

How the VPP Application Process Works



Introduction

The Voluntary Protection Programs (VPP) recognize employers and workers in the private industry and federal agencies who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries. In VPP, management, labor, and OSHA work cooperatively and proactively to prevent fatalities, injuries, and illnesses through a system focused on: hazard prevention and control; worksite analysis; training; and management commitment and worker involvement.

To participate, employers must submit an application to OSHA and undergo a rigorous onsite evaluation by a team of safety and health professionals. Union support is required for applicants represented by a bargaining unit. VPP participants are re-evaluated every three to five years to remain in the programs. VPP participants are exempt from OSHA programmed inspections while they maintain their VPP status.

Eligibility and VPP Requirements

Are you eligible for VPP?

OSHA, through the Office of Partnerships and Recognition (OPR) accepts applications for VPP from private sector general industry, maritime, construction industry, including mobile work force, resident contractors at worksites not in VPP and Federal Agencies. Your application should be submitted by your company if your company controls worksite operations and is responsible for implementing a safe and healthful worksite.

If you have questions about your site's eligibility or have other questions about your application, please [contact your local VPP Manager](#).

Worker Support for VPP

Workers must be actively involved in VPP. The site must ensure and encourage worker involvement in the planning and implementation of the safety and health management program and in assessments and evaluations that impacts on the workers' occupational safety and health. Including workers in safety and health planning can help reduce hazards and improve the site's safety culture, leading to a safer workplace.

Examples of employee involvement may include:

- Participation on a safety committee
- Including workers on Job Hazard Analysis teams
- Safety training content developed with worker input
- Enabling workers with a means to suggest improvements to safety and health
- Including workers on teams which develop safety materials, compliance assistance, site-based safety articles, posters, slogans etc.

OSHA Inspection History

If OSHA has conducted an enforcement inspection at your worksite within the last five years months preceding your application, any of the following enforcement activities will eliminate your site from participating in VPP and your application will be rejected:

- Open enforcement investigations at the time of application.
- Pending or open contested citations or notices under appeal at the time of application.
- Willful citations or unresolved Whistleblower cases where OSHA issues a Merit Finding or 11(c), International Safe Container Act (ISCA), or Asbestos Hazard Emergency Response Act (AHERA) cases where the Office of the Solicitor of Labor files a complaint in district court during the 60 months prior to application.
- Unresolved, outstanding enforcement actions such as long-term abatement agreements or contests.
- Work-related fatality of an employee during the five years months prior to the application or a work-related fatality of a contract employee during the last year prior to application.
- Inclusion in OSHA's Severe Violator Enforcement Program (SVEP) at the time of application
- OSHA history pertaining to non-VPP worksites of the same company if it is determined that a corporate decision, program, or policy which applies to all company worksites does not meet VPP Star site-based requirements.

VPP Program Requirements

Applicant worksites will be scheduled for a thorough on-site evaluation by an OSHA on-site evaluation team comprised of OSHA staff and other safety and health professionals, including OSHA's Special Government Employees (SGE). The site must ensure union involvement if your workers are represented by a collective bargaining unit. If accepted into VPP, participants are re-evaluated every three to five years. VPP participants must meet continuing injury and illness rate requirements; maintain a comprehensive safety and health program; undergo periodic OSHA onsite evaluations; perform self-evaluations; submit annual data; and involve workers and managers in efforts to continuously improve their safety and health programs and performance.

Applicants must ensure

Compliance with the OSH Act and will correct in a timely manner, all hazards discovered through self-inspections, employee notification, accident investigations, an OSHA on-site review, process hazard reviews, annual evaluations, or any other means. The applicant will provide effective interim protection as necessary. Any worksite deficiencies identified during the OSHA on-site evaluation, will be corrected when observed. Interim protection must be provided to workers where a hazard cannot be abated immediately.

Workers actively support the VPP application. Requirements and VPP elements are in place, met, and, maintained.

Workers, including newly hired workers and contractor workers when they reach the worksite, will have VPP explained to them, including employee rights under the program, the OSH Act or 29 CFR Part 1960.

Workers performing safety and health duties as part of your SHMS will be protected from discriminatory actions resulting from their carrying out such duties, just as Section 11(c) of the Act and 29 CFR 1960.46(a) protect employees who exercise their rights. Workers will have access to the results of self-inspections, accident investigations, and other SHMS data upon request.

The information listed below will be maintained and available for OSHA review to determine initial approval of VPP participation:

- Written SHMS.
- All documentation outlined in Chapter 6.VI.A.5.
- Any agreements between management and the collective bargaining agent(s) concerning safety and health.
- Any data necessary to evaluate the achievement of individual Merit.

