

# SHARP

## Safety and Health Achievement Recognition Program Oregon Occupational Safety and Health Division

- I. PROGRAM OVERVIEW.** The Safety and Health Achievement Recognition Program (SHARP) is a program that encourages employer self-sufficiency in safety and health management. SHARP is a recognition program which provides an incentive and road map for Oregon employers to work with their employees to find and correct hazards, to develop and implement effective Safety and Health Programs, to continuously improve, and to become self-sufficient in managing occupational safety and health. A SHARP employer is defined as an employer who has successfully incorporated safety and health management principles into their workplace.
- A. SHARP is a program of the Oregon Occupational Safety and Health Division (Oregon OSHA) Consultation and Outreach Section. The overall goal of SHARP is to:
1. Recognize employers for their achievements in workplace safety and health management,
  2. Reduce workplace injuries and illnesses,
  3. Provide a means for showing other employers that occupational safety and health can work--for everyone, and
  4. Encourage employers to rely less on Consultation and more on themselves as they move down a continuum towards self-sufficiency in safety and health management.
- B. Participation in the Oregon OSHA SHARP program does not diminish existing employer and employee rights and responsibilities under the Oregon Safe Employment Act. *Guidance in this document is intended for Consultative staff to use with employers who have requested to become candidates for SHARP.*
- C. Recognition Program. To promote effective safety and health program management, continuous improvement, and to provide models for others to follow, SHARP recognizes employers who implement effective Safety and Health Programs. Recognition is achieved by:
1. Encouraging employers to use Oregon OSHA Consultation, Technical, and Training resources, and to involve their employees in establishing effective safety and health programs. SHARP employers are further encouraged to network with others and to become members of a private SHARP organization (the Oregon SHARP Alliance) which is also devoted to safety and health improvement and networking.
  2. Providing for public recognition of employers and employees as models who have worked together successfully to establish effective Safety and Health Programs. This includes

awarding the employer a SHARP certificate of achievement signed by the Administrator of Oregon OSHA, and using this recognition as a model for other Oregon employers.

D. Program Eligibility. Oregon employers who have been in business for more than one year are eligible to apply for SHARP regardless of size or type of business.

1. Prospective SHARP employers must have had a comprehensive consultation completed within the 12 months immediately prior to pursuing SHARP recognition.
2. The division will emphasize the benefits of SHARP to employers of 250 or fewer employees in high hazard industries.
  - a. SHARP Partnership Agreements will be used for larger sites, multi-location employers and certain service provider clients based on the following criteria. (SHARP Partnerships are further explained in Sections XI through XIII of this document.)
    - i. Multi-Site SHARP Partnership agreements pertain to those employers with more than two physical locations.
    - ii. Large Employer SHARP Partnership agreements are negotiable with employers who have between 251 and 500 employees. Large Employer SHARP Partnership agreements are required for those employers with more than 500 employees at a single location.
    - iii. Service Provider SHARP Partnership Agreements are available for those companies who provide safety and health related services to multiple clients.
    - iv. Leasing/Temporary Agency Partnerships are available for certain Leasing Agencies or Temporary Agencies who are committed to improving the workplace safety and health conditions where their leased or temporary employees work.
3. Successful SHARP candidates should have a Days Away, Restricted or Transfer Rate (DART) that is below the most recently published BLS industry average for their Industrial Classification (NAICS). **Note:** Oregon rates may be used for comparison only after a discussion with the local Field Consultation Manager. If the DART is not below the industry average, there should be a downward trend in those rates over a three-to-five year history.
4. To obtain and maintain SHARP status, management commitment is essential. If a company pursuing SHARP is controlled by a parent corporation or agency, it is essential that those controlling the company understand the SHARP process and the commitment necessary to maintain SHARP status. If during any part of the process, adequate authority, resources and support are not provided, the individual entity may not be able to attain or

maintain SHARP status. Therefore, a discussion with the controlling corporation or agency should occur during the SHARP evaluation process to determine their commitment to the process and to the entity pursuing SHARP.

