

## RIMS 31ST ANNUAL RIMS CONFERENCE

APRIL 25-30, 1993

ORLANDO, FL

Speaker's Name(s): LUCILLE A. BRILLAGHER D.R.M.Session Number: LC<sup>200</sup>LC<sub>301</sub> Session Name: PREVENTION & MANAGEMENT OF CARPAL TUNNEL SYNDROMEDate: THURSDAY - APRIL Time: 9:00 - 11:00 AM  
2:00 - 4:00 PM



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NUMBER OF PAGES TO FOLLOW: 7

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DATE: 4-21-93 TIME: 10:30am

PLEASE CALL IF THIS TRANSACTION IS NOT COMPLETE

"What is VPP?" Wednesday 4/28/93 Session #LC301

OUTLINE OF REMARKS TO BE MADE BY

JOE COLLIER

RIM CONFERENCE

ORLANDO, FLORIDA

APRIL 28, 1993

OVERHEAD 1 (Dept of Labor seal)

- o Peggy has stressed the hard work involved in being a part of VPP, and yet she has noted that the VPP concepts are spreading to other government agencies and to worksites abroad.
- o My job is to explain the pieces of this hard work, and why OSHA benefits from management and employees picking up the challenge to work hard for VPP recognition.
- o Management initially learns about VPP from a variety of sources:
  - the VPPPA's activities such as the annual regional and national conferences;
  - from speakers such as ourselves at other regional and national conferences;
  - from OSHA area and regional offices;
  - and from the activities of worksites already recognized in the VPP.
- o Once a worksite is interested in the VPP, the safety director usually calls an OSHA office for more information such as an outline of the information expected in an application for VPP recognition.
- o There is no set application form, but the application must contain the following information:

OVERHEAD 7 (LWDI AND IIR)

+ Rates:

- IIR and LWDI rates for the most recent three calendar years and the average of those rates for all site employees. (Although not yet required in a VPP application, similar rates for all

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contractors working regularly on the site are also considered.)

- For Star and Demonstration approval, these rates must be at least at or below the most recently published BLS average for the site's SIC.
- For Merit approval, these rates may be above the most recently published BLS average for the site's SIC, but the site must have clearly established plans to reduce these rates.

#### OVERHEAD 8 (Assurances)

- + **Assurances:** The application must include a statement of assurances signed by management saying they:
  - are committed to excellence in safety and health;
  - are committed to achieving and maintaining VPP criteria;
  - will maintain, for OSHA's review, the required written documentation showing the implementation of the site's safety and health program.
  - will correct all hazards identified in a timely manner;
  - will protect employees with safety related duties from harassment while performing those duties;
  - will provide OSHA with yearly rates' information by February 15th;
  - will inform all employees of their rights in VPP and under the OSHA Act;
  - on construction sites, will record the rates for all workers at the site together.
- + **Union statement of support.**

#### OVERHEAD 10 (Program elements, detailed as five elements)

- + **A explanation of the implementation of the four elements that Peggy described:**

#### OVERHEAD 11 (Management Leadership and Employee Involvement)

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- **Management Leadership and Employee Involvement;**

- \* Show commitment to safety and health through visible participation in the site's safety and health program;
- \* Set and communicate safety and health policy;
- \* Establish and communicate yearly the safety and health goal;
- \* Establish result-oriented objectives;
- \* Provide adequate resources;
- \* Provide and encourage meaningful employee involvement;
- \* Require contractors to have quality safety and health programs;

OVERHEAD 13

- \* Ensure that safety and health performance is a significant part of performance evaluations.
- \* Ensure that the site's safety and health program is evaluated annually, resulting in a narrative report with recommended actions for improvement where warranted, with responsibility for those actions clearly assigned, and with the completion dates set.

