



Department of Consumer  
and Business Services

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# CONSULTATION REFERENCE GUIDE

August 24, 2021

The information in this guide describes the framework of service delivery and philosophy of the Consultation Services Section of the Oregon Occupational Safety and Health Division (Oregon OSHA). This guide also presents material that is established by Oregon statute (law) or administrative rule.



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## GOAL

The overall goal of the Consultation Program is to assist Oregon employers in implementing and maintaining an effective safety and health program and to ultimately become self-sufficient in managing their program.

## Oregon OSHA Consultants

We encourage consultants to be leaders with positive attitudes. They are highly trained and qualified to provide safety and health recommendations to Oregon employers. They function as a team and a state-wide resource where staff and management work together for the common goal of helping employers solve problems and identify potential hazards at their worksites to improve their self sufficiency.

### Vision

Oregon OSHA consultants are Viewed as Leaders: “One whose example is followed.” They have positive attitudes; are good role models; understand how they impact the organization and the public; provide excellent customer service that is timely, thorough and professional; and they accept personal responsibility for their actions.

Oregon OSHA consultants are A Unified Team: “A group of people willing to act for the good of one’s group rather than oneself.” The consultation team fosters respectful, supportive relationships where staff and management work together for a common goal, trusting one another and recognizing each other’s accomplishments.

Oregon OSHA consultants are Utilized as a Resource. They are knowledgeable, creative, resourceful and available as expert resources to customers and other Oregon OSHA staff. Consultants are effective communicators and establish and maintain active partnerships with a focus on customer service.

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## STATE-FUNDED VS FEDERAL-FUNDED CONSULTANTS

### State-Funded Consultants

The majority of consultants in Oregon OSHA are 100 percent funded by the state of Oregon. This guide provides state-funded consultants with the information necessary to conduct and administer consultations. Federal-Funded Consultants 21(d).

Oregon OSHA has four consultation positions funded through a federal 21(d) grant. These consultants must follow federal guidelines for conducting consultations. In addition to the procedures presented in this guide, 21(d) consultants should refer to the [Oregon OSHA CPPM Addendum](#), and the federal directive and the Consultation Policy and Procedures Manual (CPPM) for their requirements.

## Public Entities Covered under (23(g))

Any of our state funded consultants can potentially conduct Public Entity consultations. These consultations are considered to be covered under the 23(g) grant. In addition to the procedures presented in this guide, Public Entity Consultation (23(g)) activities should refer to the Oregon CPPM Addendums, and federal CPPM for their requirements.

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## PRODUCTIVITY EXPECTATIONS

All consultants are expected to maintain steady production. Factors such as types of consults, trainings given, rule-making committee participation, amount and type of participation in publication review, special projects, and quantity of consults are some of the elements considered in measuring overall productivity. It is expected that you keep track of your participation in projects that are not tracked by ORCA.

Overall annual program expectations –2520 (assuming fully staffed).

Safety – 20 FTE ~ 65% = 1680

Health – 14 FTE ~ 35% = 840

In order to achieve this goal the productivity levels would be on average 7 per month for safety and 5 per month for health. Manager are expected to establish individual expectations for employees.

Many factors influence the monthly totals, including leave time, intake levels, and other activities/engagements the consultant may be a part of. These productivity metrics are a starting point for staff and management to establish a basic framework of monthly workload.

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## SERVICES BY TYPE

Oregon OSHA Consultation Program focuses on safety, health, and ergonomic issues; safety and health program evaluation; SHARP and VPP evaluations; and process safety management (PSM). Some consultations are comprehensive and some are limited to a specific request by the employer. Some services are on-site or we are now offering virtual services as well.

During specific consultations, consultants take the opportunity to explain to the employer the benefits of a higher level of assistance, including safety and health program reviews. Please see the section titled “Relationship to Enforcement Activity” for Deferral information.

**Note** - See [Table 1 Service Types](#)

**Table 1 Service Types**

<b>Employer-Specific Service</b>		<b>No Specific Employer or no consultation activity</b>
<p><b>On Site Service</b> (Receives the deferral if hazards are identified, except for compliance assistance)</p>	<p><b>Virtual Service</b> (Receives the deferral if hazards are identified, except for compliance assistance)</p>	<p><b>Training &amp; Outreach</b> (no deferral)</p>
<p><b>Comprehensive</b></p> <ul style="list-style-type: none"> <li>• SHARP</li> <li>• VPP*</li> <li>• Site walk with program review</li> </ul>	<p><b>Specific</b></p> <ul style="list-style-type: none"> <li>• Program Review</li> <li>• S&amp;H Management</li> <li>• ALH</li> <li>• Follow-ups</li> </ul>	<p><b>Training &amp; Outreach</b></p> <ul style="list-style-type: none"> <li>• Association Meetings</li> </ul>
<p><b>Specific</b></p> <ul style="list-style-type: none"> <li>• Program Review</li> <li>• S&amp;H Management</li> <li>• ALH</li> <li>• Follow-ups</li> <li>• PSM</li> </ul>	<p><b>Training &amp; Education</b></p> <ul style="list-style-type: none"> <li>• Virtual training for specific ER</li> </ul>	<ul style="list-style-type: none"> <li>• Informational Meeting</li> </ul>
<p><b>Training &amp; Education</b></p> <ul style="list-style-type: none"> <li>• On site training requests</li> </ul>	<p><b>Compliance Assistance</b></p> <ul style="list-style-type: none"> <li>• Pre job</li> <li>• Informational consultation (no hazard assessment)</li> </ul>	<ul style="list-style-type: none"> <li>• Conference Presentation</li> </ul>
<p><b>Compliance Assistance</b></p> <ul style="list-style-type: none"> <li>• Pre job</li> <li>• Informational consultation (no hazard assessment)</li> </ul>		<ul style="list-style-type: none"> <li>• Booth Activity</li> </ul>

\* VPP follows a separate protocol, [PD-A241](#)

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# COMPREHENSIVE VS SPECIFIC VS COMPLIANCE ASSISTANCE

## Comprehensive Consultations

A comprehensive consultation covers the entire establishment with a hazard identification walk-around and all required written programs i.e.,– injury and illness records, written programs, safety committee operations, workplace hazards, the safety and health program, industrial hygiene sampling, and ergonomic videotaping as needed. Comprehensive consultations can be safety or health which include a written report with findings, recommendations, comments on their safety and health management system, and the guidance necessary to resolve the issues identified. Comprehensive consultation should be an onsite activity which includes employee engagement through interviews and informal conversation with employees and management as a method of evaluating the safety and health management culture. Keep your manager informed of any complex comprehensive consultations or when there is a need to send two or more consultants.

### SHARP Action Planning Consultation

Following a comprehensive SHARP evaluation, the lead consultant follows with a specific consultation to guide the employer with their action plan for the upcoming year.

### Voluntary Protection Program (VPP)

All VPP consultations are to be coordinated by the SHARP/VPP program coordinator. VPP application reviews and onsite assistance do not include a written report, but are considered a specific consultation. VPP onsite reviews are considered a specific consultation and do include a written report that is co-authored by the onsite review team. The report will be loaded into the VPP data system, instead of ORCA.

Existing VPP sites' requests for consultations will be evaluated by managers on a case-by- case basis, looking at the reasons for the request, what the site has done to address the issues, and the resources of the site to address the issue themselves. Oregon OSHA's expectation of a VPP site is that they are able to address safety and health issues and generally do not depend on Oregon OSHA consultation for assistance.

## Specific Consultations

Specific consultations provide an assessment of specific work conditions of an operation, specific equipment, machines, processes or hazards. There could be just one or multiple items addressed during a specific consultation – it could be something new or unusual that requires research. An assessment of appropriate elements of the employers' safety and health management systems should be addressed as well.

### Specific Program Reviews

This type of consultation may follow a comprehensive consultation where programs were found to be deficient and additional assistance is needed. This may also come in as a specific request from an employer to evaluate a single program, or a few programs the employer may be required to have in order to be in compliance with Oregon OSHA rules.

## Safety and Health Management Consultation

A safety and health program evaluation that is not part of a comprehensive consultation is considered a specific consultation. This includes return visits to clients working towards SHARP or safety and health program evaluations.

## Agricultural Labor Housing (ALH) Consultations

Please see Appendix H in this guide for detailed guidance regarding how to conduct ALH consultations. Here are the main topics covered in Appendix H:

Type of consultative activities for ALH

Priority of services 45 days for regular registration 30 days for H2A

Difference between substantial compliance and full compliance

Clear deferral expectations

Clear letter directions with who gets cc on #3

ALH operators typically request a consultation for one of five reasons:

1. The operator wants a normal hazard assessment or comprehensive consultation.
2. The employer received Farm Worker Housing Tax Credits and is required to have a pre-occupancy consultation.
3. The employer is registering housing for the first time (must be conducted by a state-funded consultant only).
4. The employer is applying to the state Employment Department for workers (H2A).
5. The employer is fulfilling requirements of the Migrant Seasonal Worker Protection Act (MSWPA).

If you are taking the request for an ALH pre-occupancy inspection, document the reason for the request in the additional information field in the database. (See special instructions for agriculture labor housing consultations in [Appendix H – Agricultural Labor Housing](#).)

## Follow-Up Consultations

This type of specific consultation is conducted when Oregon OSHA visits an employer to assist or verify results from a previous consultation. This may be to verify that serious hazards were abated effectively.

A follow up is to identify the correction of serious hazards and the documentation needs to be done on the previous consultation record. New hazards identified during a follow up consultation needs to be entered on the follow up consultation file.

## Process Safety Management

Consultations conducted to address any one of the process safety management subparts are considered specific. If all elements of PSM are addressed, it is considered comprehensive.

## Maritime consultations: Shipyards, Ports and Cities. Div2 vs 29 CFR 1915.

Only authorized staff that are trained can do the maritime consultations, based on managers approval.

- In Oregon most Ports Authorities are governed by municipalities, such as city, county or regional governments. Because Federal OSHA does not have jurisdiction over public-sector employees, these public sector employers fall under Oregon OSHA jurisdiction and the Division 2 General Industry Rules. Whether or not the Port itself has direction and control over the work activities and hazards on their property should be determined on a case-by-case basis. For this reason, potential multi-employer issues should be included in consultation activities with Port Authorities.
- Shipyard activities taking place on Port property are normally carried out by a number of different work groups, including but not limited to “nested” contractors whose company is hired by vessel or fleet owners, owners and employees of owners themselves who may be repairing, building or maintaining a vessel, or independent contractors, partnerships and other entities. In these cases, the work activity of shipyard work would fall under the jurisdiction of 29 CFR 1915.

## Compliance Assistance Consultations

### Compliance assistance

Information that is provided to the employer without a hazard assessment, typically these are called Pre-Jobs and Informational consultation (See below for more).

- **Informational Consultation**  
These are off-site contacts where the consultant spends one hour or more guiding an employer on safety and health program improvements. It includes an informal meeting where the consultant helps the employer plan, implement, and follow through on initiatives that impact the employer’s safety and health program. Merely providing code information does not constitute an informational consultation.
- **Pre-Job Assistance**  
A pre-job is where no employees are exposed to a hazard and therefore an enforcement deferral is not necessary. Pre-job assistance involves working with the employer before a job begins to assess those hazards that are likely to occur and developing a comprehensive safety plan for the duration of the job. It is primarily requested by employers on mobile job sites, such as logging and construction, although it is not limited to these industries. You should also encourage fixed-site employers to use this particular method of prevention when appropriate. Generate a written response for each of these types of pre-jobs.



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## TRAININGS & EDUCATION VS. TRAINING & OUTREACH

### Training & Education Consultations

A training & education consultation that is specific to an employer and their employees that had some hazard identification associated with it.

Training consultations teach employers and employees the skills, techniques, and methodologies that will assist them in establishing and maintaining safe and healthful workplace conditions.

### Training & Outreach Consultations

A training & outreach consultation may not have a specific employer and does not have any hazard identification with a specific place.

Training at this level would be to a group or associates not related to a specific consultation activities.

#### **Booth**

A training that is informational to a group of employers that have a fair or booth to manage and answer general questions.

#### **Speaking Engagements**

See definition under Training Consultation Unrelated.

#### **Presenting at Conferences or Association Meetings**

See definition under Training Consultation Unrelated.

Attending conferences for manning the booth will not be considered a consultation.

Attending trainings, conferences, or association meetings does not constitute a consultation.

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## REQUESTS AND SCHEDULING OF ONSITE CONSULTATIONS

### Intake

Onsite consultations are provided only at the request of the employer or the employer's authorized representative. Inform the employer that a comprehensive consultation will normally include a review of the establishment's injury and illness records, written programs, safety committee functions and operation, workplace hazards, and an informal review of the employer's safety and health management program. (Details for the intake process are outlined in Appendix A – Consultation Request and Intake Procedures.)

If comprehensive safety and health program assistance is requested, advise the employer of the importance of commitment to the process and that the process will be preceded by a hazard survey and initial program assessment.

If an indoor air quality consultation is requested, an industrial hygienist (IH4) consultant will complete the intake (see [Program Directive A-252](#) for additional information regarding assessing requests for assistance with indoor air quality issues).

At the time of the request, advise the employer not to wait until the consultative visit before correcting or precluding employee exposure to know hazards or risks. Advise the employer how to access our website for helpful material they can review in the interim. Discuss with your manager if there is a need to expedite the request. In the interim send any necessary health and safety code material and self inspections checklists.

During the request, ask if the employer is actively under enforcement. If under enforcement, or a pending appeal, their request will be placed on the backlog, and Oregon OSHA consultation cannot assist them until the enforcement issues are settled.

## Request & Scheduling Procedure

An intake must be completed for every consultation request for service from different disciplines, or for service at different physical addresses. Enter requests in the database as you talk to the employer, if possible, or use Appendix A. Generally, the intakes are reviewed by a field manager prior to any visit from Oregon OSHA.

For self-assignments from the unassigned list, make sure it is within your area of expertise and your geographical area. Discuss it with your manager if it is outside of your geographical area.

- Prior to contacting an employer to schedule a visit, self-assign the intake or have the manager assign it in the database by entering their identification number in the consultant identification field.
- Do not self-assign a consultation unless you are able to conduct the consultation within one month, pending the employer's availability. Otherwise keep the request on the backlog.
- Manage your backlog and data base (ORCA) entries so that it accurately represents the status of the consult. Ensure new information and/or details regarding correspondence with the employer is entered into the Contact Notes section of ORCA within 2 business days from when information was obtained. Keeping this information current ensures we are appropriately applying enforcement deferrals and are able to provide updated information when necessary. (See Response Time below)
- When scheduling consultations, make every attempt to schedule enough time or consecutive days to complete the visit.
- Contact the employer to set a date for the onsite visit. If the employer cannot schedule the consultation within the next 30-60 days, or the consultation is delayed due to enforcement activity, put it on delay and submit it for the manager to determine the next step. Consultants should attempt to set a date or an approximate timeframe for the future onsite visit.

**Note:** Enforcement delay means that the employer is under enforcement.

- Employer delay means that the employer is not able to schedule services within a 60 day window. Official delay means that there is a known event being scheduled in advance, such as VPP, SHARP, and trainings.

- A note must be made in the “contact notes” tab in the consultation database with the specifics of the delay, including the date or approximate timeframe for scheduling the onsite visit.
- Delayed consultations should be tracked by managers to ensure prompt service once the forecast time is reached. The manager may request the process for withdrawal be initiated for delayed requests that the employer is unable to schedule.
- Intakes that are not assigned within 7 days of the initial request will be reviewed by the managers.

## Response Time

The goal is to have intakes scheduled for a consultation within seven calendar days. If they haven't been assigned within 7 days, field managers may direct assign. The goal is to close the consultation within 30 working days.

If you use the Appendix A form for intake request, enter the information in the data base (ORCA) that same day or the next business day. Onsite intakes need to be entered into the system within 2 business days.

Promptly send a confirmation letter or email to notify the employer that the request was received, explain the assignment process, and describe what to expect from a consultation. Encourage the employer to have a safety committee member attend the consultation to help improve the hazard recognition skills of the committee.

The goal from initial intake to completion is within a 30 day period. Individual consultant expectations are set by their manager.

The response time expectations are:

- Intake to approval and on the unassigned list, within 3 days.
- Approved intake to assignment and to attempted scheduling, within 7 days.
- Assign to open within 30 days.
- Open to close should normally be the same day. A closing conference should be conducted with an employer/employee representative(s) that provides the employer with a general idea of the hazards that were identified during the consultation and the potential priority for correction and when the report is expected to be provided to them. Just because there is a closing conference doesn't mean that the consultation is completed. Monitoring and sampling may be needed before a completion and there can be a second closing to relay the results. Reviewing programs off site may add an additional day or two before completion.
- Close to report should be 10 calendar days or less.

Exceptions to the above expectations need to be discussed with your manager.

## Priority/Scheduling

Our goal is to assign and schedule consultations within 7 days.

This priority system was established to provide guidance when the number of requests for our services exceeds our ability to assign and schedule consults within 7 days.

The priority system establishes a numerical value for each intake based on six criteria: type of industry, hazard classification, company size, previous consultation services, local emphases/outreach, and marketing efforts. The values are then added together providing a total priority score (see Priority Scoring Details tab in ORCA). The total score is then compared to the consultation intake prioritization table.

**Table 2 Consultation Intake Prioritization Table**

<b>Score Range</b>	<b>ORCA Priority</b>	
	Expedite	With justification
12-16	High	
7-11	Normal	
1-6	Low	
	Delay	

## Withdrawal of Request

In order for a consultation request to be withdrawn, three documented attempts must be made within 15 days. If contact cannot be made with the employer after three attempts, the consultation request should be forwarded to the manager for withdrawal approval. Once approved, send a withdrawal letter, informing the employer their request will be removed from the unassigned list if no response is received within 10 days.

**Note:** Situations that do not lend themselves to the above procedures will be evaluated on a case- by-case basis by the consultation services management team. Prior management approval must be obtained if the above procedures cannot be followed.

**Note:** Admin staff can help with the scheduling and rescheduling of employers when cancelations occur.)

# COUNTY MAP

Counties are divided among consultation field offices as follows:

**Portland Field Office**

Clackamas, Clatsop, Columbia, Hood River, Multnomah, Washington

**Salem Field Office**

Benton, Lincoln, Linn, Marion, Polk, Tillamook, Yamhill, Clackamas (shared with PFO)

**Eugene Field Office**

Coos, Douglas, Lane

**Pendleton Field Office**

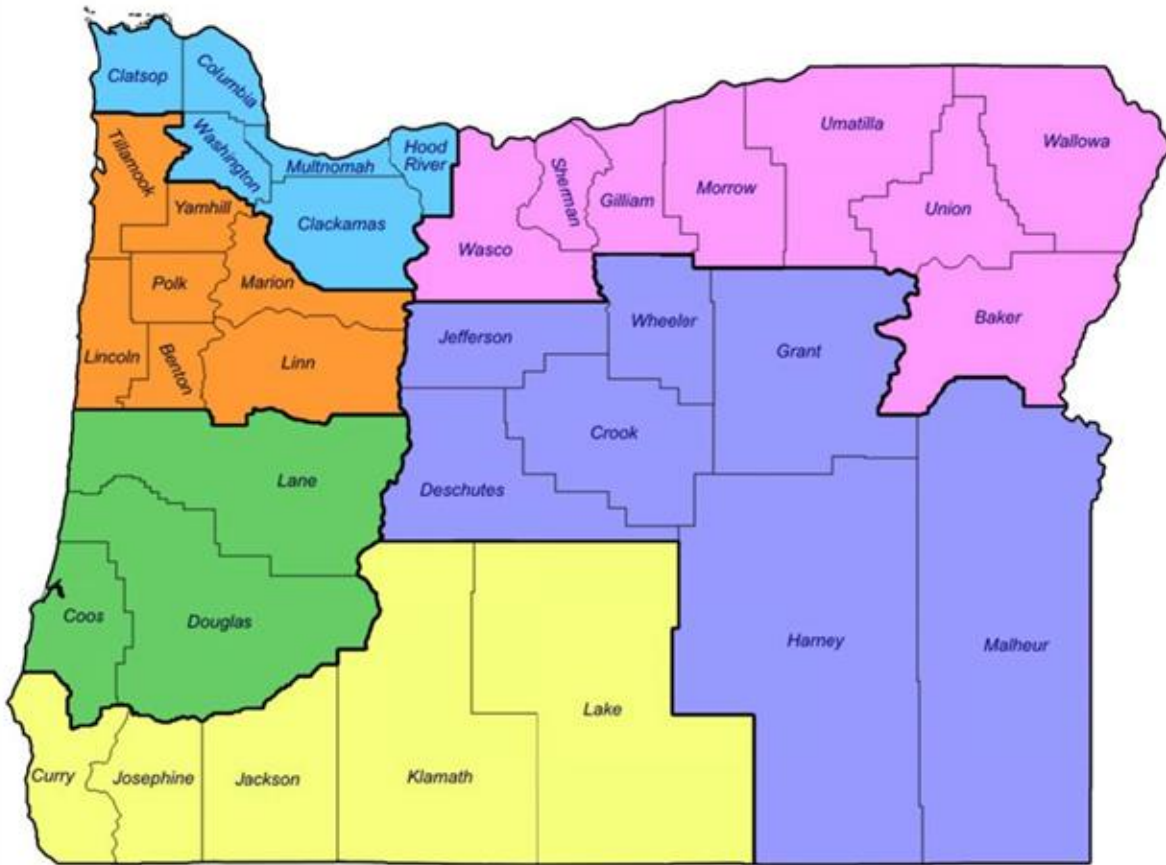
Baker, Gilliam, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco

**Bend Field Office**

Crook, Deschutes, Grant, Harney, Jefferson, Malheur, Wheeler

**Medford Field Office**

Curry, Jackson, Josephine, Klamath, Lake



- 1. Portland: Clackamas, Clatsop, Columbia, Hood River, Multnomah, Washington
- 3. Salem: Benton, Lincoln, Marion, Linn, Polk, Tillamook, Yamhill
- 4. Eugene: Coos, Douglas, Lane
- 5. Bend: Crook, Deschutes, Grant, Harney, Jefferson, Malheur, Wheeler
- 6. Medford: Curry, Jackson, Josephine, Klamath, Lake
- 5. Pendleton: Baker, Gilliam, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco

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# CONDUCT OF A VISIT

## Preparation

Prior to the visit, become familiar with as many factors concerning the establishment's operation as possible. Review information from the intake, literature on safety and health factors in similar operations, and all applicable codes and standards.

Review past injury records, available workers' compensation records, sampling data, any previous compliance or consultative visit reports, and site-specific workers' compensation data available on the query screens provided in the data system. The existence of any of the following at the establishment could, under the discretion of the consultation manager, preclude a consultation: an open inspection, pending or open citation under appeal; a willful citation in the last 12 months; a work-related fatality in the last 12 months; any Whistleblower/BOLI complaints or the establishment being in the severe violator enforcement program.

Prior to going onsite, determine if the employer is self-insured. Self-insured employers must be notified during the opening conference of the requirements specific to them as written in [OAR 437-001-1060](#).

Prior to the consultation, ensure that all necessary technical and personal protective equipment is available and functioning properly.

## Team Consultations

Each employer who has requested a multi-discipline consultation (health, safety, PSM & ergo) will be a likely candidate for a team consultation. Schedule team consultations periodically to share consultation skills and to evaluate each other's application of these operating procedures.

## Opening

During the opening meeting, explain to employers that Oregon OSHA considers all information gathered during the consultation and contained in the report as confidential. For their protection, they can sign a statement indicating their desire for the information to remain confidential. It should be explained that while this is no guarantee, it is designed to afford them further protection in the event of a legal challenge for the information. The employer's signature is completely voluntary and for their own protection from disclosure. (See Appendix D – Opening Checklists)

It is important to identify what PPE is required for the consultation.

Use the opening/closing checklist (otherwise known as the Confidentiality Form) to establish the scope of the consultation and to discuss the following:

- Oregon OSHA, our mission, and the general process of a consultation.
- The relationship between consultation and enforcement activity, including the inspection deferral. (See section Relationship to Enforcement Activity.) Assure employers that under no circumstances is information that we gather provided to the Oregon OSHA Enforcement section. Verify with the employer that they are not under enforcement activity.



- The importance of a safety and health program and that a review of the existing program is included in a comprehensive consultation.
- The employer's obligations to protect employees in the event that hazards are identified. Imminent danger situations could result in either death or serious injury. Inform the employer that they must take immediate action to eliminate employee exposure to such hazards. If the employer fails to take the necessary action, attempt to notify the affected employees and notify his/her local field consultation manager.
  - The field consultation manager shall notify the manager of consultation and outreach, who shall then notify the company of their obligation to correct the problem.
- The importance of employee participation in the consultation process, including employee interviews, participation in the walk-around, and sharing the final report. Confer with individual employees during the course of the visit to identify and judge the nature and extent of particular hazards and to evaluate the employer's safety and health program. (The employer must agree to permit employee interviews before the consultation can proceed.)
- Employer obligations under the 21(d) program if the consultant is funded under the 21(d) grant, and the obligation to correct serious hazards identified for public entities.
- Confidentiality of trade secrets that might be revealed during the visit.

## Assessing Safety and Health Program Effectiveness

Assessing the effectiveness of an employer's safety and health program is accomplished through reviewing records, interviewing employees and supervisors, and examining site conditions.

### Records Review

The onsite records review should include a comprehensive review of safety committee records, incident and accident reports, injury and illness records, written safety and health programs, policies and procedures. Gather the information needed to compute the company's DART rate and compare it to the industry average.

### Employee and Supervisor Interviews

Interviewing randomly selected employees and supervisors at all levels of an organization is critical to a comprehensive assessment. These conversations can be a good indication of the effectiveness of the overall program. Discussions should include issues such as how employees are protected from existing hazards, how hazards are reported, how reported hazards are addressed, and where to go in an emergency.

### Site Condition Evaluation

An evaluation of the overall condition of the workplace can reveal existing hazards that are indications of the effectiveness of the existing safety and health management system. Analyze the root cause of identified hazards to identify the weakness in the system that allowed the hazards to be uncontrolled. Explain during the consultation, and in the written report when

appropriate, how the hazard relates to the absence or deficiency of one or more safety and health program elements.

Evaluate worksites during other shifts (swing, graveyard, etc.) to provide the employer a true perspective of the potential hazards.

Encourage the employer to inform affected employees of identified hazards, establish an action plan for correction, and notify employees of correction. Technical assistance on the correction of identified safety and health hazards may be provided to employers during and after the onsite visit. Advise employers of other assistance available to them, but avoid recommending a specific provider. Provide additional correction strategies where possible and within applicable Oregon OSHA standards.

When a code related hazard or program deficiency is identified in the workplace, indicate to the employer whether the situation would be classified as a "SERIOUS" or "OTHER THAN SERIOUS" item. Make the determination of "SERIOUS" and "OTHER THAN SERIOUS" items according to OAR [437-001-0140](#).

## Closing Meeting

The closing meeting will normally be conducted on the last day onsite. The purpose of the closing meeting is to review identified hazards and deficiencies and to encourage the employer to continue working toward self-sufficiency in safety and health. Stress the importance of integrating a safety and health program into daily business activities and, where appropriate, discuss the results of the Safety and Health Program Assessment.

Discuss the consultation report during the closing meeting. Also discuss the importance of action planning and other services provided by Oregon OSHA, such as training opportunities, workshops, and referrals.

Use the consultation checklist to ensure that the above items are not overlooked. (See Appendix D – Opening Checklists)

**Close Date:** The close date of the consultation is the date of the closing meeting as described above. The close date of a consultation with sampling that required analysis may be the date you contact the employer with the results. Once you receive the sampling results, contact employers as soon as possible (generally within five working days). Don't delay completing the report if you can't contact the employer timely.

## Hazard Entry

Entry of hazards identified on site into ORCA is required for every consult, as is establishing the appropriate severity (Serious versus Other than Serious). See the FIRM language [Field Inspection Reference Manual \(FIRM\)](#) regarding severity determination, and use this to guide how you categorize the severity of hazards you identify on site.

**Serious Hazard Correction for 21d and 23g activities:** The employer must correct (eliminate, control) all serious hazards in accordance with the mutually agreed upon hazard correction due date(s) or any extensions, and provide the Consultant with documentation of the actions taken to correct the hazards.



## Reports

A report shall be written for each consultation and delivered (email, fax, mail) to the employer within 10 calendar days following the close date. The report is required to be generated in the ORCA system and follow these general formats. (See Appendix F – Report Format Guides) Consultation reports will not be provided to enforcement. Advise your manager if circumstances prevent you from completing the report timely.

You are responsible for providing a professionally written, technically accurate report for each consultation. You should review each report to assure all references are correct and to check for formatting and grammatical errors. All information must be consistent with section procedures and Oregon OSHA interpretations. Peer review is considered a valuable learning tool in the consultation program – ask another consultant to review your reports.

The field consultation manager will review all reports for 21d and 23g activities. The manager will also review the other reports as needed or assure that they have been reviewed to assess overall quality before they are sent. In the absence of the manager, reports may be e-mailed to other field office managers or a lead worker for review depending on the direction of the local manager.

As soon as you complete the report, update and verify all applicable information in the database. A customer survey is automatically sent 7 days after the report by ORCA.

When laboratory analysis is necessary, an industrial hygienist may elect to send a preliminary report to the employer prior to receiving the laboratory results if a significant number of hazards or serious issues were identified. A report date should not be entered into the database, however, until a final report is issued and the results of all sampling have been received. The close date will be the last contact, whether by telephone or in person, that is made with the employer.

The consultation opening and closing checklists used during the consultation must be filed with each report.

## Extensions for Correction of Serious Hazards:

An employer may request an extension of the time frame established for the correction of serious and imminent danger hazards identified in the List of Hazards. This extension shall only be granted when the employer has met all of the following criteria:

- demonstrated that a good faith effort has been made to correct the hazard within the established time frame,
- shown evidence that hazard correction has not been completed because of factors beyond the employer's reasonable control, and
- shown evidence that the employer is taking all available interim steps to protect affected employees from the hazard during the hazard correction period. Extensions to hazard correction due date(s) will be approved by the Field consultation manager for the shortest reasonable period of time. The Consultant must ensure that all extensions of hazard correction due dates are documented promptly and accurately in ORCA to maintain accurate records.

Requests for extensions must:

- Be in writing. If the extension was initially requested by phone, a confirmation of the request must be received either via fax, postal or electronic mail.
- Include all the steps taken by the employer to correct the hazard and the dates of such actions.
- Include the date that hazard correction will be completed.
- State the specific reason(s) why the hazard(s) has not been corrected.
- Describe the interim protection measures implemented by the employer to prevent employees from being exposed to the hazard.

Whenever an extension to a hazard correction due date(s) is granted, a new List of Hazards must be prepared by the Consultation program indicating the hazards granted an extension and the revised hazard correction due dates. Employers must prominently post the new List of Hazards for a minimum of three (3) working days or until the hazards are corrected, whichever is later. Previously corrected hazards do not have to be included in the new list.

For any hazard correction due date, whether initial or extended, of more than 90 calendar days, the Consultation program must require the employer to submit a Protection Plan of Action for each serious or imminent danger hazard (see below).

## Protection Plan of Action: Long Term Abatement

In circumstances where a consultant determines that an identified serious hazard(s) requires a complex hazard correction that may take more than 90 calendar days to implement, the consultant will coordinate with the employer to develop an action plan. The consultant will discuss the Protection Plan of Action with their manager and the employer during the closing conference.

The purpose of developing a Protection Plan of Action is to help the employer with the long term correction of serious hazards. If, during the initial consultation, it is determined that long term abatement will be needed, establish a plan with the employer and document interim protective measures before the closing conference. Provide the employer with the agreed upon plan as an attachment to the consultation report. All of these activities are covered under the initial consultation number. If a Protection Plan of Action is determined to be appropriate after the initial abatement period or the employer notifies the consultant that more time is needed to abate the hazard(s) a follow-up consultation will be conducted with the employer and the Protection Plan of Action will be developed following the same process as outlined above. The plan must address each separately identified hazard. The employer will provide written periodic progress reports on the status of the hazard correction process to the consultant. The frequency of the reports shall be determined by the consultant and their manager, but shall not be less than quarterly. This multi-step process for a Protection Plan of Action can be tracked in ORCA and OIS.

The plan, where appropriate, must, provide the following information for each hazard:

- Identify the hazard, outline the anticipated long-term hazard correction procedures – steps to be taken by the employer to correct a hazard, and the dates of such actions (i.e., milestones or schedule for hazard correction); and

- Include information regarding how affected employees will be protected from the hazard or hazardous condition in the interim, until hazard correction is completed.

## Documentation Required to be Uploaded to ORCA

Service Type	Documentation Required
Comprehensive & Specific (on site)	<ul style="list-style-type: none"> <li>• Confidentiality Form</li> <li>• Field Notes (including pictures)</li> <li>• Confidential Report</li> <li>• Hazard Correction Documentation*</li> </ul>
Specific (virtual)	<ul style="list-style-type: none"> <li>• Confidentiality Form</li> <li>• Confidential Report</li> </ul>
Training (for specific employer)	<ul style="list-style-type: none"> <li>• Close-out email or letter</li> </ul>

\* For consults where the correction of serious hazards is required (e.g. 21(d), 23(g), Challenge Program); can include an email, a completed hazard table, or other written confirmation that the hazard(s) has been abated

## What is Required in a Public Entity & 21(d) Report

Requirement	Example/Description	ORCA Component
Worksite Description	Briefly describe the worksite and the work activities the employer engages in	N/A (this information should be in the first two paragraphs of the report)
What Service was Requested	Identify the type of service the employer requested  (comprehensive, specific, or training),	N/A (this information should be in the first two paragraphs of the report)
General Summary of Consult	Explain why the employer requested the consult, provide a brief description of what happened during the consult	N/A (this information should be in the first two paragraphs of the report)
DART Rate Analysis & Comparison to National Average	Use the 300 logs from the previous year to calculate the DART rate; compare to the national average and put this comparison in your report	Consultation Detail Tab

Requirement	Example/Description	ORCA Component
TRC Rate Analysis & Comparison to National Average	Use the 300 logs from the previous year to calculate the TRC; compare to the national average and put this comparison in your report	N/A
Safety and Health Management Analysis	<p>At least one element of safety and health management discussed in the report that is specific to the employer (not standard language).</p> <p>Ex: Discuss employee involvement in the safety committee, safety training of new employees, resources management has devoted to worksite safety, opportunities for improvement in these or other S/H management areas, etc.</p>	S/H Assessment Tab

## Oregon OSHA’s plan for closing open Public employer’s consultation activities

Oregon OSHA currently has public employers with serious hazards that do not have documentation of correction. Several factors contribute to this issue and are listed below. Oregon OSHA’s plan is to administratively close each hazard after attempting to verify each hazard correction. Failure to close these open consultations will result in them being carried forward year after year and will likely to continue to grow if there isn’t an administrative close procedure. This is the cleanest way we can see to address this issue for activities for public employers that do not get back to us with abatement verification. Our hope is that moving forward these employers will voluntarily correct serious hazards and that staff will know how to properly enter those corrections into ORCA and have the files transferred to OIS.

### Contributing factors:

- Oregon OSHA does not currently have the authority to require abatement of hazards identified during consultative services under normal service activities. Oregon OSHA started a rule making process to address this late in 2020, but that effort has been stalled due to COVID-19 related rule activities. Oregon OSHA intends to continue pursuing rule-making activities to address this issue when other high priority rule making activities are completed.

### Background:

The Oregon Safe employment act Chapter 654 under 654.090 Occupational safety and health activities; voluntary compliance; rules; consultative services, (3) Provide consultative services for employers on safety and health matters and prescribe procedures which will permit any employer to request a special inspection or

investigation, focused on specific problems or hazards in the place of employment of the employer or to request assistance in developing a plan to correct such problems or hazards, which will not directly result in a citation and civil penalty.

- Oregon OSHA's consultation data system, ORCA, was not completely updated to allow for the tracking of the correction of serious hazards for public employers, and the data transfer to OIS was not finalized until February 2021.
- Consultation staff training on ORCA data entry for Public employers has not been completed.

Oregon OSHA's proposal is to administratively close the hazards that are in OIS for public employers only, by updating our ORCA data system and sending the updated files to OIS. The following is our tentative procedure for accomplishing this.

### **Protocol to administratively close Public employer hazards:**

Before a consultation is officially completed, Administrative staff, will look to see if hazards are abated and notify the manager if hazards are still uncorrected.

Administrative staff will Identify the uncorrected hazards by running the uncorrected hazards report in ORCA for public employers.

Cross reference the OIS data with ORCA data to identify the correct consultative activities. (Currently you have to cross reference Oregon TK numbers in OIS to verify the correct consultative activities.)

Managers or Administrative staff will contact consultant to verify that ORCA data is correct and that all correspondence with the employer is in the data system. This may include corrective actions.

If additional data is available from the consultant, it will be uploaded into ORCA and the file set to resend to OIS as appropriate.

If no additional information is available about the hazard being corrected, the consultant will administratively close each serious hazard for that public employer in ORCA. The consultant will notify the manager with the following:

- The report number
- Close date will be the used as the Completion Date for that hazard.
- The Verify/Refer Date will be the date the consultant administratively closed the hazard.
- The following will be entered in the corrective action section of the hazard tab: *Oregon OHSA has administratively closed this hazard. At the time of this consultation activity, Oregon OSHA did not have the authority to require public employers to correct serious hazards.*
- The consultant adds a comment on the Contact Notes tab stating that the consultation and all serious hazards have been administratively closed.
- The consultant will ensure that the record is set to send to OIS once the above has been entered for all serious hazards.

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## HAZARD RESOLUTION PROCESS

An employer has the right to disagree with the hazard correction due date(s), severity classification of the hazard, or any other substantive findings of the Written Report, may within thirty (30) working days of receipt of the Written Report request a review of the Hazard Correction Schedule and Written Report Findings by the Consultation Program Manager. The review will include a complete employer file review, interview with the consultant and may include technical and policy staff while maintaining employer confidentiality.

An employer may request a Private Discussion with the Consultant. The employer has the right to request a private meeting with the consultant to discuss matters that he or she may wish not to discuss in the presence of the employee representative.

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## SAFETY AND HEALTH ACHIEVEMENT RECOGNITION PROGRAM (SHARP)

### Overview

SHARP is a recognition program that provides an incentive and road map for employers to work with their employees to find and correct hazards, to develop and implement effective safety and health programs, and to become self-sufficient in managing occupational safety and health. The overall goal of SHARP is to recognize employers for their achievements in workplace safety and health management and in reducing injuries and illnesses. A SHARP employer is one who has successfully incorporated safety and health management principles into their workplace.

