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DOE-STD-1232-2019/2

DOE STANDARD
U.S. DEPARTMENT OF ENERGY
VOLUNTARY PROTECTION
PROGRAM-PROCEDURES
Volume 2 of 4



U.S. Department of Energy
Washington, DC 20585

AREA SAFT

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FOREWORD

This Department of Energy (DOE) Standard is approved for use by all DOE Components and their DOE regulated contractors. Originating on January 26, 1994, DOE Voluntary Protection Program (VPP) encourages and recognizes excellence in occupational safety and health protection. This program parallels the Occupational Safety and Health Administration (OSHA) VPP. DOE designed DOE VPP to apply to all DOE regulated contractors in the DOE complex, including production facilities, laboratories, subcontractors, and support organizations. DOE contractors are not required to participate in DOE VPP. In keeping with OSHA and DOE VPP philosophy, participation is strictly voluntary. Additionally, participants may withdraw from the program at any time.

This Standard uses the word “shall” to denote a requirement of this Standard; the word “should” denotes a recommendation of this Standard; and, the word “may” denotes permission, but not a requirement or a recommendation of this Standard. To satisfy this Standard, program participants need to meet all applicable “shall” statements. Alternate approaches that demonstrate an equivalent level of safety are also acceptable, if approved by the DOE field element. “Should” statements represent DOE technical expectations. Alternative approaches to “should” statements are permitted and do not require approval by DOE.

Beneficial comments (recommendations, additions, and deletions), as well as any pertinent data that may be of use in improving this document, should be e-mailed to: brad.davy@hq.doe.gov or sent to:

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I. INTRODUCTION

A. Purpose

This Standard describes the responsibilities and procedures for Department of Energy (DOE) personnel to use in processing applications, evaluating programs, and supporting DOE contractors and subcontractors in the DOE Voluntary Protection Program (VPP).

B. Background

The DOE-VPP extends official recognition to excellent safety and health programs and fosters a cooperative relationship with contractors and subcontractors in their efforts to achieve excellence.

1. Cooperation

DOE-VPP promotes a cooperative approach to safety and health program management. DOE-VPP can be effective only when a cooperative attitude exists among DOE, the contractor, and contractor employees.

2. Eligibility

DOE-VPP is available for contractors and subcontractors who demonstrate a commitment to provide exemplary safety and health programs. DOE's goal is that all of its site contractors eventually elect to participate in DOE-VPP.

3. Stimulus

Acknowledging and rewarding contractor and employee initiatives stimulate interest in finding new ways to make and keep workplaces safe and healthy.

4. Models

Safety and health programs that are successful in meeting DOE-VPP requirements can serve as models for other contractors and subcontractors who need and want to improve their programs.

C. Program Description

DOE-VPP consists of three participation levels. Implementing these levels has demonstrated a reduction in the incidence and severity of workplace illnesses and injuries at worksites while promoting worker safety and health as an integral part of daily operations.

1. Star Level

The Star Level is the core of DOE-VPP. To be eligible, applicants shall have outstanding occupational safety and health programs that are successful in reducing workplace hazards.

2. Merit Level

The Merit Level provides a planned set of steppingstones for those contractors who demonstrate the willingness and the potential to participate in the Star Level.

3. Demonstration Level

The Demonstration Level provides a testing arena for applicants when DOE does not have complete knowledge of what comprises an outstanding safety and health program in the applicant's area of operation. This allows flexibility without compromising the integrity of the Star Level.

D. DOE-VPP Philosophy and Characteristics

Participation in DOE-VPP does not diminish contractor or employee rights and responsibilities under DOE regulations Orders, and State, Federal, and other applicable laws and regulations. Working together, DOE, contractors, and subcontractors can move beyond basic program requirements in a total effort to prevent or eliminate workplace hazards. Such cooperation requires trust from all parties. Therefore, DOE bases its approach to applicants on the following principles:

1. **Voluntarism**

DOE-VPP is strictly voluntary.

2. **Autonomy**

Personnel from the Field Element (DOE Field Office, DOE Area Office, and DOE Site Office) and from DOE Program Offices that oversee the applicant's operations are not eligible to be members of the DOE-VPP Onsite Review Team.

3. **Confidentiality**

DOE shall only keep applications of approved participants on file. If an applicant withdraws, DOE shall return the application and delete electronic applications. DOE shall keep a copy of the withdrawn application at the Headquarters DOE-VPP Office for up to 1 year.

4. **Compliance**

Compliance with the provisions of title 10 CFR Part 850, *Chronic Beryllium Disease Protection Program*, and 10 CFR Part 851, *Worker Safety and Health Program*, and related DOE safety requirements is mandatory. However:

- a. DOE recognizes that even the safest workplace may temporarily be out of compliance with Federal regulations and standards. DOE expects applicants to take all feasible actions necessary to bring the site into compliance as soon as possible.
- b. The DOE-VPP staff, representing various Headquarters, field, and subject matter experts (SME), shall look beyond 10 CFR Part 851 standards, DOE safety requirements, and DOE-VPP requirements to recommend, if necessary, programmatic changes that can further improve safety and health protection in the workplace.
- c. DOE expects Star level participants to be on the leading edge of hazard prevention technology, and to exceed the requirements of 10 CFR 851, Occupational Safety and Health Administration (OSHA) requirements and industry safety and health consensus standards. Star level participants should be working for continuous improvement.

5. **Cooperation**

The DOE-VPP staff and approved DOE-VPP participants shall work together to resolve safety and health problems during the period of participation.

E. Definitions

Headquarters DOE-VPP Office: The Office of Worker Safety & Health Assistance (AU-12), within the Office of Environment, Health, Safety and Security (AU), is responsible for implementing DOE-VPP, including managing and coordinating all DOE-VPP related activities.

DOE-VPP Program Manager: An individual within the Headquarters DOE-VPP office, who is responsible for managing and coordinating all DOE-VPP related activities.

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Onsite Review Team: A group that conducts onsite reviews. The group comprises staff members from the field and Headquarters, and SMEs with interdisciplinary skills. The group includes a Team Leader, and any other safety and health professionals deemed necessary.

Team Leader: A DOE AU staff person who leads the Onsite Review Team. To qualify as a Team Leader, the individual should have:

- Participated on at least four onsite reviews.
- Served as Team Leader-in-Training for at least two onsite review with an experienced Team Leader.
- Demonstrated the ability to coordinate and integrate a variety of observations from the Team.
- Demonstrated a thorough understanding of the applicable Federal regulations and standards.

Point of Contact (POC): An individual designated by DOE, or a DOE contractor as its liaison, for DOE-VPP activities. The three types of POC are:

- Contractor/Subcontractor POC;
- Local DOE-VPP POC (Field Office, Operations Office, Site Office, or any other local DOE authority); and
- Line Program Office DOE-VPP POC.

II. PROGRAM ADMINISTRATION

A. Field Element

1. Provide a local DOE-VPP POC to coordinate activities and ensure performance of the responsibilities of the Office. This individual shall also serve as the primary contact for applicants and participating contractors in the Field element's jurisdiction.
2. Provide information on the local DOE-VPP POC, including name, mailing address, phone and email address, to the Headquarters DOE-VPP Coordinator for distribution at all levels.
3. Assist contractors in assembling their applications.
4. Review and process applications in a timely manner.
5. Provide application information, explanation, and assistance to interested contractors and employee groups.
6. Keep the Headquarters DOE-VPP Program Office informed of issues or concerns related to contractor's performance

B. Line Program Offices

1. Provide a Program Office DOE-VPP POC to coordinate activities and ensure performance of the responsibilities of the Office.
2. Provide information on the Program Office DOE-VPP POC, including name, mailing address, and phone and fax numbers, to the Headquarters DOE-VPP Program Manager for distribution at all levels.
3. Review and process applications in a timely manner.
4. Provide application information, explanation, and assistance to interested contractors and employee groups.
5. Keep the Headquarters DOE-VPP Program Office informed of issues or concerns related to contractor's performance

C Headquarters DOE-VPP Office

1. Appoint a Headquarters DOE-VPP Program Manager to coordinate activities and ensure performance of the responsibilities of the Office.
2. Provide information on the Program Manager, and all POCs to interested parties.
3. Develop and revise DOE-VPP Standards as needed.
4. Provide interpretations of the requirements of DOE-VPP as needed.
5. Provide training for Headquarters staff, field personnel, and SMEs who participate in the DOE-VPP review process. Instruct them in:
 - Management review techniques to assess safety and health programs;
 - Implementing procedures for DOE-VPP; and
 - Interpreting DOE-VPP requirements in general and specific worksite situations.
6. Provide presentations on DOE-VPP to interested groups.

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7. Develop and implement a DOE-VPP Outreach Program. The program pairs contractors/subcontractors interested in meeting DOE-VPP standards with a Star level participant in DOE-VPP or OSHA VPP.
8. Assist contractors and employee organizations in the application development process upon request.
9. Notify field activities of new DOE-VPP approvals via the AU Web page.
10. Maintain a file on all approved participants.
11. Maintain a record of all applications received.
12. Analyze program statistics.

D. Providing DOE-VPP Information to the Public

1. News Releases

The Headquarters DOE-VPP office shall work with the local DOE Field Element to prepare appropriate press releases in connection with final DOE-VPP approval.

2. Public Files

The Headquarters DOE-VPP office shall retain and make available to the public, upon request, the information required in Section V.G.

3. Speeches and Presentations

The Headquarters DOE-VPP office and Field Element should be prepared to make presentations to groups interested in the DOE-VPP.

III. APPLICATION REVIEW PROCEDURE

A. Purpose

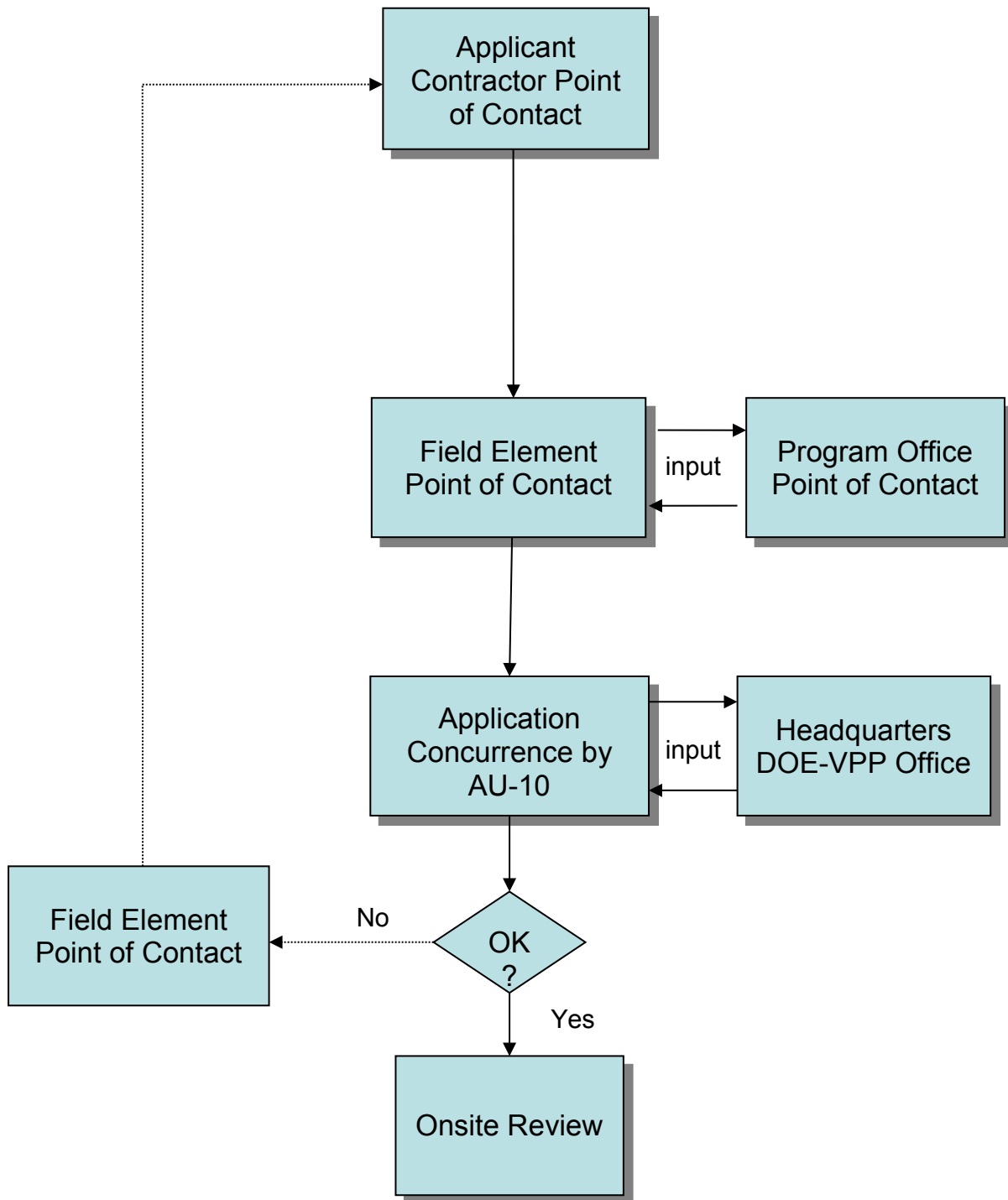
Review of the written application (see Volume 3: Application) shall establish the eligibility of the applicant site(s) for DOE-VPP. The review shall determine whether an application indicates fulfillment of the program requirements. If the application is complete, then Headquarters DOE-VPP office shall schedule an Onsite Review.

