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Benchmark report of the Occupational Safety and Health Administration (OSHA) Voluntary Protection Program (VPP) and the Safety and Health Achievement Recognition Program (SHARP)

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BENCHMARK REPORT
of the Occupational Safety and Health Administration
(OSHA)
Voluntary Protection Program (VPP)
and the Safety and Health Achievement Recognition
Program (SHARP)

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Executive Summary

Small businesses are faced with barriers when it comes to safety and health management. Unlike larger companies, they may not have the expertise or resources necessary to build effective programs. The goal of this study is to gather information about what motivates small businesses to implement safety & health management systems and identify any issues/barriers that are unique to small-sized companies. Members of the Voluntary Protection Program Participants Association (VPPPA) and the Safety and Health Achievement Recognition Program (SHARP) were selected for the survey because they have already been through the process of implementing safety & health management systems and possess a wealth of information on what it takes to build and run a successful safety & health management system in a small business.

Unfortunately, there were problems getting access to accurate and up-to-date contact information for VPP and SHARP members. However, those companies who did participate provided similar responses to the research questions. Their main motivators in pursuing VPP or SHARP were to reduce injuries and lower worker's compensation rates. Emphasizing the return on investment in safety and health is an effective driver for small businesses. The primary concern with implementation was the amount of time and paperwork. Also, with fewer employees, it can be difficult to meet the employee participation requirements for VPP because there is no safety expert; safety is delegated to those who have job duties in addition to safety and health. Compliance, the foundation of a good safety and health management system, is a large hurdle in itself for small business.

A successful safety and health program is a living process built upon good documentation, but documentation should not be a hurdle to entry into VPP or SHARP. Especially for small business, time and effort should be used where they are most effective.

Introduction

Small businesses are faced with barriers when it comes to safety and health management. First, they may not have the knowledge or expertise necessary to build a management system. Many smaller firms may not even be aware of the requirements for compliance under OSHA. Another hurdle is the lack of time and financial resources needed to train employees and managers, control hazards, and maintain safety programs. These barriers and hurdles make it difficult for small businesses to view safety and health management as a priority for their resources.

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The true challenge is convincing small businesses that they should invest in safety and health management to improve their business. An effective safety and health management system can help prevent injuries, illnesses, hazards, and compliance violations. But, when it comes to making decisions about where to spend limited resources, safety programs may not be a priority. So, what makes some small businesses invest in safety initiatives while others do not? What drives certain companies to go beyond compliance and strive for excellence in safety and health? The goal of this study is to gather information about what motivates small businesses to implement safety & health management systems and identify any issues/barriers that are unique to small-sized companies. This information will then be used to create training materials targeted toward small business.

Background

A benchmark survey of small businesses that are members of the Voluntary Protection Program Participants Association (VPPPA) and the Safety and Health Achievement Recognition Program (SHARP) was conducted. VPPPA and SHARP members were selected for the survey because they have already been through the process of implementing safety & health management systems and possess a wealth of information on what it takes to build and run a successful safety & health management system in a small business.

The Voluntary Protection Program (VPP) was created by OSHA to recognize worksites that have voluntarily implemented safety and health programs which go beyond basic regulatory compliance. To qualify for VPP, a site must have an effective safety and health management system, employee participation, and below average injury rates. VPP is open to any type of industry and any size business can qualify. In applying for VPP status, OSHA must evaluate applications to see that the management system meets performance-based criteria for:

management leadership, employee involvement, worksite analysis, hazard prevention and control, and safety and health training. If the necessary programs are in place, OSHA representatives conduct an onsite review of the facility. Once accepted into the VPP, a worksite is removed from OSHA's programmed inspection list. The idea is that if a site can show their commitment and cooperation with OSHA by allowing an onsite evaluation of their programs, then they will build a partnership with the agency allowing them to be exempt from scheduled inspections.