Each VPP applicant can submit a complete application including annual injury and illness rates to its Regional VPP Manager. Sites covered under the PSM Standard must also complete the PSM Supplement A Questionnaire.

If during OSHA's review of the application, significant organizational, ownership, union, or operational changes occur, such as a change in management, ownership, or merger, you must provide OSHA, within 60 days, a new statement of commitment signed by both the new management and any authorized collective bargaining agents.

Your worksite must demonstrate a willingness to follow through on all assurances.

- Employees must be aware of the recourse available to them if management fails to fulfill any of these assurances. This may include rescinding their support of the VPP application or exercising the right to file an OSHA complaint.

Pre-Application Assistance

[Your local VPP Manager](#) may choose to visit your worksite to offer assistance in the application process, or to obtain additional information to clarify the information provided in the application before scheduling the on-site evaluation.

Preparing the application

Please ensure that all essential information is included in the application. Examples of essential information can include: the applicant's worksite name, address, key contact personnel and their titles, corporate identification, collective bargaining agent contact information, number of employees and number contractor employees on-site, annual injury and illness rates, North American Industrial Classification System (NAICS), industry title, type of work performed, and products produced, if any.

Single Applications.

In most cases, a single VPP application is sufficient when:

Worksite	SHMS	Application Type
The applicant operates at a worksite where operations are physically separated but where a single, effective on-site evaluation is still feasible.	All applicant employees are covered by a single safety and health management system	A single application is required.
The applicant is the General Contractor of a construction worksite where subcontractor employees are also covered by the same safety and health management system.	All applicant employees are covered by a single safety and health management system	A single application is required.

Follow the directions in the North American Industrial Classification System (NAICS) Manual to determine the predominant work and the appropriate NAICS code. If questions still exist, contact your local VPP Manager.

Confidentiality

During the application process and prior to VPP approval, the application and all related information is confidential and must be used solely for VPP-related activities. If an applicant withdraws, the original application and related documents will be returned.

Identify Your NAICS Code and the Application Required for Multiple Worksites

During the initial application review, your local VPP Manager will verify the NAICS code provided in the application and determine if it is accurate for the applicant worksites. Here is [how you can determine your NAICS](#).

Worksite	SHMS	Application Type
The applicant has multiple operations.	All applicant employees are covered by a single safety and health management system.	A single application is required reflecting the appropriate NAICS code for the employer.
More than 50 percent of the predominant work performed by employees is performed at an off-site location(s).	The application is for a Mobile Work Force site.	A single application is required.
The applicant’s operations are separated by distances that would prevent an effective, single on-site evaluation.	All employees may or may not be covered by a single safety and health management system.	More than one application is required.

More than one employer at a single worksite is applying for VPP (for example, an office building).	Not Applicable	More than one application is required.
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Additional Guidance for Resident Contractors at Worksites not in

VPP The appropriate NAICS will be determined:

- If the resident contractor performs work that is independently performed, applicable across multiple industries, and not tightly integrated with the host employer’s work, then a NAICS code for the contractor’s specific work would be applied. (For example, an employer whose function is solely to erect and dismantle scaffolding).
- If the resident contractor performs specialty, skilled work not commonly performed by the host employer, then the NAICS code for that specialty skilled work would be applied. (For example, an employer engaged in computer operations and other technology-related functions).
- If the resident contractor performs work entirely unrelated to the host employer’s operations, then the NAICS code for the contractor’s specific work would be applied. (For example, those employers performing facility security operations).
- The resident contractor will be assigned the host’s industry classification (NAICS code) when the majority of the work (greater than 50 percent) performed by the resident contractor fulfills a function normally performed by the host such as general equipment maintenance
- The host employer’s own employees work side by side with the resident contractor’s employees performing the same or similar tasks.
- A resident contractor will be assigned its own NAICS code, which may differ from the host site when the majority of the work performed by the resident contractor is not normally associated with the host’s industry or services and the work is conducted independent from the host site’s supervision and control.

Impact of the COVID-19 Pandemic on the Voluntary Protection Programs

Due to the COVID-19 pandemic, adjustments to the administration of the VPP have been made. To allow for the continued operation of VPP during the COVID-19 pandemic, on June 24, 2020, OSHA modified some of the programs’ policies and procedures. These modifications help to ensure the consistent functioning of VPP in all OSHA regions. It is anticipated that these efforts will allow VPP to maintain normal functions to the greatest extent possible, including recognizing the VPP status of applicants and participants. These policy modifications will be limited to the duration of the current public health crisis.