Participation in the Oregon OSHA SHARP program does not diminish existing employer and employee rights and responsibilities under the Oregon Safe Employment Act.

The process of becoming certified as a SHARP company requires a thorough assessment of the employer's safety and health program. (Details of the SHARP program are outlined in Appendix M – SHARP Program Details)

### SHARP & Scheduled Inspection Deferrals

An employer who has reached second and subsequent year SHARP approval may be deferred from scheduled Oregon OSHA inspections. Inspection deferral is an acknowledgment by the agency that enforcement resources would be better utilized at worksites where employees may be at higher risks of injury and/or illness. SHARP deferrals are forwarded to the manager of enforcement from the manager of consultation and outreach. Deferrals are made on an annual basis and do not include imminent danger, fatality/catastrophe, accidents, complaints and referrals.



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## **SAFETY AND HEALTH PROGRAM ASSESSMENT (S&HPA THE TOOL USED FOR SHARPs)**

When SHARP was developed in the mid- 1990s, there aware seven key elements to an effective safety and health program: hazard anticipation and detection, hazard prevention and control, planning and evaluation, administration and supervision, safety and health training, management leadership, and employee participation. These elements corresponded with the Federal OSHA Safety and Health Program Assessment, Federal OSHA's Injury and Illness Prevention Program Management Guidelines issued in the Federal Register on January 26, 1989, as well as the loss prevention requirements of insurers and self-insured employers contained in OAR 437, Division 1. The OSHA Form 33 worksheet was revised for use in the SHARP process to include 58 attributes within 7 key elements to assess safety and health management systems. These key elements should form the basis of the consultant's onsite review and recommendations for change.

Between 2016 and 2018 Federal OSHA updated the 1989 Safety and Health Management Guidelines and developed the Recommended Practices for Safety and Health Programs. The core elements are management leadership, worker participation, hazard identification and assessment, hazard prevention and control, education and training, and program evaluation and improvement. An element on communication and coordination for host employers, contractors and staffing agencies was added to make seven core elements. The Form 33 worksheet was revised to have 47 attributes within 6 core elements, with the communication and coordination element to be assessed on any applicable attribute.

Both these S&HPA Worksheets were designed as a tool for use in assessing an employer's safety and health program to evaluate the effectiveness of that employer's safety and health management system. Oregon OSHA has started to transition to the new assessment tool with 47 attributes for all new SHARP participants. Employers who were in Oregon's SHARP program prior to January 2020, and all 21d Staff involved consultation will continue in the program until they graduate, (or in the case of the 21d staff OIS is updated) using the original assessment form with 58 attributes.

The goal of a consultation is to help the organization complete future prevention efforts independently. For employers with multiple locations, encourage the employer to include managers from other locations to attend one consultation at one location. Visits may be made to multiple locations or establishments; however, the employer should demonstrate a willingness to apply the knowledge gained during any consultation at other locations where appropriate.

The majority of comprehensive consultations should include a review and discussion of the employer's safety and health program. Use the Oregon OSHA Safety and Health Program Assessment (S&HPA) Worksheet for all SHARP assessments and when possible for non-SHARP . You can review the safety and health program during a specific consultation or as part of a comprehensive consultation.

When you use the Safety and Health Program Assessment (S&HPA) Worksheets, you must discuss elements and ratings (full or partial, Appendix K – Instructions for the Safety and Health Program Assessment Worksheets ( 58 and the 47)) during the closing meeting with top

management. Develop an action plan schedule at this meeting with the employer. Place the completed worksheet and explanation in the office file and in the report.

Appendix K. contains the original 58 attribute SHPA form used by Oregon Consultants from 1995 through 2018. This form will be used by 21(d) staff. All SHARP companies that were originally assessed with the 58 attribute form will be assessed with that form through their participation in SHARP. The 58 attribute form is projected to be phased out after 21(d) staff begin using the 47 attribute form and all SHARP employers using the 58 attribute form have graduated.

Appendix K.1. contains the modified 47 attribute SHPA form to be used for all new safety and health management assessments including SHARP. This 47 attribute SHPA form will gradually replace the 58 attribute form as less SHARP employers will who started the process use using the 58 attribute form each year moving forward. Graduate Oregon OSHA SHARP Program

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## RELATIONSHIP TO ENFORCEMENT ACTIVITY

### Confidentiality

Consultative activity by Oregon OSHA shall be separately administered and conducted independently of any enforcement activity per Oregon statute. The Consultation Services Section shall not inform the Enforcement Section of the results of any consultation activity.

If you observe an imminent danger situation at a location where consultation has not been invited, you need to do what you can to persuade the employer to correct it immediately. If you do not have an open consultation and you simply observe a condition, you can either stop and ask them to correct it (just as any safety and health professional might) or refer it to enforcement for immediate action. Notify the local field consultation manager. If a consultation manager is not available, notify the local field enforcement manager. Once back in the office, you may need to make a referral and submit it to the local enforcement office.

If an imminent danger situation is observed at a location where the employer has requested our services, advise the employer of the hazard and the need to take immediate action to eliminate employee exposure. If the employer fails to take the necessary action, notify the local field consultation manager. The field manager will inform the manager of consultation and outreach who will notify the company of their obligation to correct the problem. Please do NOT refer the situation to enforcement, but contact your field consultation manager and the State-wide Consultation manager of the situation.



## DEFERRAL GUIDE:

The following table outlines how the consultation deferral of enforcement activity is applied.

Enforcement Deferral Guide					
Consultation Activity		Enforcement Activity			
Industry Type	Deferral Time (in days from report sent date)	Imminent Danger, Accident Investigation, Complaint, Referral	Emphasis Program Inspection (no employer list generated)	Emphasis Program Inspection (employer list generated)	Comprehensive Inspections & Follow Ups
		Deferred?	Deferred?	Deferred?	Deferred?
General Industry	60	N	N	Y	Y
Construction	30	N	N	Y	Y
Agricultural Labor Housing	30	N	N	Y	Y
H2A	30	N	N	Y	Y
Agriculture (farm/fixed site)	60	N	N	Y	Y
Logging (fixed site)	60	N	N	Y	Y
Logging (mobile site)	30	N	N	Y	Y
Maritime	60	N	N	Y	Y
SHARP Activity	1 year for 2nd year SHARP and beyond	N	N	Y	Y
Challenge Program	1 year from receipt of commitment letter	N	N	Y	Y
Voluntary Protection Program (VPP)	3-5 years	N	N	Y	Y
On Site Activity, any industry	Deferral Granted (refer to industry type for deferral length)	N	N	Y	Y
Virtual Service, any industry	Deferral granted only if hazards are identified	N	N	Y	Y
Follow-Up Consults	Deferral granted only if new hazards are identified	N	N	Y	Y

## In Progress Consultations

All consultative visits are considered “in progress” from 7 days prior to the opening meeting through 60 days after the report is issued for fixed sites, 30 days for mobile job sites and agriculture labor housing sites. A consultation already in progress, with active contact notes within 30 days of last entry, has priority over scheduled compliance inspections. The employer may notify the compliance officer of the consultation in progress and request a delay of the inspection until after the consultation is completed.

Enforcement may ask the local field consultation manager if an employer is under consultation prior to driving a long distance to open an unannounced inspection. In this case, information may be given to enforcement regarding whether a consultation is in progress, but not about the consultation itself.

“In progress” status on construction and logging sites applies only to the employer that has requested the consultation. Other contractors working on the site must specifically request a consultation before being covered under an “in progress” consultation. If you receive such a request while onsite, follow the procedures in of this manual and enter the new request into the database.

SHARP consultations are considered “in progress” as defined above. Working toward SHARP or working on an action plan to fix problems in the management system is not a consultation “in progress” and does not qualify for deferral from inspection.

## In-Progress Compliance Inspections

Consultation activity should not take place at a site where any compliance inspection is in progress, unless compliance assistance is requested and with manager prior approval. A compliance inspection is considered to be “in progress” from the time a compliance officer seeks entry to the workplace until the closing (if no citations are issued), until all citations are paid (if citations are issued), or until the appeal is settled and signed. If a referral is made to another compliance officer, the inspection is considered “in progress” until that compliance officer completes his/her inspection.

A compliance inspection will also be considered “in progress” in cases where entry is refused until the inspection is conducted, the administrator determines that a warrant to obtain entry will not be sought, or the manager of enforcement determines that allowing a consultation to proceed is in the best interest of employee safety and health.

Maintain the requirement not to schedule a compliance inspection in response to a complaint based upon a posted List of Hazards at an establishment, unless the employer fails to meet its obligations described in 29 CFR 1908.6(f), or fails to provide interim protection for exposed employees (29 CFR 1908.6(e)(8)).

## Services After Enforcement Activity

Consultation will not normally provide abatement assistance after a compliance inspection. Exceptions may be made where the manager of enforcement and the manager of consultation

and outreach have determined it to be in the best interest of worker health and safety. This may occur where unique expertise is needed or in an extended long-term abatement process.

In the rare situation where consultative services occur when an enforcement action is not a final order, **do not** discuss, advise, or in any way become involved in any process, situation, or hazard that is still under citation. This will only occur under special arrangements and will be monitored by your supervisor and the compliance officer's supervisor.

## Special Compliance Inspections

The consultant shall normally cease an onsite consultative visit already in progress when one of the following types of compliance inspections is about to take place:

- Imminent danger investigation.
- Fatality, catastrophe or accident investigation.
- Complaint or referral investigation.
- Other critical inspections as determined by the administrator.

The consultation may be resumed upon completion of the compliance inspection and all related activities.

## Complaint Letters

Some employee complaints receive an enforcement letter. The letter generally advises the employer to take action and to report the steps taken. This form of complaint resolution may generate a request for a consultation. If this happens, take the following steps:

1. Inform the enforcement supervisor of the request.
2. Be aware that complaints can be generated by labor relations problems; therefore, deal only with safety and health issues.
3. Focus on working with the employer to quickly resolve the problem. Encourage the employer to openly communicate with employees about steps being taken to resolve the hazards.

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## INTERNAL QUALITY ASSURANCE PROGRAM:

The Internal Quality Assurance Program is how Oregon OSHA will provide reasonable assurance that the organizational objectives are being achieved in consultative program. In coordination with our Internal Training section we want to make sure that we have adequate training and supervision of our consultants.

## Elements of the IQAP

**Training and supervision** – The anticipated period of supervised training will vary based on the new consultants experience and training needs. Our Internal Training Team will keep track of the new hires training for approximately 2 years. Please see the Internal training courses for all

the trainings available. In addition to the required internal trainings, the Field manager will also look at the training of the new hire in the following areas:

- On the job evaluations or Accompanied Visit Evaluation, located in Appendix J
- Review of work products and data entry

**Communication to Employers** – Verbal and written communication to employers will be based on what is stated here in this guide, and any additional guidance will be used based on the employers needs.

**Program Management** – The consultation Program will be managed by the Statewide Consultation Manager through the use of:

- Clearly written and regularly communicated policies and procedures
- Use of data and other information to effectively manager the program
- Individual accountability
- Maintenance of program uniformity through regular communication, updates and meetings
- Promoting and marketing of consultation services to targeted employers and stakeholders
- Evaluating service through the surveys, random audits and reports to check for broad programmatic trends in series and delivery

*This concludes the body of The Guide – Appendices to follow*

# APPENDIX A – CONSULTATION REQUEST AND INTAKE PROCEDURES

The form and a list of questions and suggestions for the intake process. The most current version of the form is in the data base (ORCA).

## Intake Employer Questionnaire

Date: \_\_\_\_\_ (Please enter into ORCA on the same day)

Would you like the Consultation within the next 60 days?     No     Yes

**Enforcement activity:**    No     Yes

Field Office: \_\_\_\_\_ Request Date: \_\_\_\_\_

Legal Name/Owner: \_\_\_\_\_ Employer ID No.: \_\_\_\_\_

DBA: \_\_\_\_\_ Location: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Phone: \_\_\_\_\_

Title: \_\_\_\_\_ Cell/2nd No.: \_\_\_\_\_

Email: \_\_\_\_\_ Fax: \_\_\_\_\_

Mail Address: \_\_\_\_\_ County: \_\_\_\_\_

Site Address: \_\_\_\_\_ Nature of Business: \_\_\_\_\_

Source:

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Previous OR-OSHA Referral | <input type="checkbox"/> Website Conference PE | <input type="checkbox"/> Public Media Radio/TV |
| <input type="checkbox"/> Onsite Request            | <input type="checkbox"/> Workshop/Training     | <input type="checkbox"/> Cold Calls            |
| <input type="checkbox"/> Direct Mail               | <input type="checkbox"/> HB Letter             | <input type="checkbox"/> Other _____           |

No. of employees: \_\_\_\_\_ Private          Public          Tribal

**a) Type of Service Requested**

(See below Q's)

- S = Safety
- H = Health
- E = Ergonomic
- PSM = Process Safety Management

**b) Industry** (See below Q's)

- A = Agriculture
- C = Construction
- G = General Industry
- F = Forest/ Logging
- L = Ag Labor Housing

**c) Assistance Requested**

- C = Comprehensive
- S = Specific
- T = Training

Site SIC/NAICS

Related Consultation?          Report Number: \_\_\_\_\_          Settlement Agreement \_\_\_\_\_

Comments:

**Priority:**    Normal     Expedite

## Appendix A – Consultation Request and Intake Procedures

Listed here are some example questions to ask when taking an intake or making cold calls:

### General

- Have you ever had a consultation before?
- Why are you calling?
- Who is responsible or in charge of your S&H programs?
- Who will be attending the consultation? (Along with management, encourage them to have employee involvement during the consultation – SC, union, lead, etc.)
- What kind of processes do you have in place?
- What kind of departments do you have?
- What type of equipment do you have?
- How many buildings do you have? Square footage?
- What would you like to accomplish?
- Program review/walk through/both?

### Safety

- Construction activity?
- How many subs?
- What type of equipment?
- Phase of project?
- Phase duration for hazard of concern?

### Health

- Noise?
- Have you done previous sampling?
- Medical office?
- Hospital?
- Chemical handling?
- Lasers?
- Welding?

### Ergo

- Sprain and strain injuries?
- Physical material handling?
- Repetitive tasks?

### PSM

- What are your chemicals?
- Are you covered by the PSM standard?
- How much/What is the quantity?
- Do you submit EPA, RMP report?

### ALH

- Is your camp registered this year?
- Were you registered last year?
- Are you H2A?
- Have you made significant changes? Normal vs registered and do they need a letter of substantial compliance or full compliance for H2A or not at all.

## Types of Businesses that generally require *just* a Safety consultation or *just* an IH consultation:

### Safety Consultations

Grocery stores  
Auto shops  
Restaurants  
Various types of Retail Stores  
Motel/Hotels  
Gas stations  
Logging  
Trucking firms

### IH Consultations

Dentists Offices  
Medical Offices  
Health Clinics  
Barbers/Hair Dressers  
Nail Salons

**Types of Businesses that generally require both a Safety consultation and an IH consultation:**

Auto Body Shops  
Fire Departments  
Hospitals  
Nursing & Assisted Living Facilities  
Colleges/High Schools

**Safety First:**

Refer to health or ergo if necessary

Most construction projects (health is concrete, siding, coating, remodel of structure older than 1980)

Auto Repair Shops  
Machining Shops  
Grocery Stores  
Distribution Facilities  
Maritime (should talk them into health once onsite)  
Small to moderate size Food Manufacturing (safety should address use of chemicals for sanitation)

**Health First:**

Refer to safety or ergo if necessary

Auto Body Shops  
Health Care Clinics  
Dental Offices  
Assisted Living and Long Term Care  
Small Brewery

**Usually Need S&H**

Woodworking Facility (safety first due to amputation emphasis)  
Foundry  
Heavy Manufacturing  
Chemical manufacturing  
Dairy  
Semiconductor  
Water & Wastewater Treatment





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## APPENDIX B – CONFIRMATION LETTER

– Sent out automatically via email.

**SAMPLE: Wording will change according to discipline requested.**



**Oregon**

Kate Brown, Governor

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Department of Consumer and Business Services  
Oregon Occupational Safety & Health Division (Oregon OSHA)  
350 Winter Street NE | PO Box 14480 | Salem, OR 97309-0405  
Phone: 503-378-3272 | Toll Free: 1-800-922-2689 | Fax: 503-947-7461  
osha.oregon.gov

Re: Consultation Request No:

Thank you for requesting Oregon OSHA's consultative services. We are looking forward to visiting your worksite at to assist you with your efforts. An Oregon OSHA consultant will be calling you to arrange a mutually agreeable date and time to visit your worksite. Consultation requests are generally addressed in the order they are received. Our response time may vary as it is determined by the number and complexity of requests we receive.

Oregon OSHA strongly encourages employee participation in workplace safety and health activities including consultation visits. Employee participation in the consultation will increase the value of the consultation for your business and assist employees in increasing their hazard recognition skills.

We are looking forward to working with you to improve workplace safety and health for your employees. This location will be exempt from an Oregon OSHA **scheduled** enforcement inspection beginning **seven calendar days before** the on site consultation visit. If an Oregon OSHA enforcement inspection is in progress or has recently taken place at this site, your request may be delayed until the enforcement process has been completed.

If you have any questions, please feel free to call, or visit our website at <https://osha.oregon.gov> for additional information.

Field Consultation Manager  
Consultative Services Section

Portland Office  
(503) 229-6193

Salem Office  
(503) 373-7819

Eugene Office  
(541) 686-7913

Medford Office  
(541) 776-6016

Bend Office  
(541) 388-6068

Pendleton  
(541) 276-2353

Public Education  
(888) 292-5247 option 1

Resource Center  
(888) 922-2689

Technical Services  
(503) 378-3272



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## APPENDIX C – WITHDRAWAL LETTER

- Sent out automatically via email.

Date

Company Name Address  
City, State Zip

Re: Consultation Request No: 00-0000

(Cannot Contact Employer) The Oregon Occupational Safety and Health Division, Consultation Section, has attempted several times to contact you and arrange a date for an onsite visit without success. For this reason your request for a consultation will be removed from our pending list if we do not hear from you by xxx. In the future if you have a need for our services, call one of the following field offices:

or

(Per Employer Request) At your request, the Oregon Occupational Safety and Health Division, Consultation Section, has removed your name from our pending list for a consultation. In the future if you have a need for our services, call one of the following field offices:

We appreciate your interest in improving safety and health at your work place and encourage you to contact our offices again upon completion of the enforcement activity (if a citation was issued it must be paid or an appeal settled). Contact the office nearest you from the list below to request a consultation.

Portland	(503) 229-6193
Salem	(503) 373-7819
Eugene	(541) 686-7913
Bend	(541) 388-6068
Medford	(541) 776-6016
Pendleton	(541) 276-2353
Salem Central Office	(503) 378-3272 or Toll Free 1-800-922-2689

If you have questions or concerns regarding this withdrawal, contact me or visit our website at [osha.oregon.gov](http://osha.oregon.gov) for more information.

Field Consultation Manager  
Consultation Services Section  
Oregon OSHA (name of field office)  
Field office address  
Field office city  
Field office telephone number



# APPENDIX D – OPENING CHECKLISTS



Report No.: \_\_\_\_\_

Consultant: \_\_\_\_\_

Legal Name \_\_\_\_\_

DBA \_\_\_\_\_

## Initial Meeting

**Confidentiality:** The employer has requested, and Oregon OSHA has agreed, to hold all information associated with this consultation confidential to the extent provided for by law. (Employee exposure records must be shared with affected employees per OAR 437 Div. 2, 1910.1020) Yes \_\_\_ No \_\_\_

Employer or Authorized Representative:

Signature \_\_\_\_\_ Date \_\_\_\_\_

Title: \_\_\_\_\_

The parties agree that this agreement may be electronically signed. The parties agree that the electronic signatures appearing on this agreement are the same as handwritten signatures for the purposes of validity, enforceability, and admissibility.

Check to agree:

- \_\_\_ Name of Employer Representative
- \_\_\_ Name of Employee or Safety Committee Rep
- \_\_\_ Review the Purpose and Scope of Consultation
- \_\_\_ Explain Process (written programs, recordkeeping, hazard assessment walkthrough, safety committee, and safety and health management)
- \_\_\_ Employer’s Obligation to Protect Employees if Imminent Danger
- \_\_\_ Explain the Relationship between Enforcement and Consultation and Inspection Deferral
- \_\_\_ Confidentiality of Trade Secrets

## Closing Meeting

- \_\_\_ Participants
- \_\_\_ Observations and Recommendations
- \_\_\_ Safety & Health Management and Self Sufficiency
- \_\_\_ Action Planning
- \_\_\_ Oregon OSHA Services
- \_\_\_ Report and Consultation Evaluation Form

Comments: \_\_\_\_\_

\_\_\_\_\_

Appendix D – Opening Checklists

Report No.: \_\_\_\_\_

Consultant: \_\_\_\_\_

Legal Name: \_\_\_\_\_

DBA: \_\_\_\_\_



**Initial Meeting**

Is the employer under Enforcement? Yes \_\_\_ No \_\_\_

**Confidentiality:** The employer has requested, and Oregon OSHA has agreed, to hold all information associated with this consultation confidential to the extent provided for by law. (Employee exposure records must be shared with affected employees per OAR 437 Div. 2, 1910.1020) Yes \_\_\_ No \_\_\_

Employer or Authorized Representative:

Signature \_\_\_\_\_ Date \_\_\_\_\_

Name (print): \_\_\_\_\_

Title: \_\_\_\_\_

- \_\_\_ Name of Employer Representative
- \_\_\_ Name of Employee or Safety Committee Rep
- \_\_\_ Review the Mission, Purpose and Scope of Consultation
- \_\_\_ Explain Process (cost, written programs, recordkeeping, hazard assessment walkthrough, safety committee, and safety and health management)
- \_\_\_ Review Employer’s Obligations
  - a. Imminent Danger/Referral
  - b. Hazard Correction/Verification/Referral
  - c. Posting the List of Hazards
  - d. SHARP/VPP
- \_\_\_ Review Employer’s Rights
  - a. Modify Scope/Terminate Visit
  - b. Correction Schedule/Report Findings
  - c. Informing Enforcement
  - d. Private Discussion with Consultant

- \_\_\_ Explain the Relationship between Enforcement and Consultation and Inspection Deferral
- \_\_\_ Confidentiality of Trade Secrets

**Closing Meeting**

- \_\_\_ Participants
- \_\_\_ Observations, Recommendations, Abatement Dates, and Extension
- \_\_\_ Safety & Health Management and Self Sufficiency
- \_\_\_ Action Planning
- \_\_\_ Oregon OSHA Services
- \_\_\_ Report and Consultation Evaluation Form

Comments: \_\_\_\_\_

\_\_\_\_\_

## Information Request Form

Please have the information on this form available during the inspection. If sent in the mail or copied, the records will become part of the file.

This form should be sent to the ER a head of time to review and make sure available onsite

Date: \_\_\_\_\_ Report number: \_\_\_\_\_

Employer: \_\_\_\_\_

### Injury and Illness Records

- OSHA 300 Log / 300A form/ last 3yrs
- 801's
- Hours Worked
- Exempt by NAICS/Size

### Safety Committees or meetings

- Minutes

### Personal Protective Equipment

- Hazard Assessment

### First Aid

- Emergency Medical Plan
- Fire Evacuation Plan
- HazWOPER
- Emergency Response Plan
- Training Records

### Hazard Communication

- Written Program
- List of Chemicals
- SDS's

### Cranes and Hoists

- Inspection Records
- Operator Procedures
- Lifting Attachments
- Crane Operator Certification
- Rigging Qualification
- Signalperson Qualification

### Powered Industrial Trucks

- Inspection Records
- Maintenance Records
- Operator Training

### Powered Platform (Ext. Bldg. Maint.)

- Written Procedures for operation
- Plan for emergencies

### Self-Insured/ Group Insured

- Health and Safety Loss Prevention Program

### Health

- Air contaminants
- Sampling Records
- Medical Surveillance
- Asbestos
- Lead
- Lab/ Chemical Hygiene Plan

- Tuberculosis Protocol/screening

### Noise

- Hearing Conservation Program
- Audiometric Testing
- Noise Monitoring
- Feasibility Study
- Training Records

### Respiratory Protection

- Written Program
- Fit-Testing Records
- Medical Evaluation Records
- Training Records

### Bloodborne Pathogens

- Exposure Control Plan
- Hep B vaccine/declination statements
- Sharps Injury Log

### Confined Space

- Written Plan
- Entry Records
- Instrument records & calibration
- Training Records

### Lock Out/Tag Out [LOTO]

- Energy Control Procedures
- Specific Equipment Audits/Annual Review
- Training Records

### Construction

- Flagger/ Traffic Control Training
- Aerial Lifts Training
- Fall Protection Training
- Scaffold Training
- Excavations



Department of  
Consumer and  
Business Services

**Oregon OSHA Consultation  
Onsite Request-Initial Meeting Form**

Report # \_\_\_\_\_

Consultant \_\_\_\_\_

Legal Name			
DBA			
Mailing Address			
Recent Enforcement Activity?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Contact Name			Title
Contact Phone Number			
Contact Email Address			
Site Address			
Number of Employees at Site			

<p><b>Confidentiality:</b> The employer has requested and Oregon OSHA has agreed to hold all information associated with this consultation confidential to the extent provided for by law.</p>		<p><b>Note:</b> Employee exposure records must be shared with affected employees per 29 CFR 1910.1020</p>	
<input type="checkbox"/> Yes <input type="checkbox"/> No Date _____	Employer or Authorized Representative Print Name _____ Signature _____ Title _____		

**Consultation Opening**

Name of employer representative \_\_\_\_\_

Name of employee or safety committee representative \_\_\_\_\_

- Review the purpose and scope of consultation
- Explain consultation process  
Written programs, recordkeeping, hazard assessment, safety committee and safety and health mgmt.
- Employer’s obligation to protect employees if imminent danger
- Explain the relationship between enforcement and consultation deferral
- Confidentiality of Trade Secrets

**Consultation Closing**

Participants \_\_\_\_\_

Observations and Recommendations \_\_\_\_\_

Safety & Health Management and Self Sufficiency \_\_\_\_\_



## Appendix D – Opening Checklists

### Action Planning

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- Oregon OSHA Services
- Report and Consultation Evaluation Form

### **Comments:**



# APPENDIX E – INSTRUCTIONS FOR COMPUTING INCIDENCE RATES

Instructions for computing incidence rates for an individual firm

Days Away, Restricted and/or Transfer Rates (DART) and Total Injury & Illness Rates (TIIR)

The incidence rates for an individual establishment or firm may be calculated by using the same formula used to calculate industry-wide incidence rates from the annual Occupational Injury and Illness Survey. The incidence rates (IR) are calculated for numbers of injuries and/or illnesses, or for cases with days away and/or job transfer or restriction, per 100 workers per year. The rate is calculated as:

$$IR = (N \times 200,000) \div EH \quad \text{or} \quad (N \div EH) \times (200,000) = IR$$

Where: IR = Incidence Rate (either DART or TIIR)

N = Number of cases with days away and/or job transfer or restriction or number of cases with injuries/illnesses

EH = Total hours worked by all employees during the calendar year

200,000 = Base for 100 full-time equivalent workers<sup>1</sup> (working 40 hours per week, 50 weeks per year)

The formulas in the following table may be used to determine the Days Away, Restricted, and/or Transfer (DART) Rate, or to determine the total injury and illness rate (TIIR):

Incident Rate	OSHA 300 Log Column Entry	Calculations
Days Away, Restricted, or Transferred	H _____	_____ (cases)
DART Rate	+ I _____	× 200,000
Was Lost Workday Injury and Illness Rate (LWCDIR)	Total = _____ (cases)	÷ _____ (hours)
		= _____ (rate)
Total Injury & Illness Rate	G _____	_____ (cases)
TIIR Rate	+ H _____	× 200,000
<b>Note:</b> Consultants will not normally calculate TIIR unless specifically requested by the employer, or when it is for VPP purposes.	+ I _____	÷ _____ (hours)
	+ J _____	= _____ (rate)
	Total = _____ (cases)	

<sup>1</sup> Employee hours (EH) are the total number of hours actually worked during the year by all employees from payroll or other time records. The hours worked figure should not include any non work time even though paid, such as vacation, sick leave, holidays, etc. (If actual hours worked are not available for employees paid on commission, salary, by the mile, etc., hours worked may be estimated on the basis of scheduled hours or 8 hours per workday.)

## Instructions for comparing incidence rates for an individual firm against published data

For purposes of SHARP evaluation, the company DART rate for the most recently completed calendar year shall be calculated by the consultant. That calculated company rate shall be compared to the most recently published data for the industry.<sup>2</sup>

There is a three-year lag in this process. When the consultation takes place (this year), the consultant will calculate the DART rate for site's most recently completed calendar year (last year) and then compare that against the most recently published data (data from two years ago).

The Industry Rates are found in the "Incidence rates of nonfatal occupational injuries and illnesses by industry and case types. Oregon, (year)" This information can be found on the [Oregon OSHA SHARP website](#). The table in this link is updated annually in early January.

The consultant shall compare the calculated company DART rate to the rates published in the "Total" column under "Cases with days away from work, job transfer, or restriction." If a comparison is made of total injury and illness rates, the comparison will be made to the rates published in the "Total recordable cases" column.

The consultant shall compare the calculated company rate against the most current NAICS code published. First, determine if there's a matching six digit code, if there's none, look for a five digit code, if there's none, look for a four digit code, if there's none, look for a three digit code, if there's none, look for a two digit code. If there's not a two-digit code, locate the main category activity name that has no NAICS code and use those rates. If the six digit NAICS code is not published, refer to the Oregon OSHA NAICS Codes Selection Guidelines for instructions on determining the appropriate code to use.

Both the company DART rate and the industry average rate must be included in the SHARP Executive Summary. For more information on DART, Refer to Program Directive [A-249](#).

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<sup>2</sup> Yearly tables with Incidence rates of Nonfatal Occupational Injuries and Illnesses by Industry can be found at <https://osha.oregon.gov/pubs/reports/Pages/default.aspx> or <https://www.bls.gov/iif/oshstate.htm#OR-SOII> or <https://www.bls.gov/iif/oshsum.htm>

## Guidelines for Selecting NAICS/SIC Codes to Determine Nonfatal Occupational & Illness Industry Rates

When determining incidence rates of nonfatal occupational injuries and illnesses by industry and case types, use the most current information and tables available from the Bureau of Labor Statistics, U.S. Department of Labor, and from Oregon’s Department of Consumer and Business Services.

These tables are located online at:

- <https://www.bls.gov/iif/oshstate.htm#OR-SOII>
- <https://www.bls.gov/iif/oshsum.htm>
- <https://www.oregon.gov/dCBS/reports/protection/Pages/boli-statistics.aspx>

Please use only these tables to determine industrial rates for these years and future years.

**Note:** When determining a company’s industrial rate always use the table year that is two years prior to the SHARP award year. (Example: The calendar year award date is 2020, use the 2018 table.)

### Guidelines for selecting NAICS codes in Table 6.

Select the “Total” column under the heading, “Cases with days away from work, job transfer, or restriction.”

When the company’s six digit NAICS code is identical to the table 6 code simply select the corresponding industrial rate in the “Total” column.

When the company’s NAICS code is not identical to the table 6 code then select the appropriate NAICS code that covers the field of activities. First, determine if there’s a matching six digit code, if there’s none, determine if there’s a matching five digit code, if there’s none, look for a four digit code, if there’s none, look for a three digit code, if there’s none, look for a two digit code. If there’s not a two-digit code, locate the main category activity name that has no NAICS code and use those rates. Refer to the attached table 6 for the following examples.

1. A company’s NAICS is 236270. Since there is no matching six or five digit code, select the four digit code 2362.
2. A company’s NAICS code is 111510. Since there is no matching six or five digit code, and no 1115 four digit code, select the three digit code 111.
3. A company’s NAICS code is 235110. Since there is no matching six or five digit code, no four digit 2351, no three digit 235 code, select the two digit code 23.
4. A company’s NAICS code is 221110. Since there is no two digit 22 code in the NAICS code numeric order on page 1 of table 6, select the four digit code 2211 on page 5. In this case the NAIC code is not in numeric order by category.
5. A company’s NAICS code is 611620. The company is Tualatin Hills Park & Recreation. There is a 61 code under the “State government” classification, “Education Services” on page 5, and a 611 code under the “Local government” classification, “Educational services” on page 7. Select code 611 on page 7, since this organization is part of local government.



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## APPENDIX F – REPORT FORMAT GUIDES

These Report Format Guides are the Templates that are to be used in the ORCA System. Reports are required to be generated in the ORCA system. The IH sampling and Training Templates have yet to be a wizard in the system, but are expected to be uploaded with specific information.

### Comprehensive Report

Date

Name, Title  
Company Name  
Address  
City

RE: Consultation Report xx-xxxx

Dear Mr.:

Thank you for the opportunity to visit your workplace to conduct a comprehensive (safety, health, ergonomic) consultation on date.

*All sections below should be included in the written report.* If an employer does not have a required Oregon OSHA program, include a discussion in that section addressing the lack of a program as well as recommendations for implementation.

#### **General summary:**

Overview of the consultation visit including participants, special circumstances such as new operations or new management, challenges encountered, recommended referrals and other relevant information, such as number of serious and other than serious items found on the walk through.

#### **Safety and health management:**

Summary of the discussion on safety and health management specific to the company. Summary should include examples of deficient elements of their safety and health management program as reflected by hazards found.

#### **Written programs:**

General discussion of Oregon OSHA mandated programs and any other programs reviewed. Code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

**Record keeping / dart:**

Discussion of OSHA 300 log, 801, injuries, illness and any notable trends.

**Safety committee:**

General discussion on the company's safety committee operations. Any specific code related deficiencies should be addressed in the "Hazard Identification and Correction" section.

*The following paragraphs are standard language for all reports and their content should not be altered*

Attached you will find the "Hazard Identification and Correction" worksheets that list the hazards observed during the consultation. The observations and recommendations made in this report are designated as SERIOUS (S) or OTHER THAN SERIOUS (OTS) based upon probable severity if an injury or illness were to occur. SERIOUS hazards are those situations or conditions that could result in serious illness, physical harm or death. OTHER THAN SERIOUS hazards are those situations or conditions that could result in employee injury or illness of a less serious nature. These designations are intended to help you prioritize corrective action. You should develop an action plan to ensure prompt correction of these identified hazards.

Your company is exempt from a routine scheduled Oregon OSHA inspection at this location for (60 days or 30 days) from the date of this report. As mentioned during the consultation, this does not exempt your company from enforcement action in the event of an accident investigation, an employee complaint, referral, or the observance of an imminent danger.

During the consultative visit, I attempted to identify all the hazards. However, there may be some hazards that I did not see or identify. It remains the responsibility of the employer to ensure the safety and health of employees and to identify and correct all hazardous conditions or situations. This report cannot result in enforcement activity, nor can Oregon OSHA Enforcement use this report as a basis for citation.

Oregon OSHA does not endorse particular vendors or products. Any information provided in this report about a product or vendor should not be interpreted as an endorsement. Employers are encouraged to conduct their own research on products that will meet their specific needs.

Oregon OSHA values feedback from its customers on the services they received. Please take the time to complete and return the enclosed questionnaire in the postage-paid envelope provided. Thank you for requesting our assistance to improve safety and health in your workplace. Contact me if you have questions regarding occupational safety and health issues.

Signature block



## Specific Report

Date

Name , Title  
Company Name  
Address  
City

RE: Consultation Report xx-xxxx

Dear Mr.:

Thank you for the opportunity to visit your workplace to conduct a specific (safety, health, ergonomic) consultation on date.

### **General summary:**

Overview of the consultation visit, including participants, special circumstances such as new operations or new management, challenges encountered, recommended referrals and other relevant information.

*Select applicable sections from below as they apply to the scope of the consultation.*

### **Safety and health management:**

Summary of discussion on safety and health management specific to the company. Discussion should include examples of deficient elements of their safety and health management program as reflected by hazards found.

### **Written programs:**

General discussion of Oregon OSHA mandated programs and any other programs reviewed. Code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

### **Record keeping / dart:**

Discussion of OSHA 300 log, 801, injuries, illness and any notable trends.

### **Safety committee:**

General discussion on the company’s safety committee operations. Any specific code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

## Appendix F – Report Format Guides

*The following paragraphs are standard language for all reports and their content should not be altered*

Attached you will find the “Hazard Identification and Correction” worksheets that list the hazards observed during the consultation. The observations and recommendations made in this report are designated as SERIOUS (S) or OTHER THAN SERIOUS (OTS) based upon probable severity if an injury or illness were to occur. SERIOUS hazards are those situations or conditions that could result in serious illness, physical harm or death. OTHER THAN SERIOUS hazards are those situations or conditions that could result in employee injury or illness of a less serious nature. These designations are intended to help you prioritize corrective action. You should develop an action plan to ensure prompt correction of these identified hazards. Information provided to assist you in correcting or abating hazards should not be considered a formal endorsement of any vendor or product.

Your company is exempt from a routine scheduled Oregon OSHA inspection at this location for (60 days or 30 days) from the date of this report. As mentioned during the consultation, this does not exempt your company from enforcement action in the event of an accident investigation, an employee complaint, referral, or the observance of an imminent danger.

During the consultative visit, I attempted to identify all the hazards. However, there may be some hazards that I did not see or identify. It remains the responsibility of the employer to ensure the safety and health of employees and to identify and correct all hazardous conditions and/or situations. This report cannot result in enforcement activity, nor can Oregon OSHA Enforcement use this report as a basis for citation.

Oregon OSHA does not endorse particular vendors or products. Any information provided in this report about a product or vendor should not be interpreted as an endorsement. Employers are encouraged to conduct their own research on products that will meet their specific needs.

Oregon OSHA values feedback from its customers on the services they received. Please take the time to complete and return the enclosed questionnaire in the postage-paid envelope provided. Thank you for requesting our assistance to improve safety and health in your workplace. Contact me if you have questions regarding occupational safety and health issues.

Signature block

## IH Sampling Report

Date

Name, Title  
Company  
Address  
City

RE: Consultation Report xx-xxxx

Dear Mr.:

Thank you for the opportunity to visit your workplace to conduct a health consultation on \_\_\_\_\_ (date) for \_\_\_\_\_.