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The Safety and Health Achievement Recognition Program (SHARP) is similar to the Voluntary Protection Program, but it is only available to small businesses. SHARP, like the VPP, is a strategic partnership with OSHA designed to recognize employers with exemplary safety and health management systems. SHARP is different from VPP in that it is only open to employers with less than 250 employees at any one site; less than 500 company wide. Evaluations and assistance through SHARP comes from the State Consultation Project Manager, instead of OSHA directly. The goal is to provide free consultation services for small businesses, thereby encouraging them to establish good management systems.

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To be considered for SHARP, a site must agree to a consultation visit including: a complete hazard identification, involving employees in the process, correcting any hazards identified, having a safety and health management system that meets OSHA's guidelines, and an injury rate below the national average. When an employer receives SHARP certification, they are exempted from programmed inspections during the period for which SHARP certification is valid. Requirements vary from state to state. SHARP is a good program for small companies that have high-quality safety and health management systems, but may not be able to meet all of the requirements for VPP certification. Also, SHARP provides free compliance inspections, while VPP requires sites to do their own audits. SHARP companies are viewed as industry leaders in safety and health; they set examples for other small businesses to follow in making safety a top priority.

The goal of this benchmark study is to gain insight from small companies that have gone through the initial implementation phase and now maintain an effective safety and health management system. VPP and SHARP companies have been through this experience. We wish to uncover the reasons why these sites chose to pursue safety and health initiatives. What pushes them to invest in safety and health? What problems did they run into? With a better understanding of what motivates a small business to invest in and pursue safety and health excellence, we can train and motivate other small businesses to follow suit.

Method

Benchmark companies were selected from the Voluntary Protection Program Participants Association (VPPPA) and the Safety and Health Achievement Recognition Program (SHARP). Only small businesses with less than 500 total employees were contacted. Surveys were primarily conducted over the phone; some responses were received via e-mail. Safety representatives (or other upper level managers with safety responsibilities) from VPP and SHARP companies were contacted and asked the following seven questions about their safety and health management systems:

1. What was your company's main motivation for pursuing VPP/SHARP status?
2. Which areas required the most work to meet VPP/SHARP requirements?
3. Did you run into any problems with implementing your safety & health program? Do you continue to have any problems managing your S&H program?
4. Who performs safety & health requirements in your company? How many people?

5. Do you have an estimate of the level of effort needed to implement and run an effective safety & health program in a small business (i.e., man-hours, number of people, hours per week spent on safety-related tasks)?
6. Did you see an improvement after entering VPP/SHARP? What areas improved the most?
7. How do you measure safety & health performance?

These questions were designed to facilitate discussion. Those contacted were encouraged to elaborate on their experiences and provide some examples that might help other small businesses facing similar issues. More detailed questions were asked on specific areas that pertain to individual companies. In this way, we hoped to gain ideas on how each business managed to get employees to accept and become involved in company safety initiatives. Once the surveys were completed, responses were reviewed and compared to assess any similarities or trends among different business sectors. For example, did health care facilities produce similar responses and how did they compare to, say, manufacturing plants. Did the respondents have similar experiences? Were there any notable trends in the responses based upon size or hazard class?

Results

A problem encountered while conducting the benchmarking study was inavailability of contact information. The main problem was that the study needed small businesses with less than 500 employees company wide. OSHA has a database of VPP members sorted by number of employees; however, VPP certifies a *site* not a whole company. At first glance it appears as if there are many small businesses that have achieved VPP status, but in reality there are very few. RIT researchers attempted to contact as many sites as possible, unfortunately initial contact