When an application is submitted, the Regional Office will assess resources to determine if the application can be processed. Applications that have not been reviewed and accepted more than nine months will be returned to the applicant.

Once your local VPP Manager is ready to process your application, you will be notified through a telephone call or an email. Your local VPP Manager will review the application and contact you if additional documentation is required.

Once an application is complete and accepted, your local VPP Manager will schedule an on-site evaluation. The scheduling of the on-site evaluation will be based on Covid-19 pandemic impact, OSHA staffing levels and as OSHA resources allow.

The rates supplied in the application will be examined as follows:

- For general industry, the reviewer of the application will calculate the three-year TCIR and DART rates for injuries and illnesses, using data from the last three complete calendar years.
- For the construction industry, calculate rates for the life of the worksite if fewer than three years. At a minimum, the most recent 12 months is required, and the data must include all employees of contractors and subcontractors on the worksite. (On construction worksites, all contractors are considered worksite employees for the purpose of rate calculations, and, therefore, are included in the applicant/participants' rates).
- Evaluate the applicant/participants' injury and illness history by using a three-year TCIR and a three-year DART rate; (a minimum of one year rates for construction). The three-year TCIR and DART rates must be below at least one of the three most recent years of specific industry national averages for nonfatal injuries and illnesses at the level published by BLS for that industry. Compare both rates to the same single year.
- An alternative rate calculation may be used for eligible smaller worksites.
- The reviewer must determine if the applicant's injury and illness rates are low enough to warrant an on-site review.

SAFETY AND HEALTH ELEMENTS

The application should describe how the applicant is meeting the VPP requirements, addressing each of the elements and sub-elements of an effective SHMS:

Management Leadership and Employee Involvement.

The applicant must describe top-level management leadership in the applicant or participant's SHMS. (Note: Management must clearly describe its commitment to meeting and maintaining the requirements of VPP. The applicant must also describe how employees are involved in safety and health.)

Worksite Analysis

You must describe methods used to recognize, identify, and analyze hazards. Effective worksite analysis provides the information managers and employees need for a thorough understanding of all hazards to which they may be exposed.

Hazard Prevention and Control

You must describe and give examples of how hazards are addressed, including preventative maintenance, occupational health care program, emergency preparedness, and hazard elimination employing the hierarchy of controls.

Safety and Health Training

You must describe its formal and informal safety and health training program for managers, supervisors, and employees. The information must include training protocols and schedules of training.

Incentive Programs

Incentive programs can be a valuable means to promote workplace safety and health. Incentive programs can reward workers for safety and health suggestions, reporting near-misses or hazards, and encourage involvement in the safety and health management program. Incentive programs can also be rate-based and focuses on reducing injuries and illnesses. For example, a rate-based incentive program could reward workers with a bonus or prize at the end of the month when no injuries are reported.

Employers must take care such a program is not implemented in a manner that discourages workers from reporting any injury or illness. If a VPP applicant chooses to use an incentive program, the program must comply with the provisions in Sec. 11 (c) of the OSH Act and 29 CFR Part 1904.

Your local VPP Manager will determine if your incentive program meets the requirements and encourages or rewards workers to reporting injuries, illnesses, near misses, or hazards; and encourages workers to become involved in the site's safety and health program.

Additional Attachments

The reviewer will determine if the application contains the required additional attachments, as follows:

- Copy of top-level safety policy
- Organization chart
- Site Incentive Program
- Most recent Annual Evaluation
- Signed statement of union support, if applicable
- VPP PSM Application Supplement (Supplement A), if applicable
- Site Whistleblower program

Discussion with the Applicant

In some cases OSHA may need to discuss the appropriate program choice with the applicant. If the applicant's three year injury and illness rates are at or above the national average for the applicant/participant's industry, and/or the applicant has not had all of the required elements for Star in place for one year, the applicant will be contacted about the possibility of qualifying for Merit.

Incomplete Applications

If the application is determined to be incomplete, your local VPP Manager will notify the applicant, identifying the missing documentation and requesting that the missing information be submitted as soon as possible.

If the additional documentation is not provided within a reasonable amount of time, the application will be rejected and returned to the applicant. An application can then be resubmitted for consideration to participate in the VPP. If it is clear that the applicant cannot qualify for VPP, the application will be rejected and returned with written explanations why the application was not approved by OSHA.

Voluntary Withdrawal of an Application

You can withdraw your application during any phase of the application process by notifying the VPP Manager. The withdrawal is effective on the date the notification is received in the Regional Office and the VPP Manager will return the original application to the applicant. business days.