**II. SHARP COMMITMENT LETTER.** Early in the SHARP process, employers must agree in writing to the following basic tenets of SHARP (a sample SHARP commitment letter can be found on the Oregon OSHA Web site under SHARP Program). Follow-up visits toward SHARP certification, after the initial assessment, will not be completed until receipt of the SHARP commitment letter. The written agreement must be signed and sent to the local Oregon OSHA Field Consultation Manager. In the letter, the employer must agree to:

- A. A comprehensive consultation survey of all conditions and operations at the establishment, including a complete safety and health systems review.
- B. Involve employees in the development, operation, and improvement of all elements of the written workplace safety and health program as well as in the decisions that affect their safety and health. At union and non-union sites, if the employee representatives object to the site's involvement in SHARP, the Field Consultation Manager will advise the employer that the application cannot go forward until both labor and management agree on participation in SHARP.
- C. Work diligently to accomplish the following:
  - 1. Correct all identified safety and health hazards, and provide the local Field Consultation Manager with written confirmation that each identified hazard has been corrected within an agreed upon time frame.
  - 2. Develop, implement, or improve all elements of an effective safety and health management system at the site.
  - 3. Work to maintain a downward trend in injury and illness Days Away, Restricted or Transfer (DART) rates over the most recent five (5) years.
  - 4. Develop and maintain a written safety and health program.
  - 5. Achieve an acceptable rating on the attributes of the Oregon OSHA Safety and Health Program Assessment Tool.
- D. Inform the local Field Consultation Manager prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace. "Changes" mean relocation of facilities, change of ownership or major organizational changes, additions to buildings, new processes, i.e., painting of parts rather than purchasing them already painted, new lines of machinery, etc. "Changes" do not include process changes at construction or other mobile sites.
- E. Notify the local Field Consultation Manager when all elements of SHARP have been fully implemented so a follow-up visit can take place.

A sample SHARP commitment letter can be found on the Oregon OSHA Web site under SHARP Program. Follow-up visits toward SHARP certification, after the initial assessment, will not be completed until receipt of the SHARP commitment letter.

**III. SHARP PROCESS.** SHARP is a process designed to identify the strengths and weaknesses of an employer's occupational safety and health management system. The process normally starts with a written request from the employer. The request initiates an intake for a comprehensive consultation including an initial assessment, followed by a report with recommendations. The process includes one or more action plan meetings between the employer and consultant(s) to identify and begin implementation of objectives designed to meet the goal of achieving SHARP certification.

A. Preparation. Once the employer has requested in writing, the initial pursuit of SHARP and has agreed to the basic tenants, the lead consultant will discuss the intended process with the local Field Consultation Manager to ensure the necessary consultative disciplines are involved in the process.

The preparation for a SHARP consultation will follow the format outlined in G. of the Consultative Services Reference Guide.

B. Conduct of a Visit. In the opening meeting the consultant(s) will review the employer's request for consultation assistance, and will review the program requirements (including the potential for multiple discipline consultations) with the employer to ensure the employer understands the commitment necessary to pursue SHARP.

As the SHARP process progresses from the hazard identification stage to the Safety and Health Program improvement stage, the employer will need to commit additional resources to develop and complete action plans. The employer will be informed that the consultant will remain available to coach the employer and employees to develop or improve any existing elements, and that Oregon OSHA training resources are available to assist with skill development. Achieving SHARP, however, is the employer's responsibility, and Oregon OSHA's time onsite will shorten as the employer builds capacity toward being self-sufficient.

C. Employee Participation. Employers electing to pursue SHARP must be committed to developing a written Safety and Health Program that involves employees in significant ways that affect their safety and health.

Employee representatives must be involved in the consultative process including hazard assessment and action plan formulation.

D. Comprehensive Consultation. A comprehensive consultation of the employer's establishment must be conducted covering all operations, including a complete Safety and Health Program review. All hazards identified will be discussed in light of how the elements of an effective Safety and Health Program will address their continued correction and control.

1. For companies with mobile worksites that are in or working toward SHARP, the consultant(s) shall evaluate a representative number of the mobile worksites during the comprehensive consultation process to ascertain the effectiveness of the company-wide Safety and Health Program.

