



Safety & Health Management System Evaluation

OSHA VPP

January 2025

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This presentation outlines safety and occupational health management system (SOHMS) evaluation requirements for the purposes of the Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) implementation.

The presentation provides information on the background and importance of SOHMS evaluations, 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.

In this presentation, S&HMS (safety & health management system) evaluation is synonymous with SOHMS evaluation, annual VPP self-evaluation, and annual self-evaluation.

Objectives

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

This presentation is beneficial to safety professionals and VPP representatives, as well as others with responsibilities or involvement in the annual VPP self-evaluation.

Background

- Included in the ML&EI criteria for VPP
- Used to evaluate the effectiveness of the SOHMS
- Submitted with an OSHA VPP application
- Submitted annually after receiving OSHA VPP recognition



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ML&EI = Management Leadership and Employee Involvement

Annual self-evaluation: A critical review performed to assess the effectiveness of all four VPP elements and their sub-elements.

Sometimes, organizations mistakenly think safety and health (S&H) inspections qualify as an annual self-evaluation. A comprehensive S&H inspection **does not** meet the criteria of this evaluation unless it broadly assesses the four VPP elements.

NOTE: You must submit your most recent (previous calendar year) annual self-evaluation along with your OSHA VPP application when applying for OSHA VPP recognition. OSHA references this file during your OSHA VPP on-site assessment. VPP recognized worksites must submit an annual self-evaluation annually to their regional OSHA/VPP office; **it is due by February 15** every year.

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Importance

- Provides an opportunity to review and assess the overall SOHMS
- Recognizes strengths and weaknesses of the SOHMS and S&H program
- Identifies goals for improvement
- Presents employee involvement opportunities



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The purpose of an annual self-evaluation is to critically look at your SOHMS and identify strengths and weaknesses. Then you can address any findings or gaps and work towards continuous improvement.

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Importance

- Facilitates communications between organizational functions
 - Helps evaluate SOHMS implementation effectiveness
 - Focuses on maintenance, sustainment, and continuous improvement
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- An illustration featuring two stylized human profiles in blue and orange, facing each other. Between them is a large, colorful brain composed of numerous small icons representing various organizational functions such as communication, technology, and management.

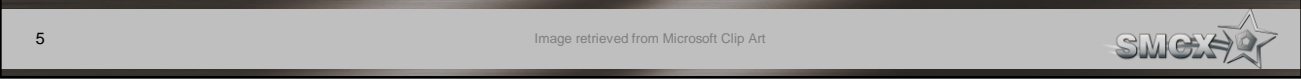
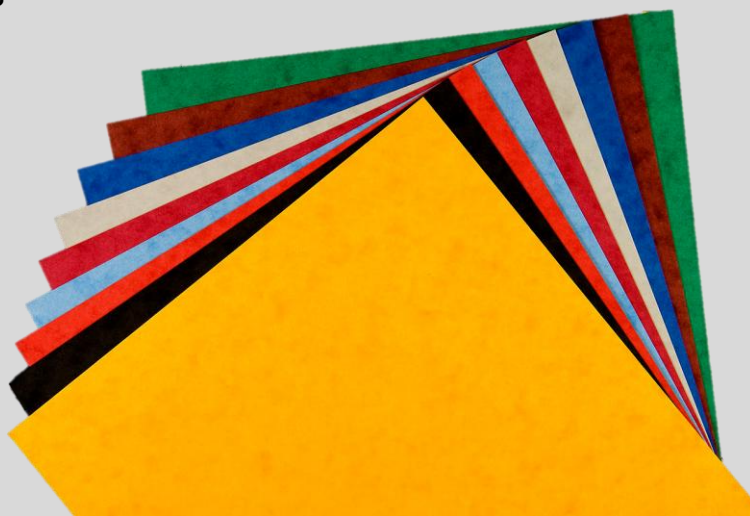


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Documentation

- Annual VPP self-evaluations

How well do you
execute your S&H
programs and
processes?



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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.

Annual self-evaluations show how well your organization executes S&H programs and processes. The more annual self-evaluations you complete, the more you can show how your SOHMS has improved over time.