General summary and specifics of the consultation included here.

*Use this paragraph if applicable*

Attached you will find the “Hazard Identification and Correction” worksheets that list the hazards observed during the consultation. The observations and recommendations made in this report are designated as SERIOUS (S) or OTHER THAN SERIOUS (OTS) based upon probable severity if an injury or illness were to occur. SERIOUS hazards are those situations or conditions that could result in serious illness, physical harm or death. OTHER THAN SERIOUS hazards are those situations or conditions that could result in employee injury or illness of a less serious nature. These designations are intended to help you prioritize corrective action. You should develop an action plan to ensure prompt correction of these identified hazards.

*The following paragraphs are standard language for all reports and their content should not be altered*

Your company is exempt from a routine scheduled Oregon OSHA inspection at this location for (60 days or 30 days) from the date of this report. As mentioned during the consultation, this does not exempt your company from enforcement action in the event of an accident investigation, an employee complaint, referral, or the observance of an imminent danger.

During the consultative visit, I attempted to identify all the hazards. However, there may be some hazards that I did not see or identify. It remains the responsibility of the employer to ensure the safety and health of employees and to identify and correct all hazardous conditions and situations. This report cannot result in enforcement activity, nor can Oregon OSHA Enforcement use this report as a basis for citation. However, employee exposure records must be shared with affected employees, their representatives, and Oregon OSHA representatives, including compliance officers, per OAR 437 Division 2 1910.1020.

## Appendix F – Report Format Guides

Oregon OSHA does not endorse particular vendors or products. Any information provided in this report about a product or vendor should not be interpreted as an endorsement. Employers are encouraged to conduct their own research on products that will meet their specific needs.

Oregon OSHA values feedback from its customers on the services they received. Please take the time to complete and return the enclosed questionnaire in the postage-paid envelope provided. Thank you for requesting our assistance to improve safety and health in your workplace. Contact me if you have questions regarding occupational safety and health issues.

Signature block



## Noise Sampling Results For:

Employee/Job Task/Location	Sample Time (hr:mn) <sup>1</sup>	AL (dBA) <sup>2</sup>	PEL (dBA) <sup>3</sup>	Exceeds AL/PEL?	NIOSH Noise Criteria <sup>4</sup>

### <sup>1</sup>Sample Duration:

The amount of time (hours and minutes) the employee was sampled to evaluate the noise exposure. Where work tasks remain the same through out the work shift the reported levels are representative of the 8-hour projected noise exposure.

### <sup>2</sup>Action Level:

An 8-hour time-weighted average of 85 decibels (dBA) measured on the A-scale, slow response, or equivalently, a dose of fifty percent.

8 Hour shift ---- AL = 85 dBA

10 Hour shift ---- AL = 83.4 dBA

12 Hour shift ---- AL = 82.1 dBA

16 Hour shift ---- AL = 80.0 dBA

At or above the AL a hearing conservation program must be administered for the exposed and or representative employee without regard for the use of hearing protection. Elements of the program include noise monitoring, annual audiometric testing, evaluation of audiograms, hearing protection, employee training, and medical record keeping.

### <sup>3</sup>Permissible Exposure Limit:

The PEL is equivalent space to an 8-hour time-weighted average of 90 dBA. This is equivalent to a noise dose of 100%. A 90 dBA threshold is used, so that only noise levels at or above 90 dBA are included in the measurement.

At noise levels equal to or greater than 90 dBA, action must be taken to reduce exposures below the PEL. When feasible, noise exposure above 90 dBA needs to be controlled or eliminated through a combination of engineering and administrative controls, and/or personal protective equipment, in that order. Examples of noise engineering controls include structural noise barriers, equipment modification, etc. Administrative controls can be used to limit the amount of time a worker is exposed to noise above 90 dBA. Proper selection and use of hearing protection devices is the final choice for control when other methods are not feasible, or are being implemented but can not reduce employee noise exposure to 90 dBA averaged over an eight hour shift.

### <sup>4</sup>NIOSH Noise Criteria:

An 8-hour time-weighted average of 85 dBA measured on the A-scale, slow response using an 80 dBA sampling threshold and 3dB exchange rate. Due to the lower exchange rate, this standard is more protective. To prevent occupational hearing loss, appropriate hearing protection should be worn when noise exposure exceeds 85 dBA.

## Training / Other Services Report

An example of an email that can be sent out and uploaded into ORCA

Date

Name, Title  
Company Name  
Address  
City

RE: Consultation Report xx-xxxx

Dear Mr.:

Thank you for requesting our assistance.

General summary and specifics of the presentation or training provided (participants, follow-up to unanswered questions, recommended consultations, or any other relevant information).

It was a pleasure to work with your company to improve safety and health in your workplace.

Oregon OSHA values feedback from its customers on the services they received. Please take the time to complete and return the enclosed questionnaire in the postage-paid envelope provided. Thank you for requesting our assistance to improve safety and health in your workplace. Contact me if you have questions regarding occupational safety and health issues.

Signature block

## Worksheet Sample - Hazard Identification and Correction

No	Item	Location	S	O T S	Recommended Action	Due Date
<b>Hazardous energy</b>						
1	<p><b>Energy Control Procedures</b> shall be developed, documented, and utilized for the control of potentially hazardous energy when employees are engaged in the activities around servicing and maintenance on machines or equipment where the unexpected energizing, start up, or release of stored energy could occur.</p> <p><a href="#">Rule: 29 CFR 1910.147(c)(4)(i)</a></p>	Administrative	X		<p><b>Hazardous Energy Control (LO/TO):</b> Develop and implement written “machine-specific” energy control procedures and post at the location of the equipment. A best practice is including photographs of the energy-isolating devices to the equipment.</p>	
<b>Fall from heights</b>						
2	<p>Fall protection training</p> <p><a href="#">Rule: 29 CFR 1910.30(a)(1)</a></p>	Administrative	X		<p>[32][35][40] <b>Fall Protection Training:</b> Ensure the training given to employees covers all the requirements. Verify that the OSHA 10 hour class covers all the requirements and the basics (components, inspections, calculating fall distances, general anchor characteristics, etc.) and follow-up to ensure all the nuances and differences of the 10hr training that aren’t covered – are communicated.</p>	

**Item:**

Description of hazard or deficiency found. Indicate potential rule violation if applicable or write “Recommendation” if hazard is not rule related. Rule should be formatted in a manner consistent with our standards. For example 1910.1030(c)(1) for a Federal Rule or 437-002-1030(5) for an Oregon initiated rule.

**Location:**

Location of hazard or deficiency within the site. Write “Facility” if issue applies to the entire facility such as program deficiencies.

**S /OTS:**

Designate hazard as “S” for serious and “OTS” for other than serious. Severity rating will be based on the definition in OAR 437-001-0140, Evaluation of Severity to Establish Penalties – “a severity rating...on the basis of the degree of injury or illness that is reasonably predictable. If more than one injury or illness is reasonably predictable... the severity based upon the most severe injury or illness. Severity ratings will be selected from the following schedule:

- a) Other Than Serious – Conditions that could cause injury or illness to employees but would not include serious physical harm.
- b) Serious Physical Harm.

**Corrective Action:**

Consultant should provide guidance on how to eliminate hazards. Recommendations, as feasible, should be for first eliminating the hazard, engineering controls, personal protective equipment and administrative controls.



**Assigned To:**

Explain to the employer the use of the sheet as an action plan form. This column should be left blank so the employer can designate a responsible person as part of their action planning.

**Due Date:**

This column should be left blank so the employer can designate target dates for correction in the action planning process.

## Worksheet Sample B - Hazard Identification and Correction

Firm Name: \_\_\_\_\_ Report Number: \_\_\_\_\_

Consultation Date: \_\_\_\_\_

**Item:**

Individually number each hazard or deficiency found. Clearly describe the hazard or deficiency and indicate location found within the site.

**Corrective Action:**

Consultant should provide guidance on how to eliminate hazards. Recommendations, as feasible, should be for first eliminating the hazard, engineering controls, personal protective equipment and administrative controls.

**SERIOUS /OTHER THAN SERIOUS:**

Designate hazards as serious or other than serious. Severity rating will be based on the definition in OAR 437-001-0140, Evaluation of Severity to Establish Penalties - “a severity rating...on the basis of the degree of injury or illness that is reasonably predictable. If more than one injury or illness is reasonably predictable... the severity based upon the most severe injury or illness. Severity ratings will be selected from the following schedule:

- a) Other Than Serious – Conditions that could cause injury or illness to employees but would not include serious physical harm.
- b) Serious Physical Harm.

Indicate potential rule violation if applicable or write “Recommendation” if hazard is not rule related. Rule should be formatted in a manner consistent with our standards. For example 1910.1030(c)(1) for a Federal Rule or 437-002-1030(5) for an Oregon initiated rule.

## SHARP Comprehensive Report

Date

Name, Title  
Company Name  
Address  
City

RE: Consultation Report xx-xxxx

Dear Mr.:

Thank you for requesting our assistance in your efforts to pursue SHARP. A comprehensive (safety, health, ergonomic) consultation was conducted on date.

*All sections below should be included in the written report.* If an employer does not have a required Oregon OSHA program, include a discussion in that section addressing the lack of a program as well as recommendations for implementation

### **General Summary:**

Overview of the consultation visit, including participants, special circumstances like new operations or new management, challenges encountered, recommended referrals and other relevant information.

### **Safety And Health Management:**

Discussion on the process followed to arrive at the scoring achieved for the safety and health management assessment form.

### **Written Programs:**

General discussion of Oregon OSHA mandated programs and any other programs reviewed. Code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

### **Record Keeping / Dart:**

Discussion of OSHA 300 log, 801, injuries, illness and any notable trends and its relevance to their SHAPR status.

### **Safety Committee:**

General discussion on the company’s safety committee operations and its importance to the SHARP program. Any specific code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

**Action Planning:**

Recommendations on how to prepare for Action Planning meeting that will follow this report. Include time and date of meeting if already scheduled.

*The following paragraphs are standard language for all reports and their content should not be altered*

Attached you will find the “Hazard Identification and Correction” worksheets that list the hazards observed during the consultation. The observations and recommendations made in this report are designated as SERIOUS (S) or OTHER THAN SERIOUS (OTS) based upon probable severity if an injury or illness were to occur. SERIOUS hazards are those situations or conditions that could result in serious illness, physical harm or death. OTHER THAN SERIOUS hazards are those situations or conditions that could result in employee injury or illness of a less serious nature. These designations are intended to help you prioritize corrective action. You should develop an action plan to ensure prompt correction of these identified hazards.

Your company is exempt from a routine scheduled Oregon OSHA inspection at this location for (60 days or 30 days) from the date of this report. As mentioned during the consultation, this does not exempt your company from enforcement action in the event of an accident investigation, an employee complaint, referral, or the observance of an imminent danger.

During the consultative visit, I attempted to identify all the hazards. However, there may be some hazards that I did not see or identify. It remains the responsibility of the employer to ensure the safety and health of employees and to identify and correct all hazardous conditions and/or situations. This report cannot result in enforcement activity, nor can Oregon OSHA Enforcement use this report as a basis for citation.

Oregon OSHA does not endorse particular vendors or products. Any information provided in this report about a product or vendor should not be interpreted as an endorsement. Employers are encouraged to conduct their own research on products that will meet their specific needs.

Oregon OSHA values feedback from its customers on the services they received. Please take the time to complete and return the enclosed questionnaire. A postage-paid envelope has been provided. Thank you for requesting our assistance to improve safety and health in your workplace. Contact me if you have questions regarding occupational safety and health issues.

Signature block

Please include all team members as applicable

## 21(d) and 23 (g) activities Report

Date

RE: Consultation Report

Dear Mr.:

Thank you for the opportunity to visit your workplace to conduct a comprehensive consultation on July 22, 2008.

### **General Summary:**

Overview of the consultation visit including participants, special circumstances such as new operations or new management, challenges encountered, recommended referrals and other relevant information.

### **Safety and Health Management:**

Summary of discussion on safety and health management specific to the company. Summary should include examples of deficient elements of their safety and health management program as reflected by hazards found.

### **Written Programs:**

General discussion of Oregon OSHA mandated programs and any other programs reviewed. Code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

### **Training Provided**

### **Record Keeping / Dart:**

Discussion of OSHA 300 log, 801, injuries, illness and any notable trends.

### **Safety Committee:**

General discussion on the company’s safety committee operations. Any specific code related deficiencies should be addressed in the “Hazard Identification and Correction” section.

### **Safety and Health Program Assessment**

Consultants will include a summary of the specific safety and health management elements that were addressed in the consultation. A full safety and health management assessment is required for SHARP or comprehensive formal assessment of the safety and health management system.

*The following paragraphs are standard language for all reports and their content should not be altered*

Attached you will find the “Hazard Identification and Correction” worksheets that list the hazards observed during the consultation. The observations and recommendations made in this report

## Appendix F – Report Format Guides

are designated as SERIOUS (S) or OTHER THAN SERIOUS (OTS) based upon probable severity if an injury or illness were to occur. SERIOUS hazards are those situations or conditions that could result in serious illness, physical harm or death. OTHER THAN SERIOUS hazards are those situations or conditions that could result in employee injury or illness of a less serious nature. These designations are intended to help you prioritize corrective action. You should develop an action plan to ensure prompt correction of these identified hazards. Your company is exempt from a routine scheduled Oregon OSHA inspection at this location for 60 days from the date of this report.

As mentioned during the consult, this does not exempt your company from enforcement action in the event of an accident investigation, an employee complaint, referral, or the observance of an imminent danger.

### **Item 1**

Corrective Action

Correction Date

OTHER THAN SERIOUS - *Rule*

### **Item 2**

Corrective Action

Correction Date

OTHER THAN SERIOUS - *Rule*

### **Posting of Hazards:**

Accompanying this report is a List of Hazards that includes a description of the SERIOUS hazards and the date by which we mutually determined the hazards would be corrected. This List of Hazards must be posted, unedited in a prominent location where it is readily observable by all employees for three working days or until the hazards have been corrected, whichever is later.

### **Request for Extension Of Hazard Correction Due Date(S):**

If an extension of abatement time is needed, return the partially completed Hazard Identification and Correction Worksheet, in the enclosed envelope with a letter requesting the extension. You may fax (503-378-4921), or e-mail to request an extension of time for correcting a SERIOUS hazard, if you prefer. The request should indicate that a good faith effort has been made to correct the hazards, that the delay was beyond your control, and what interim measures have been put into effect to protect workers from the hazards. If we approve an extension to the correction due date(s), a new List of Hazards will be sent to you showing the revised dates. This new list must then be posted.

During the consultative visit, I attempted to identify all hazards. However, there may be some hazards that I did not see or identify. It remains the responsibility of the employer to ensure the safety and health of employees and to identify and correct all hazardous conditions and/or situations. This report cannot result in enforcement activity, nor can Oregon OSHA Enforcement use this report as a basis for a citation. Information provided is not a formal endorsement of any vendor or product.

## Appendix F – Report Format Guides

Oregon OSHA values feedback from its customers on the services they received. Please take the time to complete and return the enclosed questionnaire. A postage paid envelope has been provided.

Thank you for requesting our assistance to improve safety and health in your workplace. Contact me if you have questions regarding occupational safety and health issues.

### Hazard Identification and Correction

Firm Name: \_\_\_\_\_ Report Number: \_\_\_\_\_ Date: \_\_\_\_\_

Item 1	Corrective Action Taken	Assigned To
Location:	See body of letter for recommendations	
		Correction Date
		Date Completed
Other Than Serious	<i>Rule:</i>	

Item 2	Corrective Action Taken	Assigned To
Location:	See body of letter for recommendations	
		Correction Date
		Date Completed
Other Than Serious	<i>Rule:</i>	

Employer Signature: \_\_\_\_\_ Date: \_\_\_\_\_



## Extension Letter 21 (d)

Date

Re: Extension Request for Consultation Report No:

Dear:

We have considered your application for an extension of time to correct item \_\_\_\_\_ of the serious hazard found in your establishment. Your request is hereby granted and the (correction date) has been extended to \_\_\_\_\_.

Agreed upon modification or extension of correction due date must also be posted for either three working days or until the serious hazard have been corrected, whichever is later. Posting must be in a prominent place where it is readily observable by all affected employees.

Enclosed is a new hazard correction sheet. Please return it verifying the correction have been completed by the new date. Contact us if you have any questions.

Sincerely,

Enc.: New Hazard Correction Sheet




# APPENDIX G – CUSTOMER SURVEY

**OREGON.gov** Search:  Find

Text Size: [A+](#) [A-](#) [A](#) [Text Only Site](#) [Accessibility](#)

**Oregon OSHA Consultation Services Survey**



[https://www4.cbs.state.or.us/exs/osha/con\\_srvy/](https://www4.cbs.state.or.us/exs/osha/con_srvy/)

## Oregon OSHA Consultation Services Survey

Report No:

Report Date:

Firm Name:

Contact Person:

Consultant:

Consult Type:

### Timeliness \*

Excellent    Good    Fair    Poor    Don't Know

How do you rate the timeliness of the services provided by Oregon OSHA Consultative Services?

Comments:

### Accuracy \*

Excellent    Good    Fair    Poor    Don't Know

How do you rate the ability of Oregon OSHA Consultative Services to provide services correctly the first time?

Comments:

Appendix G – Customer Survey

**Helpfulness \***

Excellent    Good    Fair    Poor

Don't Know

How do you rate the helpfulness of Oregon OSHA Consultative Services employees?

Comments:

\* identifies questions that must be answered

**Completeness \***

Excellent    Good    Fair    Poor

Don't Know

How do you rate the completeness and helpfulness of your report?

Comments:

**Expertise \***

Excellent    Good    Fair    Poor

Don't Know

How do you rate the knowledge and expertise of Oregon OSHA Consultative Services employees?

Comments:

**Availability of Information \***


Excellent    Good    Fair    Poor

Don't Know

How do you rate the availability of information at Oregon OSHA Consultative Services?

Comments:

## Appendix G – Customer Survey

Overall Service *	Excellent	Good	Fair	Poor	Don't Know
How do you rate the overall quality of service provided by Oregon OSHA Consultative Services?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Comments:					

We would appreciate any other comments or suggestions you have regarding the services provided.



[Review Your Answers](#)

Page 2 of 2

\* identifies questions that must be answered

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## **APPENDIX H – AGRICULTURAL LABOR HOUSING**

This guidance is not intended to be all inclusive and will not address all situations that a Consultant will encounter while conducting an ALH Consultation. Refer to the rules covering ALH operations for specific information. Only appropriately trained staff are to conduct ALH consultations for registration or application purposes.

There are many core safety and health issues which must be carefully evaluated when conducting a consultation for agricultural labor housing. To effectively evaluate the safety and health conditions, consultants must enter these housing facilities even when they are occupied. An interior walk-through is also necessary to verify the square footage is adequate for the number of occupants. When occupied, consultants should be especially respectful of the occupants and the fact we have been allowed to enter their home.

The purpose of conduct pre-Occupancies consultations is to facilitate for initial registration and initial H2A applications. There is no requirement to conduct annual consultations for labor housing only first time registering or major remodeling or for first time use for H2A (employment under the Inter Agency Agreement (IAA)). will conduct annual for these types of operations.

### **Special Instructions For Agriculture Labor Housing Consultations**

Agricultural Labor Housing (ALH) requests are identified with an “L” (Labor Camp) in the Industry field. When self-assigning work, consultants who are allowed to conduct ALH consultations should scan the backlog for these requests and make Pre-Occupancy and H2A requests a priority for scheduling. Agriculture Labor Housing Consultations being requested for the purpose of registering a facility with Oregon OSHA must be conducted by a state-funded consultant. All other ALH requests will be conducted by authorized staff and following the normal priority system, but may be assigned out of order to make the best use of our limited resources.

### **Response Times**

A Pre-Occupancy consultation for an initial registration is to be conducted within 45 days from date of intake. The facility must be in substantial compliance prior to issuing the letter to the site Operator and email to ALH registration coordinator.

An H2A Pre-Occupancy consultation is completed by Oregon OSHA. Oregon OSHA is only responsible for the initial consultation, except in cases where major renovations have taken place at facilities previously approved for occupancy by Oregon OSHA. The initial consultation is to be completed within 30 days of the intake date. Annual recertification consultations for an H2a facility are to be conducted by the Employment Department under the Inter-Agency Agreement (IAA)).

Other ALH Consultation requests will follow the normal priority system. Operators who request consultations every year will be placed on a low priority and only provided consultation services as time permits.

All ALH consultations must use the NAICS code for Migrant Workers Camp, 721310.

## Consultation process

Prior to conducting a consultation for ALH or H2A, the consultant must review all registration information. If an operator/employer was registered in the previous year, that registration information should be verified during the visit. If the consultation is for the purpose of first registration or registration is required based on the rule, the consultant is to discuss the registration requirement in the report sent to the operator/employer; the consultant will include the contact information for the labor housing coordinator in the report.

On site activities will include entering all facilities related to the ALH housing operation, determining the square footage, identifying all amenities, and verifying water testing as appropriate. Establish the maximum occupancy level based on existing amenities.

The agricultural housing checklist is to be used on every ALH consultation (Appendix I). A copy of the completed checklist should be left with the employer at the time of the consultation. Copies of the completed checklist should also be sent to the employer with the report as well as retained in the consultation file.

ALH consultation reports are to be completed as a priority. The report for consultations conducted to evaluate if the employer is substantially in compliance must address, but is not limited to, the adequacy of the water supply, fire prevention, electrical service, sewage disposal, and sleeping quarters.

### Typical types of Consultation activities:

**ALH Consultations Conducted to Fulfill OR-OSHA Registration Requirements:** Along with the standard report, these consultations must have a second letter (see example letter below) sent indicating they are substantially in compliance with ALH regulations. If applicable, a notification to register may also be included.

**ALH Consultations Conducted to Fulfill H2A Registration Requirements:** Along with the standard report, these consultations must also include a letter indicating they are in compliance with all ALH regulations (see Appendix X). If applicable, a notification to register (see Appendix ?) may also be included.

**ALH Consultations Conducted to Meet Tax Credit Requirements:** The Oregon Department of Housing and Community Services offers a tax credit for construction, installation or rehabilitation of farm worker housing. To meet the requirements of the tax credit program, these housing projects are required by law to be in substantial compliance with all agricultural labor housing regulations of the Oregon Safe Employment Act. Consultations conducted to meet these requirements shall include a tax credit letter (see Appendix H) when the housing was found to be substantially in compliance with OR-OSHA standards.

Oregon OSHA **does not** conduct safety and health consultations of community-based farm worker housing projects (i.e. multi-unit apartments or duplexes in urban areas). These requests should be forwarded to the Consultation and Outreach Manager. In these cases, copies of occupancy permits issued by the local building authority will be accepted as proof of compliance (see Appendix H).

**Below are standard paragraphs to be used in the Substantial/In Compliance Letters sent to employers:**

**Not registered**

Since there are more than five (5) workers who will be residing in this housing, you will have to register this location with Oregon OSHA as Agricultural Labor Housing. Here is a link to the Application for Registering Agricultural Labor Housing (ALH). [Application For Registering Agricultural Labor Housing](#) The registration document must be posted at each applicable location.

**For registration**

A copy of the letter of substantial compliance has been forwarded to Oregon OSHA's Ag Labor Housing Coordinator for informational purposes. If you have questions regarding registration, please contact Kate Ryan at 971-673-2918 or email [kate.ryan@oregon.gov](mailto:kate.ryan@oregon.gov). If you have questions regarding your consultation, please feel free to contact me.

**H2A**

Subsequent inspections and registration: H-2A certified housing must be re-inspected and re-registered each year. As we discussed, The State of Oregon Employment Department will conduct subsequent inspections. If this location is utilized for H-2A housing, please contact the Oregon Foreign Labor Certification Coordinator, Dora Herrera, [dora.a.herrera@oregon.gov](mailto:dora.a.herrera@oregon.gov) or at (971) 301-3472.

A copy of the letter of compliance has been forwarded to Oregon OSHA's Ag Labor Housing Coordinator and Oregon Foreign Labor Certification Coordinator for informational purposes. If you have questions regarding registration, please contact Kate Ryan, Dora Herrera, or me.

**In Progress and Deferrals**

An ALH consultation is considered *in progress* **7 days before the scheduled onsite** and **30 days after the report is issued**. As these consultations are either for registration or H2A application purposes no additional deferral time is provided.

Do not delay in issuing the report or letter to the employer. Consultations conducted to verify correction of hazards identified for ALH letters of compliance or substantial compliance are not provided any additional time beyond the original 30 days.

**ALH Consultation confidentiality**

The consultation report is treated in the same manner as all other consultation reports and are only releasable to the employer or their designee. The employer / operator may provide permission to release the report but that requests must be in written form and uploaded into the documents tab for that consultation.

The letter for registration or application may be discoverable in a public records request. Information contained in these letters need to be limited to basic information about the facilities number and type of buildings, the amenities that exist at the located, and the maximum occupants based on all factors and amenities observed. (See example letter bellow)





# Oregon

Kate Brown, Governor

Department of Consumer and Business Services  
Oregon Occupational Safety & Health Division (Oregon OSHA)  
350 Winter Street NE | PO Box 14480 | Salem, OR 97309-0405  
Phone: 503-378-3272 | Toll Free: 1-800-922-2689 | Fax: 503-947-7461  
osha.oregon.gov

Date of letter

Contact Person

Business Name

Address

Address

City/State Zip

**Re:** Letter of Substantial Compliance for Agricultural Labor Housing Registration:

Request Number **XX\_XXXXXX**

Employer ID: **Employer ID**

HOUSING NAME and ADDRESS(ES)  
**Housing Name, Address, City/State Zip**

LOCATION NO: **Location Number**

Employer ID: **Employer ID**

The Oregon Occupational Safety and Health Division conducted a safety and health consultation at the agricultural labor housing referenced above on (**Month Day year**)(if follow-up was conducted to verify corrections ad that date as well.) At the time of the consultation the housing was found to be in substantial compliance with the requirements of the Occupational Safety and Health Code.

According to the configuration and amenities available for the workers and based on information in the table below, you will be able to house a maximum of # Occupants at this location. See the labor housing checklist (<https://osha.oregon.gov/OSHAPubs/checklists/1876.pdf>) for a list of requirements.

**Use one of the following formats to identify specific information.**

Structure #1 **type of structure, year built address or building #**

(3 Duplexes, 6 units total – wood structures) 4676 Hutson, Mt Hood Parkdale, Oregon

**Maximum** Occupancy for this address is **32** as configuration is planned

Total amenities for the address

11 – Sinks (includes utility sink) (*Required 1 for every 6 occupants*)

1 – Washer/Utility sink and clotheslines inside and out (*Required 1 for every 30 occupants*)

Appendix H – Agricultural Labor Housing

- 2 – 4-Burner - Electric Stove (back unit) *(Required 2 burners for every 10 occupants)*
- 3 – 2-burner plates in enclosed communal area *(Required 2 burners for every 10 occupants)*
- 6 – Toilets *(Required 1 for every 15 occupants)*
- 6 – Showers/tub *(Required 1 for every 10 occupants)*
- 6 – Refrigerators
- Heat – Electric
- Water – public system
- \*Limiting Factor - Square footage**

**Verified Amenities**

Title	Quantity	Notes
Buildings	1	Built in 2019-2020, wood framed.
Occupants	16	4 persons per each of the 4 sleeping rooms.
Sleeping Rooms	4	2 sets of bunkbeds per sleeping room.
Toilets	2	Individual toilet rooms
Sinks	4	Kitchen 2, and bath 2
Showers	2	Individual shower rooms
Laundry	1 washer & 1 dryer	Laundry room
Cook burners	8	2 Stove tops, each with 4 cook burners, oven & microwave
Refrigerator(s)	4	Kitchen/Dining
Tables & Chairs	2 tables & 16 chairs	Kitchen/Dining are
Garbage	Containers with lids	4, approximately 120 gallon with regular service

“## Occupants” building #XXX	“## Occupants Building #XXX”
4 Sinks	1 Sinks
2 Toilets	1 Toilets
2 Showers	1 Showers
1 Garbage containers	1 Garbage containers
4 Cooking burners	4 Cooking burners
1 Washers	1 Washers

Appendix H – Agricultural Labor Housing

The Doodleland Consultation Report #21-1234, consisted of 2 units, wood framed.

123 Main St “Total Occupants ##”

“## Occupants” Crazy doodle house		“## Occupants Dazed doodle mom house”	
4	Sinks	1	Sinks
2	Toilets	1	Toilets
2	Showers	1	Showers
2	Garbage containers	2	Garbage containers
4	Cooking burners	4	Cooking burners
2	Washers	2	Washers

The housing at this location was not registered with Oregon OSHA. Agricultural labor housing in the State of Oregon is required to be registered (separate locations must be individually registered). The registration document is required to be posted at each applicable location.

For your convenience a copy of the registration form has been included. Please complete the form and return it to the PO Box listed on the registration form. A copy of this letter has been forwarded to the Oregon OSHA’s Ag Labor Housing Coordinator. If you have questions regarding your registration, please contact Kathleen Fenton at 503-947-7418. If you have questions regarding your consultation, please feel free to contact me.

cc: Oregon OSHA Ag Labor Housing Coordinator

## Appendix H – Agricultural Labor Housing

Additional resources that might be helpful in these types of consultations.

### **Other Resources**

[Oregon OSHA Labor Housing Inspection Checklist](#)

[Oregon OSHA Supplemental Labor Housing Inspection Checklist for COVID-19](#)

[H-2A main website](#)

[H-2A and H-2B Temporary Labor Certification Programs](#)

Sheep: [Standards for Mobile Housing Applicable to Occupations Involved in the Open Range Production of Livestock](#) (pdf)

[Oregon OSHA and Oregon Employment Department Memorandum of Understanding](#) for H2A Agricultural Labor Housing

[Form ETA 338](#) (out-of-date but still useful for self-inspection)

## Employer Furnished Housing and Facilities

US Department of Labor Employment and Training Administration					1. Employer's Name and Address						
2. Housing Locations					3. Housing Description						
<b>4. Sleeps Rooms</b>		a. Dormitory Type			b. Family Type				ES USE ONLY		
No. & Measure	1	2	3	4	1	2	3	4	<b>5. Capacity (Adults)</b>		
Length									<b>6. Regulations Compliance</b>		
Width No											("X" proper box)
Ceiling Height									Water		
Square Feet									Electricity		
No. of Rooms									Site		
No. Beds, Single									Screening		
No. Beds, Bunks, Doubles									Heating		
<b>1. Facilities (Number of each)</b>											
Flush Toilets	Privy		Urinals		Lav. Or Washbasins			Showerheads			
Bathtubs	Movable Bathtubs		Laundry Machines		Fixed Laundry Tubs			Movable Laundry Tubs			
Cook Stoves	Refrigerators		Garbage Containers		First Aid Kits			Fire Extinguishers (No, & type)			
<b>2. Comments</b>											
<b>3. Employer's Certification</b>											
<p>I CERTIFY THAT I have reviewed the housing regulations of the U.S. Department of Labor, ( ) OSHA ( ) ETA, and that the housing described herein ( ) meets ( ) does not meet such standards. I hereby authorize representatives of the State Employment Services Office and/or Employment and Training Administration regional office to inspect the above housing at any reasonable time.</p>											
Employer's signature				Typed Name and Title				Date			

<b>4. Housing Inspected By:</b>		
Signature of Authorized Official	Typed Name and Title	Date
<b>5. Approval - Housing approved for occupancy by workers recruited interstate.</b>		
Signature of Authorized Official	Typed Name and Title	Date

ETA 338 (Jan. 1981)

Agricultural Labor Housing (ALH) requests are identified in ORCA as industry type is Labor Camp. When self-assigning work, consultants who conduct ALH consultations should scan the backlog for these requests and make them a priority for scheduling. *Agriculture Labor Housing Pre-Occupancy Consultations being requested for the purpose of registering a facility with Oregon OSHA Enforcement must be conducted by a state-funded consultant.*

All ALH consultations must use the NAICS code for Migrant Workers Camp, 721310.

H-2A – We have 45 days to conduct the consultation. The employers have to correct all hazards, we have to verify correction, and they need the letter of compliance. [H-2A Employer Handbook](#) (pdf) explains the process.

## Appendix H – Agricultural Labor Housing

Prior to conducting a consultation of ALH, the consultant should review all registration information. If an employer was registered in the previous year, that registration information should be verified during the visit.

There are many core safety and health issues that must be carefully evaluated when conducting a consultation for agricultural labor housing. To effectively evaluate the safety and health conditions, consultants must enter these housing facilities even when they are occupied. An interior walk-through is also necessary to verify the square footage is adequate for the number of occupants. When occupied, consultants should be especially respectful of the occupants and the fact we have been allowed to enter their home.

The agriculture housing checklist is to be used on every ALH consultation is below. A copy of the completed checklist should be left with the employer at the time of the consultation (through a commitment to Oregon Legal Services). Copies of the completed checklist should be scanned and sent to the employer with the report as well as retained in the consultation file.

ALH consultation reports are to be completed as a priority. The report for consultations conducted to evaluate if the employer is substantially in compliance must address, but are not limited to, the adequacy of the water supply, fire prevention, electrical service, sewage disposal, and sleeping quarters.

### ALH Consultations Conducted to Meet Tax Credit Requirements:

The Oregon Department of Housing and Community Services offer a tax credit for construction, installation or rehabilitation of farm worker housing. To meet the requirements of the tax credit program, these housing projects are required by law to be in substantial compliance with all agricultural labor housing regulations of the Oregon Safe Employment Act. Consultations conducted to meet these requirements shall include a tax credit letter (see Appendix H) when the housing was found to be substantially in compliance with Oregon OSHA standards.

Oregon OSHA **does not** conduct safety and health consultations of community-based farm worker housing projects (i.e. multi-unit apartments or duplexes in urban areas). These requests should be forwarded to the consultation manager. In these cases, copies of occupancy permits issued by the local building authority will be accepted as proof of compliance.

## Notification to Register Agricultural Labor Housing

Date

Re: Agricultural Labor Housing Report:

Employer ID:

**Housing Name and Addresses**

**Location No:**

The Oregon Occupational Safety and Health Division conducted a safety and health consultation at the agricultural labor housing referenced above on. At the time of the consultation, we found the housing to be in substantial compliance with the requirements of the Occupational Safety and Health Code.

The housing at this location was not registered with Oregon OSHA. Agricultural labor housing in Oregon is required to be registered (separate locations must be individually registered). The registration document is required to be posted at each applicable location.

Please complete the registration and return it, along with a copy of this letter, to Oregon OSHA. If you have questions, contact me or the Oregon OSHA Salem Field Office, where the applications are processed, at 503- 378-3274.

Field Consultation Manager

Consultation Services Section

cc: Oregon OSHA Ag Labor Housing Coordinator



## Agricultural Labor Housing Tax Credit Letter Farm Based

Date

Re: Agricultural Labor Housing Safety Consultation Report

Employer ID:

**Housing Name and Addresses**

**Location No:**

On \_\_\_\_\_, I conducted a safety and health hazard consultation of the agricultural labor housing unit at the above addresses as you had requested. The purpose of the survey was to determine if these housing units complied with the Oregon Occupational Safety and Health Code for tax credit purposes. A total of \_\_\_\_\_ were reviewed for compliance.

**All units were found to be in substantial compliance with the requirements of the Oregon Occupational Safety and Health Code.**

It is my understanding that farm worker housing tax credits were awarded for construction or rehabilitation recently completed at this location. Oregon statute requires projects receiving farm worker housing tax credits to comply with all requirements of the Oregon Occupational Safety and Health Code. This letter should be retained as proof that this requirement was met at the above referenced location.

Field Consultation Manager  
Consultation Services Section  
503-378-3272

## **Agricultural Labor Housing Tax Credit Letter Community Based**

Date

ATTN:

RE:

The above referenced community-based housing project has been awarded farm worker housing tax credits by the State of Oregon.

By statute, a taxpayer is entitled to take the tax credit only if the housing complies with all safety and health laws, rules, regulations and standards applicable to farm worker housing. Oregon OSHA is in receipt of the occupancy permits issued by \_\_\_\_\_ for the \_\_\_\_\_ project. These permits signify the structure has been inspected by local building officials and meets all applicable state and local building requirements. As such, Oregon OSHA is satisfied that this housing project is suitable for residency by agricultural workers and meets applicable safety and health laws, rules, regulations and standards.

If you need information or additional assistance regarding tax filing, please consult the Oregon Department of Revenue at 503-378-4988.

Field Consultation Manager  
Consultation Services Section  
503-378-3272

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## APPENDIX I – LABOR HOUSING INSPECTION CHECKLIST



### LABOR HOUSING INSPECTION CHECKLIST

Oregon Occupational Safety & Health Division (Oregon OSHA)  
350 Winter St. NE, Salem, Oregon 97301-3882  
503-378-3272 or 800-922-2689 (toll-free)

Because of version control, please use the most current version on the website. We are no longer reprinting the check list in this document. [Labor Housing Inspection Checklist \(https://osha.oregon.gov/OSHAPubs/checklists/1876.pdf\)](https://osha.oregon.gov/OSHAPubs/checklists/1876.pdf)



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## APPENDIX J – ACCOMPANIED VISIT EVALUATION

This is part of our internal quality assurance program. Please discuss with the Consultant, Field manager and the Statewide Consultation manager if there are any major issues.

Consultant \_\_\_\_\_ Date \_\_\_\_\_

Evaluator's Name \_\_\_\_\_

Company Name \_\_\_\_\_ Report # \_\_\_\_\_

### A. Preparation

- Consultant contacted the employer to clarify the request and ensure adequate management participation.
- Consultant researched the company and reviewed claims information and past consultation/inspection history.
- Consultant familiarized themselves with the machinery, processes, and hazards normally associated with this type of industry.
- Consultant established personal protective equipment needs for the location and obtained the needed equipment.
- Consultant asked about employee representation for the consultation.
- Consultant advised the employer of any written programs, injury and illness records, or other documents that would be evaluated as a part of the consultation process.

Comments:

### B. Opening Meeting

- Consultant introduced themselves properly.
- Consultant restated the purpose and scope of the visit to clarify the request for service and expectations.
- Consultant explained the consultation process to include written programs, record keeping, walk around, safety committee evaluation, and a safety and health management review as applicable.
- Consultant talked about interviewing employees during the consultation to gain their participation.
- Consultant explained the employer's obligation to correct any imminent danger situations.
- Consultant explained the enforcement/consultation relationship.
- Consultant discussed the confidentiality of our services (which includes the report), and the disclosure of monitoring data, if applicable.
- Trade secrets and PPE needs were discussed.