B. Procedure Summary

Figure 1 illustrates the flow of the application review process. DOE shall review DOE-VPP applications at the Field level first, then at the Program level, and finally at the Headquarters DOE-VPP Office level, in the following phases:

- Review of the application by the Field Element with input from the Program Office. Provide a recommendation for an Onsite Review to the Director for Worker Health and Safety; and
- Review of the application by the Headquarters DOE-VPP office. The decision whether an applicant meets the criteria for an Onsite Review occurs in this phase, which should not exceed 25 working days.

Figure 1.
DOE-VPP Application Process Flow



C. Field element Responsibilities

1. Receive applications submitted by contractors/subcontractors under the purview of the Field element.
2. Notify the Headquarters DOE-VPP Program Manager when it receives an application.
3. Review applications submitted by a contractor/subcontractor. Coordinate with the Program Office, (See Section III, D, Program Office Responsibilities). Within 40 working days of receiving the application, the Field Element shall decide whether the application is complete and should continue through the application process. If it is clear from the application that the contractor cannot qualify for DOE-VPP, the Field element's Manager should suggest that the contractor withdraw the application. (See Section III.F, Withdrawal of the Application).
4. The reviewer shall verify that the applicant has reported totals for employee hours worked, Total Recordable Cases (TRC), and Days Away, Restricted or Transferred (DART) case rates for each of the last 3 complete calendar years in order to calculate 3-year average rates. For new operations having less than three complete calendar years' experience, the reviewer shall use at least 12 months' data for calculation.
 - a. Review the OSHA 300 Logs (and/or information in DOE's Computerized Accident Incident Reporting System – CAIRS) for the most recent complete 3- year period (at least 12 months for new operations with less than 3 years of data) to verify that the logs have been properly maintained for the entire period.
 - (1) The dates of entry should be reasonably continuous. The reviewer should discuss any major gaps of time with the record keeper.
 - (2) The injury classifications should be consistent with the OSHA definition of recordable injuries, as determined by reviewing the description provided on the form and discussing the criteria used for determining classification with the record keeper.

NOTE: It is essential that rate calculations for construction operations include all subcontract employees.
 - (3) An alternative rate calculation may be used for eligible smaller worksites (fewer than 200,000 work hours) using their best 3 out of most recent 4 years of incidence rates.
- b. The reviewer shall review the applicant's OSHA 301 forms or their substitute (workers' compensation or insurance reports of injury/illness) to verify that DART case rate entries are recorded properly. The reviewer shall compare these injury/illness report forms with OSHA 300 Log entries to assess the accuracy of classification (DART versus TRC) and the thoroughness of log maintenance. Another verification source is the infirmary or first aid station log. The reviewer should use the requirements of the most current version DOE Order 231, Environment, Safety and Health Reporting.
- c. The reviewer should discuss possible errors or omissions with the record keeper to determine whether the OSHA 300 Log entries need to be changed. Once the reviewer and record keeper reach agreement, the record keeper can make any necessary changes. Experience to date indicates that employers may over-record as often as they may under record. If there is any indication of deliberate under-recording of injuries, the Team should conduct employee interviews to determine employees' views of injury and illness reporting. Deliberate under-recording of accident/injury and illness data is evidence of bad faith on the part of the applicant or participant and is cause to reject the application or terminate participation.

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- d. Calculate TRC rates and DART case rates based on the verified OSHA 300 Log, including any changes made.

- (1) For each of the three most recent complete years of data, the TRC rate is calculated using the following formula:

$$\text{TRC Rate} = \frac{\# \text{TRC's } [\text{Col(G)} + \text{Col(H)} + \text{Col(I)} + \text{Col(J)}] \times 200,000}{\# \text{ of employee hours worked}}$$

- (2) For each of the three most recent complete years of data, the DART case rate is calculated using the following formula:

$$\text{DART case rate} = \frac{\# \text{DART cases } [\text{Col(H)} + \text{Col(I)}] \times 200,000}{\# \text{ of employee hours worked}}$$

where the variable “COL()” refers to the columns on the OSHA 300 form.

NOTE: Employee hours should reflect all full and part-time workers, including seasonal, temporary (including temporary contract workers if supervised by company personnel), administrative, supervisory, and clerical personnel.

- (3) An alternative rate calculation may be used for eligible smaller worksites (fewer than 200,000 work hours) using their best 3 out of most recent 4 years of incidence rates. DOE shall not use this alternative calculation for annual award calculations.
- e. In like manner, calculate the rates for the current year to ensure they are in line with the previous years.
- f. To calculate the 3-year average rates, sum the TRC incidents (or the DART case rates) for the 3-year period and use the same formula, dividing by the sum of the hours worked over the 3-year period. Compare the 3-year average rate to the most current published Bureau of Labor Statistics (BLS) injury and illness rates for that industry (See Volume 2, Appendix A). The North American Industry Classification System (NAICS) code used for comparison in the construction industry should be the NAICS code that describes the type of construction at that site.
- g. Compare injury and illness rates calculated by using the above procedures with the most recently published BLS annual injury and illness rates for the appropriate three-digit NAICS level, available at <http://www.bls.gov/iif/oshsum.htm>, *Industry Injury and Illness Data*. Appropriate data are in columns entitled “Total Recordable Cases” and “Cases with days away from work, job transfer, or restriction,” sub heading “Total.” Only the most recent year data should be used, not prior years or an average of the BLS rates.
- h. Prior to an Onsite Review, the reviewer may request copies of the applicant's OSHA 300 Log for the most recent 3-year period.
5. If the reviewer determines that injury and illness rates warrant a pre-onsite visit, the reviewer may visit the site solely to review and verify the log and injury and illness rates in advance of the Onsite Review.
6. Prepare recommendations on whether the Headquarters DOE-VPP Office should arrange for an Onsite Review.
7. Transmit reviewed applications and recommendations to the DOE Program Office.

D. Program Office Responsibilities

1. Receive applications and recommendations transmitted by the Field Element and provide input and concurrence on whether to recommend an Onsite Review.
2. Transmit applications and recommendations to the Headquarters DOE-VPP Office.

E. Headquarters DOE-VPP Office Responsibilities

1. Receive and review applications and recommendations from the local DOE authority. Within 25 working days of receiving the application, determine whether the application is complete.
2. Prepare and transmit a recommendation to Director, Office of Worker Health and Safety (AU-10) if the application warrants an Onsite Review.
3. Upon concurrence from AU-10 that an applicant is ready for an Onsite Review, notify applicant and assemble a team of Headquarters, field, and SME personnel.
4. The Onsite Review Team Leader, in conjunction with the applicant, shall establish the date of an Onsite Review, and notify the Area and Operations Offices, as applicable, for Onsite Review arrangements.

F. Withdrawal of the Application

An applicant may withdraw for any reason by notifying a Headquarters DOE-VPP Coordinator or the POC to whom it submitted the application. The withdrawal is effective on the date the Headquarters DOE-VPP Coordinator or POC receives the notification.

1. Notification

When an application is withdrawn, a DOE-VPP Coordinator notifies all applicable POCs.

2. Acknowledgment

The Field element Manager should acknowledge the withdrawal with a letter to the applicant giving the official withdrawal date.

- a. The letter should include a statement that DOE shall entertain re-application if circumstances change.
- b. The Field element Manager should send copies of the letter to all applicable POCs and a Headquarters DOE-VPP Coordinator.

3. Application Return

DOE shall return the original application to the applicant within 10 working days after notification of withdrawal and delete any electronic copies.

- a. The Headquarters DOE-VPP Office shall retain a working copy for 1 year to facilitate responses to questions about the handling of the application.
- b. DOE shall not retain other copies.

IV. ONSITE REVIEW

A. Purpose

A team of DOE Headquarters, field staff, and other SMEs conduct the Onsite Review to accomplish the following:

1. Verification
To ascertain the accuracy of the information supplied in the application.
2. Assessment
To identify both the strengths and weaknesses of the contractor's safety and health program as currently implemented at the site(s). To ensure that all necessary safety and health program elements are operating and that procedures are in place for thorough implementation.
3. Quality Assurance
To determine if the safety and health program protects employees against site hazards.
4. Recommendation
To provide information to assist the Associate Under Secretary for Environment, Health, Safety and Security (AU-1) in making the approval decision.

B. Onsite Review Procedure

1. The Onsite Review Team
The AU-12 Director appoints an Onsite Review Team. The Director determines the team size based on the size and complexity of the site. DOE personnel who have oversight responsibilities for the site operations, or personnel from or employed by the site or the company under review, are not eligible to participate as Team members. At a minimum, the review team shall consist of:
 - a. A Team Leader who possesses:
 - (1) Thorough knowledge of the DOE-VPP elements as outlined in DOE-VPP Volume 1: *Elements*;
 - (2) Thorough knowledge and understanding of safety and health program management; and
 - (3) Experience as a Team Leader in Training on two onsite reviews (see Section I.E.5).
 - b. Other safety and health professionals deemed necessary. If available, a team should also include a Safety Specialist, an Industrial Hygienist, and a medical professional. The Director may add other team members as necessary, based on the applicant's operations.
2. Pre-Onsite Planning
 - a. The Team Leader and all team members shall review the application well in advance and prepare for the Onsite Review. This includes, but is not limited to, coordination with other AU Offices.
 - (1) **Knowledge of Industry.** Team members should become familiar with the mission and specifics of the site.

