



October 20, 2017

OSHA Docket Office
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

Re: Docket Number OSHA-2017-0009

Dear Docket Officer:

The National Safety Council (NSC) applauds the Occupational Safety and Health Administration (OSHA) for requesting public input on the future direction of the Voluntary Protection Program (VPP). NSC has continually supported VPP as demonstrated in our adopted policy statement and many of our members achieving membership in VPP.

NSC is a 100-year-old nonprofit committed to eliminating preventable deaths in our lifetime by focusing on injuries in workplaces, on the road and in homes and communities. Our more than 13,500 member companies represent more than 50,000 U.S. worksites.

NSC believes in recognizing companies that go above and beyond to provide safe workplaces. Our programs, like the Journey to Safety Excellence, offer tools and resources to small and medium sized businesses who want to improve their safety programs and the Campbell Institute recognizes organizations with a strong commitment to safety. We respectfully submit these comments for your consideration.

1. *How can the Agency Increase Participation while maintaining the integrity of VPP and operating within the available resources?*

As reported by the Department of Labor Inspector General, OSHA must decrease the review time for VPP applications. In order to do so, OSHA should consider other resources that can provide high quality VPP reviews of safety and health programs that may allow OSHA personnel to focus on other VPP priorities.

2. *How can the agency recalibrate VPP to optimize the engagement of Long term VPP Participants?*

VPP long term participants have shown a commitment to worker health and safety that many companies and locations strive for in their own operations. This longevity should be recognized and utilized. Instead of sun setting companies with long term involvement in VPP, they could be offered opportunities to



maintain currency by mentoring interested companies and new entrants, by sharing best practices with non-VPP companies or by demonstrating leadership in a specific safety area such as temporary and contract workers or fall protection. VPP should use press releases to raise the profile of VPP in a specific geographic or issue area, while raising the bar for safety. A commitment to safety should not sunset and VPP should not sunset companies that have stepped up for safety, but encourage them to continually raise the bar and be more engaged.

3. ***How might the agency recalibrate Corporate VPP for greater effectiveness?***

The recalibration of the VPP program should occur in the restructuring of the program. Just as commerce is not limited to a geographic area or political boundaries, VPP should recognize that companies transcend the OSHA regions. One of the criticisms of VPP is inconsistency of implementation across the regions. This inconsistency should be addressed through a structure that more closely aligns the regional VPP staff with the Alliance staff at OSHA Headquarters. More nationally focused and standardized reviews could provide the same type of audit experience across different organizations.

4. ***How can the agency further leverage participant resources such as the Special Government Employees (SGE)?***

Many Special Government Employees in the safety and health field maintain memberships and in such organizations as NSC, ASSE, AIHA, etc., while maintaining certifications such as ASC, CSP, CIH, etc. The Agency should enter into Alliances with these organizations so that during their conferences, which many of the OSHA staff and SGEs attend, OSHA staff and SGEs could provide training, share experiences and best practices. This would have the added benefit of raising the profile of both VPP and the SGEs associated with VPP to a wider audience at these conferences, and it would save funds by holding these events when OSHA staff and SGEs are already traveling to the same conferences instead of planning separate events.

5. ***What other ideas are there to enhance and improve VPP moving forward?***

OSHA's Directorate of Cooperative and State Programs (DCSP) should engage across the Agency to utilize such resources as the data submitted under the *Improve Tracking of Workplace Injuries and Illness* rule to verify injury rates for the VPP applications.

Since safety is about continuous improvement, NSC urges OSHA to continue the annual self-evaluation submission.

As stated earlier, the future success of VPP depends on retaining existing companies in the program as well as bringing new companies along as safety



and health leaders. Streamlining the application and review process is essential to VPP growth and identifying qualified partners to assist and support this process will be beneficial to the program.

Again, we appreciate the opportunity to provide comments to reshape VPP so that it continues to represent safety and health excellence, leverages partner resources, and further recognizes the successes of long-term participants.

Sincerely,

A handwritten signature in black ink, appearing to read "DAPH", with a long horizontal flourish extending to the right.

Deborah A.P. Hersman
President & CEO