The initial On-site Evaluation

After an application is approved, your local VPP Manager will consider the impact of the Covid-19 pandemic and attempt to schedule an on-site evaluation at a mutually agreed date and time. The VPP Manager will also assess Covid-19 travel restrictions, social distancing, facial masks and vaccination status in addition to determining if OSHA resources allow an onsite evaluation to be scheduled.

If during the time the application was being reviewed, an enforcement inspection is opened at the applicant site, the on-site evaluation will be postponed until the enforcement inspection is closed. The Regional Office will determine if the enforcement inspection should result in the application being to the site. If the on-site evaluation is postponed for a substantial period of time, the application will be returned to the site.

Completing the Online Application

Applicant Self-Registration and Sign in to VPP (Applicants that have not yet registered for an account)

Click on the [VPP](#) using Internet Explorer or Google Chrome and Login page will open
To self-register Click on **Self Registration** link:

1. Enter your **First Name, Last Name, Email, and Password**
2. Enter **Company Name** if you are a new applicant
3. Click in box beside '**I accept the Rules**' and Login button
4. Click on **Register** (you will receive the link on the given email address for activation of the account)
5. Click on the link received in the email
6. Click on link for **Login** on the page

After clicking on '**Register**' you will be returned to the login page. Clicking on the received link will navigate you to the confirmation page. You will receive the message '**Confirmation successful**' Clicking on the link for **Login** will navigate you back to Login page.

1. Enter your username and password to sign-in.
2. Enter your User Name: (e.g. jdoe)
3. Enter your password: (will be provided to the new users)
4. Click on **Login** button
5. You will see the **Application Profile** page.

Applicant Sign in to VPP - (For Applicants who have already registered)

Click on the [VPP](#) using Internet Explorer or Google Chrome and the Login page will open:

1. Enter your User Name: (e.g. jdoe)
2. Enter your **password**: (will be provided to the users)
3. Click in box beside **I accept the Rules of Behavior** link
4. Clicking on **I accept Rules of Behavior** link opens the page and **Return to Sign-in** button.
5. You will be allowed to enter your username and password.

Click on **Login** button:

1. **Application Profile** page will be displayed
2. You will be allowed to enter the username and password. You can log in to VPP.
After logging in, you should see the **Application Profile** page.

Entering Applicant Profile Information (Applicant)

1. Enter all the information for all of the fields on **VPP Applicant Information Profile**
2. Click on **Save**
3. Clicking on '**Save on Applicant profile**' tab enables the remaining tabs. You will be able to save the data temporarily and can resume with the application later. You should see the confirmation message, '**Record saved successfully**'
4. Once all the fields are complete on the page for a given **Section**, after clicking on **Save**, the incomplete indicator will change to **Complete** on the icon.

Hint: Please **Save** as draft after completing each **Section** in the application.

Enter the Union Information

1. Click on **Union Information tab**
2. Enter values for all of the fields on **Union Information** (If Union Support of VPP Application is selected as YES)
3. Click on **Save**
4. Click on **Add New Union icon** on top
5. Click on the **Delete Union** icon to remove **Union Information**

Adding Additional Union Information

1. You will be displayed the page with blank fields.
2. Clicking on **Add new Union** will allow you to add another record for Union.
3. Clicking on **Delete Union** will delete the selected record. (Users are advised to click on Save as Draft after completing every section)
4. You can add and delete multiple unions

Enter Injury and Illness information

1. Enter values for all the fields on **Injury and Illness Rate** tab
2. Enter a brief description in the text box for **Work and Products** produced at the site
3. Using the drop down arrows, identify **Hazards** present
4. Enter additional information in the text box, if **Other** is selected
5. The Section icons will displayed a flag with current status - "Complete" or "Incomplete"

Complete the Profile

1. Click on '**Verify if Applicant Profile is Complete** button
2. Clicking on the button will navigate the user to the Home Page and will display **Manage Profile, Begin Application button**.
3. Clicking on **Manage Profile** will navigate back to the applicant profile screen.
4. After clicking, you will be notified if any fields are incomplete or have incorrect values.
5. Once all the **Sections** such as: '**Applicant Information, Union Information, Injury and Illness Rates and Work and Products**' **Sections** show 'Completed' status, Click on button '**Verify all Sections are complete**'
6. The '**Overview of Current Application Status**' and the '**Applicant profile completed/unlocked**' arrow will display as **Blue**, which indicates that this **Section** is completed.

7. You can click on the '**Begin Application**' button to start the application

Begin Application (Applicant)

From the Homepage, Click on **Begin Application**

1. Clicking upon the button, you will be navigated to the user to page with questionnaire and a button for **Back to Home Screen**
2. Click on **Section I - Management Leadership & Employee Involvement**
3. Enter a response for each question
4. Click on corresponding radio button for **YES** or **NO**
5. Click on **Save** on the bottom right of the screen
6. Click on next tab in the navigation bar to proceed
7. Clicking on **Sections** listed on left navigation pane will allow you to respond to questions
8. In order to complete the application, you will have to enter a response for each question.

