# DIVISION OF OCCUPATIONAL SAFETY AND HEALTH CONSULTATION SERVICES POLICY AND PROCEDURE MANUAL

**TITLE: PARTNERSHIP PROGRAMS: P&P D-64.1**

**Cal/VPP – SPECIAL TEAM MEMBER REQUIREMENT Page 1 of 8**

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**AUTHORITY:** OSHA 29 CFR 1908, CSP 03-01-005, and California Labor Code Sections 6300 and 6354.

**POLICY:** It is well recognized that being a participant in the Cal/OSHA Voluntary Protection Program (Cal/VPP) requires significant commitment and cooperation between the State of California and member companies. If the program is to remain strong and successful, a significant level of participant commitment is required to assist the Cal/OSHA VPP team as well as new applicants and current member companies.

This program outlines the requirements for VPP Star sites to support the VPP program through the designation and participation from Special Team Members (STM). This program also addresses the various roles STMs will play during the VPP application, evaluation, and re-evaluation process for the State of California.

## STM ACTIVITIES

1. STMs perform pre-visits of new VPP applicants
2. Mentor other sites interested in achieving VPP in California
3. Assist the VPP team with onsite evaluations/re-evaluations
4. Prepare Cal/VPP reports pertaining to STM assignments
5. Assist the VPP team in other Cal/VPP activities, such as but not limited to, promotions, seminars, and training

## STM RESPONSIBILITIES

1. Pre-visits:
	1. Review applications, VPP elements, and applicable Cal/OSHA Title 8 regulations
	2. Contact site's VPP representative to arrange visit
	3. Check the site's readiness for a VPP evaluation
	4. Check the physical condition of the site
	5. Review and validate injury and illness records and rates
	6. Interview key staff and employees
	7. Provide site with guidelines for the evaluation visit
	8. Answer questions about the VPP evaluation process
	9. Provide assistance to get the site ready for VPP status
2. Onsite final evaluation/re-evaluation:
3. Participate in onsite evaluation
4. Apply technical expertise in Cal/VPP Elements and Cal/OSHA Title 8 Regulations
5. Perform evaluations and make recommendations in assigned area(s)
6. Provide written report to the Cal/VPP team leader in a timely manner.
7. Perform follow up visit and assistance requested by Cal/VPP Manager.

Mentoring:

1. Share documents and information with the new applicants.
2. Establish formal communication system with site, such as e-mail, cell phone, fax, teleconferences, etc.
3. Perform site visits and audits to prepare site for VPP Journey
4. Prepare and give formal presentations, consultations, and training
5. Hold meetings with site management and employees

## MENTORING PROGRAM

Mentors are not a substitute for a VPP applicant's safety and health resources. However, it is important for mentors to provide technical and program assistance to the VPP applicant's managers and employees.

A mentor for a site will be selected based on:

1. The availability of STM
2. The physical location of the applicant's site
3. The type of industry/process
4. The size of employer
5. The complexity of the operation

## OVERVIEW REQUIREMENT:

1. Every Cal/VPP site must commit to providing STMs for continued participation in the Cal/VPP program. Each STM is expected to participate in one or more VPP activities each year based on the number of employees for each site. (See Table below)
2. Sites with more than 250 employees must commit to provide at least two STMs for continued participation in the Cal/VPP or commit one STM to participate in two STM activities each year. (See Table below)
3. Sites with more than 1500 employees must commit to provide at least three STMs for continued participation in Cal/VPP or, commit one STM to participate in three STM activities each year. (See Table below)
4. Small Business Sites (15 employees or less) may petition Cal/OSHA to opt out of this requirement if compliance with this practice would create a hardship for the employer. The exemption request should be in letter format and directed to the Cal/VPP Manager. The Cal/VPP Manager has the authority to approve or disapprove the small business STM exemption.

NOTE: Please reference the Cal/VPP STM Participation Options for participation available to STMs.