View the annual self-evaluation format in OSHA's Cooperative and State Programs (CSP) 03-01-005 document (Appendix A) at: https://www.osha.gov/sites/default/files/enforcement/directives/CSP_03-01-005.pdf

Please note certain VPP regions have templates they prefer for the annual self-evaluation. The templates contain the same basic requirements, but the formats are slightly different. Contact your Regional VPP Manager to see if they have a regional template. Find your Regional VPP Manager's contact information at: <https://www.osha.gov/vpp/vpp-managers-text>

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Documentation

- The annual self-evaluation should include:
 - ☐ A description of the organization composition
 - ☐ Worksite and contractor injury and illness rates
 - ☐ Significant S&H changes and events
 - ☐ Success stories and implemented best practices
 - ☐ Written descriptions of how each VPP sub-element is met
 - ☐ Progress made on recommendations/goals from the previous year
 - ☐ Identified SOHMS strengths and weaknesses
 - ☐ Goals for improvement

Each worksite has a different composition of employees. Be specific and describe the types of employees you have at your site (e.g., civilians, military personnel, volunteers, contractors).

Include injury and illness rates for your organization and for any applicable contractors working at your worksite.

Applicable contractor: A contractor whose employees worked at least 1,000 hours for a VPP participant in any calendar quarter within the last 12 months and are not directly supervised by the participant.

Significant S&H changes and events may include: leadership changes, facility modifications, the addition of new processes, or changes in resources (e.g., S&H staff).

Focus on the efforts put forth over the past calendar year when writing your self-evaluation. Use previous results from old annual self-evaluations, if possible, to see how you improved.

You'll complete the Process Safety Management (PSM) Supplemental B Questionnaire if PSM occurs at your site. See the "VPP PSM Supplement B for Calendar Year" document at:
<https://www.osha.gov/vpp/vpp-policy>

Leadership/Management Knowledge

- Leaders and managers should know about:
 - The purpose of the annual self-evaluation
 - SOHMS strengths and weaknesses
 - Implemented best practices
 - Significant S&H changes and events
 - S&H goals and objectives for which they are responsible
 - Their responsibility for the final review and approval of the annual self-evaluation

Leaders drive the SOHMS.

Consider how you communicate SOHMS evaluation information to your leaders – you may need to establish periodic meetings with leadership and/or they may want you to email them the results of the annual self-evaluation. Either way, keep leaders in the loop. Let them know about identified strengths and weaknesses. Bring ideas on how to improve identified gaps. Ensure they understand the timeframes to fix identified weakness.

Leaders should approve and sign completed annual self-evaluations to acknowledge their acceptance.

Key Personnel Knowledge

- Key personnel should know about:
 - Who conducts the annual self-evaluation
 - VPP sub-elements for which they have direct functional responsibility
 - Purpose and importance of the annual self-evaluation
 - Identified strengths and weakness from the last annual self-evaluation
 - Goals for improvement
 - When to submit the annual self-evaluation to OSHA

Key personnel may include: S&H staff, industrial hygienists, occupational health personnel, emergency managers, contracting office personnel, human resources staff, and some managers and supervisors.

Key personnel manage or provide support for many VPP elements. They may be able to provide great insight on the strengths and weakness of your SOHMS and help generate goals for your organization.

Workforce Knowledge

- Employees should be knowledgeable about:
 - The annual self-evaluation as a part of OSHA VPP Star recognition
 - Ways to provide input for the annual self-evaluation
 - Goals for improvement that directly affect them



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Involve employees as much as possible during an annual self-evaluation. All levels of employees should know how to contribute information to improve your SOHMS, even if it doesn't directly relate to the annual self-evaluation. They should also know how they help the organization achieve goals that directly impact the workforce.

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Action Checklist

- ☐ Develop a plan to complete your annual self-evaluation
- ☐ Collect and review SOHMS documents
- ☐ Complete and review the annual self-evaluation
- ☐ Submit the evaluation to OSHA, if applicable
- ☐ Focus on continuous improvement



Follow this action checklist to implement and sustain VPP expectations for SOHMS evaluation. Each of these items will be covered in more detail.

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Pre-Planning

- Read through the VPP requirements listed in OSHA's CSP 03-01-005
- Become familiar with OSHA's annual self-evaluation format
- Know when to perform an annual self-evaluation:
 - As part of the OSHA VPP application process
 - At least one year prior to submitting an OSHA VPP application
 - Annually, once OSHA recognizes your worksite as a VPP Star