## Appendix J – Accompanied Visit Evaluation

Comments:

### C. Safety and Health Programs and Hazard Identification

- Consultant proceeded in a logical and systematic manner, covering all areas the employer requested.
- Consultant identified and explained all hazards observed during the walk around/hazard assessment.
- Consultant encouraged employer/employee participation during the walk around/hazard assessment.
- Consultant reviewed all written programs as necessary.
- Consultant reviewed OSHA 300 information and discussed trends and DART rate.
- Consultant reviewed and discussed safety committee operations.

Comments:

### D. Closing Meeting

- Consultant discussed all hazards and program deficiencies observed during the consultation and provided recommendations for correction to the employer.
- Consultant encouraged self-sufficiency and discussed the seven elements of an effective safety and health management system.
- Consultant discussed action planning and the need to set priorities for correction.
- Consultant discussed other services available through the Oregon OSHA Consultation Services Section and the employer's workers compensation insurance carrier.
- Consultant discussed the time line for the report, and the Consultation Evaluation Form.

Comments:

### E. Consultation Process

- The consultant was professional and courteous during the consultation.
- The consultant stressed the importance of a safety and health management system and tied the hazards and program deficiencies to the seven key elements.
- The consultant met the employer's expectation of the consultation.
- The consultant demonstrated good hazard identification skills, some of which were not limited to their discipline or Oregon OSHA codes.

Comments:

## Appendix J – Accompanied Visit Evaluation

### F. Written Report

- The report was clear and concise.
- The report included all items addressed during the consultation.
- Proper rules/standards/agency interpretations were referred to in the report.
- The consultant provided recommendations that were practical/effective for the hazards observed/identified.
- Where applicable, the consultant tied the hazards and deficiencies noted in the report to the corresponding elements of an effective safety and health management system.
- The format of the report was consistent with section expectations, including proper grammar.

Comments:





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## APPENDIX K – INSTRUCTIONS FOR THE SAFETY AND HEALTH PROGRAM ASSESSMENT WORKSHEETS ( 58 AND THE 47)

In 2016, federal OSHA updated the 1989 safety and health program guidelines and replaced them with OSHA's recommended practices for safety and health programs. After that revision, they modified the existing 58 attribute SHPA form in a slightly condensed version with 47 attributes.

These appendices contain the two Safety and Health Program Assessment (SHPA) tools used by Oregon OSHA Consultation to evaluate an employer's safety and health management systems. Both these S&HPA Worksheets are designed as a tool for use in conducting assessments of an employer's safety and health program to evaluate the effectiveness of that employer's safety and health management system.

Appendix K. contains the original 58 attribute SHPA form used by Oregon Consultants from 1995 through 2018. This form will be used by 21(d) staff and by consultants working with public sector employers. All SHARP companies that were originally assessed with the 58 attribute form will be assessed with that form through their participation in SHARP.

Appendix K.1. contains the modified 47 attribute SHPA form to be used for all new safety and health management assessments including SHARP. This 47 attribute SHPA form will gradually replace the 58 attribute form as less SHARP employers will use the 58 attribute form each year moving forward. The 58 attribute form is projected to be phased out after all sharp employers using it have graduated.

The Reference guide to the 47 attribute SHPA can be downloaded from the internal consultation web page under SHARP Tools in the SHARP & VPP link.

<http://osha.cbs.state.or.us/consultation/docs/form-33-reference-guide-2019.pdf>

A Safety and Health Program Assessment (S&HPA) is an evaluation of the company's safety and health management system (using the Safety and Health Program Assessment Worksheet). An S&HPA can be done during a comprehensive consultation or independently of a comprehensive consultation. The S&HPA Worksheet is designed as a tool for use in conducting assessments of an employer's safety and health program to evaluate the effectiveness of that employer's safety and health management system.

SHARP companies or companies working toward SHARP must have a full assessment, with all 58 attributes evaluated.

All completed assessment forms should have some justification and/or recommendations under the comment section for questions rated as 0 and 1. All completed assessments should be included and/or referenced in the report sent to the employer.

Instructions for using the worksheet are as follows:

**Categories:** The S&HPA Worksheet is divided into the following seven categories (or elements):

- I. Hazard Anticipation and Detection
- II. Hazard Prevention and Control
- III. Planning and Evaluation

## Appendix K – Instructions for the S&HP Assessment Worksheets

- IV. Administration and Supervision
- V. Safety and Health Training
- VI. Management Leadership
- VII. Employee Participation

There are several attributes or sub-elements in each category.

**Attributes:** Each attribute or sub-element is listed as a separate item. All 58 attributes are positive statements to which the evaluator agrees with varying degrees of continuity.

There are 58 attributes that are considered building blocks to effective safety and health management systems.

**Rating Instructions:** Each survey question or attribute has six possible ratings: 0, 1, 2, 3, NA, or NE. The value for each rating is described in the following table.

Rating	Description		Descriptor
0	No Discernable or meaningful indication that the item is even partially in place	Nor or	None
1	Some portion or aspect is present, although major improvement is needed	Mostly No	Some
2	Item is largely in place, with only minor improvements needed	Yes or	Most
3	Item is completely in place	Mostly Yes	All
NE	Not Evaluated: Recognizes that comprehensive evaluations can be incremental		Not Evaluated
NA	Not Applicable: Must have justification in the comments box why the item is not applicable		Not Applicable

Consultants will use their best professional judgment to rate each attribute based on the information obtained during the consultation. To rate an attribute simply put an “X” in the box under the desired rating indicator.

**Rating Cues:** The bits of information obtained in the assessment are rating cues. A rating cue is a specific fact or perception that prompts and supports the rating of a relevant topic. Each attribute is worded as a positive statement. All rating cues will either confirm (support) or negate (deny) the statement. The cues give weight to the rating for the individual attributes.

Cues confirm or deny the existence of the attribute, the extent of the attribute, the character of the attribute, and the effect of the attribute. Cues are found in observations and measurements, interviews, and reviews of documentation. There can be multiple cues, including initial cues, corroborating cues, and conflicting cues. The following table illustrates how cues are used to rate attributes.

### Rating Value

0. Eliminated by a single CONFIRMING cue
1. Requires a few CONFIRMING cues **and** one or more NEGATING cues
2. Requires multiple CONFIRMING cues **and** a few NEGATING cues
3. Eliminated by a single NEGATING cue

## Appendix K – Instructions for the S&HP Assessment Worksheets

**Comments:** The comment section is to be used to give the employer recommendations on how to improve in this specific attribute. Ratings that are “0” or “1” should include a recommendation for improvement. “NA” ratings must be justified by the consultant.

**Some Suggestions:** In reality, there is a very small gap between the 0 (zero) rating and the 1 (one) rating and between the 2 (two) rating and the 3 (three) rating. There is a large gap between the 1 (one) rating and the 2 (two) rating. That gap is the difference between mostly no and mostly yes.

Look for things that are done well and reinforce these things with personnel for their good efforts. The more you can encourage small positive steps, the greater chance that significant positive change will follow and the greater the opportunity to return and provide comprehensive assistance.



8. Effective job hazard analysis is performed.

Comments: 0 1 2 3 NA NE

---

9. Expert hazard analysis is performed.

Comments: 0 1 2 3 NA NE

---

10. Incidents are investigated for root causes.

Comments: 0 1 2 3 NA NE

---

## II. Hazard Prevention and Control

11. Feasible engineering controls are in place.

Comments: 0 1 2 3 NA NE

---

12. Effective safety and health rules and work practices are in place.

Comments: 0 1 2 3 NA NE

---

13. Applicable OSHA-mandated programs are effectively in place.

Comments: 0 1 2 3 NA NE

---

14. Personal protective equipment is effectively used.

Comments: 0 1 2 3 NA NE

---

15. Housekeeping is properly maintained.

Comments: 0 1 2 3 NA NE

---

16. The organization is properly prepared for emergency situations.

Comments: 0 1 2 3 NA NE

---

17. The organization has an effective plan for providing competent emergency medical care to employees and others present at the site.

Comments: 0 1 2 3 NA NE

---

18. Effective preventive maintenance is performed.

Comments: 0 1 2 3 NA NE

---

19. An effective procedure for tracking hazard correction is in place.

Comments: 0 1 2 3 NA NE

---

### III. Planning and Evaluation

20. Workplace injury/illness data are effectively analyzed.

Comments: 0 1 2 3 NA NE

---

21. Hazard incidence data are effectively analyzed.

Comments: 0 1 2 3 NA NE

---

22. A safety and health goal and supporting objectives exist.

Comments: 0 1 2 3 NA NE

---

23. An action plan designed to accomplish the organizations safety and health objectives are in place.

Comments: 0 1 2 3 NA NE

---

24. A review of in-place OSHA-mandated programs is conducted at least annually.

Comments: 0 1 2 3 NA NE

---

25. A review of the overall safety and health management system is conducted at least annually.

Comments: 0 1 2 3 NA NE

---

### IV. Administration and Supervision

26. Safety and health program tasks are each specifically assigned to a person or position for performance or coordination.

Comments: 0 1 2 3 NA NE

---

27. Each assignment of safety and health responsibility is clearly communicated.

Comments: 0 1 2 3 NA NE

---

28. An accountability mechanism is included with each assignment of safety and health responsibility.

Comments: 0 1 2 3 NA NE

---

29. Individuals with assigned safety and health responsibilities have the necessary knowledge, skills, and timely information to perform their duties.

Comments: 0 1 2 3 NA NE

---

30. Individuals with assigned safety and health responsibilities have the authority to perform their duties.

Comments: 0 1 2 3 NA NE

---

31. Individuals with assigned safety and health responsibilities have the resources to perform their duties.

Comments: 0 1 2 3 NA NE

---

32. Organizational policies promote the performance of safety and health responsibilities.

Comments: 0 1 2 3 NA NE

---

33. Organizational policies result in correction of non- performance of safety and health responsibilities.

Comments: 0 1 2 3 NA NE

---

**V. Safety and Health Training**

34. Employees receive appropriate safety and health training.

Comments: 0 1 2 3 NA NE

---

35. New employee orientation includes applicable safety and health information.

Comments: 0 1 2 3 NA NE

---

36. Supervisors receive appropriate safety and health training.

Comments: 0 1 2 3 NA NE

---

37. Supervisors receive training that covers the supervisory aspects of their safety and health responsibilities.

Comments: 0 1 2 3 NA NE

---

38. Safety and health training is provided to managers.

Comments: 0 1 2 3 NA NE

---

39. Relevant safety and health aspects are integrated into management training.

Comments: 0 1 2 3 NA NE

---

## VI. Management Leadership

40. Top management policy establishes clear priority for safety and health.

Comments: 0 1 2 3 NA NE

---

41. Top management considers safety and health to be a line rather than a staff function.

Comments: 0 1 2 3 NA NE

---

42. Top management provides competent safety and health staff support to line managers and supervisors.

Comments: 0 1 2 3 NA NE

---

43. Managers personally follow safety and health rules.

Comments: 0 1 2 3 NA NE

---

44. Managers delegate the authority necessary for personnel to carry out their assigned safety and health responsibilities effectively.

Comments: 0 1 2 3 NA NE

---

45. Managers allocate the resources needed to properly support the organizations safety and health system.



Comments: 0 1 2 3 NA NE

---

46. Managers assure that appropriate safety and health training is provided.

Comments: 0 1 2 3 NA NE

---

47. Managers support fair and effective policies that promote safety and health performance.

Comments: 0 1 2 3 NA NE

---

48. Top management is involved in the planning and evaluation of safety and health performance.

Comments: 0 1 2 3 NA NE

---

49. Top management values employee involvement and participation in safety and health issues.

Comments: 0 1 2 3 NA NE

---

## VII. Employee Participation

50. There is an effective process to involve employees in safety and health issues.

Comments: 0 1 2 3 NA NE

---

51. Employees are involved in organizational decision making in regard to safety and health policy.

Comments: 0 1 2 3 NA NE

---

52. Employees are involved in organizational decision making in regard to the allocation of safety and health resources.

Comments: 0 1 2 3 NA NE

---

53. Employees are involved in organizational decision making in regard to safety and health training.

Comments: 0 1 2 3 NA NE

---

54. Employees participate in hazard detection activities.

Comments: 0 1 2 3 NA NE

---

55. Employees participate in hazard prevention and control activities.

Comments: 0 1 2 3 NA NE

---

56. Employees participate in the safety and health training of co-workers.

Comments: 0 1 2 3 NA NE

---

57. Employees participate in safety and health planning activities.

Comments: 0 1 2 3 NA NE

---

58. Employees participate in the evaluation of safety and health performance.

Comments: 0 1 2 3 NA NE

---

## Safety and Health Assessment Worksheet (47)

In 2016, federal OSHA updated the 1989 safety and health program guidelines and replaced them with OSHA's recommended practices for safety and health programs. After that revision, they modified the existing 58 element SHPA form into a slightly condensed version with 47 elements.

Appendix K.1. contains the modified 47 element SHPA form to be used for all new safety and health management assessments including SHARP. This 47 element SHPA form will gradually replace the 58 element form as less SHARP employers will use the 58 element form each year moving forward. The 58 element form is projected to be phased out after all sharp employers using it have graduated.

The Reference guide to the 47 element SHPA can be downloaded from the internal consultation web page under SHARP Tools in the SHARP & VPP link.

<http://osha.cbs.state.or.us/consultation/docs/form-33-reference-guide-2019.pdf>

This assessment worksheet applies the seven core elements in OSHA's Recommended Practices for Safety and Health Programs. This assessment is only a snapshot of a company, to assist the employer with efforts to reduce the risks of workplace injuries, illnesses, and catastrophic events by identifying shortcomings and providing recommendations for continuous improvement.

### Seven Core Elements

1. Management Leadership
2. Worker Participation
3. Hazard Identification and Assessment
4. Hazard Prevention and Control
5. Education and Training
6. Program Evaluation and Improvement
7. Communication and Coordination for Host Employers, Contractors, and Staffing Agencies (C+C)

\*Communication and Coordination (C+C) for Host Employers, Contractors, and Staffing Agencies – When applicable, for each attribute evaluated, consultants must also assess if employers established mechanisms to coordinate their efforts and communicate effectively to afford all workers equal protection against hazards. C+C requirements are incorporated into each attribute and assessed when applicable, together with all other safety and health requirements, to collectively determine the appropriate rating for an attribute.

The consultant assigns ratings to the attributes evaluated based on the following criteria:

**Legend for Rating Each Attribute of a Safety and Health Program Element:**

<b>Assessment Ratings</b>	<b>Descriptions</b>
Missing 0	All observations or cues in the workplace to assess an attribute are negative (Zero). No safety and health policy and procedures are present to implement the attribute. There is no C+C* of safety and health policies and procedures among employers as it pertains to the attribute, when applicable. Effective development and implementation of policy and procedures are needed.
Developing 1	The weight of observations or cues in the workplace to assess an attribute are predominantly negative, inadequate and/or incomplete (Sometimes). Some safety and health policies and procedures are present to implement the attribute but they are inadequate (Little Activity). There is some or no C+C of safety and health policies and procedures among employers as it pertains to the attribute, when applicable. Major improvement is needed.
Well Developed 2	The weight of observations or cues in the workplace to assess an attribute are predominantly positive, adequate, and/or mostly complete (Often). Considerable safety and health policies and procedures are present to implement the attribute and they are adequate (Most Activities Completed). There is considerable C+C of safety and health policies and procedures among employers as it pertains to the attribute, when applicable. Minor improvement is needed.
Advanced 3	The weight of observations or cues in the workplace to assess an attribute are entirely positive, exceptional, and innovative means are applied to assure continuous improvement (Always). Exceptional safety and health policies and procedures are present to implement the attribute (All Activities Completed). There is exceptional C+C of safety and health policies and procedures among employers as it pertains to the attribute, when applicable. Development, implementation, monitoring, and advancement of policy and procedures are effective.
Not Evaluated (NE)	NE is a default value when insufficient or no observations or cues are collected in the workplace to assess a particular attribute, when this is the case no rating is required.
Special Notes	<ol style="list-style-type: none"> <li>1. Personnel: refers to managers, supervisors, and workers collectively.</li> <li>2. This assessment worksheet is designed for use in General, Agriculture and Maritime Industries (workplaces) only.</li> </ol>

Consultants must determine the applicability of C+C requirements to the workplace before starting an assessment:

1. Does the employer retain temporary workers at the worksite at any time?  Yes  No
2. Does the employer retain contractors at the worksite at any time?  Yes  No

Notes:

C+C requirements apply if the consultant (rater) responds “Yes” to either one or both questions.

When applicable, for each attribute assessed, the implementation of C+C requirements must be determined.

The consultant should inquire about the procedures followed by a host employer to address C+C requirements even when only the host employer’s personnel are at a worksite but temporary workers or contractors are “sometimes” retained.

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	0	1	2	3	NE
<b>Management Leadership: Top Management Leadership</b>					
<p>How well does the top manager project the value of safety and health and initiate the foundation for a successful safety and health program?</p> <p>Name of Top Management: _____</p>					
1. Top management communicates a policy that establishes safety and health as a core value.					
Observations:					
Recommendations:					
2. Top management participates in planning and evaluating safety and health performance to drive continuous improvement.					
Observations:					
Recommendations:					
3. Top management considers proficient safety and health staff to be an advisory resource provided (as needed) to line managers and supervisors who have direct oversight of safety and health performance.					
Observations:					
Recommendations:					
<p>Streamlined attributes:</p> <p>Top management considers safety and health to be a line rather than a staff function for direct oversight of safety and health performance.</p> <p>Top management provides proficient safety and health staff support to line managers and supervisors to promote workplace safety and health.</p>					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	0	1	2	3	NE
<b>Management Leadership: Foundation</b>					
How well does the management team initiate the basic requirements of a successful safety and health program?					
4. Safety and health goals and supporting objectives that focus on specific actions to establish or improve the overall safety and health program exist.					
Observations:					
Recommendations:					
5. An action plan designed to accomplish the organization's safety and health goals and supporting objectives is in place.					
Observations:					
Recommendations:					
<b>Management Leadership: Safety and Health Program Implementation</b>					
How well does the management team execute all of the following steps, which are required for implementing every aspect of the safety and health program (each depending on the previous requirements)?					
6. Managers and supervisors personally follow safety and health procedures to set a visible leadership example.					
Observations:					
Recommendations:					
7. Managers support fair and effective policies that promote safety and health performance by all personnel.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
8. Safety and health program tasks are assigned and clearly communicated to a specific person (or position) for performance or coordination.					
Observations:					
Recommendations:					
Streamlined Attributes: Safety and health program tasks are each specifically assigned to a person or position for performance or coordination. Each assignment of safety and health responsibility is clearly communicated to a person or position for performance or coordination.					
9. An accountability mechanism is included with each assignment of safety and health tasks to monitor performance.					
Observations:					
Recommendations:					
10. Personnel assigned safety and health tasks have the necessary knowledge and skills to safely perform their duties.					
Observations:					
Recommendations:					
Streamlined Attributes: Personnel assigned safety and health responsibilities have the necessary knowledge, skills, and timely information to perform their duties. Managers assure that appropriate safety and health training is provided to personnel before starting work and continuously assess training needs.					



<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	0	1	2	3	NE
11. Personnel have the authority necessary to effectively carry out their assigned safety and health tasks as delegated by management.					
Observations:					
Recommendations:					
Streamlined Attributes: Personnel assigned safety and health responsibilities have the authority to perform their duties. Managers delegate the authority necessary for personnel to carry out their assigned safety and health responsibilities effectively.					
12. Managers ensure that appropriate resources are fully provided to personnel to support the safety and health program.					
Observations:					
Recommendations:					
Streamlined attributes: Personnel assigned safety and health responsibilities have the resources to perform their duties. Managers allocate the resources needed to properly support the organization’s safety and health program. Workers are routinely involved in organizational decision making for allocating safety and health resources.					
13. Organizational policies effectively promote the performance of safety and health responsibilities by personnel.					
Observations:					
Recommendations:					
14. Organizational policies result in correcting non-performance or poor performance of safety and health responsibilities by personnel.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	0	1	2	3	NE
<b>Worker Participation</b>					
Do workers fully participate in the safety and health program to assure its effectiveness?					
15. Workers routinely participate in hazard identification activities.					
Observations:					
Recommendations:					
16. Workers routinely participate in hazard prevention and control activities.					
Observations:					
Recommendations:					
17. Workers routinely participate in receiving and delivering safety and health training.					
Observations:					
Recommendations:					
Streamlined Attributes:					
Workers routinely participate in the safety and health training of co-workers.					
Workers are routinely involved in organizational decision making about safety and health training.					
18. Workers routinely participate in safety and health planning activities.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
19. Workers routinely participate in evaluating and improving the organization's safety and health performance.					
Observations:					
Recommendations:					
20. There are effective processes for workers to provide input and participate in all aspects of the safety and health program without barriers.					
Observations:					
Recommendations:					
Streamlined Attributes:					
<p>There is an effective process to routinely involve workers in all aspects of the safety and health program with no barriers to participation.</p> <p>Workers are routinely involved in organizational decision making regarding the safety and health policy.</p> <p>Top management values workers involvement and participation in safety and health issues.</p>					
<b>Hazard Identification and Assessment</b>					
Are hazards routinely identified to reduce or eliminate fatalities, injuries, and illnesses?					
21. The comprehensive baseline hazard assessment for the workplace is current.  (A comprehensive baseline hazard analysis has been conducted within the past five (5) years.)s					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
22. Expert workplace hazard assessment is performed.					
Observations:					
Recommendations:					
23. Effective job hazard analysis is routinely performed.					
Observations:					
Recommendations:					
24. Changes in the workplace are always effectively analyzed for their impact on occupational safety and health before implementation.  (Change analysis is performed whenever a change in facilities, equipment, materials, or processes occurs)					
Observations:					
Recommendations:					
25. Safety Data Sheets and labels are used to assess potential hazards associated with chemical products in the workplace.					
Observations:					
Recommendations:					
26. Effective safety and health self-inspections are performed regularly to identify new or recurring hazards.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
27. An effective hazard reporting system exists for early identification of hazards.					
Observations:					
Recommendations:					
28. All incidents that result in any form of OSHA recordable injuries or illnesses are investigated for root causes to prevent recurrence.					
Observations:					
Recommendations:					
29. Near misses are investigated for root causes to prevent an injury or illness.					
Observations:					
Recommendations:					
<b>Hazard Prevention and Control</b>					
After identification, are hazards eliminated or controlled? Are controls monitored to verify that they remain effective?					
30. Feasible engineering solutions are used to protect workers from hazards.  (Feasible engineering controls are in place to protect workers from hazards.)					
Observations:					
Recommendations:					
31. Effective safe work practices and administrative controls are used to protect workers from hazards.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
32. Personal protective equipment is effectively used to protect workers from hazards.					
Observations:					
Recommendations:					
33. An effective plan for monitoring the timely correction of hazards is in place.					
Observations:					
Recommendations:					
34. Effective monitoring of established hazard control measures is conducted to verify that control measures continue to function properly.					
Observations:					
Recommendations:					
35. Applicable OSHA mandated programs are effectively in place to promote safe and healthful working conditions.					
Observations:					
Recommendations:					
36. Effective preventive maintenance is routinely performed to ensure that facilities and equipment are in good working condition.					
Observations:					
Recommendations:					
37. Effective housekeeping is routinely practiced to control hazards.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
38. The organization is properly prepared for emergency situations.					
Observations:					
Recommendations:					
39. The organization has an effective plan for ensuring timely and appropriate emergency medical care for personnel and others present at the worksite.					
Observations:					
Recommendations:					
<b>Education and Training</b>					
Do all personnel have the required knowledge and skills to safely perform their duties?					
40. All workers receive appropriate and effective safety and health training in a language and literacy level that they understand before starting (or changing) work and before changes in the workplace are implemented.					
Observations:					
Recommendations:					
41. The orientation provided to all personnel before starting work includes appropriate safety and health information. (New worker orientation includes applicable safety and health information.)					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
42. All supervisors receive appropriate and effective safety and health training to oversee workers and demonstrate knowledge of the benefits of a safety and health program to the business.					
Observations:					
Recommendations:					
Streamlined attributes: Supervisors receive appropriate training to understand the safety and health aspects of operations. Supervisors receive appropriate training to understand the management aspects of their safety and health responsibilities. Relevant safety and health program impact on business effectiveness is integrated into management training.					
43. All managers receive appropriate and effective safety and health training to fulfill their role and demonstrate knowledge of the benefits of a safety and health program to the business.					
Observations:					
Recommendations:					
Streamlined attributes: Safety and health training is provided to managers. Relevant safety and health program impact on business effectiveness is integrated into management training.					



<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>NE</b>
<b>Program Evaluation and Improvement</b>					
<p>Are there processes in place to monitor, assess, and update the safety and health program to assure continuous improvement of workplace conditions?</p> <p><i>Note: See attribute #2 for top management planning and evaluation of safety and health performance.</i></p>					
44. Data from lagging indicators are effectively analyzed to monitor performance and progress.					
Observations:					
Recommendations:					
45. Data from leading indicators are effectively analyzed to monitor performance and progress.  (Hazard incidence data are effectively analyzed to monitor performance and progress.)					
Observations:					
Recommendations:					
46. An evaluation of in-place OSHA mandated programs is conducted at least annually to correct shortcomings and identify additional opportunities to improve.					
Observations:					
Recommendations:					
47. An evaluation of the overall safety and health program is conducted at least annually to correct shortcomings and identify additional opportunities to improve.					
Observations:					
Recommendations:					

<b>Safety and Health Program Assessment Worksheet, (47)</b>					
Attribute Descriptions	Assessment Ratings				
	Missing	Developing	Well Developed	Advanced	Not Evaluated
	0	1	2	3	NE
<p><b>Communication and Coordination for Host Employers, Contractors, and Staffing Agencies (i.e., C+C)</b></p> <p>At a multiemployer worksite, do the various employers effectively communicate and coordinate to provide and maintain a safe work environment for the entire workforce?</p> <p>C+C requirements are <u>not</u> assessed separately. Specific C+C requirements are incorporated into <u>each</u> attribute and assessed when applicable, together with all other appropriate safety and health requirements. See cover page for instructions.</p> <p>Action Items for C+C:</p> <ul style="list-style-type: none"> <li>(1) Establish effective communication: Each host employer establishes and implements a procedure to ensure the exchange of information about hazards present on-site and the hazard control measures in place. Thus, all workers on-site are aware of hazards as well as the methods and procedures for controlling or preventing exposures to them.</li> <li>(2) Establish effective coordination: Host employers, contractors, and staffing agencies coordinate work plans, schedules, and resolution of program differences to identify and address any concerns or conflicts that could impact safety or health before starting work.</li> </ul>					

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# APPENDIX L – SAFETY AND HEALTH PROGRAM FORMAL ASSISTANCE

## Introduction

There are three basic methods for assessing Safety and Health Program effectiveness. This guide will explain each of them. It also will provide more detailed information on how to use these tools to evaluate each element and subsidiary component of a Safety and Health Program.

The three basic methods for assessing Safety and Health Program effectiveness:

- Checking documentation of activity;
- Interviewing employees and supervisors at all levels for knowledge, awareness and perceptions; and
- Reviewing site conditions and, where hazards are found, finding the weaknesses in management systems that allowed the hazards to occur or to be "uncontrolled."

Some elements of the Safety and Health Program are best assessed using one of these methods. Others lend themselves to assessment by two or all three methods.

## Documentation

Checking documentation is a standard audit technique. It is particularly useful for understanding whether the tracking of hazards to correction is effective. It can also be used to determine the quality of certain activities, such as self-inspections or routine hazard analysis.

Inspection records can tell the evaluator whether serious hazards are being found, or whether the same hazards are being found repeatedly. If serious hazards are not being found and accidents keep occurring, there may be a need to train inspectors to look for different hazards. If the same hazards are being found repeatedly, the problem may be more complicated. Perhaps the hazards are not being corrected. If so, this would suggest a tracking problem or a problem in accountability for hazard correction.

If certain hazards recur repeatedly after being corrected, someone is not taking responsibility for keeping those hazards under control. Either the responsibility is not clear, or those who are responsible are not being held accountable.

## Employee/Supervisor Interviews

Talking to randomly selected employees and supervisors at all levels will provide a good indication of the quality of employee training and of perceptions of the program. If injury and illness prevention training is effective, employees will be able to tell you about the hazards they work with and how they protect themselves and others by keeping those hazards controlled.

Every employee should also be able to say precisely what he or she is expected to do as part of the program. And all employees should know where to go in an emergency.

Employee perceptions can provide other useful information. An employee's opinion of how easy it is to report a hazard and get a response will tell you a lot about how well your hazard reporting

system is working. If employees indicate that your system for enforcing safety and health rules and safe work practices is inconsistent or confusing, you will know that the system needs improvement.

Interviews should not be limited to hourly employees. Much can be learned from talking with first-line supervisors. It is also helpful to query line managers about their understanding of their injury and illness prevention responsibilities.

### Site Conditions and Root Causes of Hazards

Examining the overall condition of the workplace can reveal existing hazards. But it can also provide information about the breakdown of those management systems meant to prevent or control these hazards.

Looking at conditions and practices is a well established technique for assessing the effectiveness of Safety and Health Programs. For example, let's say that in areas where personal protective equipment (PPE) is required, you see large and understandable signs communicating this requirement and all employees -- with no exceptions -- wearing equipment properly. You have obtained valuable visual evidence that the PPE program is working.

Another way to obtain information about Safety and Health Program management is through root analysis of observed hazards. This approach to hazards is much like the most sophisticated accident investigation techniques, in which many contributing factors are located and corrected or controlled.

For example, let's say that during a review of conditions, you find a machine being operated without a guard on a pinch point. You should not limit your response to ensuring that a guard is installed. Asking a few questions can reveal a lot about the safety program's management systems. Why was the guard missing? If the operator says he did not know a guard was supposed to be on the machine, follow up with questions about the existence of safe work procedures and/or training.

If he says that the guard slows him down, and that the Supervisor knows he takes it off, ask questions about the enforcement of rules, accountability, and the clarity of the worksite objective of putting safety and health first.

Oftentimes, a different lead question is appropriate. Has a comprehensive survey of the worksite been done by someone with enough expertise to recognize all potential and existing hazards?

Analyzing the root causes of hazards, while very helpful during a formal assessment, is a technique that also lends itself to everyday use. Attempt to analyze causes whenever hazards are observed during a consultation.

The remainder of this appendix will identify the attributes of excellence found in each of the seven key elements of an effective Safety and Health Program.

Note: The Attributes of Excellence of a Safety and Health Program are under revision in response to the updated seven elements in the Safety and Health Program Assessment Worksheet.

The revision will be partially dependent upon input and suggestions from consultation staff.

## Attributes of Excellence of a Safety, Health, and Ergonomics Program (58)

**Note:** The Attributes of Excellence for the 47 attribute SHPA form are found under the List of Performance Indicators under each attribute in the Oregon OSHA's attributes Reference Guide For the Safety and Health Program 1assessment Worksheet, OSHA Form-22, found under SHARP & VPP on the internal Consultation web page.

### I. Hazard Anticipation and Detection

1. A comprehensive baseline hazard survey has been conducted within the last 5 years.
  - a. The comprehensive baseline hazard survey includes safety, health, and ergonomics.
  - b. The surveys are conducted frequently enough to timely and effectively address hazards.
  - c. The surveys are performed by competent and qualified individuals that can effectively and thoroughly understand the hazards of the industry.
  - d. The survey results in an updated hazard list or survey report (action plan).
  - e. The survey results in effective controls for hazards found.
  - f. The survey drives immediate corrective action on items found.
  - g. The survey tries to include outside personnel to help prevent tunnel vision and maintain objectiveness.
  - h. The survey was completed by a certified specialist.
  - i. The survey identified all serious hazards associated with the facility and resulted in appropriate hazard control programs.
2. Effective safety and health self-inspections are performed regularly.
  - a. Inspections of the workplace are conducted in all work areas.
  - b. Inspections identify new, reoccurring, or previously missed safety, health, and/or ergonomic hazards and/or failures in hazard control systems.
  - c. Inspections are conducted at least quarterly at fixed worksites, weekly at rapidly changing sites, and as frequently as daily where necessary.
  - d. Inspectors have adequate training in workplace safety, health, and ergonomics.
  - e. Logs, checklist, or other type of written reports are used to document formal inspections.
  - f. All hazard findings are addressed as soon as practically possible.
  - g. Hazards identified do not appear on future inspections.
  - h. The responsibility for inspections rests with more than one person.

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- i. The responsibility for inspections is scattered throughout the organization.
  - j. Inspections are conducted by teams.
  - k. Appropriate time is provided to conduct the inspections.
  - l. Tools (such as digital cameras, palm pilots, and computers) are used in self-inspection process.
3. Effective surveillance of established hazard controls is conducted.
- a. Established hazard controls for safety, health, and ergonomics are in place and operational.
  - b. The hazard controls are prioritized with the emphasis on engineering controls, safe work practices, and administrative controls before PPE.
  - c. Employees understand the hazard control associated with their work areas.
  - d. Monitoring evaluation of hazard controls is on going and known to and by the work force.
  - e. Supervisors receive training in surveillance of established hazard controls.
  - f. At least some employees receive training in surveillance of established hazard controls.
  - g. Surveillance activity is required supervisory duty and is tracked in some fashion.
  - h. Some type of trend analysis of tracked surveillance activity is done.
  - i. Trend analysis of tracked surveillance activity results in improved performance of established hazard controls.
4. An effective hazard reporting system exists.
- a. A system for employee reporting of safety, health, and ergonomic hazards is in place and is known to all employees.
  - b. The system allows for the reporting of physical and behavioral hazards.
  - c. Corrective action is taken promptly on all confirmed hazards.
  - d. While waiting for final correction, the employer finds ways to protect those affected.
  - e. All personnel are aware that hazards can develop within existing jobs, processes and/or phases of activity.
  - f. The system provides for self-correction of hazards when possible.
  - g. Employees are provided positive reinforcement or incentive for using the system.
  - h. There is an informal method of hazard reporting for employees to report hazards to their supervisors.
  - i. There is a formal method available to employees to report hazards on a form to the safety department.

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- j. Reported hazards are collected and analyzed and used to set priorities and action planning on addressing hazards in the workplace.
  - k. There is a mechanism for formal and informal hazard reporting to promptly communicate (to the person reporting the hazard) the status and intended action regarding the reported hazard.
  - l. All hazards reported are communicated to the work force in some manner.
  - m. Few hazards are noted in the workplace.
5. Change analysis is performed whenever a change in facilities, equipment, materials, or processes occurs.
- a. Change analysis includes a review of safety, health, and ergonomic hazards.
  - b. Changes in space, processes, materials, or equipment at the facility are planned.
  - c. Affected personnel are made aware of planned changes prior to implementation.
  - d. A comprehensive hazard review process exists and is used for all changes.
  - e. The hazard review (analysis) process encourages recommendations for improvement, which are implemented prior to start-up.
  - f. The analysis process involves competent, qualified specialists appropriate to the process being evaluated.
  - g. There is a formal, written process for change analysis.
  - h. Affected employees are involved in the change analysis.
  - i. Change analysis procedures include revisions of Job Hazard Analysis (JHA), Standard Operation Procedures, lockout methods, PPE, and other program elements affected by the change.
6. Accidents are investigated for root cause.
- a. Workplace policy requires a thorough investigation of all accidents and incidents.
  - b. All accidents and incidents are investigated as required by policy.
  - c. All investigations are conducted by personnel trained in accident/incident investigation techniques.
  - d. All investigations include input from all affected parties and witnesses, where possible.
  - e. All investigations determine "root causes" and underlying factors.
  - f. Recommendations designed to adequately address root causes, are made as a result of all investigations and result in prompt corrective action with the intent to prevent reoccurrence.
  - g. Completed investigative reports are routed to appropriate levels of management and knowledgeable staff for review.
  - h. Investigations are done by management and employees.

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- i. Results of investigations are shared with the work force.
  - j. Top management reviews all accidents and incidents to review if root cause was identified adequately.
  - k. Standard forms are used to document all accidents and investigations.
  - l. Top management participates in investigations.
7. Safety Data Sheets (SDS) are used to reveal potential hazards associated with chemical products in the worksite.
- a. Employees understand the hazards introduced to their jobs by chemical use.
  - b. Hazards identified in SDSs are effectively controlled.
  - c. Employees have seen and understand the SDSs applicable to the chemicals they use.
  - d. Applicable SDS information is incorporated into written job hazard analysis forms.
  - e. SDSs are periodically reviewed in order to determine if a safer product could be used, or if current JHAs address the hazard adequately.
  - f. Information on the SDS is used by personnel performing change analysis to identify potential hazards related to new chemicals being introduced into the workplace.
  - g. The Safety Committee reviews SDSs to address the prevention, elimination, and/or control of hazards posed by chemical products.
8. Effective job hazard analysis is performed.
- a. Job hazard analysis addresses safety, health, and ergonomic hazards.
  - b. There are hazard-analysis systems designed to address routine jobs, processes, or phase hazards in place at the facility.
  - c. Hazard analysis systems identify or prompt corrective or preventive action to reduce or eliminate worksite hazards.
  - d. All tasks, job processes, or phases of activity are analyzed.
  - e. All job processes, or phases of activity are analyzed whenever there is a change, when a loss incident occurs, or on a schedule of no more than 3 years.
  - f. Upon implementation of the corrective or preventive actions identified by the hazard analysis process, the written hazard analysis is revised to reflect those actions.
  - g. Employees are involved in the hazard analysis process.
  - h. Accident and incident investigation leads to job hazard analysis when appropriate.
  - i. There is a standard and uniform format used to document job hazard analysis.
  - j. JHAs are posted at workstations.
  - k. Assessment tools and interviews are utilized in the hazard analysis process.



