

Reprinted from: Esposito, P. "Annual Self-Evaluations" published in the VPPPA Leader, Fall 2001

## **Who does the best Annual Self-Evaluations?**

Depending on how you count the number of VPP required elements or actions, either the 19 in the marketing poster, the 27 in the Health and Safety Program Management Guidelines, or the 25 in the revised guidance published last July, Annual Self-Evaluations have always been one of the requirement elements for VPP. Under the Management Commitment and Leadership major element, it is considered a tool that management uses to ensure that the safety and health program is evaluated regularly, and provides the value and progress expected to drive continuous improvement.

The definition (and OSHA VPP expectation) of self-evaluations has been at times confusing for most of us, because similar analysis are called so many things by many different companies. What is an evaluation? An Audit? Is it an Assessment? Is it a Review? Is it a Survey? Is it a Corporate Compliance Audit? Where can I find this definition?

In addition, what are you suppose to do with the self-evaluation? Who needs to know about it? What do you do with the results? Does OSHA see it? Who does the self-evaluation? Well, the answers to these questions are about as varied as the number of sites performing self-evaluations. There is no one way, no black and white, when it comes to performing self-evaluations. However, there are a number of things all good self-evaluations have in common.

### **Definition:**

To start with, let's review a definition. Norman Deitch, Region 2 VPP Coordinator, stated in the 2001 VPPPA conference in New Orleans, that a Self-Evaluation is not an audit, it is not an inspection, it is not a compliance review. These types of assessments look at conditions, or history, and do not evaluate the process or effectiveness. He says "audits look back, evaluations look forward". Evaluations look at and predict if a process is in place, and if they are effective. The evaluation also looks to verify if the program is driven by a process and not by an individual or personality. A process certainly benefits from a strong leader or champion, but if its success relies solely on that individual, then it may not survive a change in leadership, which will inevitably happen. The successful evaluation looks at process and effectiveness.

### **Criteria:**

Where does one find the criteria or requirements for performing self-evaluations? Well, there are a number of publications referencing the requirements.

OSHA VPP Policy and Procedures Manual (TED 8.1), 11/10/86

OSHA's S&H Program Management Guidelines 1/26/1989

OSHA's Draft Managing Worker Safety and Health, Chapter 12 *Evaluating Your Safety and Health Program (1991-1993)*

OSHA Revised VPP Policy and Procedures Manual, (TED 8.1a), 5/24/1996

OSHA Federal Register Revisions to VPP 7/24/2000

OSHA's DIR 01-02 (TED 3.5) Interim Guidance for Voluntary Protection Programs

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First published in 1986, OSHA's TED 8.1a defined what OSHA was looking for in an evaluation. Also, in 1989, OSHA published their Health and Safety Program Management Guidelines (PMGs), currently referenced on the OSHA VPP web site.

For the annual evaluation, the PMGs stated:

As a result, the PMGs further defined the annual evaluation as " A Comprehensive program audit is essential periodically to evaluate the whole set of safety and health management means, methods, and processes, to ensure that they are adequate to protect against the potential hazards at the specific worksite. The audit determines whether policies and procedures are implemented as planned and whether in practice they have met the objectives set for the program. It also determines whether the objectives provide sufficient challenge to lead the organization to meet the program goal of effective safety and health protection. When either performance or the objectives themselves are found inadequate, revisions are made. Without such a comprehensive review, program flaws and their interrelationship may not be caught and corrected."

While OSHA uses the term "audit" here, what is meant is a thorough review of each VPP element or action. So where do we go to figure out what is included in a good evaluation? If you were designing one from scratch, which company's model would you choose? At the various sessions through the years, many companies have presented one method or another. They are performed by teams and individuals, safety committee members and third-party consultants, monthly and at the end of a year. All of these methods have been demonstrated as successful. So whom do you copy? One overwhelming suggestion on the part of most of the OSHA VPP coordinators is to mimic what they do when they come on-site for their review. This being said, what is their process?

**Document Review** - Develops a list of program strengths and weaknesses by:

Reviewing Documents (Procedures and Records)

Interviewing Relevant Authors

Interviewing Responsible Parties

**Formal and Informal Interviews** - Verify strengths, confirming weaknesses. Are there still program gaps? Interview:

Employees

Supervisors

Committee Members, etc.

**Visual Observations** - Confirm (verify) that controls are in place via:

Informal interviews on the shop floor

Verification of records

Verification of interview comments

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*"Review program operations at least annually to evaluate their success in meeting the goal and objectives, so that deficiencies can be identified and the program and/or the objectives can be revised when they do not meet the goal of effective safety and health protection."*

Based on this process, do you develop a plan to perform these three essential steps for each of the 25 VPP elements? Many companies have developed detailed questioning guides or protocols for their evaluation teams to answer. The type of program issues OSHA VPP answers are found in the TED 8.1a, Appendices B and E. Each question or protocol is verified via interviews and visual observations.

Perhaps the most significant aspect of the evaluations performed by OSHA VPP are the interviews. This is where OSHA gets concrete examples of programs either being in place, or not. The important interviews are not with H&S professionals. The telling interviews are with workers, supervisors, etc. being able to explain programs relevant to their work area, how hazards are identified and abated, how management is involved, that their training is right for the job, and that the right controls are in place, and their use enforced. OSHA even publishes the questions they use, in their TED 8.1 document, Appendix D. So, if you are developing or performing evaluations, and not doing interviews, how do you really know if programs are reaching their intended audience (workers)? This is OSHA's critical step. Is it yours?

### **Requirements:**

In their latest reference, OSHA states that the Evaluations:

Review program operations at least annually to evaluate their success in meeting the goal and objectives, deficiencies can be identified and the program and/or the objectives can be revised when they do not meet the goal of effective safety and health protection.

Review each of the VPP elements or actions.

Must be in place at least one year prior to VPP application submittal

Are submitted as a Narrative Report, Feb. 15th to OSHA VPP (2 copies)

Must also be performed immediately prior to completion for a construction site

Many companies first attempt at these evaluations are rather weak, or ineffective. OSHA expects this. However, the companies most successful at maintaining interest in safety, year after year, OSHA review after OSHA review, are the sites that invest in their annual self-evaluation and teams. Sharing results, developing detailed objectives from these evaluations, requiring management and departments to share in the implementation of new initiatives, committees tracking and validating completion of objectives throughout the year is the real benefit of performing these evaluations. The continuous improvement of the self-evaluation process is one of the most significant methods to keep VPP alive.

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### **The Narrative Report: Evidence of the Annual Evaluation:**

One main reason to perform the evaluation is to develop goals and objectives, based on weaknesses identified. Another reason is because OSHA VPP requires that you send it to them as part of your annual submittal. Therefore, the Narrative Report submitted to OSHA every year, summarizes the results of the evaluation. It contains:

Last year's objectives and their status

This year's evaluation to each VPP element, including:

- 1 Past Activities:
- 2 Evaluation Findings (strengths and weaknesses):
- 3 Recommendations for Improvement (if any)

Finally, the most successful sites communicate not only the results of the evaluation to their workforce, but use the evaluation as the driving force for the year's efforts.

During OSHA's on-site review, they interview members of the evaluation team, and workers, to understand how the evaluation is performed, and if the results are communicated to everyone. Based on the numerous site visits performed over the years, I've seen self-evaluations performed a number of successful ways. They all seem to have two things in common: they perform detailed interviews, and they mimic the OSHA process. So, if you are developing your self-evaluation process, or just looking to improve it, look at what you can learn from the OSHA process.

*Written by Paul Esposito, CIH, CSP  
STAR Consultants, Inc. Annapolis, MD  
[www.starconsultants.net](http://www.starconsultants.net)*

*STAR specializes in helping companies achieve and maintain VPP, and perform self-evaluations. His clients include GE, Eaton, Lucent, among others. He has performed over 175 VPP evaluations during the past 9 years, and his company sells a self-evaluation manual, used by over 90 VPP sites.*