DoD Safety Management Center of Excellence

Routine Inspections

OSHA VPP

January 2025






This presentation outlines routine inspection 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 routine inspections, 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 routine inspections
  - List routine inspections-related documentation
  - Describe the knowledge leadership/management, key personnel, and the workforce should have regarding routine inspections
  - Identify routine inspection-related actions to implement and sustain OSHA VPP

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This presentation is beneficial to safety and health (S&H) professionals, VPP representatives, and designated routine S&H inspectors, and all employees involved in the completion of routine inspections.

Background & Importance

- Included in the WA criteria for VPP
- Monitors recurring worksite hazards and regulatory non-compliance
- Identifies and abates worksite hazards
- Encourages employee involvement in S&H
- Educates employees about their work environment

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WA = Worksite Analysis

Routine inspection: A worksite assessment completed in a repetitive fashion, such as annually, quarterly, or monthly.

A robust routine inspection program is a vital part of any safety and occupational health management system (SOHMS).

Documentation

- S&H inspection system or process
- Hazard identification training records for designated inspectors
- S&H inspection checklists and records
- Hazard tracking log submissions for S&H inspection findings
- S&H inspection finding trend analysis

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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.

S&H inspection records capture the weekly, monthly, quarterly, or annual inspections performed by various levels of personnel. Be sure to have these inspection records on hand to support how your worksite regularly identifies hazards.

Provide the training records for personnel performing routine S&H inspections. OSHA VPP expects personnel performing S&H inspections receive adequate hazard recognition training. Document all hazard recognition training you provide to your inspectors and other employees.

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Leadership/Management Knowledge

- Leaders and managers should know:
  - Their roles and responsibilities in the inspection program
  - Routine inspection process(es)
  - Frequency of inspections
  - Resources allocated toward the inspection program
  - Hazard abatement process
  - Accountability process for completing inspections

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Leaders and managers support your inspection program by holding personnel accountable and allocating resources for hazard abatement. An accountability process ensures those assigned to complete inspections do so correctly and on time.

Image retrieved from Microsoft Images.

Key Personnel Knowledge

- Key personnel should be knowledgeable about:
  - Routine inspection process(es)
  - Frequency of inspections
  - Who participates in S&H inspections
  - Required training for inspectors
  - Location of completed inspection documents
  - Revision/review process for inspection program
  - Inspection-related trends

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Image retrieved from Microsoft Images

Key personnel may include: S&H representatives, personnel assigned to perform S&H inspections, and others involved in trend analysis efforts.

Key personnel should know:

- How to document inspection findings
- Number of areas needing inspected, or inspection area jurisdiction
- Who performs S&H and routine self-inspections and who may participate
- Training for routine self-inspectors
- How inspection findings will be submitted/collected and by who
- Process for notifying affected personnel of identified hazards in their work area that cannot be immediately corrected
- Tracking and trending S&H inspection findings
- S&H inspection process review process.

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Workforce Knowledge

- Employees should know:
  - Potential S&H hazards in their work area
  - Results of S&H inspections in their work area
  - Their involvement in S&H inspections
  - Training received to participate in inspections

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Image retrieved from Microsoft Images

Get employees involved! Identifying S&H hazards is most effective if your employees have an opportunity to participate.

Image retrieved from Microsoft Images.

Action Checklist

- ❑ Develop a written S&H inspection program
- ❑ Create an inspection schedule
- ❑ Make self-inspection checklists
- ❑ Select S&H inspectors
- ❑ Train S&H inspectors
- ❑ Conduct and document self-inspections

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Follow this action checklist to implement and sustain VPP expectations for routine inspections. Each of these action checklist items are covered in more detail.

Written Routine Inspection Program

- Review existing Service/Agency guidance
- Develop a routine S&H inspection program
- Include written inspection procedures and responsibilities
- Have leadership review and approve the program

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Review existing Service/Agency guidance (e.g., Army Regulation 385-10, Naval Operations Instruction 5100.23H, Marine Corps Order 5100.29C, Department of Air Force Instruction 91-202) for inspection requirements you need to follow. These regulations and instructions provide guidance on inspections, hazard tracking, and hazard abatement.

