



**MARINE CORPS LOGISTICS COMMAND
HEADQUARTERS (LOGCOM HQ)
VOLUNTARY PROTECTION PROGRAMS (VPP)
IMPLEMENTATION PLAN**

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1. PURPOSE

This Implementation Plan provides guidance for the implementation of the Occupational Safety and Health Administration (OSHA) Voluntary Protection Programs (VPP) at Marine Corps Logistics Command Headquarters (LOGCOM HQ).

2. EXECUTIVE SUMMARY

This document is intended to provide guidance to assist LOGCOM HQ in implementing VPP at Marine Corps Logistics Command, Albany, GA. It may also be used by associate organizations to support their local VPP efforts. The information contained within, combined with documents listed below and site assessments, should be used by LOGCOM HQ organizations to develop strategic plans to execute and sustain VPP. Successful implementation lies in establishing solid partnerships between management, labor, OSHA, safety and occupational health (SOH) professionals, VPP mentors and LOGCOM HQ employees. The ultimate goal of VPP is to change our current safety culture to one that is safer for the individual, where we all look out for each other and practice safe habits 24/7 so we can support our Marines in the field even more effectively and efficiently than we already do. This document lists Authority and References, Program Goals, Background and Scope, Program Management/Oversight, Application Approach and Execution, Responsibilities and Approval.

3. AUTHORITY AND REFERENCES

- a. SECDEF memo, Zero Preventable Accidents, 30 May 07
- b. OSHA VPP Policies and Procedures Manual: CSP 03-01-002 (TED 8.4), 25 Mar 03
- c. Federal Register Notice 65FR45650-45663, VPP requirements for obtaining Star Status are outlined here.
- d. MCO 5100.8 Marine Corps Occupational Safety and Health Policy
- e. MCO 5100.29B Marine Corps Safety Program
- f. MCO P1710.30 Marine Corps Safety Inspections
- g. MCO 3500.27B Marine Corps Operational Risk Management
- h. NAVSEA Op-5 Ammunition & Explosive Ashore Safety Regulation for Handling, Storage, Production, Renovation and Shipping
- i. OPNAVINST 5102.1D Mishap and Safety Investigation, Reporting and Record Keeping

- j. OPNAVINST 5100.23F Occupational Safety and Health Program
- k. SECNAVINST 5100.10H Safety and Occupational Health and Inherent Responsibilities of Each Command.
- l. 29 CFR 1960 Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters
- m. CG's Safety and VPP Statement
- n. President of AFGE Local 2317's Support of VPP letter dated 14 Oct 09
- o. MARCORLOG 1700.29, LOGCOMHQ Wellness Program 23 Dec 08

4. PROGRAM GOALS

- a. Advance war-winning capabilities...on time, on cost, by decreasing workplace injuries, illnesses, lost workdays and federal worker compensations costs.
- b. Preserve LOGCOM HQ resources, decrease workplace injuries, illnesses, lost workdays and federal worker compensations costs through management commitment and involved employees (active duty, civilian and contractors) in Safety and Health Management Systems (SHMS).
- c. Achieve OSHA VPP Star recognition for LOGCOM HQ and subordinate Commands. While achieving Star recognition is a goal within each application area, the ultimate goal is to produce and sustain a world-class SHMS and a culture of continuous improvement at LOGCOM HQ.
- d. Transform the compliance-based OSHA program into a performance-based SHMS.
- e. Involve all Marines (active duty, civilian and contract workers) at LOGCOM in the SHMS.
- f. Create a lasting working partnership between OSHA, LOGCOM HQ leadership, labor and SOH professionals.
- g. Improve SOH accountability at all organizational levels.
- h. Consider contractor performance for new solicitations that require contractor SHMS meet or exceed tenets of VPP. Monitor contractor performance accordingly.