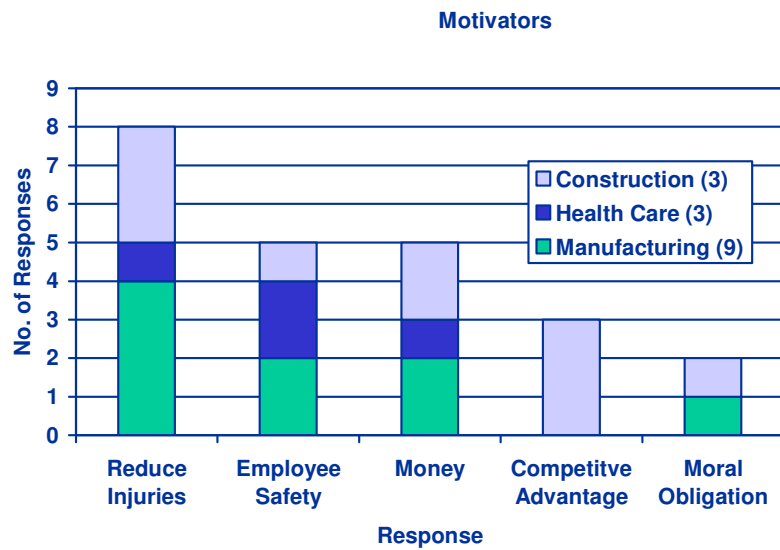
information was incorrect or outdated in many cases. There was difficulty contacting businesses for the study since the necessary information did not exist. In addition, even though participation in these programs is recognition for excellence, many were reticent to share their experience.

We are grateful to the sites that did respond and participate in the research.

A total of 15 small businesses, from a variety of industries, participated in the survey. Three were construction companies, three were health care facilities, and the rest were general industry or manufacturing. Ten of the sites surveyed were VPP companies; five were SHARP sites. Following is a summary of their responses; conclusions/recommendations appear in the final section of the report.

Motivation:

1.) *What was your company's main motivation for pursuing VPP/SHARP status?*



The companies' main motivation for pursuing VPP/SHARP status was to reduce the number of injuries and decrease worker's compensation costs. This seems like a logical response since the goal of any safety program should be to prevent injuries or illness. Three sites said that a consultant recommended the VPP or SHARP program to them, and two people replied that they entered VPP/SHARP because it provided them with a "peace of mind" knowing they were doing their best to ensure worker safety. Other motivators were to improve the site's safety record, reduce insurance costs, prevent OSHA fines by ensuring compliance, to increase employee involvement with management, and to ensure staff safety. Others said they felt a moral obligation to go above and beyond just complying with regulations. The SHARP companies said they were first interested in the free annual inspections available through the program, not the recognition, and one said they became interested in SHARP for the free consultation services provided as part of the program. The advice and mentoring available from other VPP companies is what interested one company to apply for VPP status. All three construction companies said that VPP status gave them a competitive advantage and that they wanted to "set a standard for others in the industry" of what safety should be. They weren't seeing any improvement under their current safety programs, so they wanted to try something new, and decided to go for VPP. Two construction companies said they wanted to show that safety is a value of the company, and VPP was a way of getting recognized and proving their commitment.

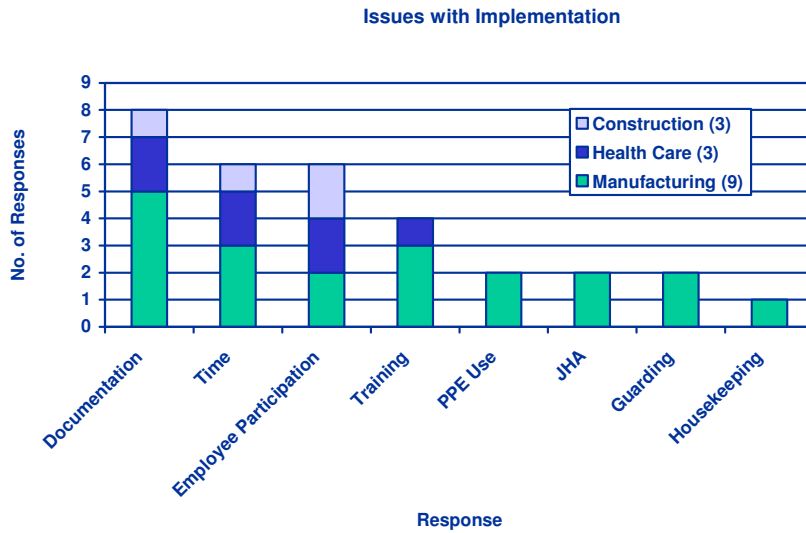
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Implementation:

- 2.) Which areas required the most work to meet requirements? AND
- 3.) Did you run into any problems implementing your S&H program?