Hint: Please **Save** each tab before moving to next tab

Hint: You can skip to different tabs of the within the same **Section** using a dropdown at the top right corner and selecting to tab in the choice list.

Completing the Rest of the Application:

Section II - Worksite Analysis

You must describe methods used to recognize, identify, and analyze hazards. Effective worksite analysis provides the information managers and employees need for a thorough understanding of all hazards to which they may be exposed.

Section III - Hazard Prevention and Control

You must describe and give examples of how hazards are addressed, including preventative maintenance, occupational health care program, emergency preparedness, and hazard elimination employing the hierarchy of controls.

Section IV - Safety and Health Training

You must describe its formal and informal safety and health training programs for managers, supervisors, and workers, including contractor workers. The information must include training protocols and schedules of training.

Completing Section II, Section III and Section IV

1. Proceed as in **Section I**
2. Select each **Section** using the navigation panel on the left
3. Clicking on the individual **Section** will display the questions for each **Section**
4. Click on **Back to Home Screen**
5. Clicking on **Back to Home Screen** will navigate you back to the home page.

Hint: Please **Save** each tab before moving to next tab and **Save** often to avoid losing information.

Submitting Additional Documents (Applicant)

1. Click on **Additional Documents** tab in the left navigation pane
2. Click on the downloadable links for your Commitment letter, PSM Questionnaire A and VPP Union Support Statement
3. PSM Questionnaire A will be displayed only if PSM is selected as YES in the applicant profile
4. Click on dropdown to **Choose document type**
5. Click on **Choose file**
6. Click on **Upload and Save**
7. You can upload your application. If you choose to mail the application, click on the checkbox for **I prefer to mail in the documents.**
8. If document type is **Other**, enter the document description
9. Clicking on links, you will be able to download the files on your local machine. You will be allowed to browse and upload the completed files
10. The **Upload and Save button** will be disabled after you click on the checkbox for **I prefer to mail in the documents.** All requested documents are mandatory and must be submitted as a part of application process.

Hint: Please do not upload your site's Annual Self-Evaluation at this time.

Hint: Other supporting documents your local VPP Manager could ask for could include:

- Management Commitment Letter
- Documentation showing Employee Involvement
- Union Support Letter
- Facility Site Map provided to On-site Evaluation Team Leader (during On-site)
- Employee Self-Checklists
- Samples of Site Programs
- Site Inspection Forms

If you have questions about your application, please [contact your local VPP Manager](#).

Preview an Application Prior to Submitting (Applicant)

1. Click on **Preview** tab in the left navigation pane
2. Clicking on **Preview**, will show the **Read Only** data for the completed profile
3. Click on **Validate QA Section is Complete** button
4. After clicking on the **Validate QA Section is Complete** button, you will be notified that the 'Applicant has provided responses for all the questions'.
5. Click on the checkbox for **I acknowledge that I have provided all the required information correctly.**
6. Click on **Submit** button
7. After clicking on **Submit**, you will be returned to the **Home Page** with a message that **'Application has been submitted'**

8. It will also take you to the '**Overview of Current Application Status**' and the '**Applicant Submitted**' arrow will show in color **blue**, which indicates that this section is completed.

Reset Password - VPP (Applicant)

1. Click on **Reset Password** link on Login page
2. Click on **Reset** button
3. Clicking on **Reset password** link opens the page where user will provide Username, current password and new Password.
4. Clicking on **Reset button**, you will be notified that password has been updated
5. Clicking on **Return to Sign-in** will take you back to the login screen

Forgot Password - VPP (Applicant)

1. Click on **Forgot Password** link on Login page
2. Enter your **registered email address**
3. Click on **Send Password Reset Email button**
4. Click on the link received in the email
5. Click on **Submit**
6. Click on **Return to Sign-in**
7. Clicking on Forgot password link will navigate you to a page
8. Clicking on **button** will send reset link to the email address
9. Clicking on the link will redirect the user to page to provide new password
10. Clicking on **Submit**, you will be notified that the password has been updated
11. Clicking on **Return to Sign-in** will navigate you to the login Page

Help us improve this guide:

Please send an email to harris.richard@dol.gov. We would greatly appreciate any comments, feedback or suggestions to improve this guide. All comments, feedback or suggestions will be considered. This request is entirely optional and voluntary and will not impact your application in any way. Thank you in advance.