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- (2) **Detailed Application Review.** Team members should review the application carefully to compile a checklist of information and data that the Team may need during the Onsite Review.
- b. The Team Leader shall coordinate arrangements for the Onsite Review.
 - (1) The Team Leader shall communicate with the DOE-VPP participant to determine a convenient time for the program evaluation. The Onsite Review duration shall depend on the size, geographic layout, and complexity of the site.
 - (2) The Team Leader shall coordinate the dates for the Onsite Review with the DOE-VPP POCs at the Headquarters Line Program Office and Field element's POC.
 - (3) The Team Leader shall determine whether the team members need special gear or training.
 - (4) The Team Leader shall prepare a detailed evaluation plan outlining the onsite review. The plan should include the purpose for the review, background information, schedule, history and operational experience, arrangements and coordination with site representatives, focus areas, and Team members. Volume 2, Appendix B provides an example template for developing a review plan.
- c. Ground Rules. The Team Leader shall explain the following ground rules concerning conduct of the review to the applicant's POC:
 - (1) During walkthroughs, the team members may choose employees at random for confidential, informal interviews. Participation in the interviews is optional and represented employees can ask that their Union representative be included in the interview;
 - (2) The Team Leader shall randomly review performance plans. The applicant shall provide the performance plans and remove any employee identification before review by the team members; and
 - (3) Team members shall select work observations based upon current tasks. They may select any work ongoing during the onsite review. The contractor should not schedule tasks simply to satisfy the review.
- d. Documents. The Team Leader should provide the applicant's POC with a suggested list of items to have ready for the onsite review (see Figure 2). The Team Leader should arrange for office and computer support, if required, with the applicant's POC in advance of the Onsite Review.
- e. Employee Representatives. Where a collective bargaining agent is involved, the Team Leader shall inform the applicant's POC that the employee representative shall be included in the initial and closing meetings and allowed to accompany the team on the site walkthrough.
- f. The Team Leader shall meet as necessary with the team in advance of the onsite review to discuss the following:
 - (1) **Timing.** The Team Leader should carefully plan the onsite schedule, to ensure the Team reviews all pertinent data during the visit.
 - (2) **Briefing.** The Team Leader should ascertain that team members are familiar with both the application and onsite procedures.
 - (3) **Assignments.** The Team Leader should make specific onsite assignments to utilize each team member's expertise effectively. Assignments should include:

- (a) Reviewing documentation;
 - (b) Conducting walkthrough and informal interviews;
 - (c) Conducting formal interviews;
 - (d) Conducting specific work observation;
 - (e) Reviewing the injury/illness log to confirm rates and averages; and
 - (f) Drafting sections of the Onsite Review Report.
- (4) **Checklist.** The Team Leader should compile a checklist of documents to be reviewed (Figure 2) and questions to be asked (Volume 4: Onsite Review, Appendix C) for the Onsite Review. Team members should review and append the list during the strategy meeting.
- (5) **Team Safety.** The contractor shall brief all Team members on site hazards and safety procedures. Team members shall comply with all site safety procedures. A knowledgeable person, familiar with both the task and the work location, should always accompany team members during work observations.
- g. The Team Leader may visit the site prior to the Onsite Review, primarily for records review and logistics planning.

3. The Onsite Review

The Onsite Review consists of the following:

- a. **Initial Briefing.** The initial briefing, led by the Team Leader, with the contractor POC and employee representatives shall clarify the scope, expectations, and any additional assistance if necessary; and provide the team with an overview of the contractor safety and health program;
- b. **Document Review.** The Team shall review documents related to all aspects of the safety and health program to determine if they adequately address hazards at the site. See Figure 2 for a sample list of items to be reviewed:
 - (1) **The OSHA 300 Log.** Careful review of the OSHA 300 Log to verify accuracy and completeness is essential. Injury/illness experience is a qualification for approval, and DOE shall subsequently use it to evaluate site performance and DOE-VPP effectiveness. The Team shall review the most recent 3 calendar years. For new operations with less than 3 years of experience, the Team shall review a minimum of 12 months. See Section III.C.4 for procedures to use in rate verification.
 - (2) **Verify Line Accountability.** To protect the confidentiality of a manager or supervisor's performance evaluations, the Team Leader should request random, sample copies of performance plans with all personnel identifiers removed.
 - (3) **Safety Committee Records.** For programs that require joint safety committees, verify that the safety committee's minutes and inspection records reflect required safety committee activities. For other programs, safety committee minutes may provide additional inspection or hazard report information, as well as an indication of the level of employee involvement.
 - (4) **Records of Employee Reports of Safety and Health Concerns.** Review at least a sample of the internal hazard report files to verify that the system operates as described, effectively documents cases, and provides reasonable and timely responses.

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- (5) Safety and Health Program. Verify all operational aspects of the program, such as inspections, accident investigations, the training program and the Personal Protective Equipment (PPE) program. (See Figure 2 for sample list)
 - (6) Additional Document Review. Team members may request additional documents and records to review. The Team shall communicate requests for documents promptly and clearly to the applicant.
- c. Site Walkthroughs. The review Team's walkthroughs ensure that the safety and health program is operating as described in the application and ascertains the adequacy of the program's implementation.
- (1) Scope. All members of the Onsite Review Team shall tour the site to understand the operations and observe working conditions. The team shall see enough of the site to understand the hazards that exist and to determine that the contractor is addressing these hazards systematically using the site's safety and health program. Any work performed by subcontract employees in the applicant's operations at the site should be included in the walkthrough.
 - (2) Informal Interviews.
 - (a) During the walkthrough, Team members shall interview randomly selected employees at their workstations. These interviews should include supervisors, maintenance personnel, injury and illness record keepers, safety committee members, and contract and temporary employees. Typical questions should address work procedures, emergency procedures, and PPE. The Team shall conduct interviews in a manner that avoids disrupting normal operations, and in a confidential manner that encourages employees to speak freely.
 - (b) Subcontractor employees should be included in the informal interviews to ensure that the contractor provides equally effective protection to all employees involved in the contractor's operations.
 - (3) Problem Areas. If previous assessments and oversight visits, OSHA 300 logs, or interviews reveal repeated problems, the Team should give special attention to those issues during walkthroughs.
- d. Safety Review (Work Observations).
- (1) Non-construction Operations. The reviewer shall:
 - (a) Follow the entire process/operation flow where possible;
 - (b) Note hazard categories (e.g., walking/working surfaces, fire safety, hazardous materials storage and handling, storage and handling of general materials, confined space entry, machine guarding, lockout/tagout, electrical equipment, power tools and welding) for appropriate analysis and control improvements;
 - (c) Where work procedure improvements are needed, suggest revisions to the corresponding safety and health management system documents (e.g., emergency planning, self-assessment procedures and reports, and complaints or reports of hazards from employees); and
 - (d) Report specific hazards needing correction in writing and agree on a period for correction.

Helpful Documentation for Onsite Reviews	
✍	OSHA log and workers' compensation first reports of injury (DOE F 5484.X or OSHA 101) for the 3 years prior to the application for the applicant contractor and any subcontract work involved in the operations covered by the application.
✍	Report(s) identifying health hazards and industrial hygiene sampling records.
✍	Training programs for safety and health, attendance records of training sessions and course evaluations. Include safety committee training, where applicable, and OSHA recordkeeping training.
✍	Self-inspection and accident reports.
✍	Forms for reports of safety or health problems/suggestions and tracking systems.
✍	Records of engineering controls.
✍	Preventive maintenance records.
✍	Emergency procedures.
✍	Plant safety and health rules.
✍	Medical records.
✍	Programs that ensure compliance with OSHA and DOE safety and health requirements such as PPE, hazard communication, lockout/tagout programs, and process safety management programs.
✍	Safety committee minutes (where applicable).
✍	Evidence of line accountability (such as managers' evaluations, bonus or penalty systems, budget accountability).
✍	Internal audits or evaluations of the entire safety and health program, including analysis of progress toward statistical and structural/programmatic goals.
✍	Hazard review and analysis documentation, such as process reviews, job safety analysis, and phase hazard analysis.

Figure 2. Helpful Documentation for Onsite Reviews

- (2) Construction Operations. The reviewer shall:
- (a) Look for evidence that categories of hazards (e.g., personal protective and lifesaving equipment, fire safety, signs, signals and barricades, material handling and storage, tools, welding, ladders and scaffolding, excavations, concrete work, steel erection, tunnels and shafts, openings and stairways, and demolition and blasting) are appropriately analyzed, controlled and managed;
 - (b) Note any categories that need improved attention and management;
 - (c) Where work procedure improvements are needed, suggest revisions to the corresponding safety and health management system documents (e.g., emergency planning, self-assessment procedures and reports, and complaints or reports of hazards from employees); and
 - (d) Report specific hazards needing correction in writing and agree on a period for correction.

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- (3) Laboratory Operations. The reviewer shall:
 - (a) Review any applicable health and safety plans for the laboratory;
 - (b) Discuss the types of work performed in the laboratory with laboratory personnel;
 - (c) Observe the location and condition of any safety equipment, such as safety showers, eyewash stations, fire extinguishers, hoods, gloveboxes, chemical storage cabinets, and PPE. Ensure equipment and PPE are being properly used;
 - (d) Be alert to special hazards created by the type of laboratory work. For example, laboratories often use electronic equipment that is not Nationally Recognized Testing Laboratory (NRTL) listed, high-voltage low amperage power supplies, highly hazardous chemicals in minute quantities, or special materials not normally encountered in other facilities;
 - (e) Review any applicable laboratory hazard analyses and identified controls;
 - (f) Review any applicable research or experiment approval documents; and
 - (g) Determine laboratory personnel's knowledge regarding special hazards and response actions to abnormal or accident scenarios applicable to the laboratory.
- e. Industrial Hygiene Review.
 - (1) Non-construction Operations. The Industrial Hygienist shall:
 - (a) Follow the entire process/operations flow where possible;
 - (b) Based on review of monitoring records and material data sheets, check known hazard areas (e.g., ventilation, storage, handling and use of toxic materials, emergency equipment, respirator use and maintenance, and radiation and noise protective measures where applicable) for possible problems in work practices;
 - (c) Look for evidence that these hazards are appropriately managed and that no other hazards have escaped managers' attention;
 - (d) Note problem areas that need improvement; and
 - (e) Where work procedures need improvements, suggest program revisions to the corresponding safety and health management system documents (e.g., safe work practices and training, the respirator program, industrial hygiene sampling and analysis, and hazard communication systems).
 - (2) Construction. The Industrial Hygienist shall:
 - (a) When possible, view all areas of construction covered by the application;
 - (b) If the entire site is not viewed, ensure that all types of construction work in progress are seen;
 - (c) Based on monitoring records, if any, and descriptions or analyses of health hazards at the site, check known hazardous areas for evidence of appropriate management;
 - (d) Look for evidence that no other hazards (e.g., asbestos removal, welding of toxic metals, sand blasting with silica; and use of solvents, paints, coatings and other toxic chemicals) have escaped managers' notice;
 - (e) Note any health protection management that needs improvement;
 - (f) Where work procedure improvements are needed, suggest program revisions to the corresponding safety and health management systems (e.g., safe work practices and

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training, the respirator program, industrial hygiene sampling and analysis, and hazard communication systems); and

- (g) Report specific hazards needing correction in writing and agree on a period for correction.

f. Formal Interviews.

- (1) Manager Interviews. Manager interviews provide Team members with information about the site's safety and health program and its management oversight system.
- (2) Employee Interviews. Employee interviews gauge the extent of employee awareness and involvement in the safety and health program.
- (3) Organized Labor Interviews. Interviews with Union representatives provide the team with information about the support and involvement of labor.

g. Preparation of Observations.

- (1) Team Observations Meeting. Prior to closeout with the contractor, the team should meet to review and summarize its observations and recommendations. The Team Leader should allow time for a complete discussion of issues to achieve team consensus.
- (2) Organization of observations for Presentation. The Team Leader is responsible for organizing the team's observations. The Team Leader shall describe the observations during the closeout presentation. The observations should coincide with the requirements for DOE-VPP participation. The Team Leader should give the applicant a clear idea of how the site compares against the expectations of DOE-VPP. This comparison includes the following:

(a) Work area observations.

