

OSHA's Safety and Health Achievement Recognition Program (SHARP)

Safety and Health Achievement Recognition Program. SHARP is designed to provide incentives and support to those employers that implement and continuously improve effective safety and health management system(s) at their worksite. SHARP participants are exempted from OSHA programmed inspections for at least one year.

- A. Employer Eligibility. Employers who request a consultation visit may be considered for participation in SHARP. In order to begin this process an employer must:
1. Employ not more than 250 employees at the site and not more than 500 at all sites, corporation-wide (in the U.S.).
 2. Be in an industry that OSHA considers a high-hazard industry.
 3. Be a single, fixed worksite.
 4. Have at least one year of operating history.
 5. Have reduced the Days Away, Restricted work activity, and/or job Transfer (DART) Case Rate and Total Recordable Case (TRC) rate at or below the national average for its industry.
- B. Program Requirements. Employers requesting approval for SHARP must:
1. Request and receive a full service visit, for both safety and health, and a comprehensive review of their safety and health management system. In addition, all hazards found by the consultant(s) must be corrected;
 2. Receive a score of at least "two" on all fifty basic attributes of the Safety and Health Program Assessment Worksheet (OSHA Form 33). Additionally, all "stretch items" of the OSHA Form 33 must be scored;
 3. Agree to notify the Consultation Project Manager prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace;
 4. Have implemented and maintain a safety and health management system addressing, at a minimum, the major elements of the 1989 Safety and Health Program Management Guidelines (as measured by the Safety and Health Program Assessment Worksheet, Form 33). Although not a requirement for participation in SHARP, a written safety and health management system as described in the 1989 Safety and Health

Program Management Guidelines is strongly recommended.

All elements of an effective safety and health management system must be fully operational.

If hazards are found during the onsite evaluation, the Consultation Project Manager must be confident that the safety and health management system will operate effectively. If the hazards found reflect deficiencies in the safety and health management system, the site cannot be recommended for SHARP approval until the deficiencies have been corrected and the Consultation Project Manager is confident that the safety and health management system will operate effectively.

A mutually agreed upon Action Plan for the continuous improvement of the employers Safety and Health Management System will be developed for correcting deficiencies that may exist.

C. Regional Administrator. Upon receipt of written verification that the employer has met all of the SHARP program requirements, the Regional Administrator will:

1. Provide the SHARP certificate to the employer, including the company's name, location, and period of exemption;
2. Notify the appropriate OSHA enforcement authority so that the company can be removed from the General Programmed Inspection Schedule for the approved exemption period, which begins on the date the Regional Office, approves the employer's participation;

D. Duration of SHARP Status.

All initial approval and initial renewal of SHARP status will be for a one year period, commencing from the date that the regional office approves the SHARP application. After the initial approval, the renewal period for SHARP status can be extended for two (2) years, at the recommendation of the Consultation Project Manager.

E. Inspection Deferral. An employer who meets all of the eligibility requirements for the SHARP program, corrects all hazards identified during the consultation visit, may be granted inspection deferral if they show reasonable promise of achieving milestones and time frames agreed upon for reducing the LWDII and TRCR and/or correcting some program deficiencies. The deferral time frame recommended by the Consultation Project Manager, including extensions, must not exceed a total of 18 month from the expiration of the correction due date(s). All of the following criteria must be met prior to granting an inspection deferral.

The employer must:

1. Post the list of Hazards identified by the consultant.
2. Provide information on all serious hazards identified by the consultant to employees and inform employees when hazards are corrected.

3. Correct all hazards identified by the consultants.
4. Show evidence of having the foundation of a safety and health management system.
5. Implement the Action Plan developed by the consultant outlining the necessary achievements and time frames required for the employer to achieve SHARP status. The employer must provide progress reports to the Consultation Project Manager.
6. Post a letter from the Regional Administrator approving inspection deferral status.
7. Agree to a full service comprehensive visit at the end of the deferral period, which initiates the SHARP application process.
8. Agree to notify the Consultation Project Manager prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace.
9. Involve employees in the safety and health management system, including the implementation of the Action Plan.
10. Be capable of reducing the site's Days Away, Restricted work activity, and/or job Transfer (DART) Rate and Total Recordable Case rate (TRC) to below the industry national average within the deferral period.

F. Renewal Requirements.

Employers at SHARP sites must apply for renewal during the last quarter of the exemption status. To remain in the program, employers will receive a full service, comprehensive visit, continue to meet all eligibility criteria and program requirements, and agree to conduct an interim-year self-evaluation. To receive a two-year exemption, the employer must agree to submit a written report that is based on the required elements of the 1989 Safety and Health Program Management Guidelines and includes OSHA 300 log data.

G. Changes that May Affect a SHARP Employer's Eligibility

1. Relocation. Employers planning to relocate their facilities must notify the Consultation Project Manager sixty days in advance of the move, and a consultant must visit the new site within thirty days after the new site becomes operational to ensure that an effective safety and health management system is in place and that the employer still meets all the requirements for exemption. If this is not the case, the Consultation Project Manager must ask the employer to withdraw from the program.
2. Change in Ownership and/ Organizational Changes. Whenever ownership or major organizational changes occur that may impact the effectiveness of the company's safety and health management system, the Consultation Project Manager must discuss the changes with the employer and schedule an onsite visit, if necessary.

H. OSHA Inspections at SHARP Sites. The following types of incidents can trigger an OSHA enforcement inspection at SHARP sites:

1. Imminent danger;
2. