# 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 6**

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**AUTHORITY:** OSHA 29 CFR 1908, OSHA Instruction TED 8.4, and California Labor Code Sections 6300 and 6354.

**POLICY:** It is well recognized that being a participant in the Cal/OSHA Voluntary Protection Program 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/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 STM’s 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 on-site evaluations/re-evaluations
4. Prepare Cal-VPP reports pertaining to STM’s assignments
5. Assist the VPP team in other California VPP activities, such as but not limited to, promotions, seminars, and training

## STM RESPONSIBILITIES

1. Pre-visits:
   1. Review applications and applicable 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 the site to get the site ready for VPP status
2. On-site final evaluation/re-evaluation:
3. Participate in on-site evaluation
4. Have technical expert in areas of assignments
5. Perform evaluations and make recommendations in assigned area(s)
6. Provide written report for VPP team leader
7. Perform follow up visit and site assistance requested by team leader

Mentoring:

1. Share documents and information
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 evaluation
4. Prepare and give formal presentations, consultations, and training
5. Hold meetings with site staff 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 programmatic 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 VPP Star Site must commit to providing one (1) STM for continued participation in the VPP program. Each STM is expected to participate in one VPP activity each year. (See Note below)
2. Sites with more than 250 employees must commit to provide at least two (2) STMs for continued participation in the Cal VPP Program, or commit one STM to participate in two STM activities each year. (See Note below)
3. Sites with more than 1500 employees must commit to provide at least three (3) STMs for continued participation in the Cal VPP Program or, commit one STM to participate in three STM activities each year. (See Note 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 California VPP Special Team Member Participation Options for participation available to Special Team Members

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

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

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

1. Cal/VPP members must designate STM’s in order to maintain Cal/VPP Star site status.
2. Failure of the Cal/VPP STAR site to provide an STM during its first year in the Cal/VPP Star 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 two 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 reservist called to active duty. Sites should write a letter to the 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-OSHA VPP Program Office. The training is valid for 2 years and must be repeated every two years.

## STM’s s are classified into 3 levels

A Level 1 STM (Observer)

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

A Level 2 STM (STM in Training)

* Participate in one Cal/VPP activities; mentoring, onsite visit, pre visit, outreach

A Level 3 STM (Fully qualified)

* Work with minimum of supervision and participate in two onsite activities.

## Special Team Member Participation – OPTIONS

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

Participate as a team member at a Cal/VPP Star Onsite 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 finally, and preparing written action items for the VPP Onsite Evaluation Report. This activity normally takes about a week to complete.

Participate as team member in Cal/VPP Annual Comprehensive Survey. As a team member with other STMs perform third party audits at the Cal/VPP Star sites. The scope and approach of the audits is similar to the Cal/VPP Star 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 confirm 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/OSHA VPP Outreach Programs. Provide Presentation during a Cal/OSHA 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 STM’s play a vital role in training STM’s and are needed to help train new STM’s. Level 3 STM’s 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.

To help facilitate the above participation requirements an annual schedule of VPP evaluations and other activities requiring STM participation will be provided to Cal/VPP Star sites and/or posted on the Cal-OSHA website.

## A. Qualifications for ALL STM Applicants\*

* Employed at a Cal/VPP Star worksite for at least two (2) years or employed at a corporate office and involved in the Cal/VPP Star process for at least two (2) years.\*
* Experience applying CAL/OSHA 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.
* Strong interpersonal skills.
* Sound reading and writing skills.
* Management and/or corporate support for participating in the Cal/VPP Star STM program.

\*Qualification may be waved on a case by case basis depending on safety and health competencies and applicable past experience.

## B. Additional Qualifications for Safety and Health Professionals

* Two or more years’ experience in the safety and health field.
* Dedicating more than 50% of daily duties to conducting or managing worksite or corporate safety and/or health activities.
* Graduated from college 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.)
* CSP, CIH are preferred
* Candidates without 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.

## C. Additional Qualifications for Safety and Health Professionals 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
* Must document work experience and/or other appropriate qualifications, for example, experience as a Process Safety Manager, Process Safety Engineer, etc.

## D. Qualifications of STM applicants who are not Safety and Health Professionals:

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 A, , these applicants must also meet the following qualifications:

* As a general rule, must be a current employee of a Cal/VPP Star worksite who has worked at a Cal/VPP Star site for a minimum of two years. However, an STM who moves from a Cal/VPP Star 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 Star onsite review team during the previous onsite review;
* Training others in safety and health procedures;
* Writing and reviewing Job Safety Analyses (JSAs) and/or Behavior Job Analyses (BJAs);
* Coordinating accident 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.

## E. 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
* Must document work experience and/or other appropriate qualifications, for example, experience as a Process Safety Manager, Process Safety Engineer, etc.