2. Using the Safety and Health Program assessment tool, and following the guidance found in the Oregon OSHA Consultation Reference Guide, the consultant will conduct an initial assessment of the employer's Safety and Health Program and discuss with the employer the elements of an effective program.
  3. Successful SHARP candidates must achieve an acceptable safety and health program effectiveness rating following the final assessment of their program. If the employer is weak in an area for which safety and health rules have yet to be adopted, such as Ergonomics, or requires long term investment or improvements, such as ventilation systems engineering, SHARP may be attained if the area needing improvement is part of a continuous improvement action plan.
  4. Initial SHARP candidates should have a three- to five-year injury and illness rate that is trending in a downward direction.
- E. Closing Meeting. The closing meeting will be conducted according to the format outlined in G. of the Consultative Services Reference Guide. In the closing meeting, the consultant will:
1. Describe the hazards identified during the consultation, and which program elements would have prevented the hazard from occurring.
  2. Discuss suggested methods of correction, time frames for correction, and any need for referrals to other section staff for hazards beyond the expertise of the consultant.
  3. Describe the adequacies and areas needing improvement of the employer's Safety and Health Program.
  4. Decide with the employer the extent to which additional short coaching sessions may be needed during the interim one year (or longer) period to facilitate and monitor the Safety and Health Program improvement process.
  5. Develop a schedule for one or more visits, which are expected to become less frequent as the employer progresses toward self-sufficiency. During the SHARP process the consultant will remain available for contact with the employer, to help the SHARP applicant move forward.
  6. Arrange to leave at least one copy of the completed Safety and Health Program Assessment Tool (if already completed) with the employer so the employer can use it as a tool to work toward full program implementation.
  7. Remind the employer that at the end of the implementation period, the employer is responsible for requesting a consultation for final, onsite evaluation for SHARP approval.
- F. Written Report. After the consultant conducts the comprehensive consultation, the employer will be advised that a written report explaining the findings of the visit and confirming any correction periods will be provided at a later date.

1. The written report will follow the format outlined in G. of the Consultative Services Reference Guide.
2. All reports must be reviewed prior to mailing according to the format outlined in G. of the Consultative Services Reference Guide.
3. The written report will reflect the consultant's findings and recommendations for hazard correction, and necessary Safety and Health Program improvements.
4. If not already completed as in III.E.6. above, the written report shall include or reference the Safety and Health Program Assessment Tool so the employer can use it to work toward SHARP approval.

G. Action Plan. After the employer has received the written report, the consultant will coach the employer to develop action plans that map out the employer's progress in implementing an effective Safety and Health Program, and other safety or health areas needing long term improvement.

1. The action plan(s) is developed by the employer following the initial comprehensive consultation. The consultant and employer together will discuss the elements of the action plan(s) and the specific time frames for achieving plan items.
2. An action plan outlines the specific steps that will be accomplished by the employer to merit SHARP approval. The action plan should address, where applicable:
  - a. The employer's correction of all identified safety and health hazards which require long term abatement methods, with time frames.
  - b. The steps necessary for the employer to implement parts of an effective Safety and Health Program, with time frames.
  - c. The steps needed to improve any other deficiencies found during the consultative visit(s).

H. Initial SHARP File. Prior to the consultant recommending approval, the consultant and the prospective employer must compile a SHARP file documenting the employer and the consultative process. The following items are required in the SHARP file:

1. Executive Summary. A completed SHARP Packet Executive Summary sheet must be in the SHARP file. The Executive Summary will include:
  - a. Company Description: A description of the company, their size, what they do, make or sell, their operations, organization, facilities or equipment. Comment on any interactions with OR-OSHA during the previous 3 years and/or any recent history including mergers, growth or downsizing. Include significant information about the

workforce (turnover, pace of work, mobile employees, permanent or temporary, demographic information, training levels, etc.).

- b. Synopsis of the SHARP Process: A description of the SHARP process with this company, when it started, who was involved, what was accomplished. (Reference report numbers and dates of visits to create a clear picture of what the SHARP process entailed. Description should be in chronological order.) Summarize the progress made by the company in terms of improvements made in the safety and health management system.
  - c. Claims Data: Completed DART data for the most recent 3 completed years. For companies that are renewing SHARP, add the new year and continue to accumulate the data. Describe any anomalies or trends noted in claims data, and discuss accident investigation procedures. If the rates are above the state average, justify the recommendation for SHARP approval.
  - d. Safety and Health Program Assessments: Describe the findings noted in the initial and final assessments of the company's safety and health management systems. Note areas of program improvement. Note program strengths as well as weaknesses.
  - e. Action Plans: Reference or describe the results of last year's action plan. Include any action items not completed. Describe action plans developed for the coming year. Note relationships to current assessment, as well as time lines, and responsibilities.
  - f. Consultant(s) Recommendations: Consultants statement verifying serious hazards were abated (or effective abatement plans in effect with interim protection in place, with completion dates) and reason(s) why consultant(s) recommend this company be approved as (or to remain) a SHARP company.
2. Assessments. Include copies of the initial and final Safety and Health Program assessment forms, as well as any interim assessments conducted during the SHARP process.
  3. Reports/Verification. Include copies of all the consultation reports generated during the SHARP process and verification that all hazards have been abated, or that action plans are in place to address the long term hazard abatement of complex items.
  4. Action Plans. Include copies of all written action plans developed to address identified hazards and to work toward SHARP. Completed action plans should include documentation on the status of individual action plan items.
  5. Employer Letters. Include copies of all letters from the employer to Oregon OSHA generated during the SHARP process, including the initial letter of commitment addressed to the local Field Consultation Manager, and the letter from the company requesting final SHARP evaluation.