OVERHEAD 14 (Worksite Analysis)

- **Worksite Analyses;**

- \* Comprehensive safety and health surveys to establish a baseline from which to measure deviation or improvement;
- \* Pre-use analyses to find and correct or control any hazards lurking in new equipment, processes, or procedures;
- \* Job hazard analyses to correct or control any hazards lurking in current jobs, processes, or procedures;

OVERHEAD 15

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- \* Routine inspection of the worksite by employee/management teams well trained in hazard recognition;
- \* System for employees to report hazards and to ensure that all hazards so reported are corrected within a reasonable time;
- \* An incident/accident investigation system that includes actions for prevention and training/retraining where necessary;
- \* Analysis of illness and injury trends to implement corrective measures.

## OVERHEAD 16 (Hazard Prevention and Control)

## - Hazard Prevention and Control; and

- \* Access to certified safety and health professionals;
- \* Means for the elimination and control of hazards through:

Engineering controls;

Administrative controls, such as job rotation;

PPE;

## OVERHEAD 17

Enforcement of safety and health rules

PM program;

Hazard correction tracking system to ensure that all hazards found are corrected in a reasonable period of time;

Medical program;

Emergency response program.

## OVERHEAD 18

## - Training.

- \* Ensure manager and supervisors understand their responsibilities;

## OVERHEAD 19

- \* Ensure employees are aware of site hazards, safe work procedures, and proper use of PPE;
- \* Ensure contractors and any temporary workers know how to protect themselves from site hazards;

If these workers are supervised by site employees, they should receive the same training as the site employees.

If these workers are supervised by others, the site management must ensure that the workers receive the same quality training as the site workers.

- \* Ensure all persons on the site understand the site's emergency procedures.

- + The application should contain samples of the implementation of these program elements such as:

- \* the site's safety and health policy statement;
- \* the site's safety and health goal and objectives for the current year;
- \* examples of employee reports of hazards;
- \* several completed self-inspection reports;
- \* a copy of the site's safety rules;
- \* several completed accident investigations;
- \* safety and health committee minutes; and
- \* a copy of the latest annual safety and health program evaluation.

- o We recommend that employees be involved in the preparation of the application for several reasons:

- + they become invested in winning VPP recognition;

- + they are most familiar with how well the safety and health program is working for them;
- + they learn more about the safety and health program beyond their own workstation.
- o Once the application is prepared, one copy is sent to the OSHA regional office and one copy to the OSHA national office.
- o When the individuals in each office are satisfied that the application is complete, the regional VPP manager will call the site to schedule an onsite review to determine how well the program described in the application is implemented at the site.
- o **ONSITE REVIEW**
  - Usually begins Monday PM and ends Friday AM unless the site is very large;
  - OSHA team is usually three to four people: a team leader, perhaps a back-up team leader, a safety professional, and an industrial hygienist;
  - Will read the written safety and health program;
  - tour the worksite noting any hazards found;
  - track correction of those hazards either immediately or within 90 days;
  - report findings daily to the site;
  - draft report containing recommendation to share with the site at the end of the week;
- o **APPROVAL PROCESS**
  - Final report is sent from the OSHA regional office to the OSHA national office with a memo recommending to the Assistant Secretary approval or disapproval;
  - On the date when the Assistant Secretary signs the certificate of approval, the site has gained VPP recognition.
  - In a similar process, Star sites are evaluated triennially; Demonstration and Merit sites annually;
  - If the VPP team finds the site ineligible for approval, the site is encouraged to withdraw its application.



- An appeal process exists if the team and the site disagree on the recommendation.
- The length of time from submission of application to approval averages eight to twelve months.

o **BENEFITS TO OSHA**

- VPP sites volunteer to be models for OSHA personnel and for other sites to learn how to improve occupational safety and health.
- VPP foster a climate of cooperation and a "can do" atmosphere when tackling safety and health problems.

o **CURRENT STATISTICS**

- 108 VPP sites nationally
- 85 Star sites; 22 Merit sites; and 1 Demonstration site.
- 25 of those sites are unionized sites.
- sites represent 50 different companies, 52 different industries, and 75,500 employees.
- In 1991, the most recent year for which we have data, the LWDI average for VPP sites were 63 percent below the industry average.