - Facilitate the return of injured/ill employees to work



The medical facility generally establishes local procedures to comply with OSHA standards, Joint Commission regulations, and military Service requirements. Many facilities write and maintain procedures in a binder for ready access.

The image shows a technician conducting an audiogram on an employee. Image retrieved from Microsoft Images.

Multi-Disciplinary Team Approach

- Establish a core team of safety, IH, and OH professionals



- Involve the team in OHCP assessments, as applicable

- Conduct periodic, routine surveys and inspections as a team
- Establish procedures for handling OH hazards
- Add IH/OH findings to a hazard log for visibility and tracking
- Review procedures at least annually
- Maintain close communication

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Image retrieved from Microsoft Images



Establish a core team to develop and assess OH care procedures and workplace health hazards. Your core team may consist of safety specialists, industrial hygienists, occupational medicine physicians, OH nurses, and other professionals (e.g., audiologists, physician assistants, nurse practitioners, ergonomists). Identify and review hazards together, as well as emergent issues. Involve the core team in the program assessment, as applicable.

Develop procedures for managing common issues at facilities and installations (e.g., indoor air quality complaints, disruptive noise conditions). Established procedures saves time and gets the appropriate parties involved immediately. Review and update your procedures annually.

Ensure clear lines of communication between the core team members. Hold regular discussion on injuries and mishaps to ensure OSHA recordkeeping logs are up to date.

Image retrieved from Microsoft Images.

Employee Training

- Provide training to ensure employees:
 - Are aware of the OHCP
 - Understand local emergency and OH care procedures
 - Perform first aid, administer CPR, or use an AED, if applicable
 - Know how to report workplace injury or illness and seek medical attention
 - Recognize workplace health hazards and the signs and symptoms of exposure
 - Enroll and participate in medical surveillance programs



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Image retrieved from Microsoft Images



Incorporate OHCP information into new hire orientation conducted by the Safety Office and work area-specific training conducted by the supervisor. Also, ensure any documentation related to training (e.g., programs, policies, procedures, forms), are located or stored in a location readily available to employees.

Train personnel you expect to provide first aid or CPR. All personnel, on all shifts, must understand the emergency procedures for their workplace.

Training for signs and symptoms of exposure to workplace health hazards should include hazardous chemicals and toxic substances, environmental, and seasonal conditions, if applicable at your organization. For example, train employees to recognize the signs and symptoms of heat stress or stroke if they work in hot environments or outdoors in the summer.

Employees enrolled into medical surveillance programs require training and testing by OH staff and recurring medical visits.

Maintain training records and track any certifications personnel receive.

The image shows employees receiving training. Image retrieved from Microsoft Images.

Medical Surveillance & Surveys

- Use surveys and workplace exposure assessments to drive medical surveillance:
 - Support early recognition and treatment
 - Limit severity of harm
 - Identify trigger requirements of toxic and hazardous substance regulations
- Use a team approach of supervisors, employees, safety, IH, and OH professionals to conduct surveillance and surveys



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Image retrieved from Microsoft Images



Review baseline IH survey reports and baseline hazard assessments. Identify all hazards are included in these document. Review employee enrollment in medical surveillance programs. Update the documents periodically, based on hazards and any changes to processes or tasks.

Involve safety, OH, and IH staff involvement in new assessments or routine surveys. Keep the team engaged and aware of potential hazards, especially in high hazard areas.

Involve supervisor and employees – their participation ensures information is accurate – they know their jobs best!

The image shows safety staff conducting a worksite assessment. Image retrieved from Microsoft Images.

Medical Surveillance & Surveys

- Document and track all completed medical surveillance and health hazard surveys
- Establish schedules for follow-up surveys and surveillance
- Report the results of surveys and surveillance to appropriate personnel



Safety inspections and IH surveys identify potential health hazards. Recommend medical surveillance for individuals conducting work in these specific work areas, depending upon the hazard exposure.

Establish procedures, based on requirements of the Privacy Act, to report exposure sampling or monitoring results (e.g., personal air sampling, noise dosimetry) to employees.

The image shows a sign stating to wear butyl rubber gloves. Image retrieved from Microsoft Images.

OHCP Assessments

- Review OH and IH staffing levels
- Determine the effectiveness of required OH care services
- Verify health services equipment and calibration
- Review capabilities to provide timely emergency services



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Image retrieved from Microsoft Images



Conduct an annual evaluation of the OHCP. Consider completing this OHCP evaluation in conjunction with the organization's OSHA VPP annual self-evaluation.

Review OH staffing levels, credentials, and licensing to ensure all staff qualifications are up to date. Also, ensure no new licensing or credentialing is needed. Credentialing offices are usually responsible for maintaining health care personnel credentials and licensing.

Verify all employees receive all required health services or surveillance. If not, determine why. Is it an OH issue or a personnel management issue?

Emergency services capability depends largely on location. Evaluate any health-related programs in place (e.g., first aid, equipment, supply replenishment, AED inspections, personnel training) based on your available emergency services.

The image shows a variation of the Plan-Do-Check-Act cycle. Image retrieved from Microsoft Images.

OHCP Assessments

- Verify all procedures are current, accurate, and effective
- Review internal and external audit findings
- Compare metrics with previous assessments
- Distribute and trend customer feedback surveys
- Review findings and plan for improvements



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Image retrieved from Microsoft Images



Review all procedures annually. Date procedures after review, even if changes have not been made, to show your procedures are up to date.

Compare metrics and findings against previous assessments. Review hazard tracking logs to determine if there are any other issues relative to your OH procedures.

Consider providing customer/employee feedback surveys. These identify issues related to the appointment process, patient wait times, and staff courtesy – feedback is incredibly valuable!

Use the findings from your OHCP assessment and develop plans of action to improve. Look for weaknesses, areas needing improvement, and ways to become even better in areas where you excel!

The image shows a customer survey. Image retrieved from Microsoft Images.

Conclusion

- In this presentation, you learned to:
 - Summarize the background and importance of an OHCP
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