6. Supporting Documentation. Additional supporting or explanatory documents may be included, as necessary or desired, which illustrate the level of excellence of the employers safety and health programs.

**IV. SHARP APPROVAL AND CERTIFICATE ISSUANCE.** When the consultant(s) have verified that the employer has met all of the requirements for SHARP approval and the SHARP file is completed, the SHARP file must be submitted to the local Field Consultation Manager.

- A. The local Field Consultation Manager will verify that the SHARP file is complete and that the employer has met all of the requirements for SHARP approval before forwarding the SHARP Executive Summary with the approval recommendation to the Consultation and Outreach Manager.
- B. Upon receipt of the SHARP Executive Summary, the Consultation and Outreach Manager or designee will review and may approve SHARP certification for the employer.
- C. The initial SHARP certificate will normally be awarded to the employer by a member of the Oregon OSHA management team. The consultant shall schedule the award ceremony at a time that is convenient to both the company and the Oregon OSHA management person.

**V. RENEWING SHARP/CONTINUOUS IMPROVEMENT.** SHARP recognition is granted in 12 month increments. To continue in SHARP, employers must apply for renewal during the last quarter of the approval year by contacting the local Field Consultation Manager (or their designee). If contact has not been made by the renewal date, a letter will be sent informing the SHARP company that they must schedule a renewal evaluation within 30 days or they will be terminated from SHARP.

A. The lead consultant and the SHARP team will conduct an in-depth evaluation to ensure the Safety and Health Program is being effectively maintained and continuously improved. The consultant will evaluate three (3) to five (5) years of injury and illness data and look at trends, injury types and severity. Those employers with incidence rates above their industry averages must be evaluated on a case-by-case basis. In addition to reviewing injury and illness rates, the consultant will:

1. Conduct a hazard assessment of the facility, to verify that workplace hazards at the site remain under control;
2. Review accident and incident investigation reports and 801 forms from the current and previous year and evaluate trends from the most recent three years of OSHA 300 Logs;
3. Assess all 58 elements of the employer's safety and health management program;
4. Evaluate the level and effectiveness of employee involvement in the site's safety and health programs;
5. Review and evaluate the detail and progress in the site's action plans for the previous and upcoming years;
6. Assess the site's continuous improvement and their movement towards self-sufficiency;
7. Assess the effectiveness of the safety committee; and
8. Review the site's written safety programs for effectiveness.

B. Second-year SHARP evaluations will consist of a comprehensive consultation as specified in III.D. of this document. Recognizing that incidence rates fluctuate, Oregon OSHA consultation will evaluate incidence rates as part of the criteria for evaluating third-year and subsequent SHARP renewals. The following approach will be applied to incidence rates of second-year and subsequent SHARP renewals.

1. Compare the SHARP employer's DART to the most recently published BLS average total for all Oregon industries. If the DART is lower than the average, the company can be recommended for renewal.

2. If the SHARP company's DART is above the state average, compare it to the BLS industry average for the specific NAICS which they are classified under. If the DART is lower than the statewide average for their NAICS, the company can be recommended for renewal.
3. If the SHARP company's DART is above the state average for the specific NAICS, the consultant will average the company's DART rates for the last three years and compare them to an average of the three most recently published rates for their industry. If the company's three-year average rate is lower than the average of the three most recently published industry rates, the company can be recommended for renewal.
4. Some SHARP renewal applicants, with limited numbers of employees and/or hours worked, may use a fourth alternative method of calculating incidence rates. The alternative method allows the employer to use the best three out of the most recent four years' injury and illness experience. The alternative method may only be used after discussion with the Field Consultation Manager.

**Note:** To determine whether the employer qualifies for the alternative calculation method, do the following:

1. Using the most recent employment statistics (hours worked in the most recent calendar year), calculate a hypothetical lost workday case incidence rate for the employer assuming that the employer had two cases during the year;
2. Compare that hypothetical rate to the most recently published BLS lost workday case incidence rate averages for the industry; and
3. If the hypothetical rate (based on two cases) is equal to or higher than the BLS average for the firm's industry, the employer qualifies for the alternative calculation method.

