

OSHA Announces New Evaluation of Voluntary Protection Programs

Cloyd Hyten, Ph.D.

June 18, 2009

In response to a critical Government Accountability Office (GAO) report, OSHA announced that it will conduct a comprehensive evaluation of its Voluntary Protection Programs (VPP) to determine their effectiveness in maintaining workplace safety.

VPP, which includes some 2,200 worksites, offers companies a way to have a more cooperative relationship with OSHA and avoid a more regulatory-compliance focused approach.

The GAO report recommended that OSHA improve its oversight of these programs because questions

had been raised about whether VPP-designated companies were implementing proper follow-up changes after worksite injuries and fatalities. The GAO noted that OSHA does not require a review of sites' safety and health systems to determine if, once admitted into VPP, a company has a rigorous enough process to remain in the voluntary program. So, questions were raised about whether some VPP companies were truly exemplary in their safety programs.

While many companies view admission to VPP as something to strive toward, clearly this GAO report suggests that merely being part of VPP is no guarantee that existing safety programs are top notch.

Company leaders and the employees who work so hard to seek VPP status certainly want to meet high standards of excellence. It is likely that they do not work to earn VPP status just to let that standard go once the designation is earned. However, this outcome is highly predictable if examined in the light of what we know about the consequences that sustain performance.

Companies would be wise to consider having a method for evaluating what is really happening from Day One after earning such designations. Government oversight organizations would do well to do the same. Once a standard is set and a status given, as in VPP, the danger is always that the actions of

commitment that led to such designations will start to slip. The science of behavior makes this clear—it is not a surprise. It is highly predictable.

OSHA or any oversight agency that establishes standards of performance has a special obligation to understand how human behavior works in organizations. Behavior will “drift” if you give a designation that requires little vigilance to maintain. Behavior-based safety programs foster a safety culture in their organizations beyond the documentation requirements of VPP, even though in achieving those good standards, real behavior changes take place and real policy and practice changes are implemented. However, to sustain behavior at

high rates, management must know how to evaluate what is really happening, and to know how to change conditions to influence what is required. Demanding compliance will not sustain what is needed. Understanding the laws of behavior, will.

Behavior-based safety (BBS) programs emphasize preventive actions, such as daily safe operator behaviors and management practices aligned to support safe behavior and safer conditions at work-sites. When done well, with a true understanding of what it takes to sustain safe habits in an organization, the emphasis is placed on continuous improvement checking and validating those key daily practices that demonstrate commitment to safety.

BBS programs add an element missing from most safety programs: a laser-like focus on human behavior, its causes, and how to change it to make safety values evident in the daily behavior of operators, supervisors and managers. Regulation, of the traditional OSHA variety, or the more cooperative form in VPP, supplies some urgency to improving safety but not a methodology. Behavior-based safety programs can supply the methods to produce changes that ultimately show up in better safety outcome measures and a safer workplace.

ADI

3344 Peachtree Rd, Suite 1050
The Sovereign – Buckhead
Atlanta, Georgia 30326

tel: **678.904.6140**

email: info@AubreyDaniels.com

web: AubreyDaniels.com

blog: aubreydanielsblog.com

twitter: [AubreyDaniels](https://twitter.com/AubreyDaniels)