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9. Expert hazard analysis is performed.
  - a. The comprehensive hazard review process involves competent, qualified safety, health and/or ergonomic specialists appropriate to the workplace.
  - b. All hazard analyses identify corrective or preventive action to be taken to reduce or eliminate the risk of injury or loss, where applicable.
  - c. All corrective or preventive actions identified by the hazard analysis process have been implemented or addressed.
  - d. Hazard analysis surveys are routinely updated, using personnel competent in the fields of safety, industrial hygiene, ergonomics, and risk management.
  - e. Outside professional resources are taken advantage of (associations, insurance loss control, private and public consultants, etc.).
  - f. Findings of expert hazard analysis are shared with the work force.
10. Incidents are investigated for root causes.
  - a. Workplace policy requires the reporting of all actual and "near miss" accidents.
  - b. All investigations determine "root causes."
  - c. All accidents and incidents are investigated as required by policy.
  - d. Results of accident investigations are corrected immediately or scheduled for correction in the organization's action plan.
  - e. Accident investigators have received appropriate training.
  - f. All accidents and incidents are reported as required by policy.
  - g. Workplace policy requires a thorough investigation of all accidents and incidents.
  - h. Personnel understand the definition of an incident in the workplace.
  - i. Personnel in the workplace understand the importance of reporting incidences and do so.
  - j. There is a formal incident reporting form.

## **II. Hazard Prevention and Control**

11. Feasible engineering controls are in place.
  - a. Safety, health and ergonomic hazard controls are in place at the facility.
  - b. Hazard controls are selected in appropriate priority order, giving preference to engineering controls, safe work procedures, administrative controls, and personal protective equipment (in that order).
  - c. Once identified, hazards are promptly eliminated or controlled.
  - d. Management, supervision, and the safety committee understand and can explain the hazard controls in the correct priority.
  - e. Employees understand and can explain the hazard controls in the correct priority.

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12. Effective safety and health rules and work practices are in place.
  - a. The rules are clearly written.
  - b. The rules relate to the safety and health policy.
  - c. The rules and work practices address potential safety, health and ergonomic hazards.
  - d. Observations demonstrate that all employees are following safe work rules.
  - e. Standards cover all work and workplaces at the facility and are readily available to all members of the work force.
  - f. There are effective means of communicating rules to the work force, such as training classes, employee safety handouts, rules posted in the workplace, and one-on-one discussions between employees and supervisors.
  - g. Employees support the rules and monitor one another to ensure compliance.
  - h. Employees have input into the development of workplace safety rules.
13. Applicable OSHA-mandated programs are effectively in place.
  - a. Required programs are fully in place and operational.
  - b. Employees and management understand and support the need for mandated programs.
  - c. Required programs are evaluated and updated at least annually.
  - d. Employees are involved in the review.
14. Personal Protective Equipment (PPE) is effectively used.
  - a. PPE assessment has been completed and documented.
  - b. Employees understand the need for, use of, and care of PPE associated with their jobs.
  - c. PPE onsite is appropriate to the hazards.
  - d. Employees use the PPE that is provided.
  - e. PPE is properly donned and kept appropriately clean.
  - f. There is documented PPE training for all affected employees.
  - g. The need for specific PPE in the workplace is adequately communicated by the means of training, postings, signs, JHAs, etc.
  - h. The PPE is properly sized for each employee.
15. Housekeeping is properly maintained.
  - a. Aisles and exit ways are clear and unobstructed.
  - b. Housekeeping is a regular task rather than an afterthought.
  - c. Routine processes, which generate waste, have housekeeping procedures built-in to them.

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- d. Storage areas are kept in a clear and orderly condition.
  - e. There is a written policy regarding housekeeping in the workplace and all personnel have been instructed in the policy and understand it.
  - f. Supervisors enforce the housekeeping policy.
  - g. There are specific and routine housekeeping inspections.
  - h. Appropriate accountability measures are in place to address poor housekeeping.
16. The organization is properly prepared for emergency situations.
- a. All potential emergency situations that may impact the facility are identified.
  - b. A facility plan to deal with all potential emergencies has been prepared in writing.
  - c. The plan incorporates all elements required by law, regulation, and local code.
  - d. The plan is written to compliment and support the emergency response plans of the community and adjacent facilities.
  - e. The plan is current.
  - f. The plan is tested regularly with drills and exercises.
  - g. Community emergency responders are involved, where appropriate, in the facility drills and exercises.
  - h. The plan is effective at limiting the impact of the emergency on the facility and the work force.
  - i. Emergency communication systems are installed, operational, and redundant.
  - j. The communication systems are tested at regular intervals (at least monthly).
  - k. Emergency directions are available, correct and accurate in all spaces, corridors, and points of potential confusion.
17. The organization has an effective plan for providing competent emergency medical care to employees and others present at the site.
- a. The facility has a plan for providing emergency medical care to employees and others present on the site.
  - b. Competent emergency medical care is available on all shifts.
  - c. The emergency medical plan is followed when medical emergencies arise.
  - d. Emergency medical care is provided in accordance with standardized protocols.
  - e. Onsite emergency medical personnel are certified to at least the basic first aid and CPR levels.
  - f. Off site providers of emergency medical care, when utilized, are medical doctors, registered nurses, paramedics, emergency medical technicians, or certified first responders.
  - g. There is an onsite nurse.

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- h. There are first aid personnel who are required to provide first aid as part of their job duties.
  - i. First aid training is offered to all personnel.
  - j. There are appropriate plans to direct outside emergency medical personnel into the workplace to the correct location.
  - k. First aid supplies are appropriate for the workplace, and there is a procedure to ensure they remain stocked.
  - l. All personnel are aware of the emergency medical plan and how to implement it, given their individual responsibilities.
  - m. There is a routine training class to review the emergency medical plan with personnel.
  - n. Outside contractors, vendors, and others are provided adequate instruction to ensure their emergency medical care while they are in the workplace.
18. Effective preventative maintenance (PM) is performed.
- a. A preventative maintenance program is in place at the facility.
  - b. Maintenance recommendations from manufacturers or builders are being followed for all applicable facilities, equipment, machinery, tools, and/or materials.
  - c. The preventative maintenance system ensures that maintenance for all operations in all areas is actually conducted according to schedule.
  - d. Operators are trained to recognize maintenance needs and perform or order maintenance on schedule.
  - e. Predictive maintenance procedures are incorporated into the system.
  - f. The preventative maintenance procedures go beyond operation-related equipment to cover the maintenance of engineered hazard controls and emergency equipment as well.
  - g. There is a scheduled shutdown to address preventative maintenance issues.
  - h. Operators give positive remarks about the PM of the machines and equipment they operate.
  - i. There is a PM policy, which not only addresses the issue of production, but also address safety.
19. An effective procedure for tracking hazard correction is in place.
- a. The tracking procedure flags and tracks safety, health and ergonomic hazards until they are adequately addressed.
  - b. There is a timetable for implementation of corrective action.
  - c. The system covers items identified from various sources, including self-inspections, employee recommendations and reports, Safety Committee, and maintenance logs.

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- d. Employees are aware of and comfortable using the system.
- e. The hazard tracking system prompts feedback after the hazard is addressed.
- f. The tracking hazard system uses a computerized spreadsheet format to identify hazards, assign responsibility for completing, completion dates, and follow-up.
- g. Employees are allowed to initiate work orders to be placed on the hazard correction form involving safety and health.
- h. A review of the tracking hazard form shows that hazards are being promptly corrected.

### III. Planning and Evaluation

- 20. Workplace injury/illness data effectively analyzed.
  - a. A system exists that tracks safety, health, and ergonomic related trends at the facility.
  - b. The system addresses trailing indicators, including accidents, occupational injuries and illnesses, hazards identified, and complaints from employees and others.
  - c. The system addresses leading indicators of safety and health effectiveness, including employee attitudes and employee behaviors.
  - d. Affected personnel understand the need to systematically, accurately and consistently provide updated information to the system for tracking.
  - e. Trend data is consistently provided to all facility personnel.
  - f. All personnel are fully aware of safety, health, and ergonomic trends, causes, and means of prevention.
  - g. Trend data is utilized to drive improvement and prevention activities.
  - h. The Safety Committee and other employees participate in analyzing workplace injury/illness data.
  - i. Evaluation of the OSHA 300 Log and workers compensation data for soft tissue illnesses or injuries is completed at least annually.
- 21. Hazard incidence data is effectively analyzed.
  - a. All written reports of inspections are retained for a period sufficient to show a clear pattern of inspections.
  - b. Statistical summaries of all routine inspections are prepared, charted and distributed to all personnel so as to show status and progress at hazard elimination.
  - c. The Safety Committee analyzes hazards to identify deficiencies in the safety and health management system.
  - d. A method exists for systematic tracking of recommendations, progress reports, resolutions, and outcomes.

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- e. The system provides for data collection and display as a means to measure the success of the system in resolving identified hazards.
22. A safety and health goal and supporting objectives exist.
- a. Safety, health and ergonomic goals and objectives exist in writing.
  - b. The goals relate directly to the safety and health policy or vision.
  - c. Objectives exist which are designed to achieve the goals.
  - d. The goals and objectives are able to be evaluated and revised as needed.
  - e. A reliable measurement system exists to indicate progress on objectives toward the goal.
  - f. The measurement system is consistently used to manage work on objectives.
  - g. The objectives can be easily explained by others within the workplace.
  - h. Measures used to track objective progress are known to the work force.
  - i. Goals are specific, measurable, achievable, result-oriented, and clear time frames.
  - j. Management visibly communicates their support of the goals to the work force.
  - k. There are concrete examples that the goals and objectives are being met.
  - l. Employees had input into the development of goals and objectives.
  - m. Goals and objectives are developed based on audits and analysis of the effectiveness of the Safety and Health Program, along with other safety and health related data.
23. An action plan designed to accomplish the organization's safety and health objectives is in place.
- a. A plan is in place to implement the objectives of the Safety and Health Program.
  - b. The plan objectives are designed to achieve the stated goals.
  - c. The objectives relate to safety, health and ergonomic deficiencies identified in periodic assessments or comprehensive review.
  - d. Objectives in the action plan are clearly assigned to responsible individuals.
  - e. The action plan includes a measurement system to track progress on each objective.
  - f. Actions planned to accomplish objectives are specific and short-termed.
  - g. Employees are involved in the development of and implementation of the action plan.
  - h. Top management visibly supports the completion of the action plan.
  - i. Top management is involved in the development of and completion of the action plan.

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- j. The organization communicates the progress of the action plan to the work force and “celebrates” successes with the work force.
24. A review of in-place OSHA-mandated programs is conducted at least annually.
- a. The review examines written materials, the status of goals and objectives, records of incidents, records of training and inspections, employee and management opinion, observable behavior and physical conditions.
  - b. The results of the review are documented and drive appropriate changes or adjustments in the program.
  - c. The review samples evidence over the entire facility or organization.
  - d. The results of the review are documented and drive appropriate changes or adjustments in the programs.
  - e. Employees are involved in the review.
  - f. The employer has a structured and scheduled system for conducting the review.
  - g. Findings are communicated to the work force.
25. A review of the overall safety and health management system is conducted at least annually.
- a. A review of the management system includes safety, health, and ergonomics.
  - b. Reviews are used to make positive changes in policy, procedures and programs.
  - c. The review includes all facets of the facility.
  - d. The Safety and Health Program is reviewed at least annually.
  - e. The review examines written materials, the status of goals and objectives, records of incidents, records of training and inspections, employee and management opinion, observable behavior and physical conditions.
  - f. The review process drives correction of identified deficiencies.
  - g. Evidence exists that demonstrates that program components actually result in the reduction or elimination of accidents.
  - h. Positive findings are communicated and celebrated with the work force.
  - i. Top management is directly involved with the audit.
  - j. Employee representatives are involved in the audit.

### **IV. Administration and Supervision**

26. Safety and Health Program tasks are each specifically assigned to a person or position for performance or coordination.
- a. An individual or group is assigned responsibility for compiling and analyzing records for safety, health and ergonomic trends.
  - b. All elements of the company's Safety and Health Program are specifically assigned to a job or of position for coordination.



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- c. Individuals within the company can describe the specific safety, health and ergonomic duties assigned to them.
  - d. Assigned responsibility is documented.
27. Each assignment of safety and health responsibility is clearly communicated.
- a. The objectives are clearly assigned to responsible individual(s).
  - b. Clear roles and responsibility are established.
  - c. Assignments are in writing.
  - d. Each assignment covers broad performance expectations.
  - e. Personnel understand their responsibilities.
28. An accountability mechanism is included with each assignment of safety and health responsibility.
- a. Authority to meet assigned responsibilities exists for all personnel.
  - b. Authority is granted in writing.
  - c. Methods exist for monitoring performance of responsibilities.
  - d. All personnel, including managers, are held accountable to follow the rules.
  - e. Positive accountability systems are an integral part of the accountability mechanisms.
  - f. Responsibilities are being met appropriately and on time.
  - g. All personnel are held accountable for meeting their safety, health, and ergonomic responsibilities.
  - h. Personnel meeting or exceeding responsibilities are appropriately reinforced for their behavior with positive consequences.
  - i. Members of management at all levels consistently address the safety behavior of others by coaching and correcting poor behavior and positively reinforcing good behavior.
29. Individuals with assigned safety and health responsibilities have the necessary knowledge, skills and timely information to perform their duties.
- a. All personnel with program assignments are familiar with their responsibilities.
  - b. Personnel with assigned safety, health, and ergonomic responsibilities have had appropriate training or mentoring to enable them to understand and meet those responsibilities.
  - c. Personnel understand the programs or process to which they have been assigned.
  - d. Specific skills, knowledge, and information (for safety, health and ergonomic responsibilities) are documented to ensure that personnel assigned the responsibility have these needed qualities.



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30. Individuals with assigned safety and health responsibilities have the authority to perform their duties.
  - a. Personnel believe they actually have the authority granted to them.
  - b. Personnel understand how to exercise the authority granted to them.
  - c. Personnel do exercise the authority granted to them.
  - d. Authority is exclusively within the control of the individual holding the responsibility.
  - e. Authority is documented and there is a formal method to ensure personnel recognize their authority.
31. Individuals with assigned safety and health responsibilities have the resources to perform their duties.
  - a. Adequate resources (personnel, methods, equipment, funds) to meet responsibilities are available to all affected personnel.
  - b. Necessary resources are within the control of the individual holding the responsibility.
  - c. Resources are being effectively applied by all personnel in order to meet responsibilities.
32. Organizational policies promote the performance of safety and health responsibilities.
  - a. There is a policy that promotes safety, health and ergonomics.
  - b. The policy is available in writing.
  - c. The policy is clear and straightforward.
  - d. The policy can be easily explained or paraphrased by others within the work force.
  - e. The safety and health policy fits within the context of other organizational values.
  - f. The safety and health policy guides all employees in making a decision in favor of safety and health when apparent conflicts arise with other values and priorities.
  - g. The policy provides for consequences that are Positive, Immediate, and Certain (PIC) from the perspective of the employee.
  - h. The policy is appropriately communicated throughout the organization including new employee orientation.
  - i. There is an incentive policy that promotes safety awareness and worker participation in safety related activities.
33. Organizational policies result in the correction of non-performance of safety and health responsibilities.
  - a. The policy statement goes beyond compliance to address the safety behavior of all members of the organization.

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- b. Failure to meet assigned responsibilities is addressed and results in appropriate coaching and/or negative consequences.
- c. Accountability data is used to revise goals and objectives so as to facilitate continuous safety and health improvement.
- d. Safe work rules are understood and followed as a result of training and accountability.
- e. Methods exist for monitoring performance.

### **V. Safety and Health Training**

- 34. Employees receive appropriate safety and health training.
  - a. An employee safety and health training program exists at the facility.
  - b. The training covers all legally required subjects.
  - c. The training covers safety, health and ergonomic hazards (awareness, location, identification, and protection or elimination).
  - d. The training system ensures that the knowledge and skills taught are consistently and correctly applied by the employees.
  - e. Employees are fully trained in the use of controls and methods to protect themselves in their work area.
  - f. All members of the work force have been trained on the use of appropriate hazard analysis systems.
  - g. All personnel involved in inspections have been trained in the inspection process and in hazard identification.
  - h. Personnel can explain and demonstrate their role under the emergency medical plan.
  - i. Personnel are trained in the use of emergency equipment available to them and can demonstrate the proper use of the equipment.
  - j. Post-training knowledge and skills are tested or evaluated to ensure employee proficiency in the subject matter.
  - k. The safety committee has effective safety, health and ergonomic training.
  - l. Employees performing high-risk jobs or tasks, where the MSD hazard(s) are not eliminated and/or administrative or work-practice controls are used to reduce MSD incidence, are trained in ergonomic risk factors and descriptions of early signs and symptoms, with an emphasis on early reporting.
- 35. New employee orientation includes applicable safety and health information.
  - a. Orientation includes information on safety, health and ergonomics.
  - b. Orientation covers the facility safety system (policy, goals and objectives, operations, tools and techniques, responsibilities, and system measurement).
  - c. Orientation covers the facility emergency procedures.

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- d. The orientation is provided to all new employees and all personnel working onsite, including vendors, temporary workers and contract workers prior to exposure to workplace hazards.
  - e. There is follow-up action to determine the retention of orientation training for new employees, and there are provisions for retraining when deficiencies are noted in the follow-up.
  - f. There is a formal and documented program, which is used for new employee orientation.
  - g. New employee orientation is reviewed in the annual Safety and Health Program audit.
36. Supervisors receive appropriate safety and health training.
- a. A supervisory training program addressing safety, health and ergonomics exists at the facility.
  - b. The training is provided to all supervisors.
  - c. Training is regularly evaluated for effectiveness and revised accordingly.
  - d. Post-training knowledge and skills are tested or evaluated to ensure supervisory proficiency.
  - e. Supervisors receive the same training as employees in their department.
37. Supervisors receive training that covers the supervisory aspects of their safety and health responsibilities.
- a. The training covers all subject matter delivered to employees.
  - b. The training covers the facility safety system (policy, goals and objectives, operations, tools and techniques, responsibilities, and system measurement).
  - c. The training covers supervisory safety, health and ergonomic responsibilities.
  - d. The training system ensures that the knowledge and skills taught are consistently and are correctly applied by the supervisors.
  - e. There is a formal and structured training program for supervisors.
38. Safety and health training is provided to managers.
- a. A management safety and health training program exists at the facility (where applicable).
  - b. Safety, health and ergonomic training is provided to all managers.
  - c. The training covers all subject matter delivered to employees and supervisors to the extent necessary for managers to evaluate employee and supervisory knowledge and skills and to reinforce or coach desired safety and health behaviors.
  - d. Post-training knowledge and skills are tested or evaluated to ensure management proficiency in the subject matter.

39. Relevant safety and health aspects are integrated into management training.
  - a. The training covers the facility safety system (management concepts and philosophies, policy, goals and objectives, operations, tools and techniques, and system measurement).
  - b. The training covers management safety, health and ergonomic responsibilities.
  - c. The training system ensures that the knowledge and skills taught are consistently and correctly applied by the managers.
  - d. The training system for all employees is regularly evaluated for effectiveness and is revised accordingly.
  - e. The training covers the reasons behind and the importance of a formal management of change (MOC) process to ensure that change is properly managed so as not to introduce unnecessary risk.
  - f. The training covers the importance of long-term safety continuity (safety succession planning) process to ensure the company maintains a continuous improvement-oriented safety culture while providing stability in health, safety, and ergonomic leadership roles.

## **VI. Management Leadership**

40. Top management policy establishes clear priority for safety and health.
  - a. The safety and health policy is supported by senior management.
  - b. The goals are supported by senior management and can be easily explained or paraphrased by others within the workplace.
  - c. Members of the work force can give examples of management's positive leadership.
  - d. Members of the work force credit management with establishing and maintaining positive safety values in the organization through their personal example and attention to the behavior of others.
41. Top management considers safety and health to be a line rather than a staff function.
  - a. Production supervisors are held accountable for safety, health and ergonomics in their departments.
  - b. All personnel are held accountable for their safety and health behaviors.
  - c. Performance evaluations of individual supervisors take into account the safety and health performance of the employees under their control.
  - d. Safety and health staff are utilized as a resource.
  - e. Supervisors and employees take ownership for safety in their work area.
  - f. Program elements are managed and administered by supervisors and employees.

## Appendix L – Safety and Health Program Formal Assistance

42. Top management provides competent safety and health staff support to line managers and supervisors.
  - a. Competent safety and health personnel are made available as a resource to assist line managers and supervisors.
  - b. Clerical support is available as needed for safety and health related functions.
  - c. Safety, health and ergonomic issues are a priority topic during production meetings.
  - d. Outside resources such as trade associations, private and public consultants are obtained as necessary.
  - e. Safety and health staff are available as a resource.
43. Managers personally follow safety and health rules.
  - a. Managers throughout the organization consistently follow the rules and behavioral expectations set for others in the work force.
  - b. Members of the work force perceive management to be consistently setting positive examples and can explain why they hold these positive perceptions.
  - c. Managers give high priority to practicing safe and healthful behaviors and to personally leading by example.
44. Managers delegate the authority necessary for personnel to carry out their assigned safety and health responsibilities effectively.
  - a. Those with safety, health and ergonomic responsibilities are given the authority to meet those responsibilities.
  - b. Delegated authority for safety and health is clearly assigned.
  - c. Position descriptions not only specifically state the responsibilities of the position, but also state the authority granted to carry out those duties.
45. Managers allocate resources needed to properly support the organization's safety and health system.
  - a. Safety, health and ergonomic considerations are included in the budget.
  - b. Top management ensures adequate resources are provided to meet safety, health and ergonomic responsibilities.
  - c. Emergency equipment appropriate to the facility (including sprinkler systems, fire extinguishers, first aid kits, fire blankets, safety showers and eye washes, emergency respirators, protective clothing, spill control and clean-up material, chemical release computer modeling, etc.) is installed or available.
  - d. Emergency equipment is distributed in sufficient quantity to cover anticipated hazards and risks, is operational, and is tested at regular intervals (at least monthly).
  - e. In addition to budgeting for safety, management allocates personnel, personnel-effort, supplies, equipment, facilities, and services for safety.

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- f. Management encourages mentoring and networking relationship with other SHARP or VPP companies, the Oregon SHARP Alliance, a local ASSE or similar health and safety networking organization.
46. Managers assure that appropriate safety and health training is provided.
- a. An employee safety, health and ergonomic training program exist at the facility.
  - b. The training covers all legally required subjects.
  - c. Training policies and procedures indicate that legally required elements are the minimum acceptable levels of training.
  - d. Training procedures cover behavioral-based safety performance activities.
  - e. Management ensures the training is specific and applicable to the work task.
  - f. Managers use the annual program reviews to identify needed training.
  - g. Management performs follow-up to training to ensure the training is appropriate, understood, and being used, and driving the improvements desired.
47. Managers support fair and effective policies that promote safety and health performance.
- a. The employer provides opportunities and mechanism(s) for employees to influence Safety and Health Program design and operation.
  - b. Safety, health and ergonomic policies promote positive behaviors while correcting deficient behaviors.
  - c. Where applicable, written policies spell out rewards for safe and healthful work activities.
  - d. Policies are established that link pay raises, bonuses, and promotions to personnel evaluations.
  - e. Position descriptions are developed to assist employees in their understanding of their responsibilities.
  - f. Safety incentive policies promote employee involvement in safety activities and do not discourage injury, illness and hazard reporting in any way.
  - g. A Management of Change policy exists to ensure occupational health, safety and ergonomic hazards are evaluated prior to change implementation.
  - h. A leadership succession process is in place to ensure long-term stability of health- and safety- related processes and procedures.
48. Top management is involved in the planning and evaluation of safety and health performance.
- a. Top management is routinely involved in activities related to planning and evaluating facility safety, health and ergonomic performance.
  - b. Top management is held accountable for facility safety performance through their own performance evaluations.

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- c. Top management is familiar with and understands the organization’s planning and evaluation efforts.
  - d. Members of the work force perceive management to be exercising positive leadership.
  - e. Top management is involved in regularly evaluating training for effectiveness.
  - f. Top management ensures that the site Management of Change (MOC) processes address organizational changes (personnel or staffing), activity changes (processes, equipment, infrastructure, software), material changes (new or different chemicals, packaging or product) and changes to the SHMS (policies, procedures).
49. Top management values employee involvement and participation in safety and health issues.
- a. Top management actively encourages employees to be involved in safety and health activities, including participation in local and regional networking and mentoring opportunities.
  - b. Management implements a process for employees for early reporting of symptoms.
  - c. Management encourages employees to report safety, health and ergonomic hazards.
  - d. Management can describe available avenues for employees to participate in safety and health activities.
  - e. Participation in the Safety Committee is respected and valued in the organization.
  - f. Supervisors and managers actively encourage use of the employee involvement systems and employees feel comfortable using those systems in all situations.
  - g. Several avenues have been established by upper management to solicit and gather employee input.
  - h. Top management ensures that the site Management of Change (MOC) processes address organizational changes (personnel or staffing), activity changes (processes, equipment, infrastructure, software), material changes (new or different chemicals, packaging or product) and changes to the SHMS (policies, procedures).

## **VII. Employee Participation**

50. There is an effective process to involve employees in safety and health issues.
- a. There are multiple avenues for employee participation in safety, health and ergonomic issues.
  - b. The avenues are well known, understood, and utilized by employees.
  - c. The avenues and mechanisms for involvement are effective in reducing accidents and enhancing safe behaviors.



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- d. Data related to key elements of safety and health performance are accumulated and displayed within the workplace to inform all personnel of progress being made.
  - e. Employees throughout the company are aware of the methods to involve employees.
  - f. There are open lines of communication between workers and forum meetings.
  - g. A Safety Committee is in place and functional.
  - h. That Safety Committee is structured in accordance with the Safety Committee rules.
  - i. There are mandatory safety meetings.
  - j. There is an open door policy.
  - k. There is a suggestion box type program.
51. Employees are involved in organizational decision-making in regard to safety and health policy.
- a. Employees accept personal responsibility for ensuring a safe and healthful workplace.
  - b. Employees have a substantial impact on the design and operation of the Safety and Health Program.
  - c. Employees have significant input to the rules.
  - d. Safety Committee members work with management to review and revise policies on safety, health and ergonomics.
  - e. Employees are involved in annual program reviews.
  - f. Employees are involved in change analysis.
52. Employees are involved in organizational decision-making in regard to the allocation of safety and health resources.
- a. Employee input is sought in regard to the future allocation of safety, health and ergonomic resources.
  - b. The Safety Committee is given the opportunity to provide feedback on planned distribution of safety and health assets.
  - c. The resource allocation goes beyond just budget, and includes allocation of personnel, supplies, equipment, facilities or services.
53. Employees are involved in organizational decision-making in regard to safety and health training.
- a. Employees are provided with the opportunity to develop and provide training to peers.
  - b. Employees have the opportunity to evaluate and update training programs.



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- c. The employer actively encourages employees to be involved in developing and delivering safety, health and ergonomic training plans for the facility.
54. Employees participate in hazard detection activities.
- a. Employees actively participate and contribute to discussions of hazard correction activity (generally at crew meetings).
  - b. Employees have input in the development of inspection procedures and employee reporting systems.
  - c. The hazard detection system provides rapid and regular feedback to employees.
  - d. Employees are involved in the analysis of the job, process, or phase of activity that applies to their assigned work.
  - e. All members of the work force have ready access to and can explain the key elements of the hazards analysis, which applies to their work.
  - f. Personnel at all levels of the organization are routinely involved in safety and health inspections.
  - g. Employees are active participants in the determination of collection methods, collection, analysis, and intervention selection for hazard detection activities.
55. Employees participate in hazard prevention and control activities.
- a. Members of the affected work force actively participate in the comprehensive hazard review process.
  - b. Safety Committee members evaluate and/or orchestrate hazard prevention and control activities.
  - c. Workers have authority and feel free to refuse unsafe work.
  - d. Employees are involved in developing hazard prevention strategies and activities.
  - e. The facility actively supports and values employee participation in hazard prevention and control activities (such as control hierarchy, safe work rules and procedures, program evaluation, PPE usage, emergency planning and facility maintenance).
  - f. Employees are encouraged and do take action on self-correcting or minimizing risk.
56. Employees participate in the safety and health training of co-workers.
- a. Employees are involved in the planning and preparing of safety, health and ergonomic training topics.
  - b. Employees conduct training classes.
  - c. Employees are involved in evaluating and updating training as needed.
  - d. Employees mentor with each other, using existing policies such as JHA or process hazard reviews.
  - e. Employees provide on-the-job training and coaching to co-workers.

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57. Employees participate in safety and health planning activities.
  - a. Employees are active participants in the action planning process.
  - b. Workers are allowed access to information needed to make informed decisions.
  - c. Employees are active participants in evaluating the facility safety, health and ergonomic planning activities.
  - d. Company goals, objectives, and action plans are developed with employee involvement.
  - e. Employees participate in developing solutions.
58. Employees participate in the evaluation of safety and health performance.
  - a. The Safety Committee makes an annual review of the Safety and Health Program.
  - b. Employees are regularly involved in evaluating the safety policies for effectiveness and revising them accordingly.
  - c. Employee input is considered an important part of supervisory and management safety performance reviews.
  - d. As part of an annual review system, employees are interviewed or surveyed to gather their input.

## Performance Indicators (47 question assessment)

### Management Leadership: Top Management Leadership

#### **#1 Top management communicates a policy that establishes safety and health as a core value.**

- Ensure that there is a written policy that establishes safety and health as core value for the business.
- Ensure that the policy sets safety and health as a core value for the protection of all workers at the site (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that the policy clearly identifies how the core value of safety fits within the other values of the business.
- Have the policy in writing, signed by the top manager, dated, and posted in prominent locations in the facility.
- Have the policy clearly express management's commitment to continuous improvement of an effective safety and health program.
- Have the policy signed by the employer or top manager and dated.
- Have the policy posted in public locations accessible to all workers in the workplace (e.g., breakroom).
- Ensure that the policy adequately emphasizes general safety and health guidance appropriate for the workplace for all personnel to follow (e.g., the policy requires all personnel to follow safety and health procedures).
- Review and update the policy on a routine schedule (e.g., to accommodate changes in the workplace).
- Have the policy clarify safety and health responsibilities of all personnel.
- Top management creates an environment that promotes safety and health performance.
- Top management holds personnel accountable for implementing the policy.
- Ensure that the safety and health policy fits within the context of other organizational values.
- Have the policy reinforce management commitment by requiring safety and health considerations in all business decisions, including contractor and vendor selection; purchasing; and facility design and modification.
- The host employer includes in contracts and bid documents any safety and health related specifications and qualifications, and ensures that contractors and staffing agencies selected for work meet those requirements.
- The host employer reviews the safety and health policies of contractors and staffing agencies before engaging their services. Important differences in policies and procedures are resolved before starting work.
- The host employer communicates with contractors and staffing agencies to determine which among them will implement and maintain the various parts of the safety and health program, to assure protection of all on-site workers before work begins.

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- The host employer identifies issues that may arise during on-site work and includes procedures for the host employer, contractors, and/or staffing agencies to use in resolving any conflicts before work starts.
- Host employers, contractors and/or staffing agencies make sure that managers with decision making authority are available and prepared to deal with day-to-day coordination issues.

### **#2 Top management participates in planning and evaluating safety and health performance to drive continuous improvement.**

- Top management sets expectations for the organization's planning and evaluation efforts by establishing goals and objectives that align with the safety and health policy.
- Top management routinely participates in activities related to planning the safety and health program (e.g., goals and objectives, action plan, change management procedures, safety and health training).
- Top management routinely participates in activities related to evaluating the facility's safety and health performance with workers input (e.g., reviews of OR-OSHA mandated programs, injury and illness data).
- Top management demonstrates accountability for safety and health performance by ensuring that prompt actions are taken to correct all program shortcomings.
- Top management demonstrates commitment by participating in the process of continuous workplace safety and health improvement.
- Top management encourages all personnel to participate in workplace planning and evaluation activities (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).

### **#3 Top management considers proficient safety and health staff to be an advisory resource provided (as needed) to line managers and supervisors who have direct oversight of safety and health performance.**

- Ensure that line managers and supervisors are held accountable for safety and health performance in their departments (i.e., line managers and supervisors for the host employer, staffing agency, and contractor, as applicable).
- Ensure that line managers and supervisors are trained and knowledgeable about all safety and health requirements for their work areas and the proper procedures to follow.
- Ensure that program elements are properly managed and administered by line supervisors to protect the safety and health of all the workers they oversee (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that performance evaluations of line managers and supervisors take into account the safety and health performance of the workers they oversee (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that supervisors and workers take ownership for safety in their work areas (i.e., supervisors for the host employer, staffing agency, and contractor, as applicable).
- Ensure that proficient safety and health staffs are utilized as a resource.

- Ensure that proficient safety and health staffs routinely assist line managers and supervisors with addressing safety and health needs in their work areas.
- Ensure that adequate clerical support is routinely provided to line managers and supervisors for effective safety and health program management.
- Outside technical resources are employed when necessary (e.g., trade associations, private consultants, OR-OSHA safety and health consultants).

## Management Leadership: Foundation

### **#4 Safety and health goals and supporting objectives that focus on specific actions to establish or improve the overall safety and health program exist.**

- Ensure that safety and health goals and objectives are documented.
- Ensure that safety and health goals and objectives focus on specific actions to improve workplace safety and health.
- Ensure that safety and health goals and objectives address protection for all personnel (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that goals and objectives are Specific, Measurable, Achievable, Result-oriented, and Time framed (i.e., SMART).
- Ensure that goals relate directly to the organization's safety and health policy or vision.
- Ensure that goals and objectives are developed based on evaluations and analysis of the effectiveness of the safety and health program using related data.
- Ensure that goals and objectives are appropriate to improve workplace safety and health.
- Have both outcome based goals (i.e., focus on the occurrence of injuries/illnesses or associated monetary losses) and process based goals (i.e., emphasize injury/illness prevention).
- Ensure that workers provide input in developing goals and objectives.
- Ensure that management visibly communicates their support for achieving goals and objectives to all personnel (i.e., managers, supervisors, and workers of the host employer, contractors, and staffing agencies, as applicable).
- Ensure that management sets safety and health goals and supporting objectives with workers input.
- Ensure that all workers, supervisors, and managers can easily explain goals and objectives.
- Ensure that goals and objectives are evaluated and revised as needed.
- Ensure that a reliable measurement system exists to indicate progress made towards completing specific objectives for achieving a goal.
- Ensure that a measurement system is consistently used to manage work on objectives.
- Ensure that the measures used to track progress made towards completing objectives are readily available for all personnel.
- Provide concrete examples demonstrating that goals and objectives are being met.

**#5 An action plan designed to accomplish the organization's safety and health goals and supporting objectives is in place.**

- Ensure that the actions in the plan meet the SMART criteria (i.e., Specific, Measurable, Achievable, Result-oriented (tied to the goal), Realistic, and Time-framed).
- Ensure that personnel are assigned tasks to accomplish in the action plan.
- Ensure that assigned tasks (actions) have planned completion dates.
- Ensure that complex actions are broken down to simpler steps in the action plan.
- Ensure that the action plan identifies resource needs.
- Ensure that the action plan identifies personnel assigned to accomplish tasks.
- Ensure that the action plan includes a measurement system to track progress for completing each objective.
- Ensure that the organization communicates the progress of the action plan to all personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that the action plan addresses how contractors and temporary workers will be provided with appropriate safety and health information, training, and protection from potential hazards by the responsible party (i.e., the host employer, contractor or staffing agency, as applicable).

## **Management Leadership: Safety And Health Program Implementation**

**#6 Managers and supervisors personally follow safety and health procedures to set a visible leadership example.**

- Ensure that managers and supervisors throughout the organization consistently follow safety and health procedures.
- Ensure that on-site management staff for contractors and staffing agencies follow safety and health procedures.
- Workers credit management with establishing and maintaining positive safety values in the organization through personal examples and attention to the behavior of others.

**#7 Managers support fair and effective policies that promote safety and health performance by all personnel.**

- Ensure that organizational policies and practices promote the performance of safety and health responsibilities by all personnel (i.e., managers, supervisors, and workers of the host employer, contractor, and staffing agency, as applicable).
- Ensure that organizational policies promote positive behaviors by all workers while correcting poor behaviors (i.e., host employer's workers, contractors, and temporary workers).
- Ensure that organizational policies and practices guide all workers to make decisions in favor of safety and health when apparent conflicts arise with other values.

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- Ensure that workers are consulted while policies are being developed to determine if they may be perceived as unfair.
- Ensure that vital safety and health information pertaining to workers' rights for all personnel are displayed and communicated at the worksite. This includes displaying the: "Oregon OSHA Job Safety and Health: It's the Law" worker rights poster as mandated for all employers covered by the Occupational Safety and Health (OSH) Act and "Your Rights as a Whistleblower" fact sheet or otherwise making it available for easy access by workers.

### **#8 Safety and health program tasks are assigned and clearly communicated to a specific person (or position) for performance or coordination.**

- Ensure that tasks for achieving objectives in the organization's action plan are specifically assigned to a position or personnel to perform.
- Ensure that all assigned safety and health tasks are properly communicated to personnel to perform.
- Ensure that all personnel with assigned tasks know their safety and health responsibilities.
- Ensure that an individual or group is responsible for compiling and analyzing records of safety and health tasks, including the assignment of tasks.
- The host employer communicates and coordinates with contractors and staffing agencies to establish responsibilities for specific safety and health tasks.
- The host employer, contractor, and staffing agency coordinate to ensure that personnel assigned safety and health tasks know their responsibilities.

### **#9 An accountability mechanism is included with each assignment of safety and health tasks to monitor performance.**

- Ensure that each assignment of a safety and health task includes performance expectations (i.e., how and when performance would be evaluated).
- Ensure that a method exists for monitoring performance of assigned safety and health tasks by all responsible personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that procedures for monitoring performance are communicated in writing and verbally to all affected personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that all personnel with assigned safety and health tasks can describe the monitoring procedures used (e.g., written reports or memoranda, periodic personal conferences, timely briefings or oral reports to the assignor, presentations at group meetings such as Safety and Health Committee meetings, electronic management information systems, direct reports to the assignor on unresolved tasks only).
- Ensure that all personnel with assigned safety and health tasks can articulate the assignor's expectations (i.e., personnel for the host employer, contractor, and staffing agency, when applicable).



- The host employer communicates expectations and reporting methods for assigned safety and health tasks with contractors and staffing agencies.

**#10 Personnel assigned safety and health tasks have the necessary knowledge and skills to safely perform their duties.**

- Ensure that management documents specific skills, knowledge, and information for safety and health responsibilities so that all personnel assigned safety and health tasks are capable of carrying out the required duties (i.e., host employer's personnel as well as contractor and staffing agency personnel, as applicable).
- Ensure that all personnel assigned safety and health tasks demonstrate the necessary knowledge, skills, and timely information to perform their duties.
- The host employer exchanges information in a timely manner with contractors and staffing agencies before work starts to verify that their personnel have the necessary knowledge and skills to perform their assigned safety and health tasks effectively.
- The host employer coordinates with staffing agencies and contractors to deal with unexpected staffing needs by ensuring that enough trained workers are available or that adequate lead time is provided to train workers.