For more information on rate calculations, see Appendix E.

- C. For third-year and subsequent SHARP evaluations, the consultant will coach the SHARP employer to take an active and ever increasing role in the SHARP evaluation process. Because the employer should be making progress toward self sufficiency, it is expected that over time the employer will take more of the responsibility for activities associated with their continued improvement and Oregon OSHA's involvement will be limited.
- D. Renewal is dependent on the consultant's assessment of continued program improvement and effectiveness. If all requirements for SHARP are verified as operating effectively by the consultant and improvement is verified, Oregon OSHA will inform the employer that the employer's renewal has been approved.
- E. Subsequent SHARP Recommendations. Prior to the consultant recommending an employer for continuation in the SHARP program, the SHARP file which documents the employer and the consultative process must be updated. The subsequent SHARP file will include an updated executive summary, any new report(s), and the most recent assessment form appended to the initial SHARP packet (see III.H. of this Appendix). Other updated information may be included where applicable.

F. Subsequent SHARP awards. Second-year and subsequent SHARP certificates will normally be awarded to the employer by a member of the consultation team.

G. File retention. Electronic copies of the Executive Summary and all S&HP Assessments will be electronically saved under:

\\Cbs\_osh\DATA\Osha\S\share\Con\_temp\All Consultation\ConTrackDocs

**VI. SCHEDULED INSPECTION DEFERRAL.** An employer who has been approved as SHARP for the second and subsequent years may be deferred from scheduled Oregon OSHA inspections. Inspection deferral is awarded as an acknowledgment by the agency that enforcement resources would be better used at work sites where employees may be at higher risk of injury and /or illnesses.

A. Following the approval of second and subsequent year SHARP participation, the Consultation and Outreach Manager will forward the approval to the Manager of Enforcement, who will defer the establishment from the scheduled inspection lists.

1. The scheduled inspection deferral (SHARP exemption) will be limited to one year, and must be renewed upon the next SHARP renewal. Once awarded, the scheduled inspection deferral may be renewed annually as long as the company continues to be approved for SHARP participation.
2. Upon graduation from the SHARP program, SHARP graduate companies will receive one final SHARP exemption that will last no more than three (3) years.

B. Oregon OSHA will continue to conduct compliance inspections in the following categories: Imminent Danger, Fatality/Catastrophe, Serious Accidents, and Complaints/ Referrals. SHARP companies must continue to abide by OAR 437-001-0700, Recordkeeping and Reporting.

1. In the event of a compliance inspection with a serious or repeat citation, the local Field Consultation Manager will determine whether or not an onsite visit shall be conducted to ensure that the safety and health management system is operating effectively.
  - a. If an onsite visit is warranted, and the consultant believes there is a connection between a serious citation and reduced effectiveness of the safety and health management system, the consultant must recommend that the SHARP employer withdraw from the program.
  - b. If an onsite visit is warranted, and the consultant believes there is no connection, the employer must be counseled on how to prevent a recurrence.
2. If a willful citation is issued or there is evidence that the site's SHARP information was falsified, the employer will be asked to withdraw from the SHARP program. If the employer does not voluntarily withdraw within 5 working days, participation will be terminated. The employer may reapply after 12 months.

**VII. FAILURE TO MEET OR MAINTAIN REQUIREMENTS.** An employer's SHARP approval and/or inspection deferral will be terminated if the Consultation and Services Manager, and the Oregon OSHA Administrator determine the employer failed to meet, or maintain SHARP requirements.

- A. If a SHARP employer fails to renew their SHARP status within two months of their scheduled renewal date, that employer will be automatically terminated from the program.
- B. Except in egregious cases, the employer will be given the opportunity to withdraw from the program, rather than be terminated. Companies withdrawing from SHARP should be encouraged to continue using SHARP criteria and to consider re-applying for SHARP in the future.
- C. Conditional Approval. A SHARP facility that is meeting the spirit of SHARP participation, but falls short in certain areas during the renewal evaluation may be considered for a conditional approval. The conditional approval status must be discussed with the Field Consultation Manager and a planned approach developed for the action plan process. SHARP employers who are not eligible for renewal or graduation will be given one of the following two choices:
  - 1. The employer can agree to a time-specific conditional SHARP approval, not to exceed two years, during which time they will focus on completing an action plan aimed at ensuring they are eligible to renew at the end of that time-frame.
  - 2. The employer will be asked to voluntarily withdraw from SHARP.

