



# Written Safety & Health Management System

OSHA VPP

January 2025

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This presentation outlines written safety and occupational health management system (SOHMS) 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 a written SOHMS, 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, safety & health management system (S&HMS) is synonymous with safety & occupational health management system (SOHMS).

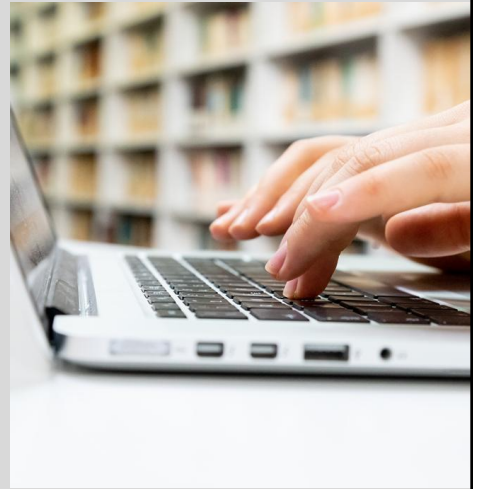
## Objectives

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

This presentation is beneficial to leaders, safety and health (S&H) professionals, and VPP representatives.

## Background

- Included in the ML&EI criteria for VPP
- Serves as the overarching guidance for the SOHMS
- Establishes a planned process for carrying out S&H procedures and SOHMS expectations
- Documents the elements and sub-elements of VPP
- Encompasses other S&H programs and processes, like those required by standard



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MLEI = Management Leadership and Employee Involvement

Many organizations have a written SOHMS comprised of the general S&H policies, procedures, processes, and programs they execute in the workplace. Having a written SOHMS is important because it captures the overall processes and systems in an organization, including how those processes and systems incorporate the four elements of VPP (e.g., Management Leadership and Employee Involvement, Worksite Analysis, Hazard Prevention and Control, and S&H Training).

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## Importance

- Provides guidance for VPP implementation and sustainment in the workplace
- Minimizes the likelihood and severity of workplace injuries and illnesses
- Allows for the anticipation of workplace challenges
- Ensures consistency in processes and procedures



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Your written SOHMS provides guidance on your organizational expectations, carrying out policies and procedures, and maintaining and sustaining the best S&H program possible. An effective written SOHMS helps you experience some of the benefits listed on this slide.

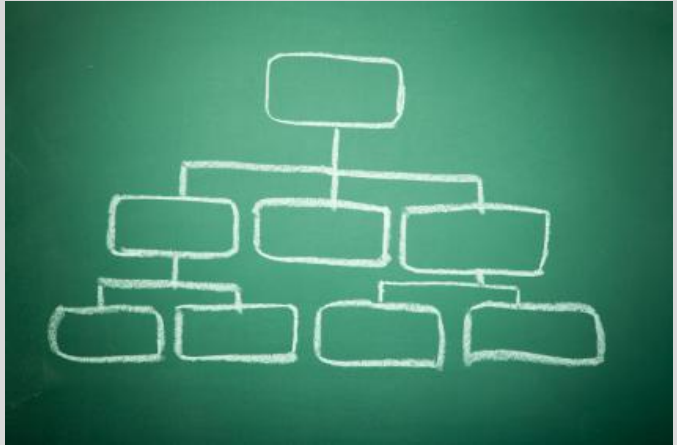
View the OSHA VPP Policies and Procedures Manual (CSP 03-01-005) for additional information regarding the written SOHMS requirement:

[https://www.osha.gov/sites/default/files/enforcement/directives/CSP\\_03-01-005.pdf](https://www.osha.gov/sites/default/files/enforcement/directives/CSP_03-01-005.pdf).

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## Documentation

- Written SOHMS document
- Organizational chart
- Safety office organizational chart, if applicable
- List of subordinate worksites
- Site map
- Applicable S&H programs



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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.

An overarching written SOHMS incorporates the VPP elements and sub-elements into your S&H processes and policies. It also provides procedures for implementing and sustaining VPP throughout your organization.

An organizational chart includes leadership from the top down. Be sure to have a list of all your organization's subordinate groups. It is important to delineate the organizations covered by your safety program. It is also important because you need to monitor their safety program and gather their safety data.

You may or may not have a safety office organizational chart depending on the size of your organization. If you do, include it in your written program and list specific contact information, that way, employees know who to contact if they have any safety questions. It also indicates where the safety office is in the organization's hierarchy.

You need a site map to support your written SOHMS. A site map shows the locations of specific buildings and operations that fall under the SOHMS.

Examples of S&H programs include: permit-required confined space entry, hearing conservation, hazardous energy control, hazard communication, and fall protection.

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## Leadership/Management Knowledge

- Leaders and managers should know about:
  - S&H hazards throughout the organization
  - Written S&H programs
  - Benefits of VPP partnership and approval
  - Best practices in S&H throughout the organization
  - Improvements made through incorporating VPP elements/sub-elements



Managers need to make S&H a core value because they set the stage for the SOHMS. Think about, why should employees care about S&H the managers don't demonstrate a commitment to it?

