Organizing Supporting Documentation for Your OSHA VPP On-Site Evaluation

Organizing your supporting documentation for the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs (VPP) is a key step before an on-site evaluation of your safety management system (SMS). Make sure your documentation provides the assessment team with all the information they need to see how you execute your safety and health programs and processes. This one pager provides tips on choosing and organizing your supporting documentation so you can **WOW** the assessment team!

Do I have a document(s) to show how I support this question?

Image retrieved from Bing Images

THE OSHA ON-SITE REPORT AND WORKSHEET—BECOME FAMILIAR

OSHA VPP assessment teams use the OSHA VPP Site-Based Participation Evaluation Report to evaluate your SMS. Documentation review is one way the team determines whether your organization meets the VPP criteria.

The Safety Management Center of Excellence (SMCX) has found selecting documentation based on the worksheet typically provides the assessment team the information they need.

CHOOSE YOUR SUPPORTING DOCUMENTATION

Read each line item in the OSHA worksheet and ask yourself, "*Do I have a document(s) to show how I support this question?*" Identify the documentation you have for the line item. Use these documents as your supporting evidence to show you have an effective process in place.

WHAT IF I DON'T HAVE SUPPORTING DOCUMENTATION?

You may have identified a gap between your SMS and the VPP criteria if you do not have documentation supporting a line item. Collaborate with others in your organization to verify who might have the needed documentation, or whether you need to establish a new process or program (and documentation).

It is important to note, not every line item requires supporting documentation. Reach out to the SMCX if you have any questions or need assistance.

KNOW YOUR DOCUMENTATION OPTIONS

Each OSHA VPP region has different expectations when it comes to supporting documentation. Only your Regional OSHA VPP Manager can tell you if they prefer to receive documents in hardcopy or electronic form. Reach out to your Regional OSHA VPP Manager to learn their preference.

Example – Worksheet Breakdown

VPP Element:

Section II. Worksite Analysis

Worksite Analysis Sub-Element:

E. Hazard Reporting

Line Item Example in E. Hazard Reporting:

E1. Is there a minimally effective means for employees to report hazards and have them addressed?

SMCX
DoD Safety Management Center of Excellence

ORGANIZE HARD COPY DOCUMENTS

Make sure the hard-copy documents you provide to the assessment team are the most current version. If the assessment team requests hard copy documents:

- Get four (4) binders and label them – one for each VPP element

- Create sections in each binder using tabs – each section represents one sub-element

- Place numbered tabs in each section to represent the line items for each sub-element

- Place your documentation behind each tab it supports

Set Up Binders

Look under "Section II. Worksite Analysis" in the worksheet to see which sub-elements you need to make sections for in your binder.

You need the following sections:

A. Baseline Hazard Analysis
B. Hazard Analysis of Significant Changes
C. Hazard Analysis of Routine Activities
D. Routine Inspections
E. Hazard Reporting
F. Hazard Tracking
G. Accident/Incident Investigations
H. Trend Analysis

Look at the "E. Hazard Reporting" sub-element to see which line items you need tabs for: E1, E2, E3, and E4

Set Up Electronic Folders
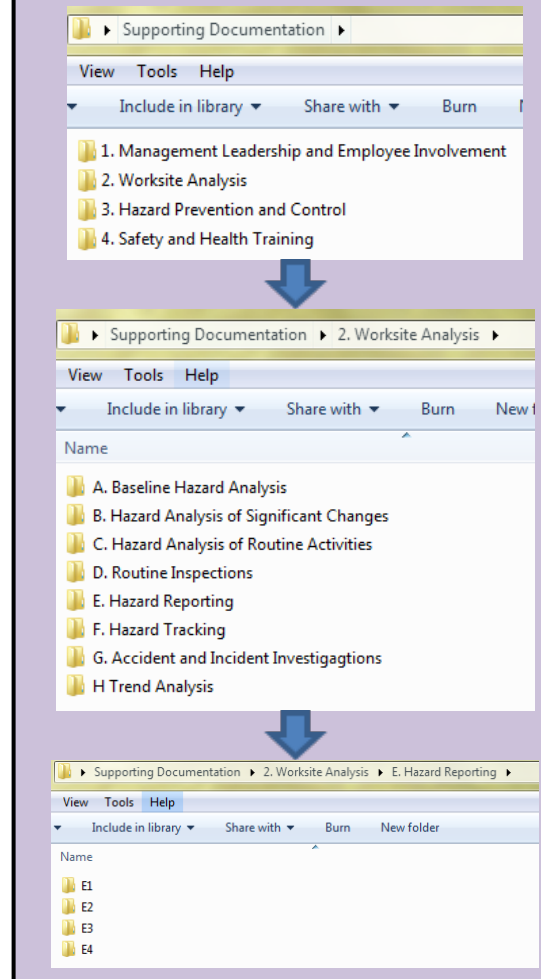
ORGANIZE ELECTRONIC DOCUMENTS

Keep in mind, the assessment team **will not** have access to your internal websites from their computers. If the assessment team requests electronic copies:

- Create four (4) folders on your computer and label them – one for each VPP element

- Create sub-element folders in each VPP element folder – name each folder so it represents a single sub-element

- Create numbered folders in each sub-element folder to represent each line item

- Place your documentation in each folder it supports

- Title your documents so they represent the information supported

- Burn this information to a CD/DVD for each assessment team member.

For additional information on the SMCX's services, please visit the SMCX-hosted website at: https://www.smscx.org/.