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BOP #4B (formerly 4.09.03)

Document Title: On-Site Consultation - SHARP

Approval Authority: Bureau Chief

A. PURPOSE

The Bureau Operating Procedure (BOP) outlines the process for delivering Consultative Services and awarding SHARP status to an employer.

B. SCOPE

This procedure applies to on-site consultation visits for SHARP.

C. DEFINITIONS

See Bureau Operating Procedure 4A and CPPM for additional definitions if needed.

SHARP - Safety and Health Achievement Recognition Program

SHARP – Employer Eligibility and Program Requirements – (from CPPM Chapter 8)

Employer must:

- be a single fixed site
- have at least one year of operating history
- have reduced their DART & TRC to below the most recently published BLS industry average
- request a full service visit & correct all identified hazards
- have implemented and maintained a S/H management system
- score at least 2 on all 50 basic attributes in the Form 33, and stretch attributes must be scored
- agree to notify Consultative Services about changes

Pre-SHARP - This phase includes the first full service on-site visits where the employer is preparing for a future SHARP approval. The maximum deferral period is 18 months from the original survey request date.

SHARP Approval Phase – This phase includes a subsequent on-site visit by each Consultant with a review of the employer's actions towards SHARP approval. The exemption period is up to 24 months from the date of approval.

SHARP Renewal Phase – This phase includes subsequent on-site visits by each Consultant with a review of the employer's status and progress in SHARP. The deferral period is up to 24 months from the date of approval.

SHARP Annual Safety and Health Management System Review - This phase involves the employer's completion of the SHARP Annual Safety and Health System Review Template which is submitted to the Bureau Chief for review and forwarded to the Consultant for review.

D REQUIREMENTS

1. All consultation activity shall be performed within the accepted guidelines found in the CPPM as well as established bureau and divisions operating procedures and requirements.
2. The employer must agree to abate all serious and non-serious hazards identified during the survey.

E. ACTION STEPS

Pre-SHARP

P1. An employer who is interested in participating in SHARP and meets all the requirements in CPPM Chapter 8, may request a full service, comprehensive visit by completing and submitting the Consultative Services request form.

P2. The Processing Assistant processes the request and processes the interim inspection deferral.

P3. The supervisor(s) assigns Consultants to conduct on-site visits.

P4. The safety consultant and the health consultant conduct full service visits, jointly or individually.

P5. The Form 33 is filled out jointly by the Consultants and will constitute the Action Plan. All basic attributes in the Form 33 scored less than 2 will have a comment describing actions necessary or suggested to improve to at least a 2. The Consultant completing the last report will mail the Form 33.

Note: If the consultants believe the employer has an existing exemplary safety and health program and meets all the requirements in Chapter 8, the consultant may recommend the employer for SHARP approval at that time. Refer to step A5.

P6. Each consultant completes a written report for their visit, mails it to the employer, and assembles the case file. The Form 33 is included with the report.

P7. If hazards are found during the visit, the Consultants may conduct Follow-Up visits to confirm the abatements and document the results on a new consultation visit form.

P8. If the employer shows promise of successfully fulfilling the requirements for SHARP, and the employer commits to instituting the Form 33 Action Plan items to fulfill SHARP requirements, the Consultants will inform the Processing Assistant and their Supervisor that the employer is a participant in the Pre-SHARP Phase. Ideally, the Consultants will recognize during the survey that the employer is capable of attaining SHARP Approval and will score all 50 basic items and the 8 stretch items on the Form 33 so that a comprehensive Action Plan can be provided.

P9. The Consultants will ensure that “SHARP” is entered in block 11 of the request form at this time.

SHARP Approval Phase

- A1. If initial visits are conducted (in lieu of Follow-ups), each Consultant completes a written report for their visit, mails it to the employer and assembles the case file. The Form 33 is completed jointly by the Consultants and will constitute the Action Plan to maintain SHARP. All 58 items on the Form 33 shall be scored; however, scores on the 8 “stretch” items do not affect SHARP Approval. The Consultant completing the last report will include the Form 33 in his/her mailing.
- A2. If hazards are found during the initial visits, the Consultants may conduct a Follow-Up visit to confirm the abatements and document the results on a new consultation visit form.
- A3. If the Consultants believe the employer is worthy of SHARP Approval, the employer is asked to draft a letter addressed to the Bureau Chief requesting SHARP approval. The employer’s letter shall describe the employer’s commitment to maintain an effective safety and health program.
- A4. The Consultants prepare the SHARP Approval Form and provide their recommendation for SHARP Approval. Case files are then forwarded to the Supervisor(s) for review. The Safety Consultant and Health Consultant complete their SHARP case files in accordance with BOP 4.09.03.
- A5. The Consultant who completes their case file last is responsible to complete the SHARP Evaluation and Approval Form (or the SHARP Renewal Evaluation and Approval Form) with input from the other Consultant and include the form in the case file.
- A6. Each Consultant forwards their case file to the Supervisor(s).
- A7. Supervisor(s) reviews for compliance with the SHARP requirements in CPPM Chapter 8.
- A8. If two Supervisors are involved, they will conduct a joint review of the files to determine a combined recommendation and forward the files to the Processing Assistant if approved.
- A9. Any files that are not approved are returned to the Consultant.
- A10. The Supervisor(s) sends the files to the Processing Assistant to log the files into the SHARP Status Log, who then forwards the case files to the Bureau Chief.
- A11. The Bureau Chief reviews the files for completeness and discusses any open issues with the Supervisors or the Consultants.
- A12. Upon approval of the SHARP Status, the Bureau Chief forwards the case files to the Processing Assistant. At this time, the Processing Assistant will also enter the Special Program Satisfied information on the Case Status Report associated with the request. The Bureau Chief will then send an email to each Consultant informing them of the approval.