**#11 Personnel have the authority necessary to effectively carry out their assigned safety and health tasks, as delegated by management.**

- Ensure that proper authority to execute assigned safety and health responsibilities exists for all personnel (i.e., personnel for the host employer, contractor, and staffing agency, as applicable).
- Ensure that management grants authority in writing.
- Ensure that there is a formal method to delegate authority to all personnel with assigned safety and health responsibilities so that they recognize their authority and other affected personnel are notified to cooperate with them.
- Ensure that authority is exclusively within the control of personnel assigned the responsibility.
- Ensure that all personnel believe that they actually have the authority granted to them to execute assigned safety and health responsibilities.
- Ensure that all personnel understand how to exercise the authority granted to them.
- Ensure that all personnel demonstrate the authority granted to them over the work, needed resources and subordinates.
- Ensure that any limitations to the authority of responsible personnel are always clearly spelled out by the assignor at the time the assignment is made. This is especially important to clarify with contractors and temporary workers, as applicable. These determinations can be included in contract documents that define the relationships between the parties.
- The host employer coordinates with contractors and staffing agencies so that responsibilities, lines of authority, and limitations are clearly delineated and specified in contracts, as appropriate.



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- Ensure that managers delegate authority to all personnel assigned safety and health responsibilities to execute their tasks. (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as appropriate).
- Ensure that appropriate policies and procedures are used by management to delegate the necessary authority to all personnel assigned safety and health responsibilities.
- Ensure that position descriptions specifically state the assigned safety and health responsibilities for a position and the authority granted to carry out those responsibilities.
- Ensure that management engages all personnel in the workplace by making them aware of assigned tasks and authority delegated to personnel for performing those tasks (e.g., organizational chart, email notifications, memoranda, position descriptions, the Safety and Health Committee charter, safety meetings).
- Ensure that responsibilities, lines of authority, and limitations are clearly delineated between the host employer, contractor, and staffing agency. This determination is included in contract documents that define the relationships between the parties.

### **#12 Managers ensure that appropriate resources are fully provided to personnel to support the safety and health program.**

- Ensure that adequate resources are available to accomplish all tasks assigned to all personnel in the workplace (; i.e., personnel for the host employer, contractor, and staffing agency, as applicable).
- Ensure that all personnel assigned tasks have the authority to obtain resources.
- Ensure that all personnel assigned tasks do not neglect to obtain resources.
- Ensure that all personnel assigned tasks know how to obtain resources.
- Ensure that resources are effectively applied by all personnel to perform assigned tasks.
- Ensure that safety and health considerations are included in the operating budget or there is a separate safety and health budget.
- Ensure that management's philosophy and practice support allocating adequate funds to meet safety and health program needs.
- Ensure that there is an adequate estimate of the resources needed to implement the safety and health program.
- Ensure that management has plans for future allocations to achieve necessary safety and health improvements.
- Seek input from all workers (as appropriate) regarding the allocation of safety and health resources (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that there are established processes for workers to provide input and receive feedback about the allocation of resources for safety and health needs. (e.g., regularly scheduled safety meetings, suggestion boxes, Safety and Health Committee comprising management and workers).
- Ensure that workers provide input on a variety of safety and health needs such as training, facility maintenance, supplies, and equipment.
- If there are contractors or temporary workers at a site, ensure that lines of authority, responsibilities, and limitations are clearly delineated, and appropriate personnel

designated to coordinate and verify the allocation of resources to execute safety and health program responsibilities. Ensure that this determination is included in contract documents that define the relationships between the parties.

- The host employer communicates with contractors and staffing agencies to verify the allocation of funds to execute their assigned safety and health responsibilities. This determination is included in contract documents that define the relationships between the parties.
- Ensure that there is a system in place for contractors and temporary workers to provide input and receive feedback on resource needs pertaining to their duties at a host employer's site, as applicable.
- Ensure that the safety and health budget or allotment of the operating budget for safety and health needs is continuously monitored and readjusted to accommodate urgent needs.
- Ensure that emergency equipment appropriate to the facility is installed or available (e.g., sprinkler systems, fire extinguishers, first aid kits, fire blankets, safety showers, eye washes, emergency respirators, protective clothing, spill control and clean-up materials, hazardous chemical release computer modeling).
- Ensure that emergency equipment is distributed in sufficient quantity to cover anticipated hazards and risks, is operational, and is tested at regular intervals (i.e., at least monthly).

**#14 Organizational policies result in correcting non-performance or poor performance of safety and health responsibilities by personnel.**

- Ensure that organizational policies and practices result in correcting non-performance/poor performance of assigned and general safety and health responsibilities for all personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that there are established procedures for correcting non-performance/poor performance of assigned and general safety and health responsibilities for all personnel.
- Ensure that the root causes of non-performance/poor performance of specifically assigned and general safety and health responsibilities incumbent on all personnel is identified and corrected (e.g., obstacles to performance such as ineffective training, poor work design).
- Ensure that there is a formal and effective system of progressive disciplinary actions used when non-performance/poor performance persists after obstacles to performance are removed.
- Ensure that the effectiveness of organizational policies and procedures in correcting non-performance/poor performance of safety and health responsibilities in the workplace is routinely analyzed by managers with workers input.
- Ensure that organizational policies and procedures for correcting non-performance/poor performance are continuously improved.
- The host employer coordinates with contractors and staffing agencies to establish a system for addressing non-performance/poor performance of assigned safety and health

responsibilities by their personnel. This determination is included in contract documents that define the relationships between the parties.

## Worker Participation

### **#15 Workers routinely participate in hazard identification activities.**

- Ensure that all relevant hazard identification activities are routinely conducted in the workplace (e.g., workplace hazard analysis, job hazard analysis, change analysis).
- Ensure that there are no barriers to workers participation in the program (e.g., language, skill level, education, lack of resources to implement the safety and health program such as requiring workers to purchase PPE that the employer is required to provide).
- Ensure that management encourages all workers to report safety and health concerns (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that management emphasizes that it will only use reported information to improve safety and health in the workplace for all workers and no worker will experience retaliation.
- Ensure that all personnel at all levels of the organization routinely participate in hazard identification activities such as safety and health inspections (i.e., workers, supervisors, and managers for the host employer as well as on-site contractor and staffing agency, as applicable).
- Ensure that all workers participate in identifying and reporting hazards without fear of retaliation.
- Ensure that all workers receive feedback from management on reported safety and health issues.
- Ensure that all workers can request or initiate temporary shutdown of unsafe activities.
- Ensure that all workers have input in developing hazard identification processes such as inspection procedures and hazard reporting systems.
- Ensure that all workers participate in the analysis of their jobs, work processes, and phases of activity that apply to their assigned work.
- Ensure that all workers have ready access to the workplace hazard analysis and job hazard analysis that applies to their job tasks and can explain the key factors.
- Ensure that all workers actively participate in the comprehensive hazard review process.
- The host employer gives contractors and staffing agencies the right to conduct site visits and inspections.
- Ensure that contractors and staffing agencies regularly give the host employer any information about hazards or concerns reported by their workers and the results of any tracking or trend analysis they perform.

### **#16 Workers routinely participate in hazard prevention and control activities.**

- Ensure that managers actively support and value the participation of all workers (i.e., host employer's workers, contractors, and temporary workers, as applicable) in hazard prevention and control activities such as emergency planning, facility maintenance, and

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selection of hazard control measures (i.e., engineering solutions (i.e., elimination, substitution, followed by engineering controls), safe work practices, administrative controls, PPE).

- Ensure that there are established procedures for workers to participate in hazard prevention and control activities (e.g., Safety and Health Committees comprising management and workers, regularly scheduled safety meetings, participation in projects or workgroups, suggestion boxes).
- Ensure that all workers participate in developing hazard prevention strategies and activities (e.g., identify engineering solutions (i.e., elimination, substitution, followed by engineering controls), design engineering solutions).
- When feasible, ensure that all workers are encouraged to take action to self-correct hazardous situations and participate in doing so.
- Ensure that Safety and Health Committee members evaluate and/or orchestrate hazard prevention and control activities.

### **#17 Workers routinely participate in receiving and delivering safety and health training.**

- Ensure that management encourages and provides resources for workers to train co-workers (i.e., peer-to-peer training).
- Ensure that management has established procedures for only experienced and trained workers to participate in training co-workers.
- Ensure that experienced and trained workers plan and prepare safety and health training topics for training co-workers (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that experienced and trained workers provide input in evaluating and updating training as needed.
- Ensure that experienced and trained workers conduct training classes for co-workers (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that experienced and trained workers provide on-the-job training and coaching to coworkers (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that experienced and trained workers use existing resources such as job hazard analyses or process hazard analyses reviews to mentor co-workers (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that there is an effective co-worker training, coaching, and mentoring program specific to the workplace.
- Ensure that all workers have opportunities to ask questions and provide feedback during and after safety and health training (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that management solicits workers input on safety and health training before making decisions.
- Ensure that there are opportunities for all workers to provide input to management regarding safety and health training (e.g., recommend training topics, delivery methods, and location).

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- Ensure that there are processes in place for all workers to receive prompt feedback from management on their suggestions and concerns.
- The host employer coordinates with contractors and staffing agencies to meet appropriate training requirements before starting work.

### **#18 Workers routinely participate in safety and health planning activities.**

- Ensure that all safety and health planning activities such as developing safety and health goals, objectives, and action plans are routinely completed with the participation of workers.
- Ensure that there are opportunities for all workers to participate in safety and health planning activities (e.g., regularly scheduled safety meetings, suggestion boxes, Safety and Health Committee comprising management and workers, assignment of safety and health planning tasks).
- Ensure that the organization routinely reviews and updates its safety and health goals, objectives, and action plans with the participation of workers.
- Ensure that there is effective communication among the host employer, contractors, and staffing agencies to address any aspect of one party's safety and health planning activities and implementation that could affect the work of other parties at a site.

### **#19 Workers routinely participate in evaluating and improving the organization's safety and health performance.**

- Ensure that the organization routinely conducts safety and health program evaluation activities (e.g., annual safety and health program review, OSHA mandated programs review, injury and illness data analysis, hazard incidence data analysis).
- Ensure that all safety and health program evaluation activities are routinely conducted with the participation of all workers, as appropriate (i.e., host employer's workers, contractors, and temporary workers).
- Ensure that management creates opportunities for all workers to participate in safety and health program evaluation activities, as appropriate (e.g., Safety and Health Committee comprising management and workers annually evaluates the safety and health program).
- As part of an annual evaluation system, interview or survey workers to gather their input, and provide management's feedback to them.

### **#20 There are effective processes for workers to provide input and participate in all aspects of the safety and health program without barriers.**

- Facilitate and encourage all workers to freely participate in safety and health activities.
- Ensure that managers maintain an open door policy for all workers to communicate about safety and health and to make suggestions.
- Ensure that there are no barriers to workers participation in the program.
- Ensure that participation in safety and health activities is conducted without fear of retaliation.

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- Ensure that management maintains an open door policy for all workers to provide input on safety and health issues.
- Ensure that other policies and programs do not discourage workers from participating.
- Ensure that workers always provide input in organizational decision making regarding safety and health policies (e.g., identification of policy shortcomings or challenges and strengths, recommendations for improvement).
- Ensure that top management has several methods to solicit and gather input on safety and health issues from all workers and provide prompt feedback (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Consider some of the common standing methods of receiving workers input including Safety and Health Committees, safety meetings, management's open-door policy, suggestion boxes, organizational e-mail systems, stop work authority, and chain-of-command reporting.
- Ensure that the opportunities for providing input on safety and health issues are well known, understood, and utilized by all workers.
- Ensure that management can describe available avenues for all workers to provide input and participate in safety and health activities, including participation in local and regional networking and mentoring opportunities, when feasible.
- Ensure that supervisors and managers actively encourage all workers to use established processes to provide input on safety and health issues.
- Ensure that all workers feel comfortable using established processes in all situations.
- Ensure that the process used by management to obtain workers input and participation in safety and health issues always includes contractors and temporary workers, as applicable.
- Ensure that managers acknowledge input from all workers, give prompt feedback, and provide positive reinforcement to workers who participate in the program.
- Consider/Ensure that a Safety and Health Committee comprising management and workers is put in place and functional.
- Ensure that the Safety and Health Committee is structured in accordance with appropriate rules and used as a tool to engage all workers in safety and health matters.
- Ensure that participation in the Safety and Health Committee is respected and valued in the organization.
- Ensure that mandatory safety meetings includes all workers.
- Ensure that all workers have access to safety and health information such as Safety Data Sheets.
- Ensure that the "OSHA Job Safety and Health It's the Law" worker rights poster is posted in the workplace
- Ensure that the Your Rights as a Whistleblower factsheet is posted in the workplace or otherwise made available for easy access by workers
- Ensure that data related to key elements of safety and health performance are collated, analyzed, and displayed within the workplace to inform all workers of progress made.
- The host employer always coordinates with contractors, staffing agencies, and their workers to address safety and health issues, as applicable.



- Ensure that there are procedures for contractors and temporary workers to provide input on safety and health policies pertaining to their duties at a host employer's site.

## Hazard Identification and Assessment

### #21 The comprehensive baseline hazard assessment for the workplace is current.

- Conduct the following assessments to address potential hazards in your workplace (as applicable):
  - Chemical exposures
  - Noise exposure
  - Process safety concerns
  - Heat and potential heat related illnesses
  - Musculoskeletal risks (ergonomics)
  - Workplace violence
- Conduct the following hazard assessments to identify foreseeable emergencies in your workplace, such as (as applicable):
  - Emergency medical response
  - Fire
  - Explosion
  - Chemical spill/release
  - Severe weather
  - Flooding
  - Workplace violence
- Ensure that hazard assessments are conducted by proficient and qualified individuals. This would include OSHA On-Site Consultation Program consultants, safety and health professionals, private consultants, insurance loss control specialists, or properly trained and experienced workers in the organization.
- Re-evaluate the baseline hazard assessment periodically by conducting an expert workplace hazard assessment. An individual(s) with the appropriate knowledge, skill, education, and expertise for the specific workplace operation (e.g., degree of complexity, risk level, types of hazards or potential hazards, control measures, regulatory requirements) should determine a reasonable timeframe for scheduling the routine re-evaluations.
- Use change analysis information to update the baseline hazard assessment.
- Ensure that the baseline hazard assessment includes identifying and implementing all OSHA mandated programs relevant to the workplace.
- Communicate the results of the comprehensive baseline hazard assessment (and related control measures) to all affected personnel (i.e., personnel for the host employer, contractors, and/or staffing agency).
- Establish and implement procedures to exchange information with contractors and staffing agencies (as applicable).
- The host employer exchanges information about hazards present in the workplace (i.e., hazards associated with routine and non-routine operations as well as foreseeable

emergencies) and the measures that are implemented to prevent or control such hazards, including emergency procedures.

- Ensure that the baseline hazard assessment is repeated when changes in the workplace occur.
- Establish a schedule for reviewing and updating the baseline hazard assessments.

**#22 Expert workplace hazard assessment is performed.**

- Ensure that the workplace hazard assessment is performed by proficient personnel within the organization or experts outside the organization when the expertise is lacking within the organization.
- Ensure that outside professional resources are used when necessary (e.g., trade associations, insurance loss control specialists, private and public consultants).
- Ensure that the workplace hazard assessment includes collecting and reviewing information with workers based on their knowledge of the facility, equipment, and work processes to determine the types of hazards that are present in the workplace; identifying workers that are exposed or could potentially become exposed; and selecting appropriate control measures for implementation.
- Ensure that proficient safety, industrial hygiene, ergonomics, and risk management professionals, are used to conduct the workplace hazard assessment when necessary.
- Ensure that the workplace hazard assessment applies a proactive approach to identifying and correcting workplace hazards in routine and non-routine operations as well as foreseeable emergency scenarios.
- Ensure that the workplace hazard assessment promotes continuous improvement of the safety and health program.
- Ensure that the workplace hazard assessment includes identifying and implementing all OSHA mandated programs relevant to the workplace.
- Ensure that all hazard assessments for the workplace identify corrective or preventive actions that will reduce or eliminate the risk of injury or loss.
- Ensure that each identified hazard is evaluated and prioritized so that those presenting the greatest risks are addressed first.
- Ensure that identified hazards are promptly corrected or appropriately scheduled for correction in the organization's action plan following the risk prioritization order.
- Ensure that interim control measures are used to protect all workers from hazards pending the implementation of permanent controls (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that hazard assessments are routinely reviewed and updated whenever there are changes that could introduce new hazards into the workplace.
- Ensure that the findings of expert workplace hazard assessments are shared with all affected parties (i.e., the host employer, contractor, staffing agency, and their workers, as applicable).
- Ensure that information is communicated between the host employer, contractor, and staffing agency before on-site work starts, and as needed when conditions change.



**#23 Effective job hazard analysis is routinely performed.**

- Ensure that there are established procedures for developing and reviewing JHAs at the facility. These procedures are designed to address hazards relating to routine and non-routine job tasks, work processes, different phases of work activity, and emergency tasks.
- Ensure that there is a standard and uniform format used to document JHAs.
- Ensure that JHAs are posted at workstations.
- Ensure that workers participate in the JHA process.
- Ensure that the employer consults with safety and health experts outside the organization when necessary.
- Ensure that the employer applies safety and health guidance from credible technical sources in developing JHAs (e.g., OSHA standards and guidance, NIOSH publications, consensus standards, manufacturer's literature).
- Ensure that assessment tools and interviews are utilized in the JHA process.
- Ensure that higher priority is given to completing JHAs for jobs with high incident rates, high rates of near misses, jobs where major changes are made, and jobs with new workers.
- Ensure that incident investigations lead to JHA revision when appropriate.
- Ensure that all tasks, job processes, and phases of activity are analyzed whenever there is a change, a loss incident occurs, and periodically.
- Ensure that JHAs identify safety and health hazards and prompt corrective or preventive actions to control or eliminate them.
- Ensure that identified hazards are evaluated and prioritized so that those presenting the greatest risks are addressed first.
- Ensure that all serious hazards are eliminated or controlled promptly (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that controls are selected using the hierarchy of controls when developing JHAs.
- Avoid selecting controls that will introduce new hazards.
- Ensure that interim control measures are used to protect workers from hazards pending the implementation of permanent controls.
- Ensure that Principles of Prevention through Design are applied in selecting equipment, machinery, and materials.
- When corrective or preventive actions identified by the JHA process are implemented, revise the written JHA to reflect those actions.
- Review JHAs with all affected workers before starting work (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that JHAs include assessments of hazards that contractors and/or staffing agencies could introduce to the site, as applicable.
- The host employer, contractors, and/or staffing agencies share JHAs for work that could impact other employers at the site.
- Ensure that information is communicated between the host employer, contractor, and staffing agency before on-site work starts, and as needed when conditions change.

**#24 Changes in the workplace are always effectively analyzed for their impact on occupational safety and health before implementation.**

- Ensure that a Change Management policy exists to evaluate occupational safety and health hazards and properly abate them prior to implementing changes in routine and non-routine operations.
- Ensure that a Change Management Program is established that is at a minimum based on a Change Management policy designating responsibilities for current and future planning activities regarding changes. These include changes in operations, workstations, or workflow; equipment, materials, or processes; personnel changes; or other major organizational changes.
- Ensure that the Change Management Program includes identifying changes in routine and non-routine operations as well as foreseeable emergencies before implementation.
- Ensure that the Change Management Program includes identifying and evaluating hazards that may arise from both the technical/operational and organizational aspects of changes before implementation.
- Ensure that changes are planned in advance.
- Ensure that there is a formal, documented, and comprehensive process for change analysis.
- Ensure that proficient personnel or qualified specialists appropriate to the process being evaluated participate in the change analysis.
- Ensure that change analysis includes evaluating safety and health hazards
- Ensure that change analysis procedures include revisions of job hazard analyses, standard operating procedures, and other program aspects affected by the change (e.g., lockout/tagout methods, PPE).
- Ensure that change analysis procedures include revisions of the organizational aspects of a change such as personnel qualifications, roles, staffing levels, scheduling, potential impact on other operations/aspects of the business, proper communication, and management responsibilities.
- Ensure that the change analysis process encourages recommendations for improvement, which are implemented prior to start-up.
- Ensure that identified hazards are eliminated or controlled prior to startup.
- Ensure that all serious hazards are promptly corrected or eliminated (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that interim control measures are used to protect workers pending the implementation of permanent controls.
- Ensure that all affected workers participate in the change analysis process, receive training before a change is implemented, and know the proper procedures to follow (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that all affected personnel are made aware of planned changes prior to implementation.
- The host employer communicates with contractors and staffing agencies and their workers about the hazards regarding changes in the workplace for routine and non-routine operations as well as foreseeable emergencies, and the control measures implemented to protect all workers.

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- Ensure that contractors and staffing agencies communicate to host employers about hazards regarding changes in the work they are doing at a site and the measures implemented to protect all workers.
- Ensure that information between the host employer, contractors, and staffing agencies is communicated before on-site work starts, and as necessary, before implementing changes.

### **#25 Safety Data Sheets and labels are used to assess potential hazards associated with chemical products in the workplace.**

- Ensure that a written comprehensive hazard communication program is effectively implemented for the workplace.
- Ensure that SDS and labels for all hazardous chemicals in the workplace are obtained and reviewed to identify potential chemical hazards, including hazards associated with foreseeable emergencies.
- Ensure that information in Safety Data Sheets is used by personnel performing change analysis to identify potential hazards related to new chemicals being introduced into the workplace.
- Ensure that hazards identified in SDS and labels are effectively eliminated or controlled.
- Periodically review Safety Data Sheets to identify any changes to chemical composition and evaluate current hazard control measures for effectiveness.
- Assign proficient personnel to review Safety Data Sheets and labels to address how to prevent, eliminate, and/or control hazards posed by chemical products.
- Ensure that Information about chemical hazards and control measures is shared with all workers that could be exposed (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that all workers that could be exposed receive proper training before starting work (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that all workers that could be exposed are familiar with the Safety Data Sheets and labels applicable to the chemicals they use in the workplace.
- Ensure that all workers that could be exposed understand information about chemical hazards and toxic substances used in the workplace.
- Ensure that applicable Safety Data Sheets and labeling information is incorporated into relevant program aspects such as completed JHA forms and standard operating procedures.
- Research safer products that are less hazardous or non-hazardous.
- Ensure that there is effective communication between the host employer, contractors, and staffing agencies to exchange relevant information (including SDS) so that all affected workers are properly informed and trained about hazardous chemicals in the workplace before starting work.
- The host employer, contractors, and staffing agencies share information before on-site work starts, and as necessary, before implementing changes.

**#26 Effective safety and health self-inspections are performed regularly to identify new or recurring hazards.**

- Ensure that routine self-inspections are conducted (e.g., all work areas, operations, activities, equipment, tools, vehicles – forklifts, powered industrial trucks, cars, trucks).
- Ensure that health inspections relevant to the workplace are routinely conducted to check for potential health hazards (e.g., noise surveys).
- Ensure that inspections are conducted to identify new, recurring or previously missed safety and health hazards, including ergonomic hazards as well as failures in hazard control systems.
- Ensure that inspections are conducted at least quarterly at fixed worksites, weekly at rapidly changing sites, and as frequently as daily or before each work shift where necessary.
- Ensure that appropriate time is provided to all personnel to conduct self-inspections (i.e., personnel for the host employer, contractor, and staffing agency, as applicable).
- Ensure that inspectors have adequate training and experience in workplace safety and health.
- Ensure that the responsibility for inspections is shared throughout the organization (i.e., workers, supervisors, middle managers, and senior managers).
- Ensure that inspections are conducted by teams comprising management and workers.
- Ensure that workers perform or participate in performing safety and health inspections of their work areas or operations.
- Ensure that each hazard identified during an inspection is evaluated and prioritized so that hazards that present the greatest risks are addressed first.
- Ensure that each hazard identified during an inspection is promptly corrected or appropriately scheduled for correction in the organization’s action plan for safety and health.
- Ensure that all serious hazards are eliminated or controlled promptly (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that hazards identified during an inspection do not appear on future inspections.
- Ensure that interim control measures are promptly implemented to protect workers pending the implementation of permanent controls.
- Ensure that self-inspections are conducted using the proper tools and procedures, as appropriate (e.g., digital cameras, tablets, and computers).
- Ensure that logs, checklists, or other types of written reports are used to document formal inspections.
- Ensure that inspection reports are available to all workers (i.e., host employer’s workers, contractors, and temporary workers, as applicable).
- Ensure that information about identified hazards and corrective actions are discussed with all parties (i.e., the host employer, contractors, staffing agencies, and all workers, as applicable).
- The host employer gives staffing agencies and contractors the opportunity to conduct inspections when safety and health responsibilities are shared.

- The host employer gathers information from all parties and disseminates it in a manner sufficient to enable each employer to assess hazards encountered by its workers, control measures implemented, and means to avoid creating hazards on the site.

**#27 An effective hazard reporting system exists for early identification of hazards.**

- Ensure that there is a system for reporting safety and health hazards including ergonomic hazards that is known to all workers (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that the hazard reporting system provides rapid and regular feedback to all workers regarding hazard correction status and planned actions (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that management emphasizes that it will only use reported hazard information to improve safety and health in the workplace for all workers and no worker will experience retaliation.
- Ensure that all workers who report a hazard experience no retaliation for bringing such information to management's attention.
- Ensure that all workers are aware that hazards can develop within existing jobs, processes, and/or phases of activity.
- Ensure that all workers can effectively recognize hazards in the workplace (i.e., workers are both aware of the existence of a hazardous condition or activity and understand, at least generally, the possible harm it represents).
- Ensure that the hazard reporting system allows all workers to report health, safety/physical, and behavioral hazards (e.g., workplace violence risk factors).
- Ensure that there is a decentralized hazard reporting method available to all workers to report hazards to their supervisors.
- Ensure that workers have the option of reporting to the level above their supervisors whenever they feel that the correction of a directly reported hazard has been neglected or is ineffective.
- Ensure that there is a centralized method available to all workers to report hazards to the safety department, Safety and Health Committee, owner-manager, or a designated personnel (e.g., on a form).
- Ensure that all reported hazards are communicated to all personnel in some manner (i.e. managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that reported hazards are collected, analyzed, and prioritized for correction in the organization's action plan.
- Ensure that corrective action is taken promptly on all confirmed hazards.
- Ensure that all serious hazards are eliminated or controlled immediately (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that the system provides for self-correction of hazards when possible.
- Ensure that workers can initiate or request a temporary suspension or shutdown of any work activity or operation they believe to be unsafe through their supervisors.

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- Ensure that the employer uses interim control measures while waiting for permanent hazard correction to protect all affected workers.
- Ensure that there is an established process for the host employer, contractors, and staffing agencies to share information about workplace hazards and concerns reported by their workers and the corrective actions taken.
- The host employer gathers information from all parties and disseminates it in a manner sufficient to enable each employer to assess hazards encountered by their workers, control measures implemented, and means to avoid creating hazards on the site.

### **#28 All incidents that result in any form of OSHA recordable injuries or illnesses are investigated for root causes to prevent recurrence.**

- Ensure that all incidents pertaining to OSHA recordable injuries and/or illnesses are investigated to determine the root causes.
- Ensure that there are established procedures for conducting incident investigations.
- Ensure that top management participates in incident investigations.
- Ensure that standard forms or methods are provided and used to document all incident investigations.
- Ensure that all incident investigation teams include both management and workers, and all participants are properly trained in incident investigation techniques.
- Ensure that all incident investigations include input from all affected parties and witnesses, where possible (i.e., host employer, contractor, staffing agency and their managers, supervisors, and workers, as applicable).
- Ensure that all incident investigations determine "root causes" or underlying factors, and there are often more than one.
- Ensure that hazards identified and the underlying root causes are promptly addressed and appropriately scheduled for correction in the organization's action plan for safety and health.
- Ensure that all serious hazards are corrected or eliminated promptly (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that each identified hazard is evaluated and prioritized for correction so that those presenting the greatest risks are addressed first.
- Ensure that interim control measures are used to protect workers pending the implementation of permanent controls.
- Ensure that the reports of completed incident investigations are routed to appropriate levels of management and knowledgeable staff for review.
- Ensure that incident investigation findings are used to improve workplace safety and health.
- Ensure that the outcomes of incident investigations are shared with all personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that recommendations designed to effectively address root causes are made for all incident investigations and result in prompt corrective actions to prevent recurrence.



- The host employer, contractors, and staffing agencies, each share incident investigation reports regarding their activities.
- When an incident includes a contractor or temporary worker at a site, the host employer conducts the incident investigation with the affected employer and shares the report with all employers at the site.

**#29 Near misses are investigated for root causes to prevent injury or illness.**

- Ensure that workplace policy clearly defines and requires all workers to report near misses and first aid events (i.e., workers for the host employer, contractors, and temporary workers, as applicable).
- Ensure that there is a clear definition and formal mechanism for all workers to report near miss and first aid events (e.g., form or computer).
- Ensure that all workers understand the definition of near misses in the workplace.
- Ensure that all workers understand the importance of reporting near misses and do so, as required by policy.
- Ensure that workplace policy requires a thorough investigation (to identify root causes) of near miss and first aid events.
- Ensure that there are established procedures for conducting investigations of near miss and first aid events.
- Ensure that standard forms or methods are used to document near miss and first aid investigations.
- Ensure that top management participates in near miss and first aid investigations.
- Ensure that investigation teams include management and workers properly trained in investigation techniques.
- Ensure that near miss and first aid investigations include input from witnesses and all affected parties where possible (i.e., managers, supervisors, and workers, for the host employer contractor, and staffing agency, as applicable).
- Ensure that all investigations of near miss and first aid events determine root causes.
- Ensure that each hazard identified in near miss and first aid investigations is evaluated and prioritized for correction so that hazards presenting the greatest risks are addressed first or appropriately scheduled for correction in the organization's action plan for safety and health.
- Ensure that all serious hazards are corrected or eliminated promptly (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that interim control measures are used to protect workers pending the implementation of permanent controls.
- Ensure that completed near miss and first aid investigation reports are routed to appropriate levels of management and knowledgeable staff for review.
- Ensure that near miss and first aid investigations generate recommendations designed to address root causes and result in prompt corrective actions to prevent an incident.
- Ensure that near miss and first aid investigation reports are shared with all personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).

- The host employer, contractors, and staffing agencies, each share near miss and first aid investigation reports regarding their activities.
- When a near miss or first aid event includes a contractor or temporary worker at a site, the host employer conducts the incident investigation with the affected employer and shares the report with all employers at the site.

## Hazard Prevention And Control

### **#30 Feasible engineering solutions are used to protect workers from hazards.**

- Ensure that the employer understands the cost benefits of providing appropriate hazard control measures to preclude workplace incidents.
- Ensure that hazard control measures are selected in appropriate priority order, with emphasis on engineering solutions first, followed by safe work practices, administrative controls, and finally PPE.
- Ensure that all workers understand the hazard control measures used in their work areas and can explain them in the preferred priority (i.e., workers for the host employer, contractors, and staffing agency, as applicable).
- Ensure that a combination of control options is used when no single method fully protects workers (i.e., engineering solutions, safe work practices, administrative controls, and PPE).
- Ensure that input on feasible engineering solutions to implement is solicited from all workers who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes (i.e., workers for the host employer, contractors, and staffing agency, as applicable).
- Ensure that safety and health experts are consulted to address complex hazards when the expertise is lacking within the workplace.
- Ensure that the employer reviews new technologies for their potential to be more protective, more reliable, and/or less costly.
- Ensure that, whenever feasible, Prevention through Design (PtD) principles are applied to the process of selecting equipment, machinery, and materials that are inherently safer (see NIOSH PtD initiative webpage).
- Ensure that reliable sources of safety and health information are consulted when selecting engineering solutions (e.g., OSHA standards and guidance materials, relevant industry consensus standards, National Institute for Occupational Safety and Health (NIOSH) publications).
- Ensure that all personnel understand how engineering solutions in their work areas function to protect workers (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that feasible engineering solutions are applied to improve workplace safety and health.
- Ensure that feasible engineering solutions are applied to promptly address serious hazards (i.e., hazards that are likely to cause death or serious physical harm).



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- Ensure that feasible engineering solutions are used to protect all workers from safety and health hazards, including ergonomic hazards, and are in place at the facility for all routine, non-routine, and foreseeable emergency operations, (i.e., workers for the host employer, contractors, and staffing agency, as applicable).
- Ensure that interim control measures are used to protect workers pending the implementation of permanent controls.
- The host employer establishes and implements procedures to exchange information with contractors and staffing agencies, and their workers about hazards present in the workplace and the control measures that are implemented to protect all workers (i.e., engineering controls, safe workplace practices, administrative controls, PPE).
- The host employer establishes and implements procedures for contractors and staffing agencies to provide information about the hazards associated with their work and the control measures to protect all workers (i.e., engineering controls, safe workplace practices, administrative controls, PPE).
- The host employer gathers and disseminates information sufficient to enable each employer to assess hazards encountered by its workers, the control measures implemented, and means to avoid creating hazards on-site.

### **#31 Effective safe work practices and administrative controls are used to protect workers from hazards.**

- Ensure that management understands the cost benefits of providing appropriate hazard control measures to preclude workplace incidents.
- Ensure that input is sought from all workers who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that safe work practices and administrative controls are clearly documented.
- Ensure that safe work practices and administrative controls are effective (i.e., developed; function properly, communicated to all affected personnel/personnel are trained, properly monitored, and consistently followed by all affected personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable)).
- Ensure that safe work practices and administrative controls are consistent with the organization's safety and health policy.
- Ensure that safe work practices and administrative controls address potential safety and health hazards.
- Ensure that there are effective means to formally and informally communicate safe work practices and administrative controls to all personnel (e.g., training classes, personnel safety handouts, rules posted in common areas in the workplace, one-on-one discussions between workers and supervisors).
- Ensure that all workers understand how safe work practices and administrative controls protect them from hazards.
- Ensure that all workers support safe work practices and administrative controls and monitor one another to promote compliance.

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- Ensure that all workers are following safe work practices and administrative controls and implement corrective actions when observations indicate otherwise.
- Ensure that controls are prioritized with emphasis on engineering solutions first (i.e., elimination, substitution, engineering controls), then safe work practices, followed by administrative controls, finally PPE.
- Ensure that a combination of control options is applied when no single method fully protects workers (i.e., engineering solutions (elimination, substitution, engineering controls), safe work practices, administrative controls, and PPE).
- The host employer establishes and implements procedures to exchange information about safe work practices and administrative controls with contractors and staffing agencies.
- Similarly, contractors and staffing agencies establish and implement procedures to provide the host employer with information about safe work practices and administrative controls that apply to their activities at the worksite.
- The host employer gathers and disseminates information sufficient to enable each employer to assess hazards encountered by its workers, the control measures implemented, and means to avoid creating hazards on-site.

### **#32 Personal protective equipment is effectively used to protect workers from hazards.**

- Ensure that management fully understands the cost benefits of providing appropriate hazard control measures to preclude workplace incidents.
- Ensure that input is sought from all workers who may be able to suggest and evaluate solutions based on their knowledge of the facility, equipment, and work processes (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that a PPE Program is effectively implemented.
- Ensure that a workplace hazard assessment was completed and documented following a hierarchy of controls process before implementing PPE usage.
- Ensure that PPE is not selected as the first line of defense.
- Ensure that a combination of control options is applied when no single method fully protects workers (i.e., engineering controls, safe work practices, administrative controls, and PPE).
- Ensure that all affected workers receive proper training before using PPE and document the training (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that the need for specific PPE in the workplace is adequately communicated (e.g., training, postings, signs, JHAs).
- Ensure that all affected workers understand the necessity, proper usage, and care of PPE associated with their jobs.
- Ensure that PPE provided to all affected workers is appropriate for the identified hazards.
- Ensure that all affected workers are provided the right size (properly fitting) PPE. ♣  
Ensure that PPE is properly inspected, donned and doffed, kept clean, and maintained in good working condition.

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- Ensure that there is strict enforcement of PPE usage by all affected personnel when required.
- The host employer communicates with contractors and staffing agencies to exchange information about the hazards present in the workplace and the measures that are implemented to protect workers, including using PPE when necessary.
- The host employer establishes procedures to cover all affected workers in the PPE Program (e.g., aware of hazards, receive appropriate training, use appropriate PPE).
- The host employer gathers and disseminates information sufficient to enable each employer to assess hazards encountered by its workers, the control measures implemented, and means to avoid creating hazards on-site.

### **#33 An effective plan for monitoring the timely correction of hazards is in place.**

- Ensure that there is a documented method for monitoring the timely correction of identified hazards (e.g., hazard control plan).
- Ensure that the hazard control plan effectively monitors safety and health hazards, until they are adequately addressed.
- Ensure that the hazard control plan covers hazards identified from various sources (e.g., self-inspections, workers' recommendations and reports, Safety and Health Committee, maintenance logs).
- Ensure that the hazard control plan identifies hazards, assigns responsibilities for correction, specifies completion dates, and verifies completion.
- Ensure that hazard correction is prioritized in the hazard control plan, so that hazards presenting the greatest risks are addressed first.
- Ensure that there is a timetable for implementing prioritized corrective actions.
- Ensure that serious hazards are eliminated or controlled promptly (i.e., hazards that are likely to cause death or serious physical harm).
- Ensure that the hazard control plan addresses hazard control measures to protect workers during routine operations, non-routine operations, and foreseeable emergencies.
- Ensure that interim control measures are used to protect workers pending the implementation of permanent controls.
- Verify that a review of the tracked hazards shows that hazards are promptly corrected.
- Ensure that procedures for tracking hazard correction are reviewed periodically and updated when necessary.
- The host employer, contractor, and/or staffing agency exchange information on hazard control measures.
- The host employer communicates with any on-site contractors, staffing agency, and their workers to ensure that their work is carried out in accordance with established procedures to control hazards.