- i) The Team should review any newly identified hazards and confirm the corrective action plans discussed with manager, including suggested revisions to the safety and health program management system.
- ii) If the contractor cannot immediately correct serious hazards, the Team and the contractor shall agree upon a prompt abatement schedule. The Team Leader shall write a memorandum to the Headquarters DOE-VPP office files for the DOE-VPP Program Manager's signature outlining the agreement, but shall not include that memorandum in the report. The contractor shall send a confirmation letter to the DOE-VPP Program Manager indicating that it successfully abated the hazards. The Headquarters DOE-VPP office shall keep the memorandum and the contractor's abatement confirmation letter with the headquarters file. Although not a part of the DOE-VPP report, these documents shall be available for use by later review teams.

- (b) Accidents or illnesses in the OSHA 300 log and in the workers' compensation data, and a comparison of these records with other documents.

- (c) Injury and illness rates.

- (d) A summary of interview comments about the safety and health program and conditions.

- (e) Implementation of the required safety and health program components specified in DOE-VPP Volume 1: Elements.

- (f) The extent to which employee involvement has affected safety and health decisions.

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- (g) A qualitative assessment of the applicant's program in action. The Team should be prepared to provide examples if it finds problems either at the program level or with operating systems.
- h. Decision on Approval Recommendation.
 - (1) The Team Leader shall confirm with the applicant's POC that the Team has reviewed all relevant materials. The Team Leader shall address any unresolved issues noted by the team. The team then chooses among the following alternatives:
 - (a) The applicant has met all requirements for Star level or Merit level;
 - (b) The applicant needs to make changes to meet DOE-VPP requirements; or
 - (c) The applicant is ineligible for DOE-VPP. If the Team identifies any serious problems that the Team and applicant cannot resolve by the end of the onsite review, the Team should consider the applicant unsuitable for DOE-VPP.
 - (2) The Team should come to consensus on its recommendation regarding approval.
 - (a) In the rare instance when the Team cannot achieve a consensus, each dissenter should document his/her rationale with supporting data.
 - (b) Any dissenting opinion(s), together with any responses by other team members, shall accompany the draft report until AU-1 makes the approval decision.
- i. Draft Report. The Team Leader is responsible for preparing a report following the format prescribed in DOE-VPP Technical Standard Volume 4: Onsite Review, Appendix D.
 - (1) The Team Leader may assign sections of the report for preparation by other team members.
 - (2) Each member shall review the draft report, which shall reflect the team's consensus on the applicant's qualifications for approval.
 - (3) Before issuing the final report, the Team Leader shall provide an opportunity for the applicant to review the draft report for factual accuracy. The Team Leader should assure the applicant that the Team welcomes factual accuracy changes.
- j. Presentation of Observations and Recommendation.
 - (1) The Team Leader may present the Onsite Review Team's observations in a Preliminary Briefing to the applicant prior to the formal presentation of Observations and recommendations.
 - (2) Site managers and employee representatives shall receive a formal briefing at the conclusion of the Onsite Review. The Team Leader shall present the Team's observations and its recommendation before leaving the site. The Team makes a "recommendation" rather than a "decision" regarding participation in DOE-VPP. It is not the responsibility of the Team to approve an applicant. That responsibility rests with AU-1. The Team should recommend one of the following:
 - (a) Star level;
 - (b) Merit level. The Team Leader shall recommend Merit level goals for all sites recommended for Merit level approval. Any Star level requirements not met at the site shall be included in the goals;
 - (c) Demonstration level;
 - (d) Deferred approval (see Section V.E); or

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- (e) Reapplication when the contractor can meet program requirements.
- (3) Closeout Meeting Procedures.
- (a) The Team shall express appreciation to contractor POC(s) for their assistance and interest, and make it clear that the Field Element DOE-VPP POC shall be available to assist participants in any way with their safety and health programs.
 - (b) If appropriate, the Team Leader shall explain the approval and post approval procedures to the applicant.
 - (c) Additionally, the Team shall announce to the applicant that they shall receive a copy of the draft report, which provides the applicant an opportunity to verify that the report accurately describes the site's safety and health program relative to DOE-VPP requirements.

V. APPROVAL PROCEDURE

A. Purpose

Reviews conducted to assess the effectiveness of the applicant's safety and health program shall result in recommendations of approval, deferred approval, or denial. This chapter sets out procedures for each contingency.

B. Responsibilities

1. DOE-VPP Onsite Review Team Leader

The DOE-VPP Onsite Review Team Leader shall be responsible for coordinating team concurrence and finalizing the draft, onsite review report.

2. Headquarters DOE-VPP Program Manager

The Headquarters DOE-VPP Program Manager shall be responsible for reviewing and, upon concurrence with the report and recommendation, transmitting the report through the appropriate channels. The DOE-VPP Program Manager shall prepare the approval package for AU-1, and arrange for award ceremony materials.

C. Report Finalization and Concurrence

The Team Leader should make every effort to ensure that the Team drafts the report promptly, typically within 2 weeks after leaving the site. The procedure for preparing the draft report is contained in Section IV.B.3.i. The Team shall use the following procedures to finalize the report:

1. Revisions

- a. The Team Leader may transmit a draft report to the DOE-VPP Program Manager at any time for discussion purposes. The Team Leader shall submit the report to the DOE-VPP Program Manager for concurrence no later than 20 working days after the Onsite Review.
- b. After DOE-VPP Program Manager reviews the draft report, AU shall provide a 2-week period (10 business days) for the applicant to complete a factual accuracy report and reply with any proposed changes to the draft report.
- c. The DOE-VPP Program Manager shall ensure that the report clearly documents the basis for the recommendation.
- d. The finalized report shall reflect the applicant's comments, where appropriate.
- e. The DOE-VPP Program Manager shall notify the Team Leader of any needed revisions to the report after submittal for concurrence. The Team Leader shall update other team members on the status of the onsite report.

2. Report Concurrence

- a. The Team Leader is responsible for obtaining team concurrence on the report and any revisions before sending the report to AU-1.
- b. The DOE-VPP Program Manager shall transmit the report and the transmittal letter to AU-1 using the AU-1 concurrence process, no later than 15 working days after receipt of the contractor's comments.
- c. The DOE-VPP Program Manager shall also draft a letter for AU-1 signature to an appropriate contractor official, notifying the site of DOE's decision on the DOE-VPP application.

D. Application Approval

1. Approval Package

If the Onsite Review Team recommends the applicant's participation in DOE-VPP, the DOE-VPP Program Manager prepares the approval package. The approval package contains any documents indicating the Onsite Review Team's observations and recommendations, and includes the following:

- a. The Onsite Review Report that includes the Onsite Review Team's recommendation;
- b. Other information necessary to present a complete picture of the site's safety and health program; and
- c. A letter for AU-1's signature notifying the applicant of approval.

2. Approval

Applicant approval is final when AU-1 signs the approval letter.

3. Notification

- a. The DOE-VPP Program Manager shall informally advise the applicant of the approval and the effective date.
- b. The DOE-VPP Program Manager shall also inform the applicant that an official letter of approval shall be sent by mail; and that the award certificate and the DOE-VPP flag shall be forwarded in approximately 2 to 3 weeks. The applicant may choose to have an award ceremony and request DOE officials to make a formal presentation.
- c. When AU-1 grants approval, the DOE-VPP Program Manager shall notify the Field element's POC, and the appropriate Program Office POC.
- d. The DOE-VPP Program Manager shall mail the signed approval letter and the final version of the Onsite Review Team's report to the applicant. This shall constitute official notification of acceptance into DOE -VPP
- e. AU shall work with the DOE Field Element to assist with a news release when desired.

4. Approval Ceremonies

- a. Field Element DOE-VPP POC:
 - (1) Provides liaison for approval ceremonies.
 - (2) Makes necessary logistical arrangements for the awards ceremony.
 - (3) Invites the Onsite Review Team, field, and contractor personnel responsible for recruiting site employees to participate in the DOE-VPP ceremony.
 - (4) Arranges appropriate media coverage.
- b. DOE-VPP Program Manager:
 - (1) Arranges for the award certificate to be printed and forwarded to the approved site, along with the flag; and
 - (2) Assists the site as requested with courtesy notification to appropriate members of the Congressional delegation representing the applicant's state and district.

E. Deferred Approval

If the Onsite Review concludes that the contractor still needs to meet one or more qualifications for program approval, the Team Leader shall take the following actions:

1. List the qualification(s) or steps still needed for program approval. Should the applicant agree to take the necessary actions to qualify, a mutually agreeable timetable not to exceed 90 days shall be set;
2. Notify the applicant in writing of action items necessary to meet remaining program qualifications, including a reference to the timetable;
3. Defer finalizing the team report until the applicant has affirmed in writing that the necessary actions are complete. In some cases, a return visit may be made by one or more team members to verify that the qualifications have been met; and
4. Advise the applicant to withdraw the application if the applicant cannot agree with, or meet actions to achieve qualifications (see procedures outlined in Section III.G). Should the applicant reconsider, they may resubmit the application later. Resubmission shall necessitate another Onsite Review before approval.

F. Application Denial

If the Onsite Review Team recommends denying the contractor's application, the DOE-VPP Program Manager shall take the following actions:

1. Prepare a letter for AU-1's signature, detailing the rationale for the decision to deny participation. The letter shall also advise the applicant that DOE shall return all documents submitted as part of the denied application (including amendments). The Headquarters DOE-VPP Office may keep a copy of the documents for up to 1 year; and
2. Prepare a letter for AU-1's signature notifying the appropriate Field Element Manager that the denied applicant is no longer under consideration for DOE-VPP participation.

G. Public File

The Onsite Review Team Leader shall compile all documents relevant to the application and place them in the public file after AU-1 approves an application. The Headquarters DOE-VPP Office shall maintain these files, including copies of the following:

1. DOE-VPP application and amendments;
2. DOE-VPP Program Manager's memorandum to AU-1 transmitting the Onsite Review Team's report;
3. The Onsite Review report; and
4. AU-1's letter to the applicant.

VI. POST-APPROVAL ACTIVITIES

A. Purpose

DOE-VPP participants are eligible for offsite or onsite assistance.

1. Offsite assistance provides information for resolving safety and health problems or identifying resources for assistance. The Field Element DOE-VPP POC makes sure that the approved site receives information pertinent to its safety and health program.
2. Onsite assistance provides ideas and insight for improving the safety and health program or resolving serious problems that might result in terminating program approval.

B. Annual Report

Each year, by February 15, the participating site shall provide the Field Element DOE-VPP POC with the site's TRC rates and DART case rates (along with the Computerized Accident Incident Reporting System (CAIRS) organization codes), hours worked, the applicable NAICS code, and estimated average employment for the past full calendar year for the contractor and any subcontractors using form found in Volume 2, Appendix A. The site shall also provide AU-12 with an electronic copy of the last completed annual program evaluation. AU-12 may retain copies of annual reports until the site withdraws from the program, a contractor change occurs, the contract ends, or DOE terminates the site from the program for cause.

C. Offsite Assistance

1. DOE-VPP Program Manager

The DOE-VPP Program Manager shall provide information and expertise, as needed, to assist the Field Element DOE-VPP POC.

2. The Field Element Manager

The Field Element manager shall ensure that the Field Element DOE-VPP POC has the following:

- a. Access to expertise, as needed, to assist the DOE-VPP participant; and
- b. Copies of all reported safety and health concerns, chemical leaks/spills, and fatality/catastrophe investigation reports concerning a DOE-VPP participant, as soon as they are completed.