The area that needed the most work to meet VPP requirements was documentation. This was the first thing most companies answered when asked where their gaps were. Eight people answered that paperwork took the most effort. Programs and procedures needed to be written, manuals needed updating, policies had to be documented, etc. Initially, one company had no formal written safety policy. VPP requires a great deal of documentation to prove the necessary programs are in place. Several managers said that they were already performing the necessary procedures, but it wasn't in writing. Three companies said training was what they were lacking the most. Employees had to be trained on proper handling of chemicals, lockout tagout, and fork trucks, for example. For the construction companies, an area that needed work was convincing

employees that OSHA was there to help. They had to change the negative view many workers had of OSHA in order to get them involved in safety initiatives.

None of the respondents said they had any serious problems implementing or running their safety and health programs. However, five people said that time was somewhat of an issue. The amount of paperwork involved in the application process took several years for some sites. Getting everything documented in the beginning was time consuming; after that it was much less of an issue. Holding safety meetings and training sessions requires time each month for both management and employees. Another challenge was the employee participation requirement for auditing, hazard prevention, and attendance at meetings. Maintaining enthusiasm among employees after the initial implementation of new programs is an ongoing issue. A number admitted having difficulty maintaining employee involvement and excitement regarding safety. One manager said that “keeping a high level of employee involvement as well as a high quality of auditing and hazard prevention is a continual challenge for the site safety manager.” Some suggestions offered were rewarding employees with a day off if they participated on safety committees, safety meetings with free donuts, and employee picnics. Employees need constant reminders to keep them in the habit of using safe work practices, or else they resort back to old ways.

Two health care businesses said they had a hard time getting employees to attend safety meetings because they run a 24-hour facility and many work long shifts. They had difficulty getting employees to stay longer to attend meetings or take time away during their shifts. This was also difficult for the construction companies because their workforce is spread out at various job sites

and it's hard to get everyone together for the required meetings. Three manufacturing sites replied that their biggest problem was employees who were reluctant to change old habits. They didn't want to wear the required personal protective equipment (PPE) or adopt new procedures. The challenge was getting "old-timers" to buy into this idea of safety and change their old ways of thinking. It required constant reminders and strict enforcement by management to make the change. A problem for construction companies was how to keep track of numerous sub-contractors at up to as many as 50 different sites. In their line of work, job duties are constantly changing for each new project. It's more difficult to work out the logistics of a mobile workforce than it is for a manufacturing plant.

Ongoing Effort:

4.) *Who performs safety & health requirements in your company? AND*

5.) *Do you have an estimate of the level of effort needed to implement and run an effective S&H management system in a small business?*

Each company representative was asked to share how they assign health and safety responsibilities within the company and how many people perform those duties. The goal here was to get an idea of how small businesses handle safety and health tasks because many of them do not have full-time safety personnel. Most of the responses indicated that those in charge of safety requirements did so in addition to other job responsibilities. Some of their job titles were: sales manager/safety director; plant manager; site safety coordinator; safety manager/production supervisor; director of safety, quality, and training; and foreman. In the construction industry, project managers were often assigned a safety role since they are on-site and working directly with employees. One construction company with 105 employees had two field safety