**#34 Effective monitoring of established hazard control measures is conducted to verify that control measures continue to function properly.**

- Ensure that control measures for safety and health hazards, including ergonomic risk factors, are evaluated for effectiveness in routine operations, non-routine operations, and foreseeable emergencies.
- Ensure that control measures are effective in protecting workers from identified hazards.
- Ensure that all personnel understand all aspects of the control measures associated with their work areas (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that personnel can describe the key safety and health control measures associated with their work areas, how such controls are monitored, and steps taken when problems are detected.
- Ensure that control measures are monitored on an ongoing basis with the participation of all workers (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that control measures are not violated or circumvented by personnel (i.e., not used, not used correctly, or not used consistently).
- Ensure that the failure of control measures is promptly addressed and appropriately scheduled for complete correction in the organization's action plan.
- Ensure that improper application of control measures is immediately addressed to prevent recurrence.
- Ensure that all supervisors receive training in evaluating established control measures (i.e., the host employer's supervisors as well as on-site supervisors for contractors and staffing agencies, as applicable).
- Ensure that all affected workers receive training in evaluating established control measures (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that supervisors routinely evaluate established control measures including worker input.
- Ensure that the procedures for evaluating established control measures are monitored for effectiveness.
- Ensure that trend analysis of hazard control evaluation findings is done.
- Ensure that trend analysis of hazard control evaluation findings results in improved performance of established controls.
- The host employer gives contractors and staffing agencies access to information on hazard control evaluation findings, including procedures for ensuring effectiveness.
- Similarly, contractors and staffing agencies share hazard control evaluation findings regarding their activities at a worksite with the host employer.

**#35 Applicable OSHA mandated programs are effectively in place to promote safe and healthful working conditions.**

- Ensure that all OSHA mandated programs relevant to operations executed in the workplace are identified (e.g., Permit-required Confined Spaces, Bloodborne Pathogens, Hazard Communication).
- Ensure that all OSHA mandated programs for the workplace are effectively in place and operational.
- Ensure that all OSHA mandated program requirements are properly established.
- Ensure that workers, supervisors and managers understand and support the need for OSHA mandated programs.
- Ensure that all OSHA mandated programs cover all workers at a site (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- The host employer makes OSHA mandated programs accessible to contractors, staffing agencies, and their workers.
- The host employer coordinates with contractors and staffing agencies to determine responsibilities for various program aspects.
- Ensure that required programs are evaluated and updated periodically, at least annually.
- Ensure that required programs are updated as workplace conditions change.

**#36 Effective preventive maintenance is routinely performed to ensure that facilities and equipment are in good working condition.**

- Ensure that there is a preventive maintenance program that addresses production issues as well as safety and health concerns.
- Ensure that top management provides adequate resources to conduct preventive maintenance according to schedule.
- Ensure that the preventive maintenance system is conducted according to the planned schedule for all operations in all areas of the facility (e.g., predictive maintenance, periodic plant shutdown, and periodic/routine maintenance).
- Ensure that the preventive maintenance procedures go beyond operation-related equipment to cover the maintenance of engineered controls and emergency equipment.
- Ensure that predictive maintenance procedures (i.e., based on periodic testing) are incorporated into the system, when necessary.
- Ensure that there are scheduled shutdowns to address preventive maintenance issues, as appropriate.
- Ensure that maintenance recommendations from manufacturers or builders are followed for the facility, equipment, machinery, tools, and vehicles.
- Ensure that all operators are trained to recognize maintenance needs and perform or order maintenance as scheduled (i.e., workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that high risk emergency repairs because of equipment failures resulting from maintenance deficiencies do not become necessary.

- Ensure that contractors and temporary workers understand the host employer's preventive maintenance tasks, programs, procedures to follow, and appropriate control measures.

**#37 Effective housekeeping is routinely practiced to control hazards.**

- Ensure that organizational policies and procedures (i.e., formal or informal) support good housekeeping practices in the workplace.
- Ensure that the work environment remains clean and orderly.
- Ensure that top management provides adequate resources to conduct regular housekeeping inspections and take prompt corrective actions.
- Ensure that specific and routine housekeeping inspections are conducted to maintain a safe and healthful workplace.
- Ensure that routine processes which generate waste have ongoing housekeeping procedures.
- Ensure that aisles and exit ways are kept clear and unobstructed.
- Ensure that storage areas are kept clean and orderly.
- Ensure that all personnel know the procedures for maintaining good housekeeping in their work areas (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that supervisors and managers monitor housekeeping in their work areas to encourage all personnel to follow good housekeeping practices (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency as applicable).
- Ensure that appropriate accountability measures are in place to address poor housekeeping.
- The host employer communicates procedures for maintaining good housekeeping to contractors, staffing agencies, and their personnel.
- Ensure that housekeeping practices are routinely evaluated to identify and implement improvement measures.

**#38 The organization is properly prepared for emergency situations.**

- Ensure that all potential emergency situations that may impact the facility or personnel are identified.
- Ensure that the facility emergency plan is current.
- Ensure that a facility plan to deal with all potential emergencies is prepared in writing.
- Ensure that the facility plan is written to compliment and support the emergency response plans of the community and adjacent facilities, as necessary.
- Ensure that posted emergency instructions/directions are available, correct, and accurate in all spaces, corridors, and points of potential confusion.
- Ensure that workers provide input/participate in planning for emergency situations.
- Ensure that all tasks for implementing the emergency plan are assigned to trained personnel to perform.



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- Ensure that the facility emergency plan incorporates all elements required by law, regulations, and local codes.
- Ensure that hazards associated with foreseeable emergency scenarios are identified and hazard control measures are implemented.
- Ensure that the emergency plan is tested regularly with drills.
- Ensure that the emergency plan is effective at limiting the impact of potential emergency situations on personnel, the facility, and the environment.
- Ensure that emergency equipment is in good working order (e.g., emergency communication systems).
- Ensure that emergency communication systems are installed, operational, fully charged and redundant.
- Ensure that community emergency responders participate in the facility's drills when coordination is required.
- Depending on the location of the business, type of business, and materials stored or used at a worksite, incorporate additional requirements for emergency plans by relevant authorities into procedures (e.g., OSHA, U.S. Environmental Protection Agency, Department of Homeland Security, state agencies, local fire and emergency response departments).
- The host employer communicates and coordinates with contractors, staffing agencies, and their workers about emergency situations and the workplace control measures and procedures to protect workers. The host employer communicates information before on-site work starts, and as needed, if conditions change.

### **#39 The organization has an effective plan for ensuring timely and appropriate emergency medical care for personnel and others present at the worksite.**

- Ensure that the facility has a plan for providing adequate emergency medical care to all personnel and others present at the site in a timely manner (i.e., managers, supervisors, and workers of the host employer, contractor, and staffing agency, as applicable).
- Ensure that adequate emergency medical care is available on all shifts.
- Ensure that emergency medical care is provided in accordance with standardized protocols.
- Ensure that the emergency medical plan is followed when medical emergencies arise.
- Ensure that first aid supplies are available, appropriate for the workplace and inspected regularly to restock as needed.
- Ensure that there is an on-site nurse or other appropriate medical professional, when necessary.
- Ensure that on-site emergency medical personnel are certified to at least the basic first aid and cardiopulmonary resuscitation (CPR) levels.
- When off-site providers are utilized, ensure that they are trained and certified to give emergency medical care (e.g., medical doctors, registered nurses, paramedics, emergency medical technicians, certified first responders).

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- Ensure that the organization coordinates with local emergency medical services to address procedures for protecting first responders from potential hazards at the worksite, when necessary to do so.
- Ensure that there are appropriate plans to direct outside emergency medical personnel to the correct location of an emergency in the workplace.
- Ensure that emergency medical plan is routinely reviewed with all personnel.
- Offer first aid training to all personnel.
- Ensure that all personnel are aware of the emergency medical plan and their individual responsibilities for implementing it (i.e., managers, supervisors, and workers of the host employer, contractor, and staffing agency, as applicable).
- Ensure that outside contractors, vendors, and others are provided adequate instruction about emergency medical care while they are in the workplace.
- The host employer communicates and coordinates with contractors, staffing agencies, and their workers about emergency medical situations and the workplace procedures to protect workers. These determinations are included in contract documents that define relationships between the parties.

### Education And Training

#### **#40 All workers receive appropriate and effective safety and health training in a language and literacy level that they understand before starting (or changing) work and before changes in the workplace are implemented.**

- Ensure that a training program exists at the facility for all workers (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that top management allocates adequate resources to educate and train all workers (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that education and training are recognized as important tools for informing workers about workplace hazards and controls so that they can perform tasks more safely and be more productive.
- Ensure that training is provided in a language and at a literacy level that all workers can understand.
- Ensure that training covers all legally required subjects.
- After training has been delivered, verify that the knowledge and skills taught are consistently and correctly applied by all workers.
- Ensure that all workers are given opportunities to ask questions and provide feedback during and after training.
- Ensure that training is evaluated to determine if all workers have received proper training (e.g., content, delivery method, and effectiveness).
- Ensure that post-training knowledge and skills are tested and evaluated to verify that all workers are proficient in the subject matter.



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- Ensure that all workers receive training on the safety and health program and their specific roles in its implementation.
- Ensure that all workers receive training on the knowledge and skills to do their work safely and avoid creating hazards that could place themselves or others at risk.
- Ensure that all workers receive training on awareness and understanding of workplace safety and health hazards and how to identify, report, and control them.
- Ensure that all workers receive specialized training, when there are unique hazards associated with their work.
- Ensure that all workers are trained on how to use appropriate hazard analyses systems.
- Ensure that all workers are trained to use control measures and know how controls protect them in their work areas.
- Ensure that all workers that participate in inspections are trained in the inspection process and in hazard identification.
- Ensure that all workers can explain and demonstrate their role under the emergency medical plan.
- Ensure that all workers are trained on how to use emergency equipment available to them and can demonstrate proper usage, as appropriate.
- Ensure that the Safety and Health Committee has effective safety and health training, including ergonomics training.
- Ensure that all workers performing high-risk jobs or tasks with potential for exposure to musculoskeletal hazards are trained in the control measures and ergonomic risk factors (e.g., descriptions of early signs and symptoms, with an emphasis on early reporting).
- The host employer coordinates with contractors and staffing agencies to ensure that their workers are properly trained to perform assigned tasks before starting work.
- The host employer coordinates with staffing agencies and contractors to deal with unexpected staffing needs by ensuring that enough trained and equipped workers are available or that adequate lead time is provided to train and equip workers.

### **#41 The orientation provided to all personnel before starting work includes appropriate safety and health information.**

- Ensure that top management allocates adequate resources to provide orientation training to all personnel (i.e., managers, supervisors, and workers for the host employer, contractors, and staffing agencies, as applicable).
- Ensure that orientation training introduces new personnel, personnel who are assuming new duties, and personnel returning to work after a period of prolonged absence to vital information specific to the workplace. This includes information about the organization, general procedures to follow, work areas, jobs (e.g., operations, tools, and techniques) and the safety and health program.
- Ensure that orientation training is provided to all managers, supervisors, and workers on-site (i.e., managers, supervisors, and workers for the host employer, contractors, and staffing agencies, as applicable) as well as vendors, before performing work.

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- Ensure that orientation training is provided to all affected personnel (i.e., new personnel, personnel assuming new duties, and personnel returning to work after a period of prolonged absence).
- Ensure that orientation training covers the facility safety and health program: policies; goals and objectives; procedures; whom to contact with questions or concerns about the program; workers' rights under the Occupational Safety and Health (OSH) Act; employers responsibilities under the OSH Act, general safety and health rules; major hazards and protections; how to report hazards, injuries, illnesses, and close calls/near misses; and emergency procedures.
- Ensure that training on the safety and health program provides personnel with a greater understanding that enables them to contribute to its development and implementation.
- Ensure that orientation training is provided in a language and at a literacy level that all personnel can understand.
- Ensure that orientation training confirms that all workers have the right to report injuries, incidents, hazards, and concerns, and to fully participate in the program without fear of retaliation (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that orientation training emphasizes that the safety and health program can only work when everyone is involved and feels comfortable discussing concerns; making suggestions; and reporting injuries, incidents, and hazards.
- Ensure that there is a formal program used to document, review, and modify orientation training.
- Ensure that there is a follow up action to determine the retention of orientation training by all personnel and there are provisions for retraining when shortcomings are noted.
- Ensure that orientation training is reviewed whenever there are relevant changes and at least annually (e.g., during the annual Safety and Health Program evaluation).

### **#42 All supervisors receive appropriate and effective safety and health training to oversee workers and demonstrate knowledge of the benefits of a safety and health program to the business.**

- Ensure that top management allocates adequate resources for all supervisors to receive proper education and training (i.e., supervisors for the host employer, contractor, and staffing agency, as applicable).
- Ensure that education and training are recognized as important tools for informing supervisors about workplace hazards and controls so that they can work more safely, be more productive, and provide effective oversight.
- Ensure that an effective training program exists in the workplace for all supervisors (i.e., supervisors for the host employer as well as any on-site contractor and staffing agency with shared safety and health responsibilities, as appropriate).
- Ensure that there is a supervisors training program used to document, review, and update training.
- Ensure that supervisors training is routinely evaluated for effectiveness and revised accordingly.

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- Ensure that supervisors receive the training necessary to provide effective oversight of workers in their department.
- Ensure that all supervisors can effectively train and motivate workers to recognize hazards, understand and properly use control measures, and follow emergency procedures.
- Ensure that all supervisors receive proper training to understand the safety and health program for the workplace, worker's rights under the OSH Act, hazards, control measures, and emergency procedures associated with the supervised work.
- Ensure that all supervisors receive proper training on safety and health procedures for the workplace (e.g., procedures for responding to workers' reports of injuries, illnesses, and incidents, including ways to avoid discouraging workers from reporting; hazard recognition and control; and incident investigation techniques).
- Ensure that the training covers supervisory safety and health responsibilities such as training workers and communicating hazards and control measures to all workers (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that training equips supervisors with the ability to demonstrate an understanding of the relationship between the effectiveness of the safety and health program implementation to protect all workers from injuries and illnesses and cost savings such as reduction in workers compensation costs (i.e. the host employer's workers, contractors, and temporary workers as applicable).
- Ensure that all supervisors demonstrate knowledge of how the effectiveness of the safety and health program impacts the business (e.g., effects on worker recruitment, turnover, absenteeism, morale, productivity, workers compensation costs).
- Ensure that all supervisors demonstrate the knowledge and skills needed to oversee workers in the safe performance of their duties.
- Ensure that all supervisors demonstrate knowledge and expertise of safety and health issues specific to the workplace.
- Ensure that post-training knowledge and skills are tested or evaluated to verify supervisory proficiency.
- Ensure that retraining is conducted when necessary.
- Ensure that supervisors training utilizes a combination of formal (e.g., apprenticeships, continuing education courses) and informal mechanisms (e.g., mentoring, coaching).
- Encourage and facilitate supervisors' participation in peer professional groups (e.g., Safety and Health Committees in business associations, local and state safety councils).

### **#43 All managers receive appropriate and effective safety and health training to fulfill their role and demonstrate knowledge of the benefits of a safety and health program to the business.**

- Ensure that the organization allocates adequate resources to train and educate managers.
- Ensure that education and training are recognized as important tools for informing managers about workplace hazards and controls so that they can provide effective leadership and be more productive.

## Appendix L – Safety and Health Program Formal Assistance

- Develop and implement a managers' training program for your facility.
- Ensure that safety and health training specific to your workplace (e.g., ergonomics, heat stress, and other topics beyond those mandated by OSHA standards) is provided to all managers (i.e., managers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that the training covers all subject matter delivered to workers and supervisors to the extent necessary for managers to evaluate worker and supervisory knowledge and skills.
- Ensure that the training covers managers' roles and responsibilities for the safety and health program and under the Occupational Safety and Health Act.
- Ensure that the training covers the facility's safety and health program (e.g. management concepts and philosophy, policy, goals and objectives, action plan, safety and health program evaluation).
- Ensure that the training includes the importance of the facility's long-term safety and health continuity process (i.e., safety and health succession planning), to facilitate the organization maintaining a continuous improvement-oriented safety and health program, while providing stability in safety and health leadership roles.
- Ensure that the training equips managers with the ability to effectively provide general oversight of the activities of supervisors and workers.
- Ensure that the training covers the impact of the safety and health program on business effectiveness.
- Ensure that all managers (i.e., managers for the host employer, contractor and staffing agency, as appropriate) demonstrate knowledge of how the effectiveness of the safety and health program impacts the business (e.g., effects on worker recruitment, turnover, absenteeism, morale, productivity, workers compensation costs).
- Ensure that training equips managers with the ability to demonstrate an understanding of the relationship between the effectiveness of the safety and health program implementation to protect all workers from injuries and illnesses and cost savings such as reduction in workers compensation costs (i.e., the host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that post-training knowledge and skills are tested or evaluated to verify managers proficiency.
- Ensure that managers provide good leadership in safety and health matters to all workers (i.e., the host employer's workers contractors, and temporary workers, as applicable).
- Encourage and facilitate managers participation in peer professional groups (e.g., Safety and Health Committees in business associations, local and state safety councils).

## Program Evaluation And Improvement

### **#44 Data from lagging indicators are effectively analyzed to monitor performance and progress.**

- Ensure that a system for track lagging indicators (e.g., injury and illness trends, workers compensation data, analysis of exposure monitoring data that show hazardous exposures) at the facility is in place. Use it to determine if key program processes are functioning and effective. Correct any shortcomings; and identify opportunities to improve workplace safety and health.
- Ensure that all personnel can demonstrate how to systematically, accurately, and consistently provide updated information to the system for tracking (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that data on lagging indicators is analyzed for trends. This may be formally for larger data sets or informally for smaller data sets (e.g. less than ten occurrences).
- Ensure that trend data analyses results are used to drive safety and health program improvement and hazard prevention activities.
- Ensure that trend data analyses results are routinely and consistently provided to all facility personnel.
- Ensure that an evaluation of the Log of Work-Related Injuries and Illnesses and workers' compensation data for illnesses and injuries is completed at least annually.
- Utilize both lagging and leading (see attribute 45) indicators to monitor performance and progress. Considering that lagging indicators are reactive and unlike leading indicators, do not provide information about the progress made by an organization in preventing workplace incidents.
- The host employer gives contractors and staffing agencies access to injury and illness records and other relevant safety and health information, as applicable.
- Ensure that procedures are established for contractors and staffing agencies to regularly give the host employer any information about injuries and illnesses pertaining to their work on-site, as applicable.

### **#45 Data from leading indicators are effectively analyzed to monitor performance and progress.**

- Ensure that there is a system in place that tracks safety and health related trends at the facility; verifies if key program processes are functioning and effective; corrects any shortcomings; and identifies opportunities to improve workplace safety and health.
- Ensure that the system addresses leading indicators of safety and health program effectiveness (e.g., number and types of uncontrolled hazards identified during safety and health inspections such as missing machine guards; number of routine industrial hygiene exposure assessments conducted (when necessary) and analyzed; number of hazards that did not cause injury or illness that were reported; number of near miss events

reported; number of workers who have completed required safety and health training; timely completion of corrective actions).

- Ensure that data from leading indicators are analyzed by management with workers participation (e.g., Safety and Health Committee comprising management and workers).
- Ensure that all personnel demonstrate that they can systematically, accurately, and consistently provide updated information to the system for tracking (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that statistical summaries of all routine inspection findings and corrective actions taken are prepared, charted, and distributed to all personnel to show status and progress with eliminating hazards (i.e., managers, workers, and supervisors for the host employer, contractor, and staffing agency, as appropriate).
- Ensure that all written inspection reports are retained for a period sufficient to analyze trends.
- Ensure that statistical summaries of all near miss event investigation findings and corrective actions taken are prepared, charted, and distributed to all personnel to show status and progress with eliminating hazards.
- Ensure that all incident investigation findings (whether or not injuries or illnesses occurred) are retained for a period sufficient to analyze trends.
- Ensure that workers participate in activities on how to improve the safety and health program's performance.
- Utilize both lagging and leading (see attribute 45) indicators to monitor performance and progress. Considering that lagging indicators are reactive and unlike leading indicators, do not provide information about the progress made by an organization in preventing workplace incidents.
- Ensure that data analyses results for leading indicators are shared with all personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as appropriate).

**#46 An evaluation of in-place OSHA mandated programs is conducted at least annually to correct shortcomings and identify additional opportunities to improve.**

- Ensure that a routine system for conducting evaluations of in-place OSHA mandated programs is established.
- Ensure that personnel assigned to evaluate the in-place OSHA mandated programs are proficient in examining documented materials (e.g., written safety and health programs such as Permit-required Confined Spaces for the workplace, incident records, personnel training records, maintenance and inspection records).
- Ensure that personnel assigned to evaluate the in-place OSHA mandated programs are proficient in evaluating the entire facility or organization to verify that program requirements are adequately implemented.
- Ensure that personnel assigned to evaluate in-place OSHA mandated programs include workers', supervisors, and managers.



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- Ensure that the evaluation team notes observable behavior, physical conditions, and potential health hazards in the assessment.
- Ensure that evaluation results are documented and drive appropriate changes or modifications to OSHA mandated programs.
- Ensure that evaluation results are communicated to all workers (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that the evaluation of in-place OSHA mandated programs covers applicability to contractors and staffing agency workers.
- The host employer evaluates OSHA mandated programs required of other employers at the host site, and resolves gaps in program implementation in a timely manner before work begins. The host employer includes these determinations in contract documents that define relationships between the parties.

### **#47 An evaluation of the overall safety and health program is conducted at least annually to correct shortcomings and identify additional opportunities to improve.**

- Ensure that the evaluation of the overall safety and health program covers all applicable safety and health issues.
- Ensure that the overall safety and health program is evaluated at least annually.
- Ensure that the overall safety and health program evaluation includes input/participation from all levels of the organization (i.e., managers, supervisors, and workers).
- Ensure that top management directly participates in the safety and health program evaluation.
- Ensure all workers participate in safety and health program evaluations.
- Ensure that individuals conducting the evaluations assess all sources of information including input from workers and management, observable behavior, physical conditions, potential health hazards, and documented materials (e.g., written safety and health programs such as Permit-required Confined Spaces for the workplace, hazard analyses findings, health hazard exposure monitoring reports, hazard control plan, action plan, incident investigation reports, training records, maintenance records, and inspections records).
- Ensure that individuals conducting the evaluations assess all facets of the facility to verify program implementation effectiveness.
- Ensure that the overall safety and health program evaluation includes assessing compliance with all safety and health regulations relevant to the workplace.
- Ensure that the overall safety and health program evaluation is used to improve policies and procedures.
- Ensure that the overall safety and health program evaluation process drives correction of identified shortcomings.
- Ensure that management encourages all workers to participate in finding solutions to program shortcomings (i.e., host employer's workers, contractors, and temporary workers, as applicable).
- Ensure that assessment findings indicate that the overall safety and health program elements actually result in reducing or eliminating incidents (i.e., Management

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Leadership; Worker Participation; Hazard Identification and Assessment; Hazard Prevention and Control; Education and Training; Program Evaluation and Improvement; Communication and Coordination for Host Employers, Contractors, and Staffing Agencies)

- Ensure that the overall safety and health program evaluation findings are communicated to all personnel (i.e., managers, supervisors, and workers for the host employer, contractor, and staffing agency, as applicable).
- Ensure that positive safety and health evaluation findings are celebrated with all personnel.
- The host employer's annual evaluations of the overall safety and health program also includes the effectiveness of safety and health coverage for contractors and temporary workers at the host site.
- Ensure that the results of the overall safety and health program evaluations are made available to all parties (i.e., the host employer's workers, contractor, and staffing agency, as applicable).



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## APPENDIX M – SHARP PROGRAM DETAILS

### Safety and Health Achievement Recognition Program Oregon Occupational Safety and Health Division

#### I. Program Overview

The Safety and Health Achievement Recognition Program (SHARP) is a program that encourages employer self-sufficiency in safety and health management. SHARP is a recognition program that provides an incentive and road map for Oregon employers to work with their employees to find and correct hazards, to develop and implement effective Safety and Health Management Systems (SHMS), to continuously improve, and to become self-sufficient in managing occupational safety and health. A SHARP employer is defined as an employer who has successfully incorporated safety and health management principles into their workplace.

- A. SHARP is a program of the Oregon Occupational Safety and Health Division (Oregon OSHA) Consultation Services Section. The overall goal of SHARP is to:
  - 1. Recognize employers for their achievements in workplace safety and health management,
  - 2. Reduce workplace injuries and illnesses,
  - 3. Provide a means for showing other employers that occupational safety and health can work--for everyone, and
  - 4. Encourage employers to rely less on consultation and more on themselves as they move down a continuum towards self-sufficiency in safety and health management.
- B. Participation in the Oregon OSHA SHARP program does not diminish existing employer and employee rights and responsibilities under the Oregon Safe Employment Act. Guidance in this document is intended for consultative staff to use with employers who have requested to become candidates for SHARP.
- C. Recognition Program

To promote effective safety and health program management, continuous improvement, and to provide models for others to follow, SHARP recognizes employers who implement effective Safety and Health Management Systems. Recognition is achieved by:

  - 1. Encouraging employers to use Oregon OSHA consultation, technical, and training resources, and to involve their employees in establishing effective safety and health programs. SHARP employers are further encouraged to network with others and to become members of a private SHARP and VPP organization (the Oregon SHARP Alliance), which is also devoted to safety and health improvement and networking.

## Appendix M – SHARP Program Details

2. Providing for public recognition of employers and employees as models who have worked together successfully to establish effective Safety and Health Management Systems (SHMS). This includes awarding the employer a SHARP certificate of achievement signed by the Administrator of Oregon OSHA, and using this recognition as a model for other Oregon employers.

### D. Program Eligibility

Oregon employers who have been in business for more than one year are eligible to apply for SHARP regardless of size or type of business.

1. Prospective SHARP employers must have had a comprehensive consultation completed within the 12 months immediately prior to pursuing SHARP recognition. The existence if any of the following at the establishment (specific location) precludes participation in SHARP:
  - i an open inspection, pending or open citation under appeal.
  - ii willful citation in the last 12 months (the consultation manager has discretion to review each case).
  - iii a work-related fatality in the last 12 months(the consultation manager has the discretion to review each case).
  - iv is in the Severe Violator Enforcement Program.
2. The division will emphasize the benefits of SHARP to employers of 250 or fewer employees or 500 and fewer employees corporate-wide in high hazard industries. The upper corporate size limit does not apply to franchises.

The following Partnership information has been lined out due to the fact that Oregon OSHA is not currently having agreements, but will leave the information here in case agreements are made in the future.

~~SHARP Partnership Agreements will be used for larger sites, multi-location employers and certain service provider clients based on the following criteria. (SHARP Partnerships are further explained in Sections XI through XIII of this document.)~~

- ~~a. Multi-Site SHARP Partnership agreements pertain to those employers with more than two physical locations.~~
- ~~b. Large Employer SHARP Partnership agreements are negotiable with employers who have between 251 and 500 employees. Large Employer SHARP Partnership agreements are required for those employers with more than 500 employees at a single location.~~
- ~~c. Service Provider SHARP Partnership Agreements are available for those companies who provide safety and health related services to multiple clients.~~
- ~~d. Leasing/Temporary Agency Partnerships are available for certain Leasing Agencies or Temporary Agencies who are committed to improving the~~

~~workplace safety and health conditions where their leased or temporary employees work.~~

3. Successful SHARP candidates should have a Days Away, Restricted or Transfer Rate (DART) that is below the most recently published BLS industry average for their Industrial Classification (NAICS). Note: Oregon rates may be used for comparison only after a discussion with the local field consultation manager. If the DART is not below the industry average, there should be a downward trend in those rates over a three-to-five year history.
4. To obtain and maintain SHARP status, management commitment is essential. If a company pursuing SHARP is controlled by a parent corporation or agency, it is essential that those controlling the company understand the SHARP process and the commitment necessary to maintain SHARP status. If during any part of the process, adequate authority, resources and support are not provided, the individual entity may not be able to attain or maintain SHARP status. Therefore, a discussion with the controlling corporation or agency should occur during the SHARP evaluation process to determine their commitment to the process and to the entity pursuing SHARP.
5. Incentive Programs, if any, for a SHARP company must be positive and promote safety awareness and worker participation in safety-related activities. SHARP company incentive programs must not discourage injury, illness and hazard reporting in any way.
6. Anti-Retaliation Program. The Consultant will recommend to employers seeking SHARP approval that their establishments implement an anti-retaliation program. The anti-retaliation program should address management leadership, commitment and accountability; provide a system for listening to and resolving employees' safety and compliance concerns; provide a system for receiving and responding to reports of retaliation; provide anti-retaliation training for employees and managers; and involve a plan for program oversight.

## II. SHARP Commitment Letter

Early in the SHARP process, employers must agree in writing to the following basic tenets of SHARP (a sample SHARP commitment letter can be found on the Oregon OSHA website under SHARP Program). Follow-up visits toward SHARP certification, after the initial assessment, will not be completed until receipt of the SHARP commitment letter. The written agreement must be signed and sent to the local Oregon OSHA field consultation manager. In the letter, the employer must agree to:

- A. A comprehensive consultation survey of all conditions and operations at the establishment, including a complete safety and health systems review.
- B. Involve employees in the development, operation, and improvement of all elements of the written workplace safety and health program as well as in the decisions that affect their safety and health. At union and non-union sites, if the employee representatives object to the site's involvement in SHARP, the field consultation manager will advise

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the employer that the application cannot go forward until both labor and management agree on participation in SHARP.

- C. Work diligently to accomplish the following:
  - 1. Correct all identified safety and health hazards, and provide the local field consultation manager with written confirmation that each identified hazard has been corrected within an agreed upon time frame.
  - 2. Develop, implement, or improve all elements of an effective safety and health management system at the site.
  - 3. Work to maintain a downward trend in injury and illness Days Away, Restricted or Transfer (DART) rates over the most recent five (5) years.
  - 4. Develop and maintain a written safety and health program.
  - 5. Achieve an acceptable rating on the attributes of the Oregon OSHA Safety and Health Program Assessment Tool.
- D. Inform the local field consultation manager prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace. “Changes” mean relocation of facilities, change of ownership or major organizational changes, additions to buildings, new processes, i.e., painting of parts rather than purchasing them already painted, new lines of machinery, etc. “Changes” do not include process changes at construction or other mobile sites.
- E. Notify the local field consultation manager when all elements of SHARP have been fully implemented so a follow-up visit can take place.

A sample SHARP commitment letter can be found on the Oregon OSHA website under SHARP Program.  
[https://osha.oregon.gov/consult/Documents/sharp\\_committ.doc](https://osha.oregon.gov/consult/Documents/sharp_committ.doc) Follow-up visits toward SHARP certification, after the initial assessment, will not be completed until receipt of the SHARP commitment letter.
- F. Notify the Local Field Consultation Manager of any open enforcement inspections, whistleblower complaint, catastrophe, fatality or severe injury incident at the establishment .

### III. SHARP Process

SHARP is a process designed to identify the strengths and weaknesses of an employer’s occupational safety and health management system. The process normally starts with a written request from the employer. The request initiates an intake for a comprehensive consultation including an initial assessment, followed by a report with recommendations. The process includes one or more action plan meetings between the employer and consultant to identify and begin implementation of objectives designed to meet the goal of achieving SHARP certification.

- A. Preparation

Once the employer has requested in writing, the initial pursuit of SHARP and has agreed to the basic tenants, the lead consultant will discuss the intended process with the local field consultation manager to ensure the necessary consultative disciplines are involved in the process.

The preparation for a SHARP consultation will follow the format outlined in G. of the Consultation Reference Guide.

### B. Conduct of a Visit

In the opening meeting the consultant will review the employer's request for consultation assistance, and will review the program requirements (including the potential for multiple discipline consultations) with the employer to ensure the employer understands the commitment necessary to pursue SHARP.

As the SHARP process progresses from the hazard identification stage to the Safety and Health Program improvement stage, the employer will need to commit additional resources to develop and complete action plans. The employer will be informed that the consultant will remain available to coach the employer and employees to develop or improve any existing elements, and that Oregon OSHA training resources are available to assist with skill development. Achieving SHARP, however, is the employer's responsibility, and Oregon OSHA's time onsite will shorten as the employer builds capacity toward being self-sufficient.

### C. Employee Participation

Employers electing to pursue SHARP must be committed to developing a written Safety and Health Program (SHMS) that involves employees in significant ways that affect their safety and health. Employee representatives must be involved in the consultative process including hazard assessment and action plan formulation.

### D. Comprehensive Consultation

A comprehensive consultation of the employer's establishment must be conducted covering all operations, including a complete Safety and Health Program review. All hazards identified will be discussed in light of how the elements of an effective SHMS will address their continued correction and control.

1. For companies with mobile worksites that are in or working toward SHARP, the consultant shall evaluate a representative number of the mobile worksites during the comprehensive consultation process to ascertain the effectiveness of the company-wide Safety and Health Program.

A General Contractors wishing to pursue SHARP will agree to the Tenets outlined in IV. SHARP for General Contractors in Construction Pilot.

2. Using the Safety and Health Program assessment tool, and following the guidance found in the Oregon OSHA Consultation Reference Guide, the consultant will conduct an initial assessment of the employer's Safety and Health Program and discuss with the employer the elements of an effective program.

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3. Successful SHARP candidates must achieve an acceptable safety and health program effectiveness rating following the final assessment of their program. If the employer is weak in an area for which safety and health rules have yet to be adopted, such as Ergonomics, or requires long term investment or improvements, such as ventilation systems engineering, SHARP may be attained if the area needing improvement is part of a continuous improvement action plan.
4. Initial SHARP candidates should have a three- to five- year injury and illness rate that is trending in a downward direction.

### E. Closing Meeting

The closing meeting will be conducted according to the format outlined in G. of the Consultation Reference Guide. In the closing meeting, the consultant will:

1. Describe the hazards identified during the consultation and which program elements would have prevented the hazard from occurring.
2. Discuss suggested methods of correction, time frames for correction, and any need for referrals to other section staff for hazards beyond the expertise of the consultant.
3. Describe the adequacies and areas needing improvement of the employer's Safety and Health Program.
4. Decide with the employer the extent to which additional short coaching sessions may be needed during the interim one year (or longer) period to facilitate and monitor the Safety and Health Program improvement process.
5. Develop a schedule for one or more visits, which are expected to become less frequent as the employer progresses toward self-sufficiency. During the SHARP process the consultant will remain available for contact with the employer, to help the SHARP applicant move forward.
6. Arrange to leave at least one copy of the completed Safety and Health Program Assessment Tool (if already completed) with the employer so the employer can use it as a tool to work toward full program implementation.
7. Remind the employer that at the end of the implementation period, the employer is responsible for requesting a consultation for final, onsite evaluation for SHARP approval.

### F. Written Report

After the consultant conducts the comprehensive consultation, the employer will be advised that a written report explaining the findings of the visit and confirming any correction periods will be provided at a later date.

1. The written report will follow the format outlined in G. of the Consultation Reference Guide.
2. All reports must be reviewed prior to mailing according to the format outlined in G. of the Consultation Reference Guide.



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3. The written report will reflect the consultant's findings and recommendations for hazard correction, and necessary Safety and Health Program improvements.
4. If not already completed as in III.E.6. above, the written report shall include or reference the Safety and Health Program Assessment Tool so the employer can use it to work toward SHARP approval.

### G. Action Plan

After the employer has received the written report, the consultant will coach the employer to develop action plans that map out the employer's progress in implementing an effective Safety and Health Program, and other safety or health areas needing long term improvement.

1. The action plan(s) is developed by the employer following the initial comprehensive consultation. The consultant and employer together will discuss the elements of the action plan(s) and the specific time frames for achieving plan items.
2. An action plan outlines the specific steps that will be accomplished by the employer to merit SHARP approval. The action plan should address, where applicable:
  - a. The employer's correction of all identified safety and health hazards that require long term abatement methods, with time frames.
  - b. The steps necessary for the employer to implement parts of an effective Safety and Health Program, with time frames.
  - c. The steps needed to improve any other deficiencies found during the consultative visits.

### H. Initial SHARP File

Prior to the consultant recommending approval, the consultant and the prospective employer must compile a SHARP file, documenting the employer and the consultative process. The following items are required in the SHARP file:

1. Executive Summary. A completed SHARP Packet Executive Summary sheet must be in the SHARP file. The Executive Summary will include:
  - a. Company Description: A description of the company, their size, what they do, make or sell, their operations, organization, facilities or equipment. Comment on any interactions with OR-OSHA during the previous 3 years and/or any recent history including mergers, growth or downsizing. Include significant information about the workforce (turnover, pace of work, mobile employees, permanent or temporary, demographic information, training levels, etc.).
  - b. Synopsis of the SHARP Process: A description of the SHARP process with this company, when it started, who was involved, what was accomplished. (Reference report numbers and dates of visits to create a clear picture of what the SHARP process entailed. Description should be in chronological order.) Summarize the progress made by the company in terms of improvements made in the safety and health management system.

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- c. Claims Data: Completed DART and TCIR data for the most recent 3 completed years. For companies that are renewing SHARP, add the new year and continue to accumulate the data. Describe any anomalies or trends noted in claims data, and discuss accident investigation procedures. If the rates are above the state average, justify the recommendation for SHARP approval.
  - d. Safety and Health Program Assessments: Describe the findings noted in the initial and final assessments of the company's safety and health management systems. Note areas of program improvement. Note program strengths as well as weaknesses.
  - e. Action Plans: Reference or describe the results of last year's action plan. Include any action items not completed. Describe action plans developed for the coming year. Note relationships to current assessment, as well as time lines, and responsibilities.
  - f. Consultants Recommendations: Consultants statement verifying serious hazards were abated (or effective abatement plans in effect with interim protection in place, with completion dates) and reason(s) why consultant(s) recommend this company be approved as (or to remain) a SHARP company.
2. Assessments. Include copies of the initial and final Safety and Health Program assessment forms, as well as any interim assessments conducted during the SHARP process.
  3. Reports/Verification. Include copies of all the consultation reports generated during the SHARP process and verification that all hazards have been abated, or that action plans are in place to address the long term hazard abatement of complex items.
  4. Action Plans. Include copies of all written action plans developed to address identified hazards and to work toward SHARP. Completed action plans should include documentation on the status of individual action plan items.
  5. Employer Letters. Include copies of all letters from the employer to Oregon OSHA generated during the SHARP process, including the initial letter of commitment addressed to the local Field Consultation Manager, and the letter from the company requesting final SHARP evaluation.
  6. Supporting Documentation. Additional supporting or explanatory documents may be included, as necessary or desired, which illustrate the level of excellence of the employers safety and health programs.