**Companies will commit to providing STM Activities based on the table below**:

| Number of Employees at the site | Required number of STM onsite assistance actions per year |
| --- | --- |
| 0 – 250 | 1 |
| 251 – 1500 | 2 |
| More than 1500  | 3 |

 \*Note: STMs can be a combination of onsite or corporate staff

1. Cal/VPP sites must designate STMs to maintain Cal/VPP site status.
2. Failure of the Cal/VPP site to provide an STM during its first year in the Cal/VPP program will be documented in a letter from the Program Manager of the Cal/OSHA Consultation Program. If the member company fails to provide an STM for three consecutive years, the Program Manager will send a letter informing the company that it will not be recertified for continued membership in the program.

NOTE: Smaller sites may encounter unique challenges in meeting this and other requirements if, for example, the site’s STM is a military reservist called to active duty. Sites should write a letter to the Cal/VPP Manager explaining its unique challenges and propose alternative means of demonstrating their commitment to the STM and VPP programs.

1. STM Participation Requirements:

Qualifications – Prospective STM applicants must meet the basic requirements described in D-64.1.A.

The STM nominee must be sponsored, in writing, by the individual’s employer. The employer will ensure the STM nominee meets requirements described in D-64.1.A prior to nomination. Once nominated, the individual must successfully complete a mandatory 3-day STM training course (8 hours per day) and pass the written STM exam administered by the Cal/VPP Office. The training is valid for three years and must be repeated every three ears.

## STM is classified into 3 Levels

Level 1 STM (Observer)

* Attend STM training and participate in onsite visits as an observer and work with team members.

Level 2 STM (STM in Training)

* Participate in one Cal/VPP activity: mentoring, onsite visit, pre-visit, outreach.

Level 3 STM (Fully Qualified)

* Work with minimal supervision and participate in two onsite activities.

## STM Participation – OPTIONS

In addition to completing STM training the candidate must participate in a minimum of one of the activities listed below annually:

Participate as a team member at a Cal/VPP Star Onsite Reevaluation or Evaluation. This is done to verify that an effective comprehensive safety and health management system is in place. Activities performed by the STM during the Onsite Evaluation are the following: reviewing the written safety and health management system and supporting documents; a site walkthrough is performed to observe working conditions and to verify that hazards are being appropriately controlled; conducting formal and informal employee interviews; informing the site of any findings or recommendations and preparing written action items for the VPP Onsite Evaluation Report. This activity normally takes about a week to complete.

Participate as a team member in a Cal/VPP Annual Comprehensive Survey. As a team member with other STMs perform third party audits at Cal/VPP sites. The scope and approach of the audits are similar to the Cal/VPP Onsite Evaluation, and it takes three to five days to complete.

Conduct a Pre-Visit at a new applicant’s site. A Pre-visit is generally a one-day site visit to measure the site’s readiness for an onsite team review. This usually requires reviewing the site’s: injury and illness rates, several key VPP elements, safety and health programs, physical conditions, interviewing employees and preparation of a status report. Finally, depending on the findings, a discussion of the next step in the process.

Mentor a VPP Star applicant site. The mentor may be asked to provide the applicant with information on the VPP elements, process, application and gaps with programs. Mentors will also be responsible to ensure the site representative confirms pre-visit and follow up as needed after pre-visit. Mentoring varies from sharing information via emails and telephone calls to several onsite contacts over a period of months.

Participate in Cal/VPP Outreach Programs. Provide presentations during a Cal/VPP outreach program such as a VPP applicant workshop, Best Practice Symposium or STM training. Participation in these programs usually runs about one to three days.

NOTE: Level 3 STMs play a vital role in training STMs and are needed to help train new STMs. Level 3 STMs can mentor in the STM training class and satisfy a “participation requirement”.

Participate in a VPPPA conference (Region IX). This can range from one day to several days depending on the length of the conference and may require a presentation to be made by the STM. These conferences are also an excellent source of information as many “Best Practices” are presented.