3. The Field Element DOE-VPP POC

The Field Element DOE-VPP POC assigned to a specific DOE-VPP participant serves as a general resource and should encourage the participant to seek any assistance needed to maintain the quality of its safety and health program. This assistance includes the following:

- a. Providing requested expertise through:
 - (1) Personal skills and knowledge;
 - (2) Other expertise available within DOE, OSHA, American National Standards Institute (ANSI), American Conference of Governmental Industrial Hygienists (ACGIH), American Society of Safety Engineers (ASSE), or other governmental or private organizations; and
 - (3) Recommendations of expertise available from other DOE-VPP participants.

- b. The Field Element DOE-VPP POC shall also:
 - (1) Keep the Field Element Manager, as applicable, and Headquarters DOE-VPP Office apprised of any programmatic developments and changes during a contractor's participation;
 - (2) Review any formal or informal safety and health concerns and resultant assessment reports or letters written by the Field Element concerning conditions at the DOE-VPP site. If the Field Element DOE-VPP POC determines that a serious and unresolved problem exists, an onsite assistance visit may be arranged; and
 - (3) Investigate Chemical Spills/Releases and Fatalities/Catastrophes. The Field Element DOE-VPP POC shall review reports of investigations of chemical spills/releases and fatalities/catastrophes at the assigned DOE-VPP participant site.

D. Onsite Assistance

The Field Element DOE-VPP POC may make onsite assistance visits in response to specific problems.

1. Purpose

The purpose of onsite visits is to assist the participant in resolving specific problems.

2. Indicators

Specific problems leading to an onsite visit include, but are not limited to, the following:

- a. A Star level participant's 3-year average rate above the industry average;
- b. A Star level or Merit level participant's explanation of a substantial rate increase indicates a serious problem that remains unresolved;
- c. Review of an investigation report stemming from a complaint, a chemical spill/release, or a fatality/catastrophe indicates that a serious problem at a Star level or Merit level site has not been resolved; and
- d. The contractor POC is not responsive.

3. Activities

The Field Element DOE-VPP POC's activities during an onsite assistance visit may include the following:

- a. Contact the participant to arrange the onsite visit and explain the reason(s) for the visit. The Field Element DOE-VPP POC shall assure the participant that the visit is not to investigate compliance, but to provide assistance to the participant in resolving the problem that has come to DOE's attention;
- b. Review the OSHA 300 log for a pattern that might relate to the problem;
- c. Interview appropriate managers and employees, to gain insight into the cause of a problem and its possible solution;
- d. View any areas of the site, processes, or equipment involved in the problem;
- e. Analyze the problem and recommend a solution;
- f. Brief managers on observations and recommendations;
- g. Ascertain managers' responsiveness to onsite assistance recommendations, or their ability to generate an equally responsive solution to rectify the program deficiency. A reasonable time

period should be given for site managers to consider the recommendations and make their own assessment; and

- h. Arrange additional expertise through DOE or recommend other sources.

E. Change of Contractor

The Field Element DOE-VPP POC shall evaluate significant changes in the managing contractor, or in the organizational structure at a participant site. At its discretion, the Headquarters DOE-VPP office may also conduct an onsite evaluation of the situation. Replacement of the contractor may automatically terminate DOE-VPP participation at that site, since participation applies to a contractor rather than a facility. The new contractor may request to enter into the transition program until the DOE Field Element and the Headquarters DOE-VPP office evaluate the program to ascertain continued status.

It is imperative that DOE consider the effect on all five tenets of DOE-VPP in the recommendation by the Field Element DOE-VPP POC. When a major contract changes, there may be effects on senior management structure and personnel, resources to accomplish the mission, changes in mission priority, as well as changes in management systems, policies, and procedures. Further, the new contractor needs the opportunity to demonstrate its leadership and commitment to safety excellence. Workforce participation in developing changes and commitments that differ from the previous contractor is critical to the success of the site's transition and continued VPP participation.

By definition, a change in contractor could necessitate retirement of VPP status. However, an incoming contractor may retain interim VPP status for up to a 24-month transition period if they provide a written request to AU to enter transition status within 90 days after assuming the new contract. That request shall include written commitments by both managers and labor consistent with the five tenets of VPP. During the 24-month transition process, the contractor shall evaluate the existing VPP and work with employees to identify and implement any changes. Finally, the contractor shall submit a revised application in a timeframe that enables an onsite evaluation by AU-12 within 24 months of the contract transition. Any organized bargaining unit whose endorsement was required for the original contractor may withdraw support for the transition at any time. Similarly, the new contractor may withdraw its request for transition at any time. Such withdrawal shall initiate retirement of the original Star.

As with all VPP applications, the applicable Line Management chain shall recommend whether AU should schedule an onsite evaluation. For contract changes, the basis for the Line Manager's recommendation should include an analysis of major program changes and related contractor actions to ensure changes are consistent with VPP requirements.

F. Withdrawal after Approval

A participant may withdraw from the DOE-VPP at any time after approval. Such withdrawals may occur because of plant closing, economic difficulty, or because the contractor or manager has changed. In these cases, the participant may simply withdraw by providing written notification to the Headquarters DOE-VPP office.

1. Record

When withdrawal occurs after approval, AU retains the file as a record of DOE's actions.

2. Cause

The Field Element DOE-VPP POC should determine the cause for withdrawal and notify the DOE-VPP Program Manager.

3. Acknowledgment

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The Director, Office of Worker Safety and Health Assistance should send a letter to the former participant acknowledging the withdrawal and stating the following:

- a. The DOE-VPP flag and certificate may no longer be displayed;
- b. The contractor's file shall be removed from the public file; and
- c. The contractor is welcome to reapply to DOE-VPP should circumstances change.

G. Termination

DOE may only terminate a DOE-VPP participant for cause.

1. Conditions

Termination by DOE would occur only if the participant refuses all technologically feasible resolutions for hazard abatement for one or more serious problems and employees appear to be at serious risk, the participant is deliberately underreporting accident/injury or illness data, or the participant is suppressing employee reporting of accidents or injuries.

2. Procedures

DOE shall terminate a DOE-VPP participant as follows:

- a. **Termination Package.** The DOE-VPP Program Manager shall prepare the following information for AU-1 signature:
 - (1) A memorandum to the participant explaining the reason(s) for termination; and
 - (2) Any supporting documents.
- b. **Termination Notice.** When AU-1 signs the termination letter:
 - (1) The DOE-VPP Program Manager shall notify the Field Element DOE-VPP POC by telephone; and
 - (2) The DOE-VPP Program Manager shall officially notify the Field Element Manager by memorandum of the termination.

H. Reinstatement

Reinstatement in DOE-VPP, following withdrawal or termination, requires re-application. In the case of termination for cause other than withdrawal of support by the collective bargaining agent(s), DOE shall not permit re-application for a period of 5 years.

VII. ANALYSIS OF PARTICIPANT'S ANNUAL REPORT AND STATISTICS

A. Purpose

The DOE-VPP Headquarters Office shall evaluate each participant's annual report to assess the effectiveness of the participant's safety and health program in implementing each element and sub-element of DOE-VPP, and in achieving goals and objectives. The DOE-VPP Headquarters Office shall also evaluate the participant's recommendations for program improvements and the schedule for implementation.

B. Procedure

1. Annual Review of Rates and the Annual Program Evaluation

Each February, the Field Element DOE-VPP POC ensures that participating contractors submit annual TRC rates and DART case rates, employment figures, hours worked by the participant's employees and subcontractors, number of employees, NAICS codes, and the participant's Annual Program Evaluation Report.

- a. If the Field Element DOE-VPP POC has not received this information by March 1, they shall request it from the contractor POC.
- b. The Field Element DOE-VPP POC shall review the injury and illness rate information and evaluate the annual report.
 - (1) If there is an increase in rates not adequately explained in the annual report, the Field Element DOE-VPP POC shall seek an explanation from the contractor;
 - (2) If a serious problem is evident; the Field Element DOE-VPP POC shall arrange an onsite assistance visit with the contractor; or
 - (3) If the annual program evaluation fails to demonstrate either that the contractor has properly analyzed and understood program problems, or that it has fully implemented recommendations for correction or improvement, the Field Element DOE-VPP POC shall notify the participant that DOE needs additional information, and that an onsite assistance visit may be necessary to ensure continued compliance with program requirements.

2. Annual Review of Investigation Reports

The Field Element DOE-VPP POC shall review any investigation reports of chemical spills/releases and fatalities/catastrophes to assess whether their causes and responses affect participation in DOE-VPP.

3. Annual Review of Employee Concerns

The Field Element DOE-VPP POC shall review any formal or informal complaints and resultant assessment reports or letters written by DOE concerning conditions at the DOE-VPP site to determine if a serious and unresolved problem has arisen. If so, the Field Element DOE-VPP POC shall arrange an onsite assistance visit.

4. Annual Compilation of Program Information and Statistics

If after a review of the annual evaluation, investigation, employee concerns, the Field Element POC determines the information provided is complete, the Field Element DOE-VPP POC shall forward a copy of the annual evaluation(s), the employment figures, rates, and newly computed 3-year average, along with any explanatory information, to the Headquarters DOE-VPP Program Manager by March 15.

VIII. RE-EVALUATION OF DOE-VPP PARTICIPANTS

A. Purpose

Formal onsite re-evaluation of participating DOE-VPP worksite programs enables DOE to assess the effectiveness of the safety and health program.

1. Star Level

For Star level participants, the re-evaluation enables DOE to determine eligibility for continued participation.

2. Merit Level

For Merit level participants, the re-evaluation enables DOE to determine eligibility for Star Level participation, continued Merit level participation, or termination of participation.

B. Procedure Summary

1. Schedule

Re-evaluations take priority over new application reviews.

- a. **Star Level.** DOE shall evaluate Star level participants approximately every 3 years following initial approval. If significant problems come to DOE's attention, an earlier onsite visit may be scheduled. DOE should complete the re-evaluation within 12 months of the approval anniversary based upon DOE-VPP schedules and priorities.

NOTE: When a re-evaluation would have occurred within 90 days of a change in contractor, DOE may postpone the reevaluation pending the transitional process described in section VI.E. of this document.

- b. **Merit Level.**

DOE shall reevaluate Merit participants annually following the initial approval.

- (1) If a Merit level participant requests re-evaluation to determine if it meets the Star level qualifications, DOE may conduct a re-evaluation before the annual evaluation is due.
- (2) DOE should coordinate the re-evaluation with the participant, with the objective of performing the re-evaluation within 18 months following the approval anniversary.

2. Re-evaluation Visit

The DOE-VPP re-evaluation Team shall conduct an Onsite Review of the safety and health program similar to the initial Onsite Review (see Section IV.B.3). The Team shall submit a re-evaluation report to the DOE-VPP Program Manager in the same manner as the previous onsite review report. The DOE-VPP Program Manager shall forward the recommendation to AU-1 for a decision on continued DOE-VPP participation.

C. Preparation

1. The Re-evaluation Team

The Director, AU-12, appoints the Re-evaluation Team. The Director determines the size of the Team based on the size and complexity of the site.

- a. **Personnel.** The number and experience of personnel on a re-evaluation Team shall be the same as for the Onsite Review Team, as described in Section IV.B.1. At least one member

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(and preferably more) from the initial review team or the last re-evaluation Team should participate.

- b. **Team Leader Qualifications.** The re-evaluation Team Leader's qualifications correspond to the Team Leader's qualifications as described in Section IV.B.1.a.

2. Arrangements

The Team Leader shall coordinate arrangements for the onsite re-evaluation.