A13. The Processing Assistant logs the approval, generates the SHARP certificate, and notifies the Consultant(s) that the certificate is ready for delivery to the employer.

A14. The SHARP Certificate package is provided to the employer.

A15. Rejected SHARP case files are returned to the Supervisor(s) with documented comments and not approved until additional information is provided. If SHARP status is not approved, the Supervisor will ensure that the employer is notified personally by the Consultant.

SHARP Renewal Phase

R1. Ninety days prior to the expiration of the exemption period, the Supervisor(s) are responsible for alerting Consultants to contact the employer so that the employer may request SHARP renewal by requesting a full service safety and health survey.

R2. The Safety Consultant and the Health Consultant conduct initial visits, jointly or individually.

R3. Each Consultant completes a written report for their visit, mails it to the employer, and assembles the case file. The Form 33 is filled out jointly by the Consultants and will constitute the new Action Plan to maintain SHARP. The Consultant completing the last report will include the Form 33 with his/her mailing. All 58 items on the Form 33 shall be scored; however, scores on the 8 “stretch” items do not affect SHARP Approval.

R4. If hazards are found during the initial visit, the Consultant may conduct a Follow-Up visit to confirm the abatements and document the results on a new consultation visit form.

R5. The Consultants then prepare the SHARP Approval Form and provide a recommendation for SHARP Renewal approval and forward the SHARP case files to the Supervisor(s) for review.

R6. If the employer is recommended for SHARP Renewal, the Supervisor(s) ask the Processing Assistant to process an exemption period of up to 24 months from the date of approval. In cases when an employer has an exceedingly strong program, low number of hazards and DART and TRC rates significantly below their industry average, the consultants and supervisor may recommend a three year renewal.

R7. In the event of a SHARP renewal denial or employer voluntary withdrawal, see W1-W8 below.

SHARP Annual Safety and Health Management System Review

S1. The **SHARP Annual Safety and Health Management System Review** document will be mailed to the participating employer in the month of January.

S2. The employer will complete the **SHARP Annual Safety and Health Management System Review** document and return the document to the attention of the Consultation Bureau Chief for review by the end of February.

S3. The Processing Assistant will file the **SHARP Annual Safety and Health Management Review** document in the original file and forward a copy of the document to the respective Consultants.

S4. If the Consultant has questions or comments relating to the **SHARP Annual Safety and Health Management System Review** document they may contact the Bureau Chief or Supervisor, and shall refer to W1-W8 below.

S5. In the event the annual SHARP Annual Safety and Health Management System Review document indicates that a fatality, catastrophic event, or other conditions which may affect the employer's qualification for SHARP, the Bureau Chief will refer to the recommendations outlined in CHAPTER 8 of the CPPM, and shall refer to W1-W8 below.

SHARP Denial of Renewal Request or Voluntary Withdrawal

W1. If a SHARP business/site is closed the consultants shall write an explanatory memo to their supervisor who will review same with the Bureau Chief. Upon approval by the Bureau Chief the memo shall be added to the latest SHARP files and the site will be removed from the SHARP Log by the Processing Assistant.

However, if during a scheduled SHARP renewal visit or annual evaluation an employer does not meet the minimal SHARP criteria, or if the employer voluntarily withdraws, the following steps will be followed.

W2. The consultants notify the district supervisor, in writing, that the employer will not qualify or has elected to withdraw.

W3. The supervisor will review the consultant recommendations, followed by the bureau chief, at which time a decision will be made and consultants notified by the supervisor.

W4. The consultants will subsequently notify the employer. As appropriate/approved, the employer may be given the opportunity to continue in the program as pre-SHARP, may withdraw from the program voluntarily, or is notified that their SHARP status has been withdrawn.

W5. The consultant will discuss with the employer the reasons for the decision and the procedures for reapplying for SHARP.

W6. For a SHARP renewal visit report, the denial decision, the reasoning and the requirements for future SHARP consideration will be included in the executive summary. The consultants shall also complete a SHARP Approval Form.

W7. In the event the employer withdraws voluntarily, the consultants will request a letter of withdrawal that includes the employer's reason(s). The employer shall also be requested to return their SHARP certificate (if unexpired). Any documents received will be included the latest case file(s).

W8. In the case of a denial resulting from a scheduled SHARP annual review, the consultants draft a letter from the bureau chief to the employer containing the reason(s) for the denial and outlining the requirements for re-entry into the program. The final copy (signed by the bureau chief) is placed in the latest case files.

F. DOCUMENT CONTROL

1. The content of this BOP is the responsibility of the Bureau Chief.
2. Requests for interpretation of the provisions of this procedure and suggestions for changes should be addressed to the Supervisor or Bureau Chief.
3. This document is maintained electronically.

G. REVISIONS

Rev. 1 – 03/10/2003 Moved Consultant Checklist from Attachments to References Added Consultation Case File Reminders Checklist as Attachment

Rev. 2 – 12/10/2004 SHARP process simplified and clarified.

Rev. 3 – 01/25/2007 SHARP process revised in accordance with CHAPTER 8 of the CPPM.

Rev. 4 – 07/11/2007 Made use of "Request for Extension of Original Abatement Date" form mandatory

Rev. 5 – 01/05/2012 Added the formal procedure in the form of the "Failure to Meet status and Process of SHARP Status Withdrawal" to Action Steps.

Rev 6 – 01/01/2014 Updated language to OSHA Express and combined SHARP approval process with this.

Rev 7 – 04/27/2016 Updated language to reflect small changes for CSP 02-00-003 (the new CPPM).

Rev. 8 – 06/16/2017 Included option for three year SHARP renewal in paragraph R6. The CPPM has that option and it was added to this procedure for clarity and consistency.