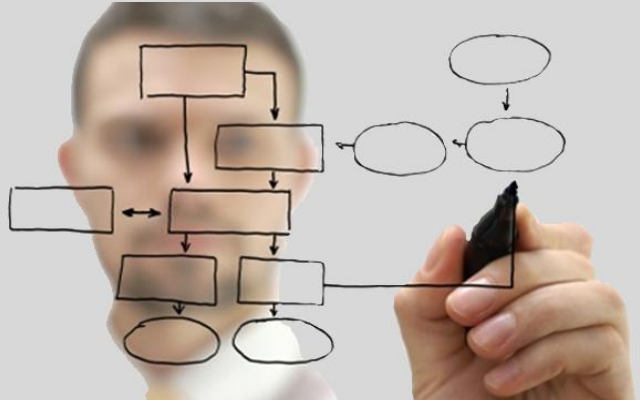
View OSHA's CSP 03-01-005 at: https://www.osha.gov/sites/default/files/enforcement/directives/CSP_03-01-005.pdf

View the annual self-evaluation format in Appendix A of the CSP.

NOTE: Conduct at least one annual self-evaluation prior to submitting your OSHA VPP application. Ask your Regional VPP Manager how they want evaluations submitted – electronically or mailed hardcopy.

Pre-Planning

- Treat the evaluation like a project
- Think about how you want to execute it
- Identify:
 - Responsible persons to address each VPP sub-element
 - Timelines for completion
 - Required resources



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The annual self-evaluation is not an individual effort. Involve employees, key personnel, and program owners to help create a comprehensive evaluation. Using a team approach also facilitates communication and creates employee involvement opportunities.

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Pre-Planning

- Allow enough time to gather information
- Allot time to review the content
- Identify one person to perform a final scrub on the information



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The annual self-evaluation is due to OSHA by February 15 each year for VPP Star sites.

Consider starting the evaluation process around September to finish it on time. Ensure there is enough time to gather information, write the evaluation narrative, and review the information for accuracy.

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Document Review

- Review supporting documents to complete the annual self-evaluation:
 - VPP perception surveys
 - Hazard analyses
 - Written hazard control programs
 - Injury and illness rates
 - Trend analysis information
 - S&H training records
 - Accident investigation results
 - Open deficiencies in the hazard tracking log
 - Safety inspection results
 - Goals and objectives (current and previous year)

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Review the documents listed on the slide during an SOHMS evaluation. These are only some examples; this list is not all-inclusive.

Other information may include: management and employee initiatives, budgets, visible involvement documentation, presented S&H awards, performance evaluations, preventative maintenance records, occupational health documents, injury and illness rates, and contractor oversight inspections.

Be ready to provide a written explanation if there are significant changes to or questionable injury and illness rates for your organization and/or the applicable contractors. Example reasons to provide a written explanation may include: a significant increase in rates, high contractor rates, or a change in the industry classification code.

Evaluation Completion

- Assign a person/group to each VPP sub-element
- Communicate roles and responsibilities to each assigned person/group
- Focus on the calendar year evaluated



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Assign subject matter experts, if available, to complete various narratives in your self-evaluation. One example is asking your training coordinator/manager to complete sub-elements related to S&H training.

Remember, your annual self-evaluation is **for a specific calendar year** (Jan 1 to Dec 31). Explain what you accomplished over the year related to S&H sustainment and continuous improvement.

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Evaluation Completion

- Write comprehensive narratives for each sub-element and describe:
 - Related activities
 - Initiated and implemented action plans
 - Examples, where necessary
 - Current condition and status
 - Strengths and weaknesses
 - Status of previous goals, if applicable
 - Corrective action plans to resolve issues
 - Goals for improvement
 - Specific actions, responsible parties, and target completion dates

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Consider these questions when developing each narrative:

- Is the process operating effectively?
- Do the employees have a basic knowledge of the process and what it entails?
- Are documents provided to support employee knowledge and practices?
- Does it meet established goals and objectives?
- Have best practices been identified?
- Are there obstacles?
- Are there improvements to make the process more effective?
- Are there any goal modifications or suggestions for the upcoming year?

Hint: The e-SMS Tool and associated portals have the capability to pull together an annual VPP self-evaluation if your organization is a registered site and your “Action Plan” is up-to-date. Find the e-SMS Tool link under “Electronic Tools” at: <https://smcsc.org/Links>

Example – Annual Self-Evaluation

Section D: Narrative Evaluation of Safety and Health Management System

1. Management Leadership and Employee Involvement

A. Management Commitment to Safety and Health Protection to VPP Participation

Narrative Evaluation:

Management's commitment to the safety and health of the site and in the participation of VPP is strong. Management at all levels strive to keep an active interest in employee's involvement and participation in VPP. Management clearly demonstrates its commitment to meeting the requirements of VPP by getting actively involved in our Safety and Health Programs. This involvement includes assuring sound personal risk reduction and compliance with established safety and health standards by mitigating safety risks through the four hierarchy control (engineering, administrative, work practice and wearing appropriate personal equipment). Management encourages prompt reporting of all mishaps and workplace safety hazards with no fear or reprisal. Additionally, management demonstrates commitment by participating in the employee involvement programs alongside employees and providing a day-to-day dedication to solve safety and health challenges. Furthermore, management encourages employees to conduct and participate in workplace safety inspections, volunteer as Volunteer Safety Representatives (VSR), Wingman Responders and participate in Safety and Health training (i.e., AED usage, etc.) with employees. [REDACTED] Senior Leadership and Union have signed letters at the [REDACTED] to show this commitment to VPP. A poster form of the letter is posted throughout the site. Goals and Objectives are available on the VPP website and progress is briefed monthly to the Wing Commander, current goal is to reduce slips/trips/falls by 5% for CY15 by increasing awareness, implementing hazard controls and tracking progress.

Goals and Objectives:

Goal 1: Management is in the process of developing a new software for Supervisor Safety Books that will be on-line that will allow Complex Safety and other auditors to access records to ensure Safety and Health Compliance.

The image shows a snippet from an OSHA VPP Star site annual self-evaluation.

Example – Annual Self-Evaluation

b. Policy
Program Description:
<p>top management recognizes the value of their employees. supervisors know that employees must come first and that is why leaders show their dedication to employees not only through their actions but through the business policies they set forth. Just as an organization has policies for financials, customers, and employees, has extensive policies to address the safety and health of its employees. Policies such as Safety and Occupational Health Program and Contractor Safety Program are regularly reviewed and updated as needed based on changes in the business, trending safety and health issues, and employee suggestions and recommendations. These business policies and processes help establish goals and objectives to guide a safety culture and continuous improvement efforts in all areas. New policies and policy changes are distributed to employees through several different means such as new employee orientation, weekly cost center safety meetings, locally created safety videos, and command initiatives such as the commander's quarterly town hall meeting.</p>
<p>Assessment of Effectiveness: EFFECTIVE</p> <p>policy establishment and distribution is effective; however, identified areas of improvement with regard to the annual and regular review of safety policies to ensure compliance with OSHA, DoD, and regulations. While the did not achieve its goal for improving the forklift attachment program in 2014, the depot made great strides in establishing a more thoroughly written safety and occupation health program. written programs were recognized as best practices by the . In addition, achieved its 2013 recommendation for improvement which included a system for better tracking of annual program reviews.</p>
<p>2014 Recommendation for Improvement: Establish a better defined and functional forklift attachment program.</p>
<p>2015 Recommendation for Improvement: Continue to pursue last year's goal of establishing a better defined and functional forklift attachment program.</p>
<p>Owner(s): Safety Office</p>
<p>Target Date for Completion: December 2015</p>

The image shows a snippet from an OSHA VPP Star site annual self-evaluation.

Example – Annual Self-Evaluation

8. Employee Involvement: The [redacted] continues to offer a variety of ways for employees to be involved with the [redacted] S&H management system.

- a) Employee Involvement in Safety. **2013 Goal met:** Employee involvement in safety will continue with the Facility Environment (FE) monitor completing monthly safety inspections. A team of employees with management will be assembled and inspect independent sections. The FE will be responsible for tracking findings and their completion dates from their respected section. **2014 Goal:** Continue this program as currently established.
- b) FE Monitor Safety Checklist Modifications. **2013 Goal met:** FE monitors safety checklist modifications where completed in 2013; flammable lockers and MSDS are a highlighted item. Checklists were modified per section to meet specific safety needs and removal of unnecessary inspection items. **2014 Goal:** Continue this program as currently established.
Additional 2014 Goals:
 - Continue employee involvement by using the ESC for S&H inspections.
 - Continue to have employees attend the annual Wingman Day event, employees learn ways to work as a team and look out for the safety of each other.
 - Continue employee tag along during the monthly safety inspections where they can provide insight (fresh eyes) looking for hazards.
 - Continue active safety & health education of all [redacted] employees by receiving initial/annual training and how to identify and resolve S&H problems.
- c) Evacuation Fire Drills. **2013 Goal met:** The [redacted] successfully completed two full evacuation fire drills in 2013. One fire drill highlighted the need for "Defend in Place" training. A training presentation was created and made mandatory for all MDG employees; completion/documentation of the training is accomplished through an [redacted] training web site. Fire critiques were used allowing employees to provide suggestions and improvements to the drills. Commanders involvement and employee accountability were noted improvements. Both 2013 drills met Fire Dept. standards. **2014 Goal:** Accomplish two successful Fire Drills and evacuations.