**Note:** Conditional SHARP status does not maintain any exemptions from inspection.

**VIII. GRADUATION FROM SHARP.** SHARP companies who have completed four consecutive years in SHARP and who successfully renew for a fifth year may be graduated from the program.

- A. After a SHARP employer completes its fourth year in the SHARP program, the lead consultant will work with the SHARP employer to jointly complete the final SHARP renewal assessment to determine eligibility for SHARP renewal.
1. If the site is not eligible for renewal, they will be given one of the following two choices:
    - a. The employer can agree to a one-year conditional SHARP approval, during which time they will focus on completing an action plan aimed at ensuring they are eligible to renew at the end of that year. **Note:** The conditional approval status must be discussed with the Field Consultation Manager and a planned approach developed for the action plan process.
    - b. The employer will be asked to voluntarily withdraw from SHARP.
  2. If the site is eligible for renewal, the site will be presented with a SHARP graduate plaque and flag.
  3. Graduation occurs during the scheduled month of renewal.
- B. Approximately 3 years after graduation, “graduates” of the SHARP program will lose their SHARP exemption from scheduled Oregon OSHA inspections.
- C. Companies that have graduated from SHARP will remain eligible to be full members of the Oregon SHARP Alliance.
- D. Initially, the role of the Oregon OSHA consultant is that of an expert consultant who takes a leadership role in guiding the prospective SHARP company through the initial consultative process. This leadership role will continue as the company attains their first year SHARP approval.
1. By the first year SHARP evaluation, the consultant should begin to transition from the role of an expert and leader in the process to the role of a coach and mentor to helping the SHARP employer understand how and why to use the safety and health assessment form as an ongoing evaluation tool. As a coach and mentor, the consultant helps the SHARP employer to understand how and why to properly apply the rating system, to analyze and evaluate injury and illness trends, to identify and locate resources available to them, and to conduct their own evaluation.

2. This transition will gradually occur over the period of participation, with the SHARP company taking on more and more responsibility for the evaluation while the consultant teaches and coaches, so that by the final evaluation, the SHARP employer will take the leadership role in the process with the consultant as a resource. When this transition is complete, the SHARP employer has truly become self-sufficient and is no longer dependent upon the consultant for a comprehensive annual evaluation of their safety and health program.

**IX. SHARP GRADUATION ASSESSMENT.** To graduate from SHARP, 4<sup>th</sup> year SHARP employers apply for renewal during the last quarter of the approval year by contacting the local Field Consultation Manager (or their designee) and scheduling the evaluation. If contact has not been made by the final SHARP evaluation date, a letter will be sent informing the SHARP employer that they must schedule a renewal evaluation within 30 days or they will be terminated from SHARP.

- A. For SHARP graduation (fifth- and final-year) evaluations, the consultant will continue to coach the SHARP employer to take an active role in the evaluation process.
- B. The lead consultant and the SHARP employer will conduct an in-depth evaluation to ensure the Safety and Health Program is being effectively maintained and continuously improved. They will evaluate three (3) to five (5) years of injury and illness data including trends, injury types and severity. Those employers with incidence rates above their industry average must be evaluated on a case-by-case basis. In addition to reviewing injury and illness rates, the consultant and the SHARP employer representative(s) will:
  - 1. Conduct a hazard assessment of the facility to verify that workplace hazards at the site remain under control.
  - 2. Review accident and incident investigation reports and 801 forms from the current and previous year and compare them to any trends noted from the evaluation of OSHA 200 / 300 Logs.
  - 3. Assess all 58 elements of the employer's safety and health management program.
  - 4. Evaluate the level and effectiveness of employee involvement in the site's safety and health programs.
  - 5. Review and evaluate the detail in and the progress on the site's action plans for both the previous and the upcoming years.
  - 6. Assess the site's continuous improvement and their movement toward self-sufficiency.
  - 7. Assess the effectiveness of the safety committee.
  - 8. Review the site's written safety programs for effectiveness.
- C. The consultant should discuss with the employer the importance of continuing the annual self-assessment process as part of their ongoing quest for continuous improvement.

**X. SHARP GRADUATION RECOMMENDATION.** Prior to the consultant recommending an employer for graduation from the SHARP program, the SHARP file must be updated. The SHARP file will include an updated executive summary, any new report(s), and the most recent assessment form appended to the initial SHARP file. Other updated information may be included where applicable.

