



Department of Defense
Voluntary Protection Programs Center of Excellence



*Development, Validation, Implementation and Enhancement for a
Voluntary Protection Programs Center of Excellence (VPP CX)
Capability for the Department of Defense*

Basic Contractor Requirements for VPP

Contract Employees Defined



- Workers who are employed by a company that provide services under contract to the VPP applicant or participant, usually working at the base or at some other government worksite.



VPP Requirements - All Contractors



- All contractor employees must:
 - Comply with OSHA regulations
 - Comply with applicable site safety rules
 - Receive awareness information from the site
 - Key hazards, recognition methods, and controls
 - Key Site safety rules
 - Emergency Procedures
 - Site participation in VPP and VPP fundamentals
 - Receive training from their employer
 - Employee rights under the OSH Act
 - Relevant hazard controls and Personal Protective Equipment (PPE)



VPP Contractor Classification



- There are a number of different terminologies or classifications of contractors used by OSHA at VPP sites:
 - Resident/Imbedded
 - Applicable
 - Nested



Resident Contractors



- A “resident” contractor is one whose employees are regularly integrated with site employees. They are sometimes called “imbedded or “service contractors”.





“Imbedded” Contractors

- VPP sites routinely include “imbedded” contractor employees in the site’s Safety and Health (S&H) employee involvement activities, such as:
 - Safety and health teams and committees
 - Emergency drills
 - Training and awareness programs
 - Problem solving initiatives



Applicable Contractors



- An “applicable” contractor is one whose employees worked at least 1,000 hours for a VPP site in any calendar quarter within the last 12 months and are not directly supervised by site personnel. These may be either resident or construction contractors.



“Applicable” Contractors



- In addition to meeting the requirements for ALL contractors, a site using “applicable” contractors must:
 - Request TCIR and DART rate data for all “applicable” contractors
 - For specialized contracts consider S&H in the contractor selection process
 - Ensure the contracting officer representative (COR) monitors contractor S&H performance and encourage improvement when appropriate
 - Provide for identification and correction of uncontrolled hazards in contractor work areas
 - Ensure the COR stops work until S&H violations are corrected.