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## Key Personnel Knowledge

- Key personnel staff should be knowledgeable about:
  - Federal, Service/Agency, state, and local S&H regulations
  - Points of contact for S&H programs
  - S&H-related documentation
  - Responsibilities with the written SOHMS
  - All workplace-related S&H hazards



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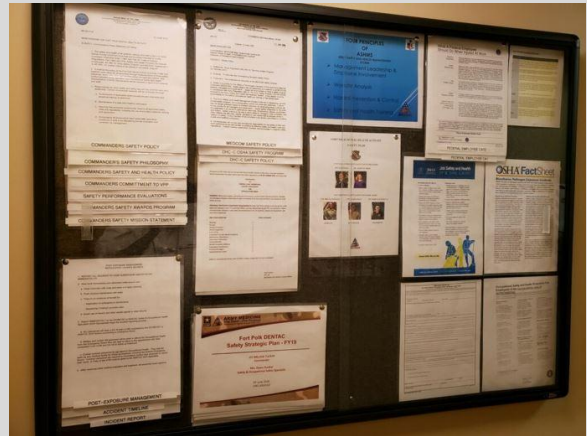
Key personnel can include S&H professionals, occupational health staff, industrial hygienists, recordkeepers, and preventative maintenance personnel.

Key personnel should understand their responsibilities as written in the SOHMS program.

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## Workforce Knowledge

- Employees should be knowledgeable about:
  - Existence of the written SOHMS and S&H programs
  - OSHA VPP elements
  - Location of S&H documents
  - Responsibilities within the SOHMS
  - Location of/access to S&H resources



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Image courtesy of Ft. Polk DENTAC



Employees should be familiar with the overarching written SOHMS and written S&H programs. They should also know where they can locate these documents, should they need to reference them, as well as their responsibilities in any S&H-related processes or procedures. Additionally, all employees should have a general understanding of OSHA VPP fundamentals.

The image shows a safety bulletin board. Image courtesy of the Fort Polk Dental Activity (DENTAC).



## Action Checklist

- ☐ Review Service/Agency and VPP requirements
- ☐ Write an overarching SOHMS document
- ☐ Update the written SOHMS periodically



Follow this action checklist to implement and sustain VPP expectations for your written SOHMS. Each of these action checklist items will be covered in more detail on the following slides.

Image retrieved from OSHA at: <https://www.osha.gov/dcsp/vpp/index.html>

## Review Requirements

- Look at DoD instructions
- Check Service/Agency regulations
  - May require written programs not required by OSHA
- Review applicable OSHA standards
  - 29 CFR 1960, Federal Employee OSH Programs
  - Standards for required written S&H programs
- Study OSHA VPP criteria
  - Refer to CSP 03-01-005



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OSH = occupational safety and health

Begin by reviewing applicable documentation for S&H requirements you may need to include in your written SOHMS.

DoD instructions with S&H information/requirements include: DoDI 6055.01, DoD Safety and Occupational Health Program.

Service or Agency regulations and instructions related to written SOHMS include:

- **Department of the Air Force:** DAFI 91-202 (Air Force Mishap Prevention Program)
- **Army:** AR 385-10 (Army Safety Program)
- **Navy:** OPNAV M-5100.23 (Navy Safety and Occupational Health Manual)
- **Marine Corps:** NAVMC Directive 5100.8 (Marines Corps Occupational Safety and Health Program Manual)
- **Defense Logistics Agency:** DLA 6055.01 (DLA Occupational Safety and Health)

You also need to include any written S&H programs required by OSHA, applicable to your worksite. Examples of S&H programs include: permit-required confined space entry, hearing conservation, hazardous energy control, hazard communication, and fall protection.

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## Write an SOHMS Document

- Incorporate all four VPP elements and their sub-elements
- Outline procedures for implementing each element/sub-element
- Address any requirements from 29 CFR 1960
- Include written S&H programs
- Gather employee input, as appropriate
- Have the highest-ranking official sign the written SOHMS

Provide an overview of each VPP element and a list of steps in which employees can help you to implement each element.

Make sure any information you include does not contradict other documents used at your workplace – use existing guidance to help create your written SOHMS.

When appropriate, consider the input of employees or their representation when drafting or approving your written SOHMS. This is important when you draft language regarding employee involvement in the SOHMS.

Have the top leader in your organization, which is usually the Commander or Director, sign the document.

Visit OSHA's Recommended Practices for S&H Programs at: <https://www.osha.gov/shpguidelines/>

## Update the Written SOHMS

- Review the written SOHMS periodically and make changes when:
  - Written procedures are modified or change
  - Changes occur to VPP criteria
  - Regulatory changes or updates require procedure changes
  - DoD, Service/Agency, or Higher HQ guidance or instructions are updated
  - SOHMS annual self-evaluation indicates a change in process or procedure
  - The written SOHMS document is outdated

Review your written SOHMS periodically and update it based on the results of your annual self-evaluation. OSHA VPP requires you critically evaluate your SOHMS annually, not only for effectiveness, but for continuous improvement. Continuous improvement may mean a change to your current processes or procedures.

In general, it is best to review this document every three (3) years, at a minimum. Remember, some specific S&H programs require annual reviews, and may need updated within your written SOHMS more often.

## Conclusion

- In this presentation, you learned to:
  - Summarize the background and importance of a written SOHMS
  - List written SOHMS-related documentation
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  - Identify written SOHMS-related actions to implement and sustain OSHA VPP