A. Final SHARP File. Prior to a graduation recommendation, the consultant and the employer must compile a SHARP file documenting the consultative process. The following items are required in the SHARP file:

1. Executive Summary. A completed SHARP Packet Executive Summary sheet must be in the SHARP file. The Executive Summary will include:
  - a. Company Description: A description of the company including size, type of business, operations, organizational structure, facilities and type of equipment. Comments on interactions with OR-OSHA during the previous years and recent history including mergers, growth or downsizing should be included. This section should also contain significant information about the workforce (turnover, pace of work, mobile employees, permanent or temporary, demographic information, training levels, etc.).
  - b. Synopsis of the SHARP Process: A description of the SHARP process with this company, when it started, who was involved, what was accomplished. (reference report numbers and dates of visits to create a clear picture of what the SHARP process entailed. Description should be in chronological order.) Summarize the progress made by the company in terms of improvements made in the safety and health management system. Summarize the impact the SHARP process has had on the workplace culture.
  - c. Claims Data: DART data for the most recent 5 (five) completed years. Describe any anomalies or trends noted in claims data and discuss accident investigation procedures. If the rates are above the state average, the recommendation for SHARP graduation must be clearly justified.
  - d. Safety and Health Program Assessments: Describe the findings noted in the SHARP assessments of the company's safety and health management systems. Note areas of program improvement related to the SHARP process, as well as program strengths and weaknesses.
  - e. Action Plans: Reference or describe the results of last year's Action Plan. Include any action items not completed. Describe action plans developed for the coming year. Note relationships to current assessment, as well as time lines, and responsibilities.
  - f. Consultant(s) Recommendation: Include a statement verifying serious hazards were abated (or effective abatement plans with interim protection in place, including completion dates) and list the reason(s) why consultant(s) recommend this company be approved as a SHARP graduate.

2. Reports/Verification. Include copies of available consultation reports generated during the SHARP process and verification that all hazards have been abated, or that action plans are in place to address the long term hazard abatement of complex items.
  3. Supporting Documentation. Additional supporting or explanatory documents may be included, as necessary or desired, which illustrate the level of excellence of the employers safety and health programs.
- B. SHARP Graduation Awards. When the consultant has verified that the employer has met all of the requirements for SHARP approval and the SHARP file is complete, it must be submitted to the local Field Consultation Manager for review.
1. The Field Consultation Manager will verify that the SHARP file is complete and that the employer has met all of the requirements for SHARP approval before forwarding the SHARP Executive Summary with the approval recommendation to the Consultation and Outreach Manager or their designee.
  2. Upon receipt of the SHARP Executive Summary, the Consultation and Outreach Manager or their designee will review and may approve SHARP graduation for the employer.
  3. The SHARP graduation plaque and flag will normally be awarded to the employer during a graduation award ceremony.
    - a. A member of the Oregon OSHA management team will normally award the SHARP graduation plaque and flag to the employer. The award ceremony will be scheduled at a time that is convenient to both the company and the Oregon OSHA management representative.
    - b. The Consultant or SHARP Program Manager will notify Oregon OSHA's Public Information Officer (or a designee as identified in Oregon OSHA SOP-21) about the employer's reaching SHARP graduate status, and make arrangements for a news release and other communications or public relations products to be written and distributed. Notification should occur four weeks prior to any scheduled "graduation ceremony", whenever practical, to allow time for the PIO to gather information, produce materials and schedule resources to photograph an award ceremony.

**XI. SHARP Partnerships.** The SHARP program was designed for employers with 250 employees or less. Oregon OSHA has developed a SHARP Partnership process to enable larger employers, multi-site employers and certain companies that provide a service to their clients the opportunity to attain SHARP status.

- A. The SHARP Partnership process requires the multi-site partner company to commit additional up-front resources to the SHARP process so that Oregon OSHA Consultation can assist them without over committing Oregon OSHA resources . The multi-site partner company will choose an internal SHARP team that will receive specific training to improve their ability to assess their own sites.
- B. In these SHARP Partnerships, Oregon OSHA and multi-site or service provider companies recognize that by working together more of their worksites or client sites can achieve SHARP recognition. And, through effective safety and health programs more workers will be protected.
  - 1. Partner companies and Oregon OSHA mutually recognize the importance of providing a safe and healthful work environment. To advance our mutual goal, we agree on the need to develop partnerships that foster mutual trust and respect for the respective roles of each organization in the occupational safety and health processes. We recognize the responsibilities inherent in these roles. We are committed to working as partners to achieve occupational workplace safety and health through shared strategies and objectives.
  - 2. The goal of the partnership is to decrease injuries, illnesses, fatalities, lower workers' compensation costs, and maximize Oregon OSHA and multi-site partner company resources.
  - 2. These partnership agreements will not in any way affect employees' rights under the Oregon Safe Employment Act and Oregon OSHA regulations.