- a. **Schedule.** The Team Leader shall communicate with the DOE-VPP participant to determine a convenient time for the program re-evaluation. The Team Leader shall perform the following:
 - (1) Schedule dates convenient to the Re-evaluation Team and the participant. The schedule should allow for completion of the review within 18 months following each annual anniversary date for Merit sites or every third anniversary for Star sites;
 - (2) Determine the duration of the re-evaluation, depending upon the size, geographic layout, and complexity of the site;
 - (3) Coordinate the dates for the re-evaluation with the Field Element DOE-VPP POCs; and
 - (4) Determine whether Team members require special equipment or training.
- b. **Pre-visit Call.** The Team Leader should contact the contractor POC in advance to explain the purpose and general activities of the visit.
- c. **Information Collection.** The Team Leader will:
 - (1) Give the contractor POC a list of documents needed for the Re-evaluation Team's review. Usually, the Team shall request documents created or revised since the initial approval or the last re-evaluation. This means that Star sites may need to have at least 3 years of documentation available.
 - (a) Documents to be Reviewed during Onsite Re-evaluation
 - i) Typically, the Team requests only documents created or revised since the initial approval or the last re-evaluation.
 - ii) OSHA Injury and Illness Log (OSHA 300), and OSHA Injury and Illness Incident Record (OSHA 301 or DOE F 5484.X).
 - iii) Industrial hygiene sampling data, audiometric testing results, safety data sheets, analyses of hazards.
 - iv) Any new or changed safety rules.
 - v) Any changes in programs that ensure compliance with OSHA and DOE safety and health requirements, such as PPE program, lockout/tagout, hazard communications, emergency procedures, documentation of training and drills.
 - vi) Job hazard reviews, process safety analyses, or phase hazard analyses conducted during period.
 - vii) Any new training programs and documentation of training given during period.
 - viii) Self-inspection reports, including records of correction.
 - ix) Accident reports for the period.
 - x) Records of employee reports of safety and health problems/concerns.

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- xii) Documents verifying use of the line accountability system.
 - xiii) Annual internal safety and health program audits/evaluations, with documentation of actions taken to address recommendations.
 - xiv) Safety committee minutes (where applicable).
 - xv) Any project reviews or analyses that examine possible failure points and the resulting planned redundancy systems.
 - xvi) Any documents related to Merit goals (where applicable).
- (b) Items and information with possible impact on DOE-VPP participation such as:
- i) Changes in injury and illness rates;
 - ii) Employee awareness and involvement in safety and health programs;
 - iii) Absenteeism rate;
 - iv) Workers' compensation claims or costs;
 - v) Turnover rates;
 - vi) Changes in productivity; and
 - vii) Other areas where managers have noted changes in relationship to the DOE-VPP program.
- (2) Provide an estimated schedule for the evaluation.
- (3) Arrange to conduct private interviews with joint safety committee members, supervisors, maintenance personnel, record keepers, medical staff (if any), and randomly selected employees.
3. Re-evaluation Team's Advance Preparation
- a. **Knowledge of the Industry.** Team members should become as familiar as possible with the type of operations at the site and any site characteristics that might affect the safety and health program.
 - b. **Detailed File Review.** Team members should review all documents in the participant's DOE-VPP file. The Team Leader should take the following documents from the file to the re-evaluation visit: the application; the initial Onsite Review report; previous re-evaluation reports; notes about correction of hazards; onsite or offsite assistance reports; annual injury and illness rate data; and chemical spill/release, fatality/catastrophe, or health and safety investigation reports.
 - c. The Team Leader shall meet as necessary with the Team in advance of the onsite review to discuss the following:
 - (1) Schedule. The Team Leader should carefully plan the onsite schedule, to ensure that all pertinent data are reviewed during the visit;
 - (2) Briefing. The Team Leader should ascertain that team members are familiar with both the application and onsite procedures; and
 - (3) Logistics. The Team Leader should discuss site access, security and training requirements, computer access, electronic media restrictions and PPE requirements.

- (4) **Assignments.** The Team Leader should make specific onsite assignments to utilize each team member's expertise effectively. Assignments should include:
- (a) Reviewing documentation;
 - (b) Conducting walkthrough and informal interviews;
 - (c) Conducting formal interviews;
 - (d) Conducting specific work observation(s);
 - (e) Reviewing the injury/illness log to recalculate rates and averages; and
 - (f) Drafting sections of the Onsite Review Report.

D. Re-evaluation Opening Conference

The Team Leader shall conduct an opening conference with the contractor and employee representatives. The conference should outline the re-evaluation process and goals, and describe any assistance needed by the team during the visit.

1. **Goals**

The Team Leader should clearly state the following goals for the re-evaluation:

- a. To determine whether Star level or Merit level requirements are being met;
- b. For Merit, to assess whether appropriate progress is being made toward accomplishing goals;
- c. To analyze the impact of changes in the safety and health program that have occurred since DOE-VPP approval or the last re-evaluation;
- d. To assess the continuing adequacy of the safety and health program;
- e. To assess the involvement and managers' and employees' satisfaction with the program; and
- f. To identify any indicators of positive DOE-VPP effects on the participant contractor's operations.

2. **Schedule**

Briefly discuss the activities and time required for the re-evaluation.

3. **Interviews**

Briefly discuss arrangements for interviews and topics to be covered.

4. **Serious Hazards**

Explain requirements for correcting any serious hazards noted. Explain that the re-evaluation is NOT a compliance assessment or audit.

- a. The Team expects immediate correction of serious hazards.
- b. Where the contractor cannot correct a hazard before the Team leaves the site, the participant shall provide the DOE-VPP Program Manager with a schedule for correcting the hazard. The participant shall notify the DOE-VPP Program Manager in writing when the correction is complete. The DOE-VPP Program Manager may direct the Team Leader to visit the site to and check the correction.

5. Status Reports

The Team Leader may give the participant a daily status report on the progress of the re-evaluation and a final briefing when the re-evaluation is completed.

E. Documentation Review

The Team shall review the requisite safety and health documents requested by the Team Leader (See Section VIII.C.2.c). The team should give special attention to any modifications in the program since the last DOE visit.

1. The OSHA 300 Log

The reviewer shall do the following:

- a. Check the log for the period since the approval or last re-evaluation for accuracy and completeness. On a construction site, the injury and illness data shall cover all employees, including subcontractor employees. Review the Site Office's bi-annual injury and illness assessments required by DOE Order 231.1B, *Environment, Safety and Health Reporting*.
- b. Recalculate the average TRC rate and DART case rate for the most recent 3-year period. Compare the rates with the most recent annual average non-fatal occupational TRC rates for the industry (See the annual BLS, *Table on Occupational Injury Incidence Rates by Industry*). Use the log verification and rate calculation procedures described in Section III.C.4.d.
- c. Compare the most recent TRC rates with the participant's rates during the previous approval period.

2. Safety Committee Records

Safety Committee minutes may provide additional information on inspections or hazard reports.

3. Records of Employee Reports of Safety and Health Concerns

Review at least a sample of the internal hazard report files to verify that the system continues to work as described, documents cases, and provides reasonable and timely responses.

4. Safety and Health Program

Evaluate changes to the operational aspects of the program, such as inspections, accident investigations, training programs, and the PPE program. (See VI-1, for sample list)

F. Site Walkthrough

All Team members should walk through enough of the site to understand the type of work done and gain a sense of working conditions.

1. Purpose

The site walkthrough is a review, not an inspection, to re-evaluate the safety and health program's operation. The Team shall assess the impact of any changes in production processes, working conditions, and the safety and health program since the initial Onsite Review or the last DOE-VPP re-evaluation visit.

2. Problem Areas

If the DOE-VPP file on the participant, the OSHA log, or the annual program evaluation report suggests potential problems in certain areas, the Team shall give those areas special attention.

3. Program Evidence

Team members should look for evidence of an excellent program in action.

- a. Appropriate management of hazards (e.g., walking-working surfaces, fire safety, storage and handling of general and hazardous materials, cryogenics, gas cylinders, machine guarding, powered tools, and welding equipment). Team members shall note items that need improved attention and management.
- b. Program improvements or lapses since the last DOE-VPP visit.
- c. Relate the problems that are visible in work areas to the contractor's work procedures, emergency planning, self-inspection procedures and reports, and reports of hazards from employees. Make notes concerning improvements to management systems.
- d. Report specific hazards needing correction in writing and agree on a period for correction.
- e. Assess the participant's level of commitment to the DOE-VPP.
 - (1) **Managers.** Team members should determine managers' attitudes toward participation and evaluate whether they remain committed to DOE-VPP. The resources devoted to the safety and health program are an indication of that commitment. Ask if managers can provide any information regarding the impact of DOE-VPP participation on the safety and health program.
 - (2) **Employees.** Ascertain how employees perceive participation in DOE-VPP. Determine if anyone has suggestions for changes in DOE-VPP.
 - (3) **Union.** If the site is unionized, ascertain how the union perceives participation in DOE-VPP.

4. Informal Interviews

Talk briefly with employees at their workstations to elicit their views on the safety and health program. Ask questions related to the following:

- a. Completion of individual Merit Program goals, if any;
- b. Depth of understanding of DOE-VPP at the site and their rights under it;
- c. Reaction to DOE-VPP; and
- d. Changes they have noted in production processes or the safety and health program.

G. Work Observations

Team members shall select jobs from ongoing work and follow the job for as long as necessary to understand the following:

1. Scope of work is adequately defined and understood by workers and supervisors;
2. All hazards have been identified and analyzed to the appropriate degree to ensure the hazard is completely understood by workers, supervisors, and planners;
3. Appropriate hazard controls have been clearly identified to the workers in a manner appropriate for the complexity of the control and worker knowledge and training;
4. All hazard controls are appropriately implemented by workers during the course of work;
5. If questions arise or unsafe conditions develop, workers stop work, place the workspace in a safe condition, and seek appropriate expertise to resolve the question or condition; and

6. The contractor actively seeks and encourages workers' feedback to supervisors and managers.

H. Formal Interviews

Use procedures described in Section IV.B.3.f. Team members may add specific questions that address Merit level goals, employee awareness and reaction to DOE-VPP participation, and changes in working conditions or the safety and health program since the last DOE-VPP visit.

I. Preparation of Observations

1. Team Observations Meeting

When the Team has completed the document reviews, interviews, and walkthroughs, it should meet privately to review and summarize its observations and prepare a recommendation for continued program participation.