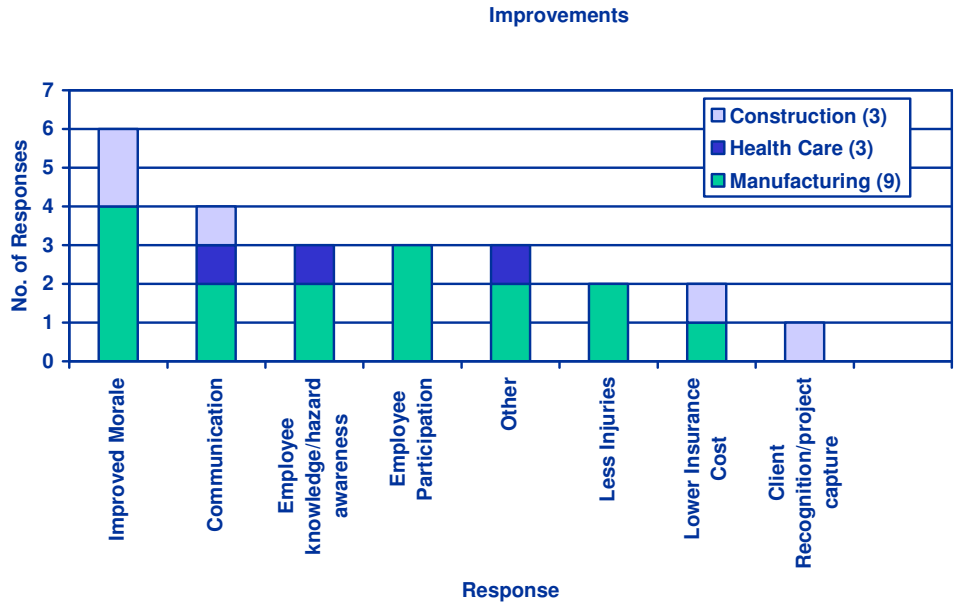
technicians responsible for compliance on-site. In health care facilities, administration employees were often in charge of safety. Usually, between one and three supervisors or managers are assigned safety roles in addition to other job tasks. The larger the company, the more likely they were to have someone designated as a safety manager. In very small companies (less than 50 employees) the plant manager often headed safety programs. Three manufacturing firms said they combined safety requirements with quality programs, like ISO 9001, to be more efficient. In the manufacturing setting, three businesses replied that safety was the responsibility of all employees. Tasks were completed by safety teams or line staff, avoiding the need for a safety department, because it became a part of employee's daily routine. Sharing safety responsibilities works well for the company because employees don't even realize they are doing safety. It becomes an integrated part of everyone's job functions, so safety programs don't take up much time. Also, everyone feels like they contribute to a safer work environment by taking it upon themselves to notice and correct hazards. If workers are given safety and health responsibilities, they'll have more of an interest in the outcome than if management took responsibility for the whole program.

This was a rather subjective question because it clearly depends on the individual site and how much work needed to be done to meet VPP/SHARP requirements. When asked to estimate the level of effort needed to implement and run an effective safety & health management system in a small business, everyone surveyed said it initially took quite a bit; then once the programs were put together and in place, it took much less time to maintain. The number of hours spent on safety related tasks depends on employee cooperation and involvement with management. In the health care sector, respondents said they currently spend about three hours per month conducting

safety meetings and inspections. Initially, more time was put in to write programs, train employees, etc. One facility estimated about four to six hours per week and another said two to three hours per week in the beginning. Manufacturing plants surveyed spent more time on safety-related tasks. One company estimated eight hours per week plus two to three hours per week from each department manager. Another said they spend around six hours per week managing their S&H system. A SHARP site replied that they spent over a month rewriting programs, establishing procedures, and conducting inspections to implement their new management system. After that, time is spent on training each year, but it doesn't take as much work once all the programs are up and running. VPP requirements are more rigorous than SHARP requirements, so the application phase for VPP could be quite long. A construction company said it took them two years to get ready for VPP. It took four months to complete the VPP application, with someone working full-time for two weeks straight at the end, for one manufacturing plant to get their programs in place.

Improvements:

6.) *What areas improved the most after entering VPP/SHARP?*



All companies surveyed said they saw improvements after entering VPP or SHARP. The biggest change, reported by seven companies, was an improvement in employee pride and morale.

