# OSHA Revises Safety and Health Program Management Guidelines

The US Occupational Safety and Health Administration (OSHA) is updating its Safety and Health Program Management Guidelines and is seeking public comment on the revisions.

Intended to help employers establish safety and health management plans at their workplaces, the guidelines were first published in 1989. OSHA is updating the document to reflect current technology and practices. According to OSHA, the revised guidelines should be particularly beneficial to small- and medium-sized businesses. And for the first time, the guidelines address ways in which multiple employers at the same worksite can coordinate efforts to ensure employee safety and health.

The guidelines are advisory only and do not create any new legal obligations or alter existing obligations under OSHA standards or regulations. The draft document is designed to provide employers and workers with a sound, flexible framework for addressing safety and health issues in the workplace. The new guidelines build on the previous version, as well as lessons learned from successful approaches and best practices under two OSHA programs: Voluntary Protection Program (VPP) and Safety and Health Achievement Recognition Program (SHARP), and similar industry and international initiatives.

OSHA has made available a draft of the revised document on its website, at www.osha.gov/shpmguidelines, along with a set of questions to consider when reviewing the guidelines. The page also has a direct link to post comments, which will be accepted until February 15. OSHA will take comments into consideration when developing a final set of guidelines.

"The goal of safety and health management is to prevent workplace injuries, illnesses and deaths," said Assistant Secretary of Labor for Occupational Safety and Health David Michaels, PhD, MPH. "Employers who embrace these guidelines will experience lower injury and illness rates, and their progress in improving the safety culture at their worksites will contribute to higher productivity, reduced costs and greater worker satisfaction."

Indeed, a study of small employers in Ohio found that workers' compensation claims fell dramatically after working with OSHA to adopt programs similar to those described in the guidelines, including the following:[2]

- The average number of claims dropped by 52%.
- The cost per claims dropped by 80%.
- The amount of lost work time per claim dropped by 87%.
- The claims per million dollars of payroll dropped by 88%.

## Understanding the guidelines

Key to the guidelines are taking a proactive approach to safety and health, in which employers are focused on prevention of injury and illness rather than a response after the fact, and continuous improvement, in which organizations begin with a basic program and simple goals and the systematically grow from there by setting further goals, monitoring performance, and evaluating outcomes.[1]

According to OSHA, traditional approaches are often reactive, addressing hazards only after a worker is injured or becomes sick, a new standard or regulation is published, or an outside inspection identifies a deficiency. These guidelines promote a focus on prevention, as well as increased worker involvement in safety and health initiatives.[1]

The guidelines address the following aspects of an effective occupational safety and health program:

- **Management/leadership:** Management provides the leadership, vision, and resources needed to implement an effective safety and health program. Business owners, CEOs, managers, and supervisors at all levels are fully committed to continuously improving workplace safety and health performance and regard this as a core organizational value, as well as provide sufficient resources to implement safety and health initiatives.

- **Worker participation:** Workers often know the most about their jobs and any potential hazards. A safety and health program will be ineffective without meaningful participation of workers and (if applicable) their representatives in establishing and operating the program. All workers, including contractors, subcontractors, and temporary staffing agency workers have opportunities to participate throughout program design and implementation, have access to information they need to participate effectively in the safety and health program, and feel comfortable reporting safety and health concerns.

- **Hazard identification and assessment:** The employer has an ongoing, proactive process to identify and assess hazards in order to fix them before they can cause harm to workers. Hazard assessment can lead to opportunities to improve program performance.

- **Hazard prevention and control:** Employers take actions to mitigate or eliminate identified risks. Effective controls protect workers from workplace hazards generally; prevent injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help employers provide workers with safe and healthy working conditions.

- **Education and training:** Employers, managers, supervisors, and workers receive training to ensure that they have the knowledge and skills needed to work safety and avoid creating hazards that could put themselves or others as risk. They should also be able to demonstrate their awareness and understanding of workplace hazards and how to identify, report, and control them. Employees whose work involves unique hazards should receive specialized training to address those risks; also personnel responsible for specific aspects of the safety and health program should receive education about those roles.

- **Evaluation and Improvement:** Employers monitor and evaluate their program's effectiveness as well as progress towards goals, looking at what works and what does not. Employers evaluate the program to verify that it has been implemented as intended and review it periodically. This includes establishing, reporting, and tracking metrics that indicate whether the program is effective, as well as identifying deficiencies and opportunities for improvement. Whenever an employer identifies opportunities to improve the program, make adjustments, and monitor how well it performs as a result. The employer shares the results of monitoring and evaluation within the workplace to help drive further improvement.

- **Coordination and communication on multiemployer worksites:** At many facilities, workers of more than one employer work alongside or interact with each other. Typically, some workers are employed by a host employer (which may be an owner or general contractor) and others by a contractor, subcontractor, or temporary staffing agency. In these settings, employers must establish mechanisms to coordinate their efforts and communicate information to ensure that all workers on site and their representatives can participate in efforts to prevent and control injuries and illnesses, and that workers are afforded equal protection against hazards. **EC**

**References**
1. US Occupational Safety & Health Administration. 2015 Nov. Accessed Dec 5, 2015. https://www.osha.gov/shpmguidelines/SHPM_guidelines.pdf.
2. Ohio Bureau of Workers' Compensation. *Ohio 21(d) SHARP Program Performance Assessment,* 2011.