- a. **Organization.** The Team Leader is responsible for organizing the Team's observations for the briefing presentation according to the evaluation measures listed in Section IV.B.3.g.
- b. **Consensus.** The Team Leader should allow time to discuss issues and achieve consensus for the oral presentation of observations, the recommendation regarding continued participation, and the drafting of the report.
 - (1) In the rare instance when the Team does not reach consensus, each dissenter shall document his/her rationale with supporting data.
 - (2) Dissenting opinions and responses by other Team members should accompany the draft evaluation report.
- c. **Confidentiality.** The Team should exercise care to protect the confidentiality of information provided by employees, specifically or in general, whether negative or positive.
- d. **Developing Observations.** In developing the Observations, the Team should address the following evaluation measures:
 - (1) TRC rates (in comparison with the industry average and past performance);
 - (2) Safety and health program components specified in DOE-VPP Volume 1: *Elements* that are required for participation in DOE-VPP;
 - (3) Program modifications since approval for participation or the last re-evaluation. Assess such changes with regard to Merit level goals (where applicable) and the other evaluation measures;
 - (4) Adequacy of the safety and health program to protect employees against hazards at the site. Members of the team should report hazards and the abatement plans agreed to with managers. The Team should discuss these hazards in relation to needed improvements in the corresponding management systems;
 - (5) Ability to control conditions at the site where contractors/subcontractors are involved;
 - (6) Progress made toward meeting individual Merit level goals, if applicable;
 - (7) Participants' satisfaction with DOE-VPP implementation;
 - (8) The nature and validity of any complaints received by DOE;
 - (9) Effectiveness of employee participation or the joint labor management safety committee (where such a safety committee is involved);
 - (10) Where other problems not listed above are detected, the Team should give examples; and

- (11) Before summarizing observations, the Team Leader should meet with the contractor POC to make sure the re-evaluation review is complete and represents an accurate "picture" of the safety and health program. The team leader should specifically address any unresolved issues noted by the team.
- e. **Summarizing Observations.** In summarizing the observations, the Team shall consider the following:
- (1) The TRC and DART case rates prior to and since initial approval or since the last re-evaluation;
 - (2) What employees, managers, and, where applicable, Safety Committee Members said about the program and conditions at the site;
 - (3) What was observed during the walkthrough and work observations; and
 - (4) The degree to which the Team verified implementation of the safety and health program, and the program meets the needs of the workplace.
- f. **Recommendations.** The Team shall choose among the following recommendations:
- (1) Star Participants.**
- (a) **Continued Participation.** The Star level participant continues to meet all requirements, and should continue as a Star level participant without conditions.
 - (b) **Deferred Recommendation.** The Star level participant is deficient in one or more requirements that it can correct within 90 days. The participant shall provide proof of deficiency correction to the Team in order to finalize the recommendation.
 - (c) **Conditional Participation.** The Star level participant is deficient in one or more requirements that it cannot satisfactorily correct during a 90-day deferral of decision, but the participant agrees to correct deficiencies within 1 year. Recommend conditional Star level participation for 1 year, with a formal re-evaluation scheduled at the end of the year.
 - (d) **Termination from Program.** The Star level participant is deficient and cannot reach agreement with the Team on correction, or the participant has not made a good faith effort to implement agreed-upon corrections. Recommend termination from DOE-VPP.
- (2) Merit Participants.**
- (a) **Star Level.** The Merit level participant has met the agreed-upon goals and meets all Star level requirements.
 - (b) **Deferral.** Participant is deficient in one or more requirements that it can satisfactorily correct within 90 days. The participant shall provide proof of deficiency correction to the Team in order to finalize the recommendation.
 - (c) **Continued Participation.** If the Merit level is progressing satisfactorily, or the contractor has agreed with DOE on resolving any problems and is acting in good faith, recommend continuing Merit level approval.
 - (d) **Merit Renewal.** If the Merit level participant has not met all goals in the agreed-upon time limit due to extenuating circumstances, recommend new Merit approval. The renewal shall include new goals and a new time limit, with total Merit participation not to exceed 5 years.

- (e) **Termination.** If the Merit level participant has failed to meet all goals in the agreed-upon time limit, or has failed to maintain DOE-VPP requirements, and there are no extenuating circumstances, termination must be recommended.

2. Draft Report

The re-evaluation team members shall discuss their observations with worksite representatives prior to drafting the re-evaluation report. The Team Leader is responsible for preparing the report. Follow the report preparation process detailed in Section IV.B.3.i.

<p>Guidelines for Conditional Star Level Participation</p> <p>A. <u>Purpose.</u> When an onsite review of a current Star level participant reveals deficiencies that require 1-year Star quality experience, a 1-year conditional Star level participation may be recommended under the following conditions:</p> <ol style="list-style-type: none">1. The contractor desires to remain in the Star Level.2. The contractor can satisfactorily correct deficiencies, with a re-evaluation in 1 year.3. The contractor starts a program to correct the deficiencies within 90 days of the re-evaluation's final briefing. <p>B. <u>Goals.</u> A goal shall be established and agreed upon with the site for every deficiency that requires correction. Individual hazards noted during the re-evaluation should not be, by themselves, the subject of goals. Each goal shall meet the following conditions:</p> <ol style="list-style-type: none">4. It shall be clearly stated.5. It shall specifically state criteria for accomplishment.6. It shall be achievable within the 1-year timeframe. <p>C. <u>Onsite Evaluation.</u> One year from the date of the conditional Star participation approval, the site shall undergo a full re-evaluation. If the Team clearly finds it to be at Star level Quality, it may recommend to AU-1 a 3-year approval for continuation in DOE-VPP. For the purpose of future evaluations, this shall begin a new cycle as a Star level participant.</p>
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Figure 3. Guidelines for Conditional Star Level Participation

J. Presentation of Observations

1. Briefing

The number of briefings presented shall depend on whether site safety and health staff desire a detailed briefing, followed by a more general briefing to the site managers. The Team may present observations orally to the site safety and health staff before writing the draft report.

2. Organization of Observations Presentation

The Team Leader will:

- a. Provide the Team's assessment of the participant's performance using the evaluation measures listed in Section VIII.H.1.d.
- b. Provide examples of program improvement or deterioration in relation to the original approval or prior re-evaluation.
- c. Emphasize that the Field Element DOE-VPP POC remains available to assist approved participants in any way with their safety and health programs.

3. Hazards

- a. The Briefing shall review serious hazards that the Team has discussed with the participant, along with the agreed-upon plan and time for correction.
- b. The Team shall discuss corrections for serious violations not agreed to by the time of the presentation with managers, and seek oral agreement on abatement plans and dates.
- c. The Team Leader shall write a memorandum to the Headquarters DOE-VPP Office files, which outlines the oral agreement. It should not be part of the report.
- d. If the contractor cannot correct the hazard immediately, the Team Leader shall request the participant to send a letter to the Headquarters DOE-VPP Office through the Field Element DOE-VPP POC describing the correction when accomplished.
- e. The Team Leader shall ensure that all hazard correction memoranda shall be included in the participant's file at the Headquarters DOE-VPP Office.

4. Draft Report

The Team Leader shall present the DOE-VPP participant with a summary of the draft report. The Team Leader shall give the participant an approximate date for the draft report's completion.

5. Recommendation

The Team Leader shall present the Team's observations in terms of a "recommendation" rather than a "decision." It is not the responsibility of the Team or the Team Leader to decide the status of the DOE-VPP participant. That responsibility rests with AU-1. Should the Team recommend termination, the Team Leader shall offer the participant contractor the opportunity to withdraw before the recommendation goes to AU-1.

K. Report Finalization

Follow procedures, schedules, and deadlines described in Sections V.C. and V.D.

L. Public File

When the re-evaluation Team's recommendation has been processed and approved, a DOE-VPP coordinator, with the assistance of the Field Element DOE-VPP POC, shall compile all documents relevant to the evaluation and add them to the public file. These additions shall include copies of the following:

1. The re-evaluation report, with any attachments.
2. AU-1 letter to the participant.
3. Notification memorandum to the Field Element Manager.

4. Any program changes not submitted in the original application.

IX. THE DEMONSTRATION LEVEL

A. Purpose

The Demonstration Level allows DOE to recognize existing achievements in unique situations where DOE needs more information before it can determine approval requirements for the Star level. Demonstration status provides a flexible evaluation arena without compromising the integrity of the Star Level. The purpose of the Demonstration Level is to determine what factors are crucial for providing Star quality employee protection where unique circumstances exist.

1. Changes to DOE-VPP

DOE may use the Demonstration Level to test possible changes in Star Level requirements. To qualify, the applicant shall have a comprehensive occupational safety and health program in place that includes all of the basic elements of the Star level. The participant would then attempt to demonstrate that one or more of the sub-elements are unnecessary, or DOE could safely modify requirements to accommodate its unique circumstance. Generally, results from more than one Demonstration participant would be preferable before DOE modifies Star level requirements.

2. Minimum Program Requirements

At a minimum, any Demonstration Level shall use safety and health management systems that provide hazard assessment integrated into the overall management of the facility (e.g., safety planning, rules, and work procedures; safety and health training; employee participation; and program evaluation). These systems shall already be operating at Star quality.

B. Responsibilities

1. DOE-VPP Program Manager

The DOE-VPP Program Manager determines whether an applicant should pursue a Demonstration Level.

2. DOE-VPP Coordinator

A DOE-VPP Coordinator closely oversees each Demonstration participant by providing support for the onsite review and re-evaluation. The Coordinator also responds to recommendations from the Field Element.

3. Field Element

The Field Element, where applicable, is responsible for the initial application review.

C. Application Processing

1. Classification

Headquarters may receive inquiries about DOE-VPP from contractors or subcontractors who have outstanding safety and health programs, but whose operations do not fit the requirements for Star level participation. In those instances, alternative approaches or conditions that appear to meet the intent of Star level requirement(s) shall be present for the site to qualify for the Demonstration Level. A contractor whose safety and health programs operations are not well understood by DOE may also apply.

2. Application Review

The application review shall follow the procedures in Section III. The Headquarters DOE-VPP Office review of the application shall additionally:

- a. Determine which Star level requirements, if any, the unique circumstances of the operation affect. Demonstration participants may meet the Star level requirements, but DOE may want

to ensure that those requirements are adequate and appropriate for the special circumstances of these participants;

- b. Examine the contractor's recommended alternative approaches to ensure they are the most effective, and adequately compensate for the missing Star level qualifications; and
- c. Obtain any additional information needed to complete the application.

D. Preparation for Onsite Review

1. Pre-visit Planning

The Director, AU-12, shall appoint the review team. The Team shall consist of a Headquarters Team Leader and other subject matter experts or safety and health professionals, as required. (See Section IV.B.2)

- a. The Team Leader shall make all necessary arrangements with the applicant.
- b. The team members shall review the application well in advance and prepare for the Onsite Review.
- c. The Team Leader shall conduct a team-planning meeting prior to the Onsite Review.

2. Consideration of Special Approaches

The Team shall give special attention to any alternative approaches a participant uses in its site safety and health program.

E. Onsite Review Procedures

1. General

Use the same general procedures specified for Star level and Merit level in Section IV.B.3.

2. Alternative Requirements Proposed

The Team shall pay particular attention to documenting alternative approaches, results of the alternative systems, and employee attitudes regarding those systems. The Team should note any important qualities missing from the program when compared with Star level requirements. The Team shall assess the effectiveness of alternative approaches.

3. Operations or Parts of Operations With Unusual Features

The Team shall pay particular attention to areas of unusual operations and their corresponding program documentation that fall outside Star level level requirements.

F. Preparation and Presentation of Observations

1. General

Use the same general procedures specified for Star level and Merit level in Section IV.B.3.g-j.

2. Deferral

DOE may allow a period of up to 90 days to correct any minor problems (see the procedures in Section V.E.).

3. Decision on Approval Recommendation

The Team shall determine that a Star level quality program protects employees before choosing among the following alternatives:

- a. If the applicant has met all requirements for the Demonstration Level and the special aspects of the program prove successful, the site may be eligible for the Star Level;
- b. The applicant has met all requirements for Star level, and the Team has determined that DOE needs no additional requirements. The Team can recommend Star Level approval without further demonstration; and
- c. The applicant does not meet requirements of the Demonstration or Star Level.

G. Draft Report

The Team Leader is responsible for preparing a report supporting the team's recommendation.

1. General

Use the same general procedures specified in Section IV.B.3.i.

2. Specific

In addition to the subjects covered by the standard report format, include:

- a. Detailed descriptions of departures from the requirements of Star level and the rationale for their use;
- b. Explanations of how the alternatives provide Star level quality employee protection;
- c. Complete and clearly state information that AU-1 can use to decide whether to change or expand Star level requirements;
- d. Information about how the site meets all current requirements for Star level recommendation; and
- e. A recommended timeframe for the Demonstration.