5. BACKGROUND AND SCOPE

- a. Background

- (1) In 1982, OSHA created VPP to recognize and partner with worksites that implement exemplary systems to manage worker safety and health. These sites implement comprehensive SHMS that exceed basic compliance with OSHA standards. This extension beyond compliance is one aspect of the program that is voluntary. To qualify for VPP recognition, applicants must have an effective SHMS in place that meets rigorous performance-based criteria in addition to the relevant OSHA compliance standards. OSHA uses a performance-based checklist to evaluate organizations for Star recognition. They look to see if personnel at all levels of management and non-management are actively involved in the SHMS, not just SOH personnel. OSHA verifies qualifications through a comprehensive on-site review process that is re-evaluated on a 3-5 year basis.
- (2) Sites employing these systems strive to excel by using flexible and creative strategies to provide the best feasible protection for their workers in which productivity, quality, profitability, safety and health are complementary goals. These worksites serve as models for effective safety and health programs in their industries while reducing employee injuries and illnesses well below industry averages.
- (3) VPP Star Sites mentor other worksites interested in improving their SOH programs, conduct safety and health training and outreach seminars and convene safety and health conferences that focus on leading-edge issues.
- (4) Participation does not diminish existing federal employer and employee responsibilities and rights under 29 CFR 1910 and 1960. Compliance with OSHA's requirements and applicable laws remains mandatory. Once a site achieves Star recognition, it must demonstrate continuous improvement to remain in the program.
- (5) The Commanding General, Directors, Supervisors and Employees at LOGCOM will lead the transition from a system managed and led by SOH professionals to a continuously improving "best-in-class" injury and illness prevention SHMS. Employees will take charge of their own safety and occupational health issues and, as importantly, they will assume SOH responsibility for their coworkers. The VPP Office and OSH technical staff will mentor, teach, and provide support to managers, supervisors, and employees. Minimum compliance alone is not sufficient. VPP focuses on exemplary safety and health performance beyond mere compliance. Financial expenditures may not always be required to abate identified hazards. Creativity in determining alternate solutions, clear lines of accountability, responsibility and execution of existing programs and processes will serve as a foundation for an exemplary safety and health management system.
- (6) Organizations that successfully implement VPP take advantage of the creative capabilities of their employees. These same organizations that reach Star

recognition display a culture of continuous improvement, exceed compliance and experience a significant decrease in occupational illness and injury rates. The average OSHA VPP Star Site has illness and injury rates 52% below the industry average.

b. Scope of VPP at LOGCOM

- (1) The Secretary of Defense challenged DoD to implement VPP in May 2003. The Secretary made it clear that VPP would provide the focus to develop "best-in-class" SHMS. The Secretary of the Navy directed implementation of VPP for the US Marine Corps in May 2003. By implementing VPP, LOGCOM can build on existing SHMS creating collaborative partnerships between leadership, employees, SOH Professionals and OSHA. VPP integrates with the key principles of the Alignment and Integration Strategic Plan February 2008. As VPP principles and key concepts are understood across LOGCOM and incorporated into our daily work processes, they strengthen our Operational Risk Management (ORM) program so all active duty, civilians and contractors have fundamental safety situational awareness and a better understanding of the role they play. This includes inherent responsibility and accountability for recognizing and acting to correct unsafe and unhealthy conditions and choices.
- (2) VPP applies to all personnel in LOGCOM: civil servants (both bargaining and non-bargaining), active duty (officer and enlisted) and contractor employees including the subordinate Commands. The ultimate goal is 100% compliance of all Centers and staff.

6. PROGRAM MANAGEMENT/OVERSIGHT AND EXECUTION

a. Program management/oversight

- (1) LOGCOM VPP Office serves as the Command's primary focal point for the LOGCOM VPP effort. SOH organizations/professionals and Centers with functional responsibilities throughout LOGCOM **MUST** be active participants in the effort. Their role in the VPP effort cannot be overstated. Leadership at every level is critical for success and sustainment. Leaders must be proactively engaged in implementation and sustainment efforts.
- (2) The LOGCOM Executive Safety Council (ESC) serves as the Command-level VPP working group. Purpose/scope, membership and administrative responsibilities for the ESC are detailed in the ESC Charter.

b. Execution

- (1) Execution of VPP is the leadership's responsibility. Success and sustainment of VPP is a partnership, between leadership, labor, OSHA, and ALL employees. A commitment to this partnership is necessary.

- (2) LOGCOM will execute VPP through a phased approach which is outlined below. The model below is adapted from the Robins Air Force Base VPP Roadmap. Verbiage has been updated for local application. There are six major phases to the LOGCOM VPP Implementation Plan, each with specific objectives and expectations.