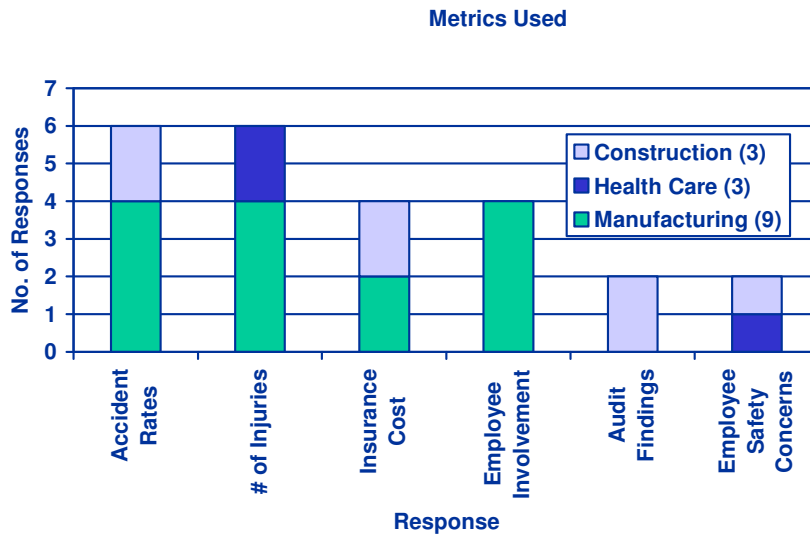
Employees feel safer at work and know that management cares about their welfare in addition to the goods or services produced. Safety representatives expressed a noticeable change in attitude and involvement from their workforce. Employees were more cooperative and engaged with management in making decisions and being a part of safety teams. Two sites reported they felt the VPP experience has made the company closer and improved communication, both upwards and down the chain. Other improvements listed were: increased employee knowledge and awareness of hazards, better programs and training, decreased accident rate, increased employee participation, more proactive in addressing safety concerns, and a decrease in worker's

compensation costs. Three people said they noticed better reporting of safety issues and accidents, including near misses, by employees. This goes along with the increase in hazard awareness by employees. As the workforce becomes more aware of potential hazards, there will likely be more reports of safety issues. Not that there are more hazards or injuries occurring, it is just that now they are more likely to be noted and addressed. Several companies also said they started recording and tracking first aids and/or near miss incidents. Previously, these types of minor injuries were not written down or not reported to management.

The construction companies surveyed said they saw an increase in new projects and client recognition after gaining VPP status. They use it as a marketing tool to advertise their commitment to safety on the job. Construction workers also saw a change in their employees' attitude toward OSHA. Working along with agency representatives as part of VPP initiation, they learned to view OSHA as less of a 'bad guy' and more of a partner. This also helped with employee acceptance of new safety programs. Another improvement not to be understated is a decrease in worker's compensation and liability insurance costs, especially in the construction industry. All three firms reported a decrease in insurance costs after entering into VPP. One firm admitted to a savings of \$250,000 within six years after gaining VPP status. Estimates on liability insurance also decreased. And not just for the construction field- a manufacturing site in SHARP reported their worker's compensation rating dropped from 1.08 to 0.72; a savings of over \$10,000 per year!

Measurement:

7.) *How do you measure S&H performance?*



Each facility is required by regulation to keep an OSHA log of all recordable injuries and illnesses, but there are many other ways to measure safety and health performance and track changes. Six companies said their primary indicator of performance is the number of injuries or illnesses each year. Accident rates like lost time accidents (LTA) and total lost workdays are used by more than a third of the companies to track performance. They also look for a year-to-year flux in those figures to monitor changes that result from new programs or incentives. A few of the people surveyed said they look at near misses and first aids reported in addition to recordables. Four companies measure how well they're doing through yearly estimates by insurance companies. The better their safety and health programs, the lower their liability and worker's compensation rating. Three sites say they choose not to use accident rates to measure success because they're not an accurate reflection of the management system. Instead, they base

how well the safety and health programs are working on employee involvement and knowledge (these were sites with very minimal accidents to begin with). One health care site tracks their record of safety concerns from employees to judge how well they're doing. This tells them several things: how effective employee awareness of hazards is, how open the lines of communication are, and how quickly management addresses those concerns. Another business said they conduct employee interviews and use those responses to gauge how effective their system is at creating a safe work environment. Construction companies are a little different with their measurements. They tended to use annual audit findings from OSHA and their insurance carriers to track safety progress.