Develop a written inspection program to make executing &H inspections easier and more effective. Written inspection programs can include, but are not limited to:

- Work areas covered
- Inspector qualifications and training requirements
- Responsibilities
- Frequency of inspections
- Inspection schedule
- Documentation for inspection findings and results
- Submission of inspection findings
- Tracking and trending of inspection findings
- Inspection program reviews
- Employee access to inspection findings and results

For an example of a written inspection program, visit:
https://www.ccohs.ca/oshanswers/prevention/effectiv.html

Inspection Schedule

- Create a documented self-inspection schedule
- Include all areas where employees perform work
- Set a completion frequency for each work area
  - Consider the types of hazards and work environment when determining frequencies

BUILDINGS	MONTH/DATE
Software Maintenance Administrative Area	March 6, June 6, September 6, December 6
Machine Shop A	Every month (January 5, February 5, March 5….)
Break Area C	January 10, April 10, July 10, October 10
Metallurgical Lab	March 21, June 21, September 21, December 21
Shipping & Receiving	February 18, May 18, August 18, November 18

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Include a self-inspection schedule as a part of your written routine inspection program. Review/update this schedule annually. Review your Service/Agency guidance for any other frequency-related requirements.

OSHA VPP requires monthly inspections, covering the entire worksite at least once per quarter. This means you can complete your inspections on a frequency that works best for your organization (weekly, monthly, or quarterly) if all your work areas are inspected at least one time each quarter. For example, if you have 12 buildings you can inspect four the first month, four different ones the second month, and the remaining four the third month. All buildings were inspected in one quarter. Then repeat this process each quarter. You must inspect an entire construction worksite on a weekly basis.

Include all work areas in your S&H inspection schedule. This means inspecting every location your employees perform work and other any spaces covered under your VPP application (e.g., administrative work areas, recreational areas, and child development centers).

The types of hazards, risks, and work environment can help you determine inspection frequency. Hazardous work areas should be inspected more frequently than less hazardous work environments. For example, you may decide to inspect administrative areas on a quarterly basis and inspect machine shops on a month basis.

See the chart for other examples.

Inspection Schedule

- Remember, at a minimum VPP requires self-inspections:
  - Be performed at least monthly
  - Cover the entire organization at least quarterly
  - Cover entire worksites weekly in construction sites

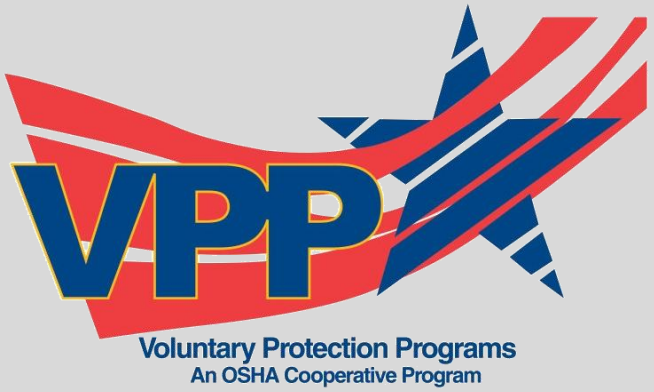

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Image retrieved from OSHA

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Image retrieved from OSHA at: https://www.osha.gov/dcsp/vpp/newlogo.html

Inspection Checklists

- Develop checklist(s) to aid inspections and documenting findings
- Consider making checklists unique to various work areas
- Review checklist(s) before implementation
- Revise the checklist(s) over time

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Image retrieved from Microsoft Images

Checklists remind inspectors what to look for during self-inspections. Remind inspectors to go beyond checklist items and document any additional hazards they identify.

Consider tailoring self-inspection checklists to your work areas instead of relying on one generalized checklist. For example, you may have a general office inspection checklist for all administrative areas, a checklist for a woodworking shop, a checklist for a motor pool with machine shop, and a checklist for areas with hazardous chemicals. Removing unnecessary items makes inspections easier.