7. PHASE 1: Assessment Phase

a. The assessment phase begins with completion of a baseline VPP gap analysis that covers the application area. This phase objective is to complete a VPP cultural assessment and gap analysis evaluating current SHMS against VPP criteria for the application area. The criteria include the four major elements of VPP: management commitment and employee involvement, work site analysis, hazard prevention and control, and safety and health training. **This phase was completed in November 2009 for LOGCOM HQ.**

b. Assessment preparation

1. In preparation for the assessment and continually thereafter, the application area will create VPP awareness through a standard communication plan. The goal is to create an awareness and exposure to VPP and its primary elements/principles across the entire application area.
2. The application area will also focus on creating a VPP partnership between management and labor representatives.
3. Until a mentor site is assigned by OSHA Region IV the unofficial LOGCOM VPP mentor is Warner Robins Air Force Base (WRAF). The primary role of a VPP mentor is to provide real examples of VPP successes, lessons learned and pitfalls to avoid. The mentor is intended to guide the application area through the VPP process and provide opportunities for the application area to discuss with and observe the in-place elements at a VPP Star Site.

8. PHASE 2: Planning Phase

- a. In the planning phase the site will use the analysis as the basis for determining required actions and for building the action plan to address gaps. During this phase, the site will work with the VPP Office to determine the task assignments according to Departmental knowledge and expertise.
- b. During the planning phase, the site should determine the approach that works best for the site. The ultimate goal is for all of LOGCOM to foster a safety culture in order to better support our Marines in the field. LOGCOM may want to consider using the Implementation Plan Activities Package to help drive the VPP culture and

improvements down to the shop/office levels. With the end goal understood, participants can better determine the most efficient approach to reach this goal. The Passport Project will be used to get employees involved.

- c. VPP Core Teams will help steer these efforts. The teams will include leadership, labor representation, employees, SOH professionals, and other non-SOH professionals (fire, logistics, personnel, training, contracting, etc).

1. The VPP Core Teams are formed to begin working issues identified from the assessment and documented in the gap analysis and action plan. The earlier in the process the teams are formed, the more efficiently the site will be able to begin addressing opportunities for improvement. These teams can serve as the basis for sub- teams formed at the organizational levels.

2. Core Teams' Responsibilities:

(a) Work hand-in-hand with the Executive Safety Council.

(b) Support the Passport Project and all other avenues developed to involve employees.

(c) Meet regularly to assess progress, share ideas, and make recommendations for improvement.

(d) Participate and interact with unit/organizational VPP teams to motivate and inspire innovative initiatives.

(e) Provide feedback and lessons learned to the Executive Safety Council and VPP Office to improve the LOGCOM SHMS and the overall VPP efforts.

3. VPP Core Teams members will be familiar with the gap analysis and how VPP expectations may differ from OSHA program elements. Core Teams will take every opportunity to gain and provide safety, health, and VPP education and awareness. VPP Core Teams should also use VPP CX and LOGCOM VPP Office for assistance as necessary and or as required.

4. Once the teams have validated the findings in the gap analysis and action plan, this will be the new baseline for determining what is required to be completed and the course of action for the VPP Core Teams and leadership.

5. The gap analysis is divided into three maturity levels/phases for completion. The different levels or phases may not be started, initiated, or completed all at the same time. The completed gap analysis and the updates will be done by the VPP Oversight Office using the e-tool. E-tool will serve as the tool for documenting and monitoring progress toward VPP application. In addition to the elements defined by the gap analysis, each gap/task has additional information identified that may help to resolve

the issue. Each gap/task will need to be assigned POC(s) with expected due dates. The POCs may spread across several organizations; whatever it takes to get resolution. The Executive Safety Council will coordinate a proposed application date in order to keep all due dates within reason.

9. PHASE 3: Execution Phase

a. The execution phase begins with initiation of the action plan. This plan is the basis for execution of VPP elements at the site. The objective of this phase is to integrate the actions into operations at the site and complete the actions required. The stages of the gap analysis follow stages of the OSHA Challenge Program. Each stage in this process is a milestone for the candidate VPP site and can receive formal recognition. The three stages of maturity of the VPP requirements and the gap analysis are independent for each of the elements being worked. In general, Stage 1 maturity level indicates whether the program or process is in place at the site. Stage 2 maturity level determines whether personnel across the site are aware of the programs identified under Stage 1. Stage 3 maturity level asks if the program is effective and is meeting the required intent of the element.

b. The goal of the execution phase is to complete all three stages of maturity.