Conclusions/Recommendations

Going back to our original question, "What does motivate small businesses to pursue safety and health management and what barriers do they face along the way?" - the results of surveys from small business members of VPP and SHARP help point to some answers.

Small businesses, unlike large corporations, do not seem to use safety as a marketing/public relations tool. The exception to this would be in the construction industry where firms directly compete with each other for project capture. The construction sector has many issues that are different from other industry groups. For example: a mobile workforce, changing job sites, and the regular use of sub-contractors. In looking for ways to encourage business to apply for programs like VPP, construction sites need a slightly different approach. Also, it may not be feasible to meet all of the requirements for VPP due to the mobility of their workers. It seems

that having a separate section of VPP expressly for construction may address those needs. Using VPP as a marketing tool for client recognition seems to be a good way to push the benefits of VPP to contractors. Of course, money is always an issue when looking to invest in new programs, so emphasizing the likelihood of lower insurance rates would probably work well, too.

First and foremost, a reduction in injury and illness rates is what many small businesses seek to gain from implementing a safety and health management system. A reduction would help to improve their worker's compensation rating and thus save money on annual insurance costs. Smaller companies are usually much more concerned with production and sales than safety. Since they don't have the capital that the larger firms have, investing significant amounts of money in safety and health may not be a top priority. Insurance cost savings shows a direct return on investment that can be very helpful for encouraging smaller firms to invest in safety.

While the concrete benefit of cost savings from a reduction in injury rates was the main reason stated for initially pursuing safety and health, the resulting improvements were mostly improved morale, employee participation, and better communication with management - which are harder to measure, but very important to business success. Most companies surveyed do not measure these indirect benefits to assess their safety and health performance. Generally, businesses use accident rates and number of injuries to gauge performance. While those statistics are important, other metrics should not be overlooked. Using employee participation, hazard reporting, and employee surveys can also be useful indicators of how well a safety program is working for employees and also as a justification for safety and health funding.

Small businesses often lack the expertise on safety and health that larger companies have. In discussions with these small business representatives, it seems that for the most part, management has a genuine concern for the safety and well-being of their employees. This may result from the fact that many times the owner of the company is also the plant manager, and has a strong interest in the output of his employees. Or it may be because in a smaller facility the people are closer and have the opportunity to interact more with management. Either way, the general feeling was that small business owners wanted to make sure they were doing what they should be doing to provide a safe workplace, but often are not aware of what those requirements are. This is why many small businesses turn to SHARP for help. One manufacturing firm told of how they first became involved in the program. The owner of the company (fifty employees) read an MSDS listing exposure limits for a certain chemical. He wanted to make sure he wasn't exposing his employees to toxic levels, but didn't know how or where to get occupational exposure testing done. Hiring an independent consultant to do testing and analysis can be expensive. Most employers seemed willing to pay for some degree of testing, but the real problem they had was not knowing who to trust. Often, chemical sales representatives will offer to do industrial hygiene testing, but they have ulterior motives - they want to sell their product versus the current product being used. A lack of knowledge about industrial hygiene worries some owners that consultants will recommend more testing than necessary just to get business. How are they supposed to know what really needs to be tested and what does not? In situations like this, the SHARP program is ideal because it offers free compliance inspections by an independent auditor. Findings do not get sent to OSHA and the inspectors have no business interest to gain.