- **2013 assessment:** VPP considers this sub-element: Effective w/ 2014 adjustments
- **Assignment of Responsibility:** VPP Steering Committee and [redacted] Employees
- **Target Date for Completion:** 12/31/14

The image shows a snippet from an OSHA VPP Star site annual self-evaluation.

Example – Annual Self-Evaluation

d. Visible Top Management Leadership:

Senior management continues their strong support and participation in the Safety and Health Program and VPP. They enforce safety policies and ensure all personnel are aware and receive the most up-to-date training. They also participate by reporting mishaps and making safety observations and corrections as warranted. Their visible participation in 2015 includes the following:

- 1) Weekly Leadership Safety Rounds. Top level leadership visit various sections of the hospital each Wednesday and informally interview staff and evaluate any safety issues or concerns of the visiting department personnel. Both patient safety and worker safety concerns are addressed.
- 2) Commanders Calls are conducted monthly by all Commanders (CC) to address squadron/group personnel in a large setting. Every CC Call has an expanded safety briefing to address any current issues or upcoming events. Also used as an open forum to gather input from all military & civilian personnel on safety issues.
- 3) Expanded Staff Meetings. The purpose of these meetings is to allow all section managers and supervisors an opportunity to address any issues or concerns, to include safety & health, directly to upper management. These meetings are held every Friday at 0700 and maximum participation is encouraged.
- 4) Core Staff Meetings. These meetings are used to address expanded management personnel on hospital concerns, policies & standards. It allows additional leadership to express their concerns/issues on health & safety within the hospital.
- 5) Committees/Working Groups. Additional groups are formed to address safety within the hospital. A good example is the  Committee whose purpose is: *"To ensure a safe, accessible, effective, and efficient environment of care consistent with the mission, services, laws and regulations. This is done through establishment, assessment, and improvement of a medical center safety management program."* Other committees include "Tiger Teams" to address particular trends or safety issues within the hospital such as the Radiation Department Safety Team. They ensure that all radiation equipment meet the required standards and developed a program to test/inspect all radiation equipment.
- 6)  from the American Federation of Government Employees strongly supports the  VPP Program.  signed the VPP Commitment letter along with . A team from the Union Office also competed in the  VPP Focus Day Event which was set up in our Simulation Center to help educate staff to identify both patient and worker safety hazards in the healthcare environment. The Union President will be attending future EOC Committee meetings and other events at the medical center.

Goals – None identified for 2016.

The image shows a snippet from an OSHA VPP Star site annual self-evaluation.

Evaluation Review

- Assign one person to collect and review each narrative
- Ensure narratives are comprehensive and accurate
- Make sure goals are set for continuous improvement



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Designate one person to collect and review each narrative. Return any section(s) without comprehensive information back to the assigned person(s). Make sure any goals you set for continuous improvement are relative to your worksite as well.

Image retrieved from Microsoft Clip Art.

Evaluation Review

- Compile the information (using the OSHA format)
- Revise the evaluation, as necessary
- Have the management team review the evaluation



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Compile your information and put the self-evaluation together. Do one final scrub – ultimately, your self-evaluation should appear as if one person wrote the whole thing!

Ensure management reviews the final version for approval. Many worksites also have labor representatives review the annual self-evaluation. Keep in mind OSHA verifies the information provided in the annual self-evaluation and the application when they conduct their on-site evaluation.

Image retrieved from Microsoft Clip Art.

Submissions

If you are a VPP Star worksite:

- Send the annual self-evaluation to your OSHA Regional Office by February 15

If you are not a VPP Star worksite:

- Keep the document on file
- Submit the annual self-evaluation with your OSHA VPP application when you are ready

Contact your OSHA Regional Office prior to the due date and ask how they want you to submit your annual self-evaluation (i.e., electronically or hard copy through the mail).

Continuous Improvement

- Use the annual self-evaluation information to:
 - Revise existing, or create new, S&H goals and objectives
 - Update, or create, implementation/sustainment action plans
 - Continually identify ways to improve your SOHMS



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Use the annual self-evaluation to continue implementing and sustaining VPP requirements and drive continuous improvement.

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Conclusion

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