### **IV. SHARP for General Contractors in Construction Pilot**

- A. SHARP for specialty trade construction worksite (mobile) will continue to follow the procedures outlined previously in the Oregon SHARP program.
- B. General Contractors (GC) in the SHARP process will follow the procedures outlined in the Oregon SHARP program, and will adhere to the following guidelines spelled out in the National Construction SHARP Pilot:



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1. SHARP recognition for General Contractor (GC) Participants is available only to general contractors who have their “home base” in Oregon qualify. Once qualified at the “home base” the GC participant may apply for GC Construction SHARP at any of their worksite’s that will be a 24 month or longer project site.
2. SHARP Participation for General Contractors is available only to general contractor employers with 250 and fewer employees on site, and no more than 500 employees corporation-wide.
  - a. The GC participant will provide the Consultation Project Manager (CPM) (or their designee) the name and description of the worksite and a schedule for completion of all phases.
  - b. The GC participant will involve employees, any collective bargaining groups or other recognized employee representatives, to work effectively in attaining SHARP recognition at the worksite.
  - c. The GC participant will require all sub-contractors on the project to submit the subcontractor’s safety and health management system (SHMS) for review prior to being awarded. If the subcontractor’s SHMS is deemed insufficient by the GC, that subcontractor must work under the GC SHMS for the particular job.
    1. The GC participant will provide a list of subcontractors with their injury and illness rates for the immediate preceding 3 year average. If a subcontractor has less than 10 employees and is not required to maintain such records, the rates may be estimated based on the number of injuries/illnesses and the number of hours worked during the previous year.
    2. During the GC SHARP Participation, the GC must submit to the CPM:
      - i. A copy of the worksite’s OSHA 300 log;
      - ii. A copy of all injury and illness incident reports; and
      - iii. Information regarding the completion of any item(s) on the SHARP Action plan
  - d. The GC participant must maintain a combined set of injury and illness records for all employees working at the site including sub-contractors.
3. The GC Participant will be responsible for ensuring correction of all hazards identified on the project, whether they are attributed to the GC or a subcontractor. Due to the short-term nature of construction worksites, identified hazards must be corrected as quickly as possible, but shall be no longer than twenty days after the closing conference. To the extent possible, hazards observed on the worksite must be corrected while the consultant is on the premises. Those hazards not immediately corrected, must be assigned the shortest possible correction due date, but no greater than three days from the closing conference, when at all possible.
  - a. The GC shall verify that hazards caused by subcontractors are corrected by the responsible subcontractor.

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- b. The GC participant must ensure subcontractors and their employees working at the site are aware of SHARP participation and of their roles and responsibilities.
- c. The GC participant must maintain the following documents in relation to the subcontractors working on the site:
  - 1. A signed letter from each subcontractor stating that they have received, read, and are willing to work in accordance with the SHARP program;
  - 2. A record of attendance at all safety meetings;
  - 3. And safety and health inspection reports, incident investigation reports or other documents that demonstrate the effectiveness of the employer's SHMS; and
  - 4. Provide safety and health orientation sessions for incoming subcontractor employees, temporary workers, and permanent employees.
- C. The GC participant must agree to periodic safety and health visits during the term of the project that will take place with very little to no advance notice. At least one safety and health visit will take place each year while the project is active.
  - 1. In addition to the periodic visit by the Consultant(s), the GC participant will conduct and electronically submit to the CPM quarterly safety and health self assessment (reports) of the worksite. The quarterly assessment report shall include:
    - a. description of training they have conducted (including toolbox talks, orientation for new employees, and other safety and health training);
    - b. copies of job hazard analysis conducted;
    - c. copies of injury and illness logs;
    - d. any other activities they improved (or maintained) regarding the quality of their SHMS.

## V. SHARP Approval and Certificate Issuance

When the consultant(s) have verified that the employer has met all of the requirements for SHARP approval and the SHARP file is completed, the SHARP file must be submitted to the local field consultation manager.

- A. The local field consultation manager will verify that the SHARP file is complete and that the employer has met all of the requirements for SHARP approval before forwarding the SHARP Executive Summary with the approval recommendation to the consultation manager.
- B. Upon receipt of the SHARP Executive Summary, the consultation manager or designee will review and may approve SHARP certification for the employer.
- C. The initial SHARP certificate will normally be awarded to the employer by a member of the Oregon OSHA management team. The consultant shall schedule the award ceremony at a time that is convenient to both the company and the Oregon OSHA management person.

## VI. Renewing SHARP/Continuous Improvement

SHARP recognition is granted in 12 month increments. To continue in SHARP, employers must apply for renewal during the last quarter of the approval year by contacting the local field consultation manager (or their designee). If contact has not been made by the renewal date, a letter will be sent informing the SHARP company that they must schedule a renewal evaluation within 30 days or they will be terminated from SHARP.

- A. The lead consultant and the SHARP team will conduct an in-depth evaluation to ensure the Safety and Health Program is being effectively maintained and continuously improved. The consultant will evaluate three to five years of injury and illness data and look at trends, injury types and severity. Those employers with incidence rates above their industry averages must be evaluated on a case-by-case basis. In addition to reviewing injury and illness rates, the consultant will:
  1. Conduct a hazard assessment of the facility, to verify that workplace hazards at the site remain under control.
  2. Review accident and incident investigation reports and 801 forms from the current and previous year and evaluate trends from the most recent three years of OSHA 300 Logs.
  3. Assess all 58 elements of the employer's safety and health management program.
  4. Evaluate the level and effectiveness of employee involvement in the site's safety and health programs.
  5. Review and evaluate the detail and progress in the site's action plans for the previous and upcoming years.
  6. Assess the site's continuous improvement and their movement towards self-sufficiency.
  7. Assess the effectiveness of the safety committee.
  8. Review the site's written safety programs for effectiveness.
- B. Second-year SHARP evaluations will consist of a comprehensive consultation as specified in III.D. of this document. Recognizing that incidence rates fluctuate, Oregon OSHA consultation will evaluate incidence rates as part of the criteria for evaluating third-year and subsequent SHARP renewals. The following approach will be applied to incidence rates of second-year and subsequent SHARP renewals.
  1. Compare the SHARP employer's DART to the most recently published BLS average total for all Oregon industries. If the DART is lower than the average, the company can be recommended for renewal.
  2. If the SHARP company's DART is above the Oregon all industry average, compare it to the BLS national industry average for the specific NAICS which they are classified under. If the DART is lower than the industry average for their NAICS, the company can be recommended for renewal.
  3. If the SHARP company's DART is above the national industry average for the specific NAICS, the consultant will average the company's DART rates for the last

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three years and compare them to an average of the three most recently published rates for their industry. If the company's three-year average rate is lower than the average of the three most recently published industry rates, the company can be recommended for renewal.

4. Some SHARP renewal applicants, with limited numbers of employees and/or hours worked, may use a fourth alternative method of calculating incidence rates. The alternative method allows the employer to use the best three out of the most recent four years' injury and illness experience. The alternative method may only be used after discussion with the field consultation manager.

**Note:** To determine whether the employer qualifies for the alternative calculation method, do the following:

1. Using the most recent employment statistics (hours worked in the most recent calendar year), calculate a hypothetical lost workday case incidence rate for the employer assuming that the employer had two cases during the year;
2. Compare that hypothetical rate to the most recently published BLS lost workday case incidence rate averages for the industry; and
3. If the hypothetical rate (based on two cases) is equal to or higher than the BLS average for the firm's industry, the employer qualifies for the alternative calculation method.

For more information on rate calculations, see Appendix E.

- C. For second-year and subsequent SHARP evaluations, the consultant will coach the SHARP employer to take an active and ever increasing role in the SHARP evaluation process. Because the employer should be making progress toward self sufficiency, we expect that over time the employer will take more of the responsibility for activities associated with their continued improvement and Oregon OSHA's involvement will be limited. In the interest of continued improvement and self sufficiency, encourage the SHARP worksite in the following:
  1. Explain to the site contact person the calculations for determining DART and TCI rates and show them how to compare their rates against the published industry rates for their industry.
  2. To develop, implement and maintain a management of change (MOC) program (or similar systematic process) and incorporate MOC training into their management training processes.
  3. To develop and implement a safety program continuity plan (succession planning or similar systematic process) in order to help facilitate long term stability in safety and health processes. The safety continuity plan should be designed to recruit and enlist promising employees, to develop their knowledge, skills, and abilities in order to prepare them to assume ever more challenging roles within the organization, so that as the organization loses key employees, the next generation of safety and health leadership is being groomed to step into new or vacated roles. Such a

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process is vital to a company in maintaining a continuous improvement oriented safety culture.

4. To develop networking and mentoring relationships with other SHARP or VPP companies, with the Oregon SHARP Alliance, with a local ASSE or other safety and health networking organization in order to keep abreast of current SHMS related information.
- D. Renewal is dependent on the consultant's assessment of continued program improvement and effectiveness. If all requirements for SHARP are verified as operating effectively by the consultant and improvement is verified, Oregon OSHA will inform the employer that the employer's renewal has been approved.
- E. Subsequent SHARP Recommendations.
- Prior to the consultant recommending an employer for continuation in the SHARP program, the SHARP file that documents the employer and the consultative process must be updated. The subsequent SHARP file will include an updated executive summary, any new report(s), and the most recent assessment form appended to the initial SHARP packet (see III.H. of this Appendix). Other updated information may be included where applicable.
- F. Subsequent SHARP awards.
- Second-year and subsequent SHARP certificates will normally be awarded to the employer by a member of the consultation team.
- G. File retention.
- Electronic copies of the Executive Summary and all S&HP Assessments will be electronically saved under: \\Cbs\_osh\DATA\Osha\S\share\Con\_temp\All Consultation\ConTrackDocs

## VII. Scheduled Inspection Deferral

An employer who has been approved as SHARP for the second and subsequent years may be deferred from scheduled Oregon OSHA inspections. Inspection deferral is awarded as an acknowledgment by the agency that enforcement resources would be better used at worksites where employees may be at higher risk of injury and /or illnesses.

- A. Following the approval of second and subsequent year SHARP participation, the consultation manager will forward the approval to the manager of enforcement, who will defer the establishment from the scheduled inspection lists.
  1. The scheduled inspection deferral (SHARP exemption) will be limited to one year, and must be renewed upon the next SHARP renewal. Once awarded, the scheduled inspection deferral may be renewed annually as long as the company continues to be approved for SHARP participation.
  2. Upon graduation from the SHARP program, SHARP graduate companies will receive one final SHARP exemption that will last no more than three (3) years.

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- B. Oregon OSHA will continue to conduct compliance inspections in the following categories: Imminent Danger, Fatality/Catastrophe, Serious Accidents, and Complaints/ Referrals. SHARP companies must continue to abide by OAR 437-001-0700, Recordkeeping and Reporting.
  - 1. In the event of a compliance inspection with a serious or repeat citation, the local field consultation manager will determine whether or not an onsite visit shall be conducted to ensure that the safety and health management system is operating effectively.
    - a. If an onsite visit is warranted, and the consultant believes there is a connection between a serious citation and reduced effectiveness of the safety and health management system, the consultant must recommend that the SHARP employer withdraw from the program.
    - b. If an onsite visit is warranted, and the consultant believes there is no connection, the employer must be counseled on how to prevent a recurrence.
  - 2. If a willful citation is issued or there is evidence that the site's SHARP information was falsified, the employer will be asked to withdraw from the SHARP program. If the employer does not voluntarily withdraw within 5 working days, participation will be terminated. The employer may reapply after 12 months.

### **VIII. Failure to Meet or Maintain Requirements**

An employer's SHARP approval and/or inspection deferral will be terminated if the consultation manager, and the Oregon OSHA administrator determine the employer failed to meet, or maintain SHARP requirements. The reason for the termination must be noted in the Activities tab of the Administrative Detail tab of the SHARP database in ORCA.

- A. If a SHARP employer fails to renew their SHARP status within two months of their scheduled renewal date, that employer will be automatically terminated from the program.
- B. Except in egregious cases, the employer will be given the opportunity to withdraw from the program, rather than be terminated. Companies withdrawing from SHARP should be encouraged to continue using SHARP criteria and to consider re-applying for SHARP in the future.
- C. Conditional Approval.

A SHARP facility that is meeting the spirit of SHARP participation, but falls short in certain areas during the renewal evaluation may be considered for a conditional approval. The conditional approval status must be discussed with the field consultation manager and a planned approach developed for the action plan process. SHARP employers who are not eligible for renewal or graduation will be given one of the following two choices:

  - 1. The employer can agree to a time-specific conditional SHARP approval, not to exceed two years, during which time they will focus on completing an action plan aimed at ensuring they are eligible to renew at the end of that time-frame.



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- a. If an extension to a conditional approval is recommended, the consultant and the field consultation manager must discuss the reasons behind the recommendation with the consultation manager.
  - b. If a second conditional approval is recommended, at any time after the first conditions have been met, the consultant and the field consultation manager must discuss the reasons behind the recommendation with the consultation manager.
2. The employer will be asked to voluntarily withdraw from SHARP.

**Note:** Conditional SHARP status does not maintain any exemptions from inspection.

### IX. Graduation from SHARP

SHARP companies who have completed four consecutive years in SHARP and who successfully renew for a fifth year may be graduated from the program.

- A. After a SHARP employer completes its fourth year in the SHARP program, the lead consultant will work with the SHARP employer to jointly complete the final SHARP renewal assessment to determine eligibility for SHARP renewal.
  1. If the site is not eligible for renewal, they will be given one of the following two choices:
    - a. The employer can agree to a one-year conditional SHARP approval, during which time they will focus on completing an action plan aimed at ensuring they are eligible to renew at the end of that year. Note: The conditional approval status must be discussed with the field consultation manager and a planned approach developed for the action plan process.
    - b. The employer will be asked to voluntarily withdraw from SHARP.
  2. If the site is eligible for renewal, the site will be presented with a SHARP graduate plaque and flag.
  3. Graduation occurs during the scheduled month of renewal.
- B. Approximately 3 years after graduation, “graduates” of the SHARP program will lose their SHARP exemption from scheduled Oregon OSHA inspections.
- C. Companies that have graduated from SHARP will remain eligible to be full members of the Oregon SHARP Alliance.
- D. Initially, the role of the Oregon OSHA consultant is that of an expert consultant who takes a leadership role in guiding the prospective SHARP company through the initial consultative process. This leadership role will continue as the company attains their first year SHARP approval.
  1. By the first year SHARP evaluation, the consultant should begin to transition from the role of an expert and leader in the process to the role of a coach and mentor to helping the SHARP employer understand how and why to use the safety and health assessment form as an ongoing evaluation tool. As a coach and mentor, the consultant helps the SHARP employer to understand how and why to properly apply

the rating system, to analyze and evaluate injury and illness trends, to identify and locate resources available to them, and to conduct their own evaluation.

2. This transition will gradually occur over the period of participation, with the SHARP company taking on more and more responsibility for the evaluation while the consultant teaches and coaches, so that by the final evaluation, the SHARP employer will take the leadership role in the process with the consultant as a resource. When this transition is complete, the SHARP employer has truly become self-sufficient and is no longer dependent upon the consultant for a comprehensive annual evaluation of their safety and health program.

## **X. SHARP Graduation Assessment**

To graduate from SHARP, 4<sup>th</sup> year SHARP employers apply for renewal during the last quarter of the approval year by contacting the local field consultation manager (or their designee) and scheduling the evaluation. If contact has not been made by the final SHARP evaluation date, a letter will be sent informing the SHARP employer that they must schedule a renewal evaluation within 30 days or they will be terminated from SHARP.

- A. For SHARP graduation (fifth- and final-year) evaluations, the consultant will continue to coach the SHARP employer to take an active role in the evaluation process.
- B. The lead consultant and the SHARP employer will conduct an in-depth evaluation to ensure the Safety and Health Program is being effectively maintained and continuously improved. They will evaluate three (3) to five (5) years of injury and illness data including trends, injury types and severity. Those employers with incidence rates above their industry average must be evaluated on a case-by-case basis. In addition to reviewing injury and illness rates, the consultant and the SHARP employer representatives will:
  1. Conduct a hazard assessment of the facility to verify that workplace hazards at the site remain under control.
  2. Review accident and incident investigation reports and 801 forms from the current and previous year and compare them to any trends noted from the evaluation of OSHA 200 / 300 Logs.
  3. Assess all 58 elements of the employer's safety and health management program.
  4. Evaluate the level and effectiveness of employee involvement in the site's safety and health programs.
  5. Review and evaluate the detail in and the progress on the site's action plans for both the previous and the upcoming years.
  6. Assess the site's continuous improvement and their movement toward self-sufficiency.
  7. Assess the effectiveness of the safety committee.
  8. Review the site's written safety programs for effectiveness.



- C. The consultant should discuss with the employer the importance of continuing the annual self-assessment process as part of their ongoing quest for continuous improvement.

## **XI. SHARP Graduation Recommendation**

Prior to the consultant recommending an employer for graduation from the SHARP program, the SHARP file must be updated. The SHARP file will include an updated executive summary, any new report(s), and the most recent assessment form appended to the initial SHARP file. Other updated information may be included where applicable.

### **A. Final SHARP File.**

Prior to a graduation recommendation, the consultant and the employer must compile a SHARP file documenting the consultative process. The following items are required in the SHARP file:

#### **1. Executive Summary.**

A completed SHARP Packet Executive Summary sheet must be in the SHARP file. The Executive Summary will include:

- a. **Company Description:** A description of the company including size, type of business, operations, organizational structure, facilities and type of equipment. Comments on interactions with Oregon OSHA during the previous years and recent history including mergers, growth or downsizing should be included. This section should also contain significant information about the workforce (turnover, pace of work, mobile employees, permanent or temporary, demographic information, training levels, etc.).
- b. **Synopsis of the SHARP Process:** A description of the SHARP process with this company, when it started, who was involved, what was accomplished. (reference report numbers and dates of visits to create a clear picture of what the SHARP process entailed. Description should be in chronological order.) Summarize the progress made by the company in terms of improvements made in the safety and health management system. Summarize the impact the SHARP process has had on the workplace culture.
- c. **Claims Data:** DART data for the most recent 5 (five) completed years. Describe any anomalies or trends noted in claims data and discuss accident investigation procedures. If the rates are above the state average, the recommendation for SHARP graduation must be clearly justified.
- d. **Safety and Health Program Assessments:** Describe the findings noted in the SHARP assessments of the company's safety and health management systems. Note areas of program improvement related to the SHARP process, as well as program strengths and weaknesses.
- e. **Action Plans:** Reference or describe the results of last year's Action Plan. Include any action items not completed. Describe action plans developed for the coming year. Note relationships to current assessment, as well as time lines, and responsibilities.

## Appendix M – SHARP Program Details

- f. Consultant(s) Recommendation: Include a statement verifying serious hazards were abated (or effective abatement plans with interim protection in place, including completion dates) and list the reason(s) why consultant(s) recommend this company be approved as a SHARP graduate.

2. Reports/Verification.

Include copies of available consultation reports generated during the SHARP process and verification that all hazards have been abated, or that action plans are in place to address the long term hazard abatement of complex items.

3. Supporting Documentation.

Additional supporting or explanatory documents may be included, as necessary or desired, which illustrate the level of excellence of the employers safety and health programs.

### B. SHARP Graduation Awards.

When the consultant has verified that the employer has met all of the requirements for SHARP approval and the SHARP file is complete, it must be submitted to the local Field Consultation Manager for review.

1. The field consultation manager will verify that the SHARP file is complete and that the employer has met all of the requirements for SHARP approval before forwarding the SHARP Executive Summary with the approval recommendation to the consultation manager or their designee.
2. Upon receipt of the SHARP Executive Summary, the consultation manager or their designee will review and may approve SHARP graduation for the employer.
3. The SHARP graduation plaque and flag will normally be awarded to the employer during a graduation award ceremony.
  - a. A member of the Oregon OSHA management team will normally award the SHARP graduation plaque and flag to the employer. The award ceremony will be scheduled at a time that is convenient to both the company and the Oregon OSHA management representative.
  - b. The consultant or SHARP program manager will notify Oregon OSHA's public information officer (or a designee as identified in Oregon OSHA SOP-21) about the employer's reaching SHARP graduate status, and make arrangements for a news release and other communications or public relations products to be written and distributed. Notification should occur four weeks prior to any scheduled "graduation ceremony," to allow time for the PIO to gather information, produce materials, and schedule resources to photograph an award ceremony.

The following Partnership information has been lined out due to the fact that Oregon OSHA is not currently having agreements, but will leave the information here in case agreements are made in the future.

## ~~XII. SHARP Partnerships~~

~~The SHARP program was designed for employers with 250 employees or less. Oregon OSHA has developed a SHARP Partnership process to enable larger employers, multi-site employers and certain companies that provide a service to their clients the opportunity to attain SHARP status.~~

- ~~A. The SHARP Partnership process requires the multi-site partner company to commit additional up-front resources to the SHARP process so that Oregon OSHA Consultation can assist them without over committing Oregon OSHA resources. The multi-site partner company will choose an internal SHARP team that will receive specific training to improve their ability to assess their own sites.~~
- ~~B. In these SHARP Partnerships, Oregon OSHA and multi-site or service provider companies recognize that by working together more of their worksites or client sites can achieve SHARP recognition. And, through effective safety and health programs more workers will be protected.~~
- ~~1. Partner companies and Oregon OSHA mutually recognize the importance of providing a safe and healthful work environment. To advance our mutual goal, we agree on the need to develop partnerships that foster mutual trust and respect for the respective roles of each organization in the occupational safety and health processes. We recognize the responsibilities inherent in these roles. We are committed to working as partners to achieve occupational workplace safety and health through shared strategies and objectives.~~
  - ~~2. The goal of the partnership is to decrease injuries, illnesses, fatalities, lower workers' compensation costs, and maximize Oregon OSHA and multi-site partner company resources.~~
  - ~~3. These partnership agreements will not in any way affect employees' rights under the Oregon Safe Employment Act and Oregon OSHA regulations.~~
- ~~C. Types of SHARP Partnerships~~
- ~~1. Multi-Site SHARP Partnership agreements (for employers with more than two physical locations).~~
  - ~~2. Large Employer SHARP Partnership agreements (negotiable with employers who have between 251 and 500 employees, required for employers with more than 500 employees at a single location).~~
  - ~~3. Service Provider SHARP Partnership Agreements (for those companies who provide safety and health related services to multiple clients).~~

- ~~4. Leasing/Temporary Agency Demonstration Partnerships (for certain leasing agencies or temporary agencies who are committed to improving the workplace safety and health conditions where their leased or temporary employees work).~~

### **~~XIII. SHARP Partnership Process~~**

~~In the SHARP Partnership agreements the partner company will choose one site (representative of their major processes) to go through the SHARP process, including an initial assessment, action planning, and a final assessment by Oregon OSHA Consultation. Note: In some cases, this one site may have gone through the SHARP process prior to the partnership agreement. In other cases, a new site may be chosen.~~

- ~~A. The partner company will designate personnel to be on their “Internal SHARP Team.” Some members of the team will be given the opportunity to accompany Oregon OSHA consultants as they evaluate the chosen worksite.
  - ~~1. Oregon OSHA will provide training to the multi-site partner company’s chosen Internal SHARP Team and provide them with the knowledge and tools necessary to evaluate a safety and health management system using the Safety and Health Program Assessment Form. This will enable the Internal SHARP Team to evaluate the individual worksites of the multi-site company and help them improve their safety and health management systems to a level required to achieve SHARP.~~
  - ~~2. Members of the Internal SHARP Team will work together with their management team to evaluate the safety and health management systems of individual partner sites using the Oregon OSHA assessment tool.~~~~
- ~~B. When the multi-site partner company’s Internal SHARP Team has evaluated one of their sites and determined that they are qualified for SHARP, they will notify Oregon OSHA Consultation via the SHARP commitment letter that they are ready for a SHARP consultation.
  - ~~1. Prior to the consultation, consultants working with SHARP partnership sites will familiarize themselves with the written multi-site partnership/collaboration agreement, familiarize themselves with the nature of work and applicable rules covering the site, and have a discussion with the field consultation manager prior to opening with the site. The consultant will hold a pre-consultation meeting with the applicable members of the Internal SHARP Team to discuss and review the work done with the site leading up to the recommendation. The consultant will then conduct the comprehensive consultation with members of the internal team, including them in the site inspection, safety and health program review, and employee interviews.~~
  - ~~2. If the partner worksite’s safety and health program qualifies, the consultant will initiate the SHARP approval process.~~
  - ~~3. If the partner worksite’s safety and health program does not qualify, the site will be encouraged to develop an action plan to improve the deficiencies.~~~~
- ~~C. SHARP Partnerships will be re-evaluated every two to three years to determine effectiveness and re-initiation.~~

## **~~XIV. Service Provider and Leasing/Temporary Agency Demonstration Partnerships~~**

~~SHARP Partnerships may be negotiated with companies who provide safety and health related services to clients or companies that provide leased or temporary employers to their clients, and take an active role in helping client sites improve workplace safety and health conditions. These partnerships are intended to enable the service provider to provide their clients with effective tools to help them better manage their safety and health programs.~~

- ~~A. Because SHARP employers are expected to promote effective safety and health program management and to be models for other employers, leasing/temporary agencies wishing to achieve SHARP will be held to a higher standard than that defined in Program Directive A-246, Worker Inspection Criteria: Temporary Service Providers and Leasing Companies, if they wish to pursue recognition as an Oregon SHARP employer.~~
- ~~B. The leasing/temporary agencies working toward SHARP are expected to go above and beyond simple compliance. They are expected to assist the host employer wherever possible to ensure adequate protection for all SHARP agency temporary or leased employees is provided. Adequate protection must include the following:
  - ~~1. Hazard control~~
  - ~~2. Site specific training~~
  - ~~3. Personal protective equipment~~
  - ~~4. Safety committee representation~~
  - ~~5. Accident reporting~~
  - ~~6. Record keeping~~
  - ~~7. Accident and incident investigation~~~~
- ~~C. SHARP leasing/temporary agencies are expected to establish partnerships with their clients (the host employer) for the express purpose of assuring a safe place of employment is provided for agency personnel.~~
- ~~D. In those cases where the host employer refuses to control hazards or provide protection, a SHARP leasing/temporary agency would be expected to refuse to provide leased or temporary employees.~~

# Oregon OSHA SHARP Safety and Health Achievement Recognition Program

## What is SHARP?

SHARP is a recognition program. It provides an incentive for Oregon employers to work with their employees to find and correct hazards, to develop and implement effective Safety and Health Programs, to continuously improve, and to become self-sufficient in managing occupational safety and health.

SHARP is a program of the Oregon Occupational Safety and Health Division (Oregon OSHA), Consultation Section.

## SHARP Process

SHARP was designed as a process to help identify the strengths and weaknesses of an employer's occupational safety and health management system. The process starts with a comprehensive consultation including an initial assessment, followed by a report with recommendations. The process includes one or more action plan meetings between the employer and consultant(s) to identify and begin implementation of objectives designed to meet the goal of achieving SHARP certification.

## Program Requirements

Oregon employers who have been in business for more than one year are eligible to apply for SHARP regardless of size or type of business. Prior to the SHARP process, employers agree in writing to the basic principles of SHARP. That agreement includes, but is not limited to:

- a comprehensive consultation of the site;

- involving employees in the safety and health program;
- correcting hazards, improving the site safety and health management system;
- informing Consultation prior to making changes that might affect safety or health; and
- notifying Consultation when all elements of SHARP are implemented so a follow-up visit can take place.

## Employee Participation

SHARP employers must be committed to developing and implementing a written Safety and Health Program that involves employees in significant ways to affect employee safety and health.

## SHARP Approval

SHARP candidates must have a Days Away, Restricted, and or Transfer (DART) rate that is below the State industry average for their North American Industry Classification System (NAICS) number.

When consultation has verified that all the SHARP requirements are met, the company can be recommended for approval. SHARP approval is granted in 12 month increments. To continue in SHARP, employers must apply for renewal during the last quarter of the approval year. Oregon employers are eligible to graduate from SHARP after five years of participation in the program.

### Inspection Exemption

An employer who has been approved as SHARP for the second and subsequent years can be deferred from scheduled Oregon OSHA inspections. Inspection deferral is an acknowledgment by the agency that enforcement resources would be better used at worksites where the level of accident prevention may need improvement.

#### For more information, call:

Oregon OSHA Central Office 1-800-922-2689

Portland Field Office	(503) 229-6193
Salem Field Office	(503) 373-7819
Eugene Field Office	(541) 686-7913
Medford Field Office	(541) 776-6016
Bend Field Office	(541) 388-6068

Our website [osha.oregon.gov](https://osha.oregon.gov)

Several Oregon SHARP companies have formed the SHARP Alliance to help promote worksite safety and health. Visit their website at <https://sharpalliance.weebly.com/>





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## APPENDIX N – OREGON OSHA CHALLENGE PROGRAM

### I. Program Overview

Oregon OSHA Challenge is a program that provides employers the opportunity to work closely with Oregon OSHA Consultation to develop or improve their safety and health management program. Challenge participants, through a series of consultations over the course of one year, will work with Oregon OSHA Consultation to find and correct hazards, develop and implement effective safety and health systems and progress toward becoming self-reliant in managing their workplace safety and health. Employers will be provided a one year deferral from scheduled Oregon OSHA enforcement inspections while they are working with consultation during their Challenge year. And can be extended if needed.

The overall goal of the Challenge Program is to:

1. Reduce workplace injuries and illnesses.
  2. Help employers to become self-reliant in safety and health management.
  3. Provide a means to confirm that hazards have been abated.
- A. Participation in the Oregon OSHA Challenge program does not diminish existing employer and employee rights and responsibilities under the Oregon Safe Employment Act. Guidance in this document is intended for consultative staff to use with employers who have requested to become candidates for the Challenge Program.
- B. Program Eligibility.
1. The employer must agree to correct all hazards identified during the consultation to be eligible to participate in Oregon OSHA Challenge.
  2. The employer must not be under enforcement (as described in the field guide).
  3. No SHARP or VPP sites.
  4. An employer can only take advantage of this service once every 5 years.

### II. Challenge Process

Employers receiving Safety and Health Consultations will also receive information on the Challenge Program if the consultant identifies the employer as one who could benefit from the program. If the employer is interested, an intake will be generated. Challenge consultations will generally require both Safety and Health intakes. An ergonomic intake may also be required based on the nature of the industry of the employer's claims history. A letter of commitment explaining the terms of the Challenge Program will be sent to the employer for their signature. No Challenge consultation activity will be initiated until the signed commitment letter is returned.

- A. Conduct of a Visit. In the opening meeting the consultant will review the Challenge program requirements with the employer to ensure the employer understands the commitment necessary to pursue Oregon-OSHA Challenge.

## Appendix N – Oregon OSHA Challenge Program

1. **Comprehensive Consultation.** A comprehensive consultation of the employer's establishment will be conducted covering all operations, including a complete Safety and Health Program review and injury analysis. All hazards identified will be discussed in light of how the elements of an effective Safety and Health System will address their continued correction and control.
2. For companies with mobile worksites that are in the Oregon OSHA Challenge program, the consultant shall evaluate all mobile worksites during the comprehensive consultation process to determine the effectiveness of the company-wide Safety and Health System. Mobile sites outside the consultant's assigned area may be conducted by a local consultant.
3. During the closing conference, the consultant will:
  - a. Describe the hazards identified during the consultation and the safety and health management elements that would have addressed the root cause of the hazard and could have prevented the hazard or similar hazards from occurring.
  - b. Discuss methods of correction and time frames for correction of hazards identified. Time frames and abatement dates will vary depending on site circumstances. For imminent danger hazards that cannot be corrected immediately, effective interim protective measures must be identified and implemented.
  - c. Develop a schedule for one or more follow-up visits to verify abatement and provide further assistance or training. During the Challenge process the consultant will remain available for contact with the employer to help the Challenge applicant move forward. The employer's worker's comp carrier could also be included in the Challenge process.
  - d. Discuss any need for referrals to other section staff for hazards beyond the expertise of the consultant.
  - e. Advise the employer that a written report explaining the findings of the visit and confirming any abatement methods and correction periods will be provided. The employer must respond by filling out an attachment describing how identified hazards were corrected and what steps or measures were initiated to prevent reoccurrence.
  - f. Advise the employer that the Challenge enforcement deferral begins when they receive their report and expires in one year. The deferral will be terminated if the employer fails to correct all hazards and/or fails to maintain their Challenge commitment.

### III. Report

Challenge reports will be completed in ORCA to allow for and track abatement verification. The report must:

- A. Identify the employer representatives dealt with on the consultation.
- B. Describe the site and the processes evaluated.

## Appendix N – Oregon OSHA Challenge Program

- C. Describe how the company is meeting the 7 elements of an effective safety and health system.
- D. Include the DART rate.
- E. Include a section describing the serious and/or other than serious items identified with the associated rule and recommendations for correction. Recommendations for correction must include steps or measures to prevent reoccurrence.
- F. Include an attachment for the employer to return that verifies the correction date and describes the corrective measure taken.

### **IV. Scheduled Inspection Deferral**

An employer who is participating in the Oregon OSHA Challenge program will receive a deferral from scheduled Oregon OSHA inspections for one year. For multi employer work sites, the inspection deferral is for the Challenge employer at that site, not the site itself. The inspection deferral is awarded as an acknowledgment by the agency that enforcement resources would be better used at worksites where employees may be at higher risk of injury and /or illnesses.

- A. The consultation manager will notify the manager of enforcement of the Challenge participant, who will defer the establishment from the scheduled inspection lists.
  - 1. The scheduled inspection deferral will be limited to one year.
- B. Oregon OSHA will continue to conduct compliance inspections in the following categories: Imminent Danger, Fatality/Catastrophe, Serious Accidents, and Complaints/ Referrals. Challenge companies must continue to abide by OAR 437-001-0700, Recordkeeping and Reporting.
- C. Consultation activity shall not take place at a site where any compliance inspection is in progress as outlined in the Field Guide. The employer's continued participation in the Challenge Program will be handled on a case by case basis when there is a citation for serious violations.

### **V. Employer Process Change**

The employer is expected to inform the local field consultation manager prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace. "Changes" mean relocation of facilities, change of ownership or major organizational changes, additions to buildings, new processes, new lines of machinery, etc. "Changes" do not include process changes at construction or other mobile sites.

### **VI. Failure To Meet Or Maintain Requirements**

An employer's Challenge participation and/or inspection deferral will be terminated if the consultation manager determines the employer failed to meet or maintain Challenge requirements. The standard enforcement deferral will still be in effect if applicable. The employer could apply again for the Challenge Program in one year.

### **VII. Program Evaluation**

The Oregon OSHA challenge program will be evaluated at least on a yearly basis to determine its effectiveness.

## Oregon OSHA Challenge Program Commitment Letter

The management and employees of \_\_\_\_\_ would like to formally declare our commitment to work with Oregon OSHA Consultation as a participant in the Oregon OSHA Challenge Program. The Challenge Program was explained to us by \_\_\_\_\_ on \_\_\_\_\_.

By signing this letter we agree to:

1. Participate in comprehensive consultations of all conditions and operations at our work site(s), including a complete safety and health system review.
2. Involve employees in the development, operation and improvement of all elements of our safety and health program.
3. Work diligently to accomplish the following:
  - a. Correct all identified safety and health hazards and provide Oregon OSHA Consultation with written confirmation that each identified hazard has been corrected within an agreed upon time frame.
  - b. Develop, implement or improve all elements of an effective safety and health management system.
4. Inform Oregon OSHA consultation prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace.
5. Inform Oregon OSHA consultation in the event of an Oregon OSHA enforcement inspection or accident investigation.

The signatures below represent the commitment of the management and employees of \_\_\_\_\_ to use Oregon OSHA Challenge Program to improve our safety and health management systems.

\_\_\_\_\_  
Name  
Title

\_\_\_\_\_  
Name  
Title

\_\_\_\_\_  
Name  
Safety Administrator

\_\_\_\_\_  
Name  
Safety Manager

Primary Contact Person:  
Name  
541/xxx-xxxx- Office  
541/xxx-xxxx- Cell

# Appendix O – Construction Contractors Board (CCB) Continuing Education Credits

## I. Overview

The Construction Contractors Board will accept Oregon OSHA consultations as continuing education credits for construction contractors seeking to maintain their CCB license. Contractors who receive a specific consultation will receive 3 hours of credit and those who receive a comprehensive consultation will receive 5 hours of credit. Contractors who successfully complete the Challenge Program will satisfy all their CCB requirements. In order to receive their continuing education credits, the contractor must correct all hazards identified during the consultation. Contractors can earn CCB continuing education credits for **one** consultation a license period. A license period is 2 years. Here is the link to the CCB web site: <https://www.oregon.gov/CCB/education/Pages/CE/safetyconsultations.aspx>

Once we are satisfied all the hazards identified during the consultation are corrected, Oregon OSHA Consultation will provide to the contractor a letter of substantial compliance. It is up to the contractor to provide the letter to the CCB in order to receive their credits. The CCB will accept the letter of substantial compliance as proof that all the hazards identified during the consultation have been corrected.

## II. Process

1. During the opening conference, explain the CCB continuing education credit program. During the consultation and at the closing conference make sure the correction date and abatement proof is established and agreed upon for those items that were not corrected during the consultation. The established abatement proof is what we must receive from the contractor, by the date agreed upon, before we can issue the letter of substantial compliance.
2. Abatement proof can take on many forms. For some consultations a written statement sent electronically will suffice, for others additional information such as pictures or receipts may be needed. In some cases there may be a need for a follow-up consultation. Be sure the contractor knows what is required.
3. The correction date should generally be no longer than 30 days from the date the contractor receives the report. The contractor should be encouraged to preclude exposure to serious hazards and correct those as soon as possible. Imminent danger situations will be addressed as described in the opening conference and Consultation Field Guide. Other than serious hazards need to be corrected in 30 days. A longer correction time can be entertained by the consultant and may be established after consulting with their manager. The letter of substantial compliance will not be provided after the established correction date.
4. When the consultant receives the abatement proof they will review it with their manager. Once the consultant and manager are satisfied that the hazards identified on the consultation have been corrected, the administrative specialist will then send the letter of substantial compliance to the contractor. The contractor must send the letter of substantial compliance to the CCB to obtain their CEU's.

## Appendix N – Oregon OSHA Challenge Program

5. The consultant can keep track of the CCB/CEU consultations by checking the abatement required box in ORCA. The consultant may contact the contractor if they feel there is a need to remind the contractor of the approaching correction date. It is up to the contractor to send in the correction proof.
6. Situations not addressed by this Field Guide will be handled on a case-by-case bases by the consultant and their manager.