C. Types of SHARP Partnerships

- 1 Multi-Site SHARP Partnership agreements (for employers with more than two physical locations).
- 2. Large Employer SHARP Partnership agreements (negotiable with employers who have between 251 and 500 employees, required for employers with more than 500 employees at a single location).
- 3. Service Provider SHARP Partnership Agreements (for those companies who provide safety and health related services to multiple clients).
- 4. Leasing/Temporary Agency Demonstration Partnerships (for certain Leasing Agencies or Temporary Agencies who are committed to improving the workplace safety and health conditions where their leased or temporary employees work).

**XII. SHARP Partnership Process.** In the SHARP Partnership agreements the partner company will choose one site (representative of their major processes) to go through the SHARP process, including an initial assessment, action planning, and a final assessment by Oregon OSHA Consultation. (Note: In some cases, this one site may have gone through the SHARP process prior to the partnership agreement. In other cases, a new site may be chosen.)

A. The partner company will designate personnel to be on their “Internal SHARP Team” Some members of the team will be given the opportunity to accompany OR-OSHA consultants as they evaluate the chosen worksite.

1. Oregon OSHA will provide training to the multi-site partner company’s chosen Internal SHARP Team and provide them with the knowledge and tools necessary to evaluate a safety and health management system using the Safety and Health Program Assessment Form. This will enable the Internal SHARP Team to evaluate the individual worksites of the multi-site company and help them improve their safety and health management systems to a level required to achieve SHARP.
2. Members of the Internal SHARP Team will work together with their management team to evaluate the safety and health management systems of individual partner sites using the Oregon OSHA assessment tool.

B. When the multi-site partner company’s Internal SHARP Team has evaluated one of their sites and determined that they are qualified for SHARP, they will notify OR-OSHA Consultation via the SHARP commitment letter that they are ready for a SHARP consultation.

1. Prior to the consultation, consultants working with SHARP partnership sites will familiarize themselves with the written multi-site partnership/collaboration agreement, familiarize themselves with the nature of work and applicable rules covering the site, and have a discussion with the field consultation manager prior to opening with the site. The consultant will hold a pre-consultation meeting with the applicable members of the Internal SHARP Team to discuss and review the work done with the site leading up to the recommendation. The consultant will then conduct the comprehensive consultation with members of the internal team, including them in the site inspection, safety and health program review, and employee interviews.
2. If the partner worksite’s safety and health program qualifies, the consultant will initiate the SHARP approval process.
3. If the partner worksite’s safety and health program does not qualify, the site will be encouraged to develop an action plan to improve the deficiencies.

C. SHARP Partnerships will be re-evaluated every two to three years to determine effectiveness and re-initiation.

**XIII. Service Provider and Leasing/Temporary Agency Demonstration Partnerships.**

SHARP Partnerships may be negotiated with companies who provide safety and health related services to clients or companies that provide leased or temporary employees to their clients, and take an active role in helping client sites improve workplace safety and health conditions. These partnerships are intended to enable the service provider to provide their clients with effective tools to help them better manage their safety and health programs.

- A. Because SHARP employers are expected to promote effective safety and health program management and to be models for other employers, leasing/temporary agencies wishing to achieve SHARP will be held to a higher standard than that defined in Program Directive A-246, Inspection Criteria: Temporary Employment and Leasing Agencies, if they wish to pursue recognition as an Oregon SHARP employer.
  
- B. The leasing/temporary agencies working toward SHARP are expected to go above and beyond simple compliance. They are expected to assist the host employer wherever possible to ensure adequate protection for all SHARP agency temporary or leased employees is provided. Adequate protection must include the following:
  - 1. Hazard control
  - 2. Site specific training
  - 3. Personal protective equipment
  - 4. Safety committee representation
  - 5. Accident reporting
  - 6. Record keeping
  - 7. Accident and incident investigation
  
- C. SHARP leasing/temporary agencies are expected to establish partnerships with their clients (the host employer) for the express purpose of assuring a safe place of employment is provided for agency personnel.
  
- D. In those cases where the host employer refuses to control hazards or provide protection, a SHARP leasing/temporary agency would be expected to refuse to provide leased or temporary employees.