(1) Minimum required elements: The site must complete all OSHA "minimum requirement" (MR) elements to be Stage 3 maturity level. Sites missing an MR element will not be allowed to submit their application to OSHA.

(2) The use of stages of maturity and requirement for all MR elements to be completed to Stage 3 is a Marine Corps specific requirement. This is a critical management tool to enable HQ to determine if a site is prepared to enter Phase 4 and submit their application. For other than MR items, the site will have to demonstrate this level of effectiveness through evaluating program documentation, interviewing personnel at the installation and assessing the site via visual evaluation. Since VPP strives to go above the bare minimum required by law, LOGCOM's approach is to clearly demonstrate the program is effective prior to application submittal. OSHA has agreed to screen our site to ensure LOGCOM is prepared before we submit our VPP application.

(3) The division of the gap analysis is broken down into stages of maturity to allow the site to improve the program in a more systematic way and to allow the site to prioritize what should be worked first.

(4) The site will complete a review of their VPP progress throughout the year and will provide the Executive Safety Council an update at least semi-annually. Each site should consider using outside support for this review to accomplish a quick assessment of the site, assistance in training and assistance with any unresolved issues.

(5)Metrics reporting process

(a)The site will record progress toward completion of the VPP application. Progress will be recorded in the e-tool that is maintained by the DoD VPP Center of Excellence contractor. The VPP Oversight Office will populate the e-tool with task resolution data for reporting purposes.

(b)A Dashboard report will be used for displaying all pertinent information "at a glance" for all LOGCOM reporting as well as tracking LOGCOM progress.

(6)Annual reviews

(a)During execution of VPP, each site will be required to complete annual safety and occupational health reviews. The purpose of this review is to provide proof of continuous improvement and advancement to the goals and requirements of VPP. The gap analysis completed as part of the assessment should be considered the installation's first annual review. An annual review will be submitted to the VPP Office by 1 Sept of each year.

(b)To meet this deadline, the site can use the results of the annual safety program management evaluation and or other safety and health audits, inspections or reviews.

(c) The results of these annual inspections are the basis for what still needs to be pursued in order to meet VPP requirements. Any areas not exceeding minimum requirement level will need to be readdressed and made to meet and exceed guideline levels.

10. PHASE 4: Review Prior to Audit/Certification Phase

a. The review prior to audit/certification phase begins with a request from the site to the VPP Office for assistance to coordinate submission of the VPP application. The objective of this phase is to complete a review of the site's VPP application package and consider conducting an on-site "mock audit" of the site's safety and health program to ensure the site is prepared for the OSHA VPP audit. The site will determine if they are ready to begin this phase based on the following criteria:

(1) All elements and sub-elements of the gap analysis are in place at an effective level. In addition, all OSHA defined MR elements are completed to Stage 3 maturity level.

(2)The civilian TCIR and DART rates evaluated over the last 3 years are below the comparable TCIR and DART rates for the 551114 NAICS.

(3)An annual review has been completed after the initial assessment and performed annually thereafter. At least one of these has been submitted to the OSHA VPP regional office.

11. PHASE 5: Audit/Certification Phase

- a. The audit/certificate phase begins when the VPP application comes into the VPP Office for submission through the chain until it reaches the OSHA VPP regional office for review. The goal of this phase is for LOGCOM to apply to be recognized at the Star level. Although there are several levels of recognition within the VPP, the Star level, which recognizes exemplary safety and health programs, is the LOGCOM established goal.
- b. Once the OSHA regional office has accepted the VPP application, they must ensure an on-site evaluation is conducted within 6 months. It is imperative that during the time between application submittal and the OSHA audit, the site continues to take action on the identified gaps from the initial assessment and on the execution of the site's operation plan to show progress toward completion. If an annual review comes due between application submittal and the OSHA audit, the installation is required to submit the review to OSHA (through the VPP Office). Finally, the site should strive to show continuous improvement in their safety and health programs after their application has been submitted. Once earned, Star level recognition must be maintained by continuing to improve.
- c. After OSHA completes the on-site audit, they will inform the site of the recognition level recommended by the site administrator to the regional VPP coordinator. This process may take up to 6 months.
- d. VPP Office will plan a formal recognition ceremony when the site receives the audit results. Recognition for achieving the level of excellence required to receive VPP Star recognition is important. This is a team accomplishment and deserving of public recognition.