## A. Required Qualifications for ALL STM Applicants\*

* Employed at a Cal/VPP Star worksite for at least two years or employed at a corporate office and involved in the Cal/VPP Star process for at least two years.
* Strong comprehension and experience applying Cal/VPP Elements and General industry, Construction Industry, and Electrical Cal/OSHA Title 8 Safety and Health regulations.
* Experience (current or within the previous two years) in a leadership position (although not necessarily management) dealing with workplace safety and health. Applicants from a Cal/VPP Star worksite or corporation must have actual Cal/VPP Star experience.
* Minimum of three years of working experience and/or responsibilities related to health and safety
* Strong interpersonal, communication, interviewing, debriefing and presentation skills.
* Sound reading, writing, auditing, analytical, and time management skills.
* Management and/or corporate support for participating in the Cal/VPP STM program.
* Dedicating more than 50% of daily duties to conducting or managing worksite or corporate safety and/or health activities.
* ASP or Certified Safety Professional (CSP) and Certified Industrial Hygienist (CIH) credentials are preferred but not required
* Graduated with a bachelor’s degree (minimum) with specialization in engineering or in a field directly related to occupational safety and health. (Additional qualifying experience may be substituted for the required education on a year-for-year basis).
* Candidates without a college degree must have successfully completed the OSHA Training Institute’s (OTI) OSHA 5119 - Cal/OSHA Standards for General Industry or OSHA 511 - OSHA Standards for General Industry or equivalent course.

\*Qualifications may be evaluated and credited on a case-by-case basis depending on safety and health competencies and applicable experience.

## B. Additional Qualifications for STM Applicants who are *Process Safety Management (PSM) Specialists*

* Must have successfully completed the OSHA Training Institute’s (OTI) Course 3300, Safety and Health in the Chemical Processing Industries and Course 3400, Hazard Analysis in the Chemical Processing Industries; or
* Must have successfully completed equivalent training; or successful completion of the Division's sponsored or approved PSM Training.
* Must document work experience and/or other appropriate qualifications, for example, experience as a Process Safety Manager, Process Safety Engineer, etc.

## C. Qualifications for STM applicants who are not employed in an official Safety and Health role:

STMs need not be safety and health professionals. They may be hourly employees who have several years of experience implementing effective safety and health management systems. Besides meeting the qualifications in section, A, these applicants must also meet the following qualifications:

* Generally, must be a current employee of a Cal/VPP worksite who has worked at a Cal/VPP site for a minimum of two years. However, an STM who moves from a Cal/VPP worksite to a non-Cal/VPP Star worksite within the same corporation may continue to serve as an STM, so long as corporate support continues. This will require a written letter of commitment by the corporation submitted to the Cal/VPP Manager.
* During that minimum two-year period, must have gained experience in at least three of the following activities (or their equivalent):
* Chairing a safety/health committee.
* Working directly with the Cal/VPP onsite review team during the previous onsite review.
* Implementing Cal/VPP Elements.
* Training others in safety and health procedures;
* Writing and reviewing Job Safety Analyses (JSAs) and/or Behavior Job Analyses (BJAs);
* Coordinating incident investigations.
* Coordinating proactive safety and health activities such as wellness days;
* Leading worksite hazard evaluation teams;
* Coordinating hazard abatement activities;
* Implementing an effective contractor safety and health program.
* Other experience that demonstrates knowledge of safety and health management systems.

## D. Nonprofessional safety and health STM applicants who are *Process Safety Management (PSM) Specialists*

* Must have successfully completed the OSHA Training Institute’s (OTI) Course 3300, Safety and Health in the Chemical Processing Industries and Course 3400, Hazard Analysis in the Chemical Processing Industries; or
* Must have successfully completed equivalent training; or successful completion of the Division's sponsored or approved PSM Training.
* Must document work experience and/or other appropriate qualifications, for example, experience as a Process Safety Manager, Process Safety Engineer, etc.