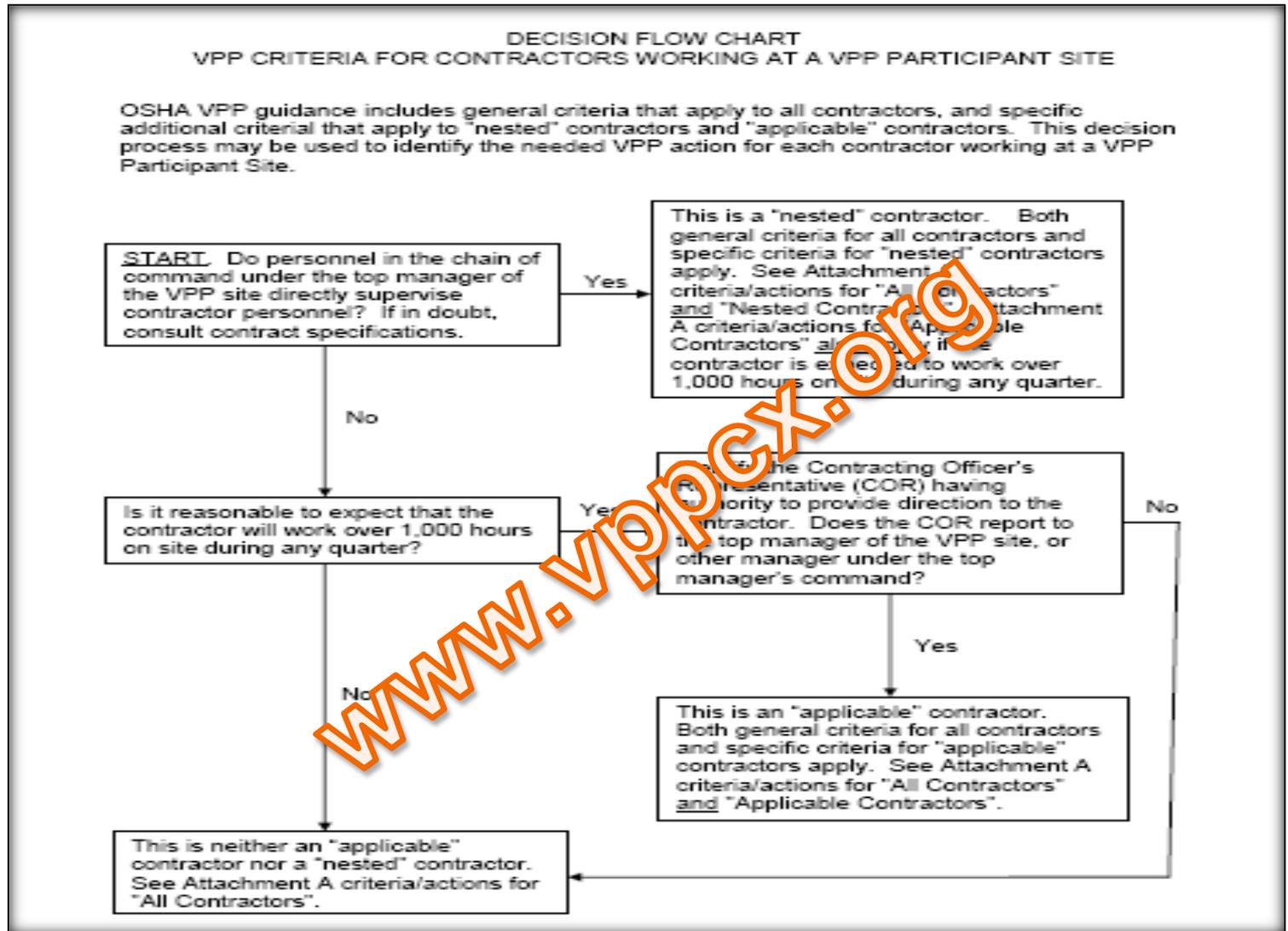
Nested Contractors



- A non-government company that provides on-site supervision. Those supervisors may maintain an office on-site.
- Examples could include:
 - Commissary employees
 - Cafeteria staff
 - Janitorial employees



Contractor Decision Flow Chart



Leadership Responsibilities



- Oversight of contractors (COR's responsibility):
 - Confirm conformance to contract provisions and work control procedures
 - Ensure contractors comply with the safety and health requirements in their contract
 - Track, investigate, and document all contractor on-site injuries and illnesses
 - Provide encouragement to improve S&H performance
 - Work cooperatively to encourage good performance --- NOT by telling them how to do the job



e-VPP Tool Mapping



- This training can be used as part of your site's documentation of action taken to address the following VPP actions:
 - Management Leadership and Employee Involvement – Contract Worker - Gap #'s 46-57
 - Safety and Health Training – Contractors - Gap #'s 241-243

The screenshot shows the eVPP Tool login page. At the top left is the "DoD VPP CX" logo. The page title is "eVPP Tool". Below the title are two input fields: "User Name:" and "Password:". To the right of the "User Name:" field is a "Log In" link. Below the input fields is a "Log In" button. A welcome message follows: "Welcome to the DoD Voluntary Protection Program Center of Excellence's Electronic VPP application (DoD VPP CX e-VPP). The e-VPP represents a convenient and easy to use tool for interested installations to prepare, manage, and submit documentation related to the Department's Voluntary Protection Program, such as an initial application, annual program evaluation, best practices information, and outreach/awareness activities." Below this message is a line of text: "More than 46,000 personnel are participating at military worksites recognized as Voluntary Protection Programs Star Sites." At the bottom, there is an "Announcements" section with two small icons of people. A "NEW:" notice states: "All new user guides and tutorial videos updated for the eVPP Spiral 4 release have been posted to the Help section for each user role. As always, the eVPP development team welcomes your feedback: dcevpndev@cdc.com."





DoD / Marine Corps Guidance

NAVMC Directive 5100.8. “These provisions apply to Marine Corps Government-owned, contractor-operated facilities only if they involve safety and health of Marine Corps personnel”, or in certain situations in which DoD has authority under DOD Instruction 6055.1.

DOD Instruction 6055.1. “This instruction does not apply generally to DoD contractor personnel and contractor operations. The contractor is responsible directly to OSHA for the safety and health of contractors' employees.”





Navy Model

OPNAVINST 5100.23. “Contractor safety and integration into base operations - refer to NAVFAC Safety information on website, including contractor safety guidelines, provided at <http://www.navfac.navy.mil/safety>. NAVFAC Instruction 5100.11J requires that contract selection criteria consider safety records and evaluation of contractor safety performance during contract work as key elements of cost and schedule risk management.”



Knowledge Check



1. How much work must a contractor perform for a VPP site in order to be classified as an “applicable” contractor?
 - a. \$100,000 per year
 - b. \$100,000 per quarter
 - c. 1,000 hours per quarter
 - d. 1,000 hours per month
2. A DoD installation that is participating in VPP and using “applicable” contractors must ensure that the Contracting Officer’s representative for each “applicable” contractor monitors the contractor’s safety and health performance.
 - a. True
 - b. False



Knowledge Check



3. A DoD installation that is participating in VPP is not permitted to include contractor employees in the site's safety and health activities.
 - a. True
 - b. False
4. Which of the following is not required to be covered during the orientation of contractors working at a VPP site? Within VPP, "applicable" and "nested" contractors are defined primarily by two factors. They are:
 - a. Key hazards, recognition methods, and controls
 - b. Site mishap rates
 - c. Key Site safety rules
 - d. Emergency Procedures



Knowledge Check



5. Because NAVFAC has established mature systems for safety and health management of contractors, local NAVFAC organizations can be effective mentors for many VPP sites. An important source of NAVFAC guidance concerning S+H management of contractors is”
- NAVFAC Instruction 5100.23
 - NAVFAC Instruction 6055.1
 - NAVFAC Instruction 5100.8
 - NAVFAC Instruction 5100.11