12. PHASE 6: Sustainment Phase

- a. Once a site has been audited by OSHA and earned Star status, the sustainment phase begins. It is critically important that a site not relax standards after the audit or the advances made during the VPP roll out will be lost. Industry experience proves that sustaining the level of effort after the OSHA audit can be even more difficult than the effort to reach VPP Star recognition. The objective of the sustainment phase is an ever-improving safety and health program and a growing culture change.
- b. Sustainment activities will include mentoring other "non-VPP" sites to include other Marine Corps installations and or tenants, other DoD sites or general industry. Mentoring is a requirement of VPP Star sites but will also help the Star site improve. The relationship the site has with its industry mentor site should continue; however, information will not be shared in both directions including from the application site back to the mentor.

c. Once an organization has reached Star recognition, it must continue submitting its annual report as the written review of the organization's safety and health management system.

d. Periodic re-application. After reaching Star recognition, the organization will be required to continue to complete annual reviews and submit them to the VPP Office. In addition, at least every 3 years the installation will be required to submit a re-application to the OSHA VPP regional office. This re-application will include information documented in the initial application and will also include any improvements/program enhancements made since the original application.

e. During sustainment, the site is encouraged to share their successes and lessons learned with other Marine Corps sites that have not yet obtained Star recognition.

13. RESPONSIBILITIES – we are changing our safety culture; changing our way of thinking.

a. LOGCOM Commanding General, Deputy and Chief of Staff

(1) Be the example for the rest of LOGCOM employees to follow.

(2) Assign planning responsibilities for VPP execution.

(3) Charter an Executive Safety Council (ESC). The ESC will include all Senior Executive Staff, Base Commander, Directors, a Union Representative and others as determined necessary.

(4) Routinely evaluate progress toward completion of VPP Star recognition based on established milestones.

(5) Support cross-functional VPP self-inspections.

(6) Provide the first line of resourcing, or resource advocacy, for workplace initiatives.

(7) Ensure implementation of VPP throughout LOGCOM.

b. LOGCOM VPP Oversight Office

(1) Draft the charter, implementation plan, meeting schedule, and other documents as needed.

(2) Serve as the focal point for the LOGCOM VPP effort.

(3) Provide direct liaison support throughout LOGCOM for all VPP efforts, education and awareness training, interpretation of VPP guidance and direction and interface to DoD VPP points of contact, the LOGCOM HQ mentor and OSHA.

(4) Provide review, comment, staffing and coordination on VPP documents.

(5) Establish necessary partnerships to effectively execute VPP.

(6) Disseminate information related to VPP as appropriate.

(7) Assist Directors in the execution of VPP within their organizations.

(8) Serve as administrator/secretary for the Executive Safety Council.

(9) Periodically report progress/recognition to the Commanding General and DoD Center of Excellence.

(10) Review and coordinate with each area on their respective gap analysis tasks and action plans.

(11) Support and or conduct assessments of organizations' VPP.

(12) Coordinate with Navy Safety Center for assessor training.

(13) Collect and maintain information used to close the gap analysis tasks.

(14) Ensure VPP implementation progress is tracked and reported.

(15) Serve as the single POC responsible for inputting the e-tool elements for approval.

(16) Integrates communication efforts to increase the synergy of the cultural change.

c. Executive Safety Council: Refer to the charter.

d. Core Teams: Direction will be provided by the Executive Safety Council.

e. Installations, Environmental, and Safety Office: Subject matter experts all fall under this umbrella and will act as liaisons across all LOGCOM organizations on applicable policies, procedures, plans and processes. IE&S is a critical organization that supports all of LOGCOM.

f. Contracts Division

(1) Serve as advisor in development of contract language and selection of contractors to ensure award criteria includes consideration of each company's historical safety and health record (e.g., TCIR and DART) where applicable.

(2) Ensure all contractual documentation and instruments, where applicable, include required information as submitted by the safety and/or program manager personnel. This will require the contractors, who work a minimum of 1,000 hours in a quarter (OSHA VPP requirement), to submit a site safety and health plan as part of the requirements process.

(3) Ensure procurement policy guidance specifies that all contractors who work a minimum of 1,000 hours in a quarter are responsible for compliance with site safety and health practices and OSHA 300 logs are available for VPP Program Office review..

14. APPROVAL

This implementation plan is effective immediately upon signature.



J. A. KESSLER
Commanding General