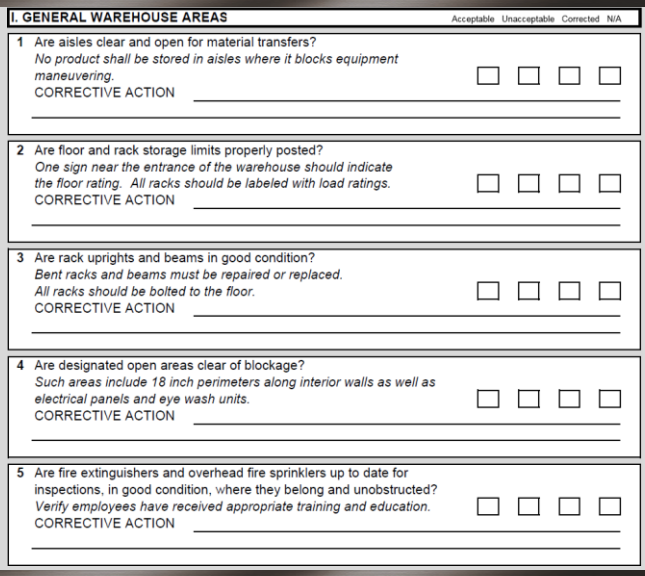
Always review and approve checklists before inspectors use them.

Review each checklist annually. Update checklists whenever process changes occur. Use inspection trends, accident investigation results, employee hazard reports, preventive maintenance information, and injury and illness trends to identify other items to include on your checklists.

Consider adding these items to checklists:
- Description of the finding
- Location of the finding
- Date of the inspection
- Inspector's name(s)
- Suggested corrective action
- Interim actions taken, if any
- Areas to indicate if the item is: not applicable to the work area; acceptable/not acceptable throughout work area; or corrected on the spot
- Space to describe findings not included in the checklist

Image retrieved from Microsoft Images.

Example – Inspection Checklist



I. GENERAL WAREHOUSE AREAS — Acceptable | Unacceptable | Corrected | N/A

1 Are aisles clear and open for material transfers?
No product shall be stored in aisles where it blocks equipment maneuvering.
CORRECTIVE ACTION _____ ☐ ☐ ☐ ☐

2 Are floor and rack storage limits properly posted?
One sign near the entrance of the warehouse should indicate the floor rating. All racks should be labeled with load ratings.
CORRECTIVE ACTION _____ ☐ ☐ ☐ ☐

3 Are rack uprights and beams in good condition?
Bent racks and beams must be repaired or replaced. All racks should be bolted to the floor.
CORRECTIVE ACTION _____ ☐ ☐ ☐ ☐

4 Are designated open areas clear of blockage?
Such areas include 18 inch perimeters along interior walls as well as electrical panels and eye wash units.
CORRECTIVE ACTION _____ ☐ ☐ ☐ ☐

5 Are fire extinguishers and overhead fire sprinklers up to date for inspections, in good condition, where they belong and unobstructed?
Verify employees have received appropriate training and education.
CORRECTIVE ACTION _____ ☐ ☐ ☐ ☐

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Image retrieved from the International Warehouse Logistics Association

The image on the slide shows an example checklist. Another example checklist can be found at: http://labor.hawaii.gov/hiosh/home/training/checklist/

Use these examples to create your own area-specific self-inspection checklist.

Image retrieved from the International Warehouse Logistics Association at: https://www.iwla.com/wp-content/uploads/2020/10/IWLA-Safety-Self-Inspection-1.29.08.pdf

Inspector Selection

- Determine inspector qualifications and training requirements
- Get employees involved – extend self-inspections beyond supervisors
- Ask for volunteers
- Rotate inspectors or assist inspectors on a periodic basis

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Image retrieved from Microsoft Images

Determine your inspector qualifications. Some worksites require personnel to have several years of experience in their work areas – that way they are incredibly familiar with the hazards, tasks, and processes.