H. Withdrawal of the Application

An applicant may withdraw the application for any reason by notifying the Headquarters DOE-VPP Office. The withdrawal is effective on the date the Headquarters DOE-VPP Office receives the notification. Use the procedures in Section III.G.

I. Approval Process

Use the general procedures found in Chapter V.

J. Post-Approval Role of the Field Element DOE-VPP POC

Use the general procedures described in Chapter VI. Give special attention to demonstration aspects.

K. Analysis of Annual Report and Statistics

Use the general procedures described in Chapter VII. Give special attention to demonstration aspects.

L. Re-evaluation

Use the same general procedures found in Chapter VIII. The report format is the same as the report following the initial Demonstration Onsite evaluation.

1. Recommendation Alternatives

As in all DOE-VPP recommendation decisions, DOE may grant a period of up to 90 days to resolve minor or compliance problems.

- a. Time Completed.

- (1) Where alternative criteria have been demonstrated:
 - (a) If the demonstrated criteria are determined to equal Star level criteria, recommend changes to the Star level requirements to allow Star level approval for this type of program; and
 - (b) If the demonstrated criteria are determined not to equal Star criteria, termination is automatic.
 - (2) Where Star level criteria are being used in unusual operations:
 - (a) If Star criteria fit this type of operation and no other aspects of this program need to be added, recommend Star approval for this site and the establishment of a policy that applicants in this type of operation may apply directly to Merit level or Star level;
 - (b) If Star criteria need additional requirements which have been identified, recommend changes to the Star Level which may allow approval for applicants with this type of operation and
 - (c) If Star criteria are determined to be inadequate and no additional requirements can be formulated to make them adequate, termination is automatic.
- b. Time Incomplete.
- (1) Where alternative criteria are being tested:
 - (a) If the demonstration criteria are determined to be equal to Star criteria, even though the full demonstration period is incomplete, recommend changes to the Star Level requirements which may allow Star level approval for this applicant;
 - (b) If the Demonstration Level remains inconclusive, recommend continuation; and
 - (c) If the contractor has exhibited serious problems that cannot be resolved within the framework of the Demonstration Level, recommend termination.
 - (2) Where Star criteria are being tested for adequacy in unusual operations:
 - (a) If the Star criteria are deemed adequate without augmentation, recommend Star approval for this site;
 - (b) If the Star criteria are determined to be inadequate, recommend changes to the Star level requirements that may allow approval for this applicant;
 - (c) If the Demonstration Level remains inconclusive, recommend continuation; and
 - (d) If the Contractor has exhibited serious problems that cannot be resolved within the framework of the Demonstration Level, recommend termination.
2. The Approval Process
- The approval process follows the same procedures as those outlined for the Star and Merit levels.
- a. The DOE-VPP Program Manager shall prepare and present the finalized report and recommendation to AU-1 concerning the need for a change in Star requirements.
 - b. AU-1 shall make one of three decisions:
 - (1) Not to modify Star level requirements;
 - (2) To propose a modification for contractor and Field Element comment; or
 - (3) To modify the requirement without comment.
 - c. Approval of the Demonstration Level site, where the contractor demonstrates alternative or additional requirements, shall await the effective date of the change to the requirement.

When AU-1 decides to make a change to Star level requirements, DOE shall notify the contractor POC by letter. Upon the effective date of the change, the DOE may approve the demonstration operations to Star level without further re-evaluation or recommendation.

APPENDIX A. VPP ANNUAL REPORT SUPPLEMENTAL WORKSHEET

Date of Review: _____ For Calendar Year: _____

Site Contractor Name/Acronym: _____

Site Name: _____

Company President/Manager: _____

Company Address: _____

Injury Incidence/Lost Workdays Case Rate (contractor (participant) employees and staff augments)					
Calendar Year	Hours Worked	TRC Cases	TRC Rate	DART*Cases	DART*Rate
(Year-2)					
(Year-1)					
(Year-reporting)					
3-Year Total					
BLS- YEAR average for NAICS** # (PROVIDE)					
CAIRS Organization Code for contractor participant: (PROVIDE)					
Injury Incidence/Lost Workdays Case Rate (subcontractors)					
Calendar Year	Hours Worked	TRC Cases	TRC Rate	DART*Cases	DART*Rate
(Year-2)					
(Year-1)					
(Year Reporting)					
3-Year Total					
BLS- YEAR average for NAICS** # (PROVIDE)					
Total Contractor & Subcontractors (3 Years)					
CAIRS Organization Code for subcontractor(s): (PROVIDE)					

* Days Away, Restricted or Transferred ** North American Industry Classification System

What percentage Above / Below the NAICS TRC Rate for reporting year: _____

Number of Contractor Employees: _____ Number of Subcontractor Employees: _____

Union Representative Name: _____

Email: _____ Contact # _____

Contractor VPP POC Name: _____

Email: _____ Contact # _____

What percentage Above / Below the NAICS TRC Rate for reporting year: _____

DOE VPP POC Name: _____

Email: _____ Contact # _____

APPENDIX B. TEMPLATE FOR REVIEW PLAN

**Department of Energy Voluntary Protection Program
Certification (Recertification) Plan for
Company Name
Site Location
Date of review**

Purpose: To organize the onsite review for the *certification/recertification* of *company name* for (*continued*) participation in the U.S. Department of Energy (DOE) Voluntary Protection Program (VPP).

Background: 1) *prior certification history if any* 2) *contractual changes that have occurred and VPP transitions if any* 3) *company composition if more than one company involved under the application or recertification* 4) *any breaks in VPP status*

Per DOE-VPP requirements, *discuss whether this is an initial, recertification, transition, or merit review*. This document provides the plan to conduct the onsite assessment, verify the safety programs, and assure that *company name (continues to or meets)* meet DOE-VPP requirements as specified in the DOE-VPP Manual. Personnel from AU-12 shall conduct observations and interviews as necessary to ensure the Team adequately reviews all the tenets of VPP. [*and to ensure that the issues and opportunities for improvement identified in the (year) review have been adequately addressed. (if a recertification or merit review)*]

Review Team: *Name* Team Leader, (*title if appropriate*), AU-12
Name, AU-12
Name, AU-12
Name, Company (if contractor)
Name, Company (if contractor)

Site Office Liaison: *Name and phone number*

Site DOE Contractor Contact: *Name and phone number*

History and Operational Experience: *Discuss site history, size, location, authority-having jurisdiction over operations, mission, hazards, current contractual obligations, operational events, significant ORPS, oversight or IG reports, or other pertinent information relevant to the tenets of VPP.*

Team Arrangements: The team shall visit (*company name*) facilities daily for assessment activities. Escorts for the team may be required for both security and safety. The site should identify counterparts to assist with access to technical documents, determine assessment activities,

and ensure Team members meet escort requirements. The Team shall require office space at the site for daily meetings and report preparation.

Products: (1) Onsite Review Report and associated cover letter; and
(2) Opportunities for Improvement/Issues List with recommendations/comments.

The Certification (*recertification or merit review*) Process for VPP Star:

The purpose of the *certification/recertification/merit review* is threefold. It is to:

- (1) Determine Star level qualifications for (*company name*);
- (2) Evaluate and document results of program participation versus program criteria; and
- (3) Identify problems that may adversely affect participation in DOE-VPP, and assess the necessity for additional problem evaluations and corrective actions.

The five measures of effectiveness for recertification are:

- (1) Compliance with the Integrated Safety Management System and VPP requirements;
- (2) Participants' general satisfaction with performance;
- (3) Nature and validity of complaints, if any;
- (4) Nature and resolution of recent/current problems; and
- (5) Effectiveness of general employee participation.

The evaluation is mainly an onsite visit that reviews the performance and operation of the safety programs. This onsite review verifies the reported information from (company's) application, self-assessment and annual report, and other documentary information. It aims to identify strengths and weaknesses, determine adequacy of efforts to address potential hazards, and gather information to assist with the decision making process that certifies the visited facility. This onsite review consists of three parts: (1) document reviews; (2) interviews with employees and managers; and (3) physical assessments, tours, walk downs of workplaces, and work observation. DOE-VPP Manual, part IV (DOE-VPP/EH-0497), "Onsite Review," provides guidance for the conduct of the onsite review.

Onsite Review Procedure:

Upon arrival onsite and at a mutually agreeable time and location, the VPP Team Leader shall brief (*authority having jurisdiction*) and (*company name*) managers on conduct of the assessment and to obtain their perspectives on any recent issues or concerns. Additionally, if requested, the VPP Team Leader may provide daily briefings to managers on progress of the review.

During the onsite review, the VPP team shall interview managers and employees at all sites covered by the VPP application, conduct worksite tours and work observations. The team shall work with the identified site counterparts to schedule these tours and observations.

Following the onsite review, a draft DOE-VPP report shall be prepared and provided to (*authority having jurisdiction*) and (*company name*) for factual accuracy review and validation. The Team shall forward the final draft report as described in the schedule.

The DOE-VPP Team Leader shall make schedules, preparation arrangements, and coordinate with local support provided by (*company name*), as needed. The DOE-VPP Team Leader shall also conduct an opening and a closing conference with the site to establish goals and methods and later to review results in findings and recommendations. Both gatherings shall be open to all VPP site participants

The onsite team shall submit a report of its visit and its recommendation to the Chief Environment, Health, Safety and Security Officer for approval. This report shall use the format of appendix D to DOE-VPP Manual, part IV, and shall address as a minimum:

- Injury and illness statistical performance;
- A general summary of program performance;
- Specific descriptions of what was regarded as “best practices”;
- A summary of outreach activities;
- A statement affirming the team’s recommendation; and
- Assess the effectiveness of site self-assessment.

Focus Areas for the Onsite Review:

- (1) The general state of the management of safety and health in work;
- (2) The level and quality of participation in VPP across the site;
- (3) The degree to which the sites satisfy the VPP requirements; and
- (4) The quantifiable value added of VPP to the sites.

Signature(s) below demonstrate concurrence with this DOE-VPP **certification/recertification/merit review** Plan for (*company name*).

Director
Office of Worker Safety and
Health Assistance
Office of Health and Safety

Director
Office of Health and Safety
Office of Environment, Health
Safety and Security

Team Schedule

Date	Team Activity
	Travel to Site
	Meet with (<i>authority having jurisdiction</i>) Manager
	Meet with (<i>company</i>) President
	Opening Conference and Meet Counterparts
	Observations/Interviews/Document Reviews
	Closing Conference
	Prepare Draft Report
	Factual Accuracy and Validation Review of Draft Report
	Issue Final Report

Team Assignments

Name	Organization/Team Responsibility	Areas of Responsibility
	Team Leader	Management Leadership
		Commitment, Responsibility, Line Accountability, Resources, Planning, Visible Management Involvement, Records Review, IIR, LWDI rates, Contract Workers, Site Orientation, Program Evaluation, and Employee Notification
		Employee Involvement
		Degree and Manner of Employee Involvement, Safety and Health Committees, Employee Reports of Hazards, Worksite Analysis, Disciplinary System, and Safety and Health Rules as related to Hazard Prevention and Control
		Worksite Analysis
		Self-Assessments, Preventive Maintenance, Pre-use/Pre-startup Analysis, Accident Investigations, Trend Analyses, Job Hazard Analyses, Hazard Tracking
		Hazard Prevention and Control
		Comprehensive Surveys, Access to Certified Professionals (Professional Expertise), Methods of Hazard Control, Positive Reinforcement (Safety and Health Rules), Personal Protective Equipment. Medical Programs, Radiation Protection Program, and Emergency Preparedness.
		Safety and Health Training
		Employee Training, Supervisor Training, and Manager Training. (Assist also with Employee Involvement-Disciplinary System and Degree and Manner of Involvement.)

Site Office Liaison: Name and Phone Number