For small businesses, it may be easiest to pursue SHARP before going for VPP status. The amount of paperwork and rigorous application process can be overwhelming for many companies. Resources available through the state as part of SHARP can help a company establish a good safety and health management system. If they wish to gain more contacts and resources, the business could then apply to VPP. This is precisely what one company in New York State did. They had been involved with SHARP for several years and wanted to take the next step by gaining VPP recognition. VPP was a larger, national program that offered more business contacts and opportunities than the state run SHARP. The downside is that they no longer receive the free annual compliance inspection from the state as part of SHARP.

A number of companies said that the VPP or SHARP was recommended to them by a private consultant or their insurance company. This is an excellent way to promote VPP because the motivation is to decrease liability costs, which many firms reported as an improvement after entering VPP, and the recommendation comes from a source other than OSHA itself. If a business can realize that “safety pays” then they are more likely to pursue it. The indirect benefits of employee participation, improved morale, and better knowledge and communication reported by the majority of companies isn’t realized until later, after an effective system has been in place for awhile. Of all the companies surveyed, the one thing that was immediately noticeable was the support of upper management for the safety program. If management doesn’t buy into the idea and support it, then it will not be effective. To a certain extent, this depends on the leadership style of the company. Some owners choose to go beyond compliance because they feel a moral obligation; others do not place as much value on safety. To the latter, it is recommended that the financial benefit be emphasized.

SHARP companies seemed like a better source of information for this study because they are *all* small businesses. We were unable to get a full listing of companies because it's confidential information protected by the state. The contacts received were from a private source, not the agency. It seems strange that a list of SHARP companies is not made public because it is a *recognition* program and one would think that those companies would want to receive some benefit from being recognized for their excellent safety initiatives, similar to VPP companies. A wider variety of small business contacts are associated with SHARP than VPP because the requirements are not as demanding and free consultation is available. It would be a good resource for small businesses to be able to network with each other on how to address similar safety issues. As stated earlier, the VPPPA contact list is also difficult to keep updated with current contact information.

Although we had some difficulty contacting enough small businesses, those that were surveyed represented a variety of industries with different processes and issues. There were three construction and three health care facilities out of fifteen total companies. Those six were all in VPP, which leads one to believe that OSHA may have targeted those two sectors to encourage safety and health management. If the goal is to get more small businesses into the VPP, then it is recommended to target specific business sectors, and inform them of what VPP is and how it would benefit their business. For small business, it is recommended to promote the possibility of insurance savings on worker's compensation and liability. Also show that OSHA should not be looked upon as the enemy; they are there to help and emphasize the benefits of having an on-site inspection to help point out compliance issues management may not be aware of. Offer some

suggestions on how to change employee behavior and unsafe habits on the job. Several companies said this was the only on-going struggle with safety and health management.

Small businesses can be hard to regulate because there are so many, and they can often slip under the radar. A lack of specialized knowledge in safety and health along with some unique processes and equipment found at smaller sites presents barriers to compliance that larger firms can overcome. Many small businesses have old, unguarded equipment and unusual processes that require special engineering or modification. Compliance inspections through SHARP are excellent ways to get professional, unbiased recommendations on how to comply with OSHA standards.

Training geared toward small businesses needs to address the areas where many small businesses are lacking. According to this study, the deficiencies are mostly in documentation of policies and procedures, enforcement of PPE, employee involvement, guarding, and job hazard analyses. The time necessary to create written programs and policies can be too much for the average small business manager who has many other job responsibilities. They may fail to see the benefit in documenting something they're already doing and have been doing for years. In this case, VPP can seem more like needless paperwork than a benefit to the company. Training materials should provide examples and templates for the small business to use in creating their own documents. That said, it is important to create a specific plan that works for each individual company. Start with generic programs, but customize and integrate them into the business routine. A good safety program should be easy for employees to follow; if it makes their job harder or presents a nuisance, they won't follow it. Effective training should provide managers

with examples of how to adapt materials to their own facility so that it becomes a useful tool, not just something that sits on a shelf and collects dust. A successful safety and health program is a living process built upon good documentation, but documentation should not be a hurdle to entry into VPP or SHARP. Especially for small business, time and effort should be used where they are most effective.