Depending on your Service or Agency guidance, supervisors are usually responsible for completing routine self-inspections. Extend your self-inspections beyond supervisors and get other employees involved! Ask for volunteers! Get non-supervisory employees, union representatives, directors or department heads, and even top leaders involved. You can also ask supervisors to choose an employee to accompany them during self-inspections.

Consider rotating inspectors into different work areas – this brings new perspectives and fresh eyes into your workspaces. You might also consider rotating inspectors on a period basis. For example, an inspector may inspect a work area for six month. During the last month, the current inspector takes the upcoming inspector around and show them what to look for, show what they typically find, and how to document and submit the results. It may be better to keep the same inspector in more hazardous areas since they know exactly what hazards are there. In this case, you can pair other employees with the permanent inspector and bring in another set of eyes.

Involving employees empowers them to take action, be more aware of their work environment, and feel more responsible for their own S&H.

Image retrieved from Microsoft Images.

Inspector Training

- Train all self-inspectors on:
  - Inspection processes
  - Inspection checklist use
  - Documentation processes
  - Hazard recognition
  - Process for submitting inspection findings

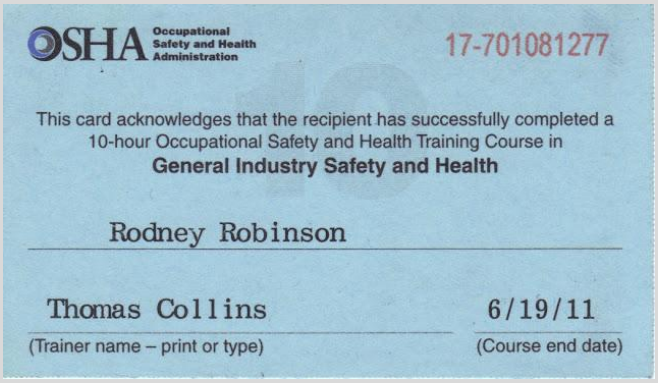

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Image retrieved from Microsoft Images

Train all inspectors on hazard recognition, particularly hazards related to the work area they are inspecting, and on your inspection processes. Sometimes, you may find inspectors did not understand an item on the checklist.

Best Practice: Provide OSHA 10- or 30-hour General Industry training course to train your inspectors.

Best Practice: Have your supervisors train employees on the inspection process and hazard recognition as they complete their scheduled inspections.

Image retrieved from Microsoft Images.

Inspection Completion

- Review inspection documents from each area
- Add submitted inspection results to hazard tracking/abatement log
- Inform employees of hazards not immediately corrected
- Track the completion of assigned inspections
- Submit inspection findings for trend analysis

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Image retrieved from Microsoft Images

Your inspectors should know how to complete routine self-inspection documents and the process for submitting those documents through their training.

Designate a location to maintain the documents. Many worksites utilize a SharePoint site or internal network location where inspectors can scan their documents and upload them to the network. Assign a responsible person(s) to either check inspectors are entering findings into the hazard tracking system or to enter all inspection findings into the hazard tracking.

Review submitted inspection checklists to make sure all the fields are fully completed or determine if the inspectors are simply “pencil whipping” the results. How can you tell? A good determination is if the form has no findings from inspection to inspection. Inspectors should always find something in their areas. Prioritize findings and provide interim controls for items that cannot be abated immediately. Inform all affected employees of the presence of the hazard when you cannot control hazards immediately, or you identified and implemented interim actions.

Track the completion of assigned inspections. Follow up when you notice an inspection is not completed. A best practice is to ask inspectors to notify a supervisor or the safety office when they will be out of the office and cannot complete an assigned inspection on time. This allows you to find another trained inspector to complete the inspection. Hold inspectors accountable when they don’t meet their designated responsibilities.

Once you review and address inspection findings, conduct trend analysis, or submit them to the person responsible for conducting trend analysis.

Image retrieved from Microsoft Images.

Conclusion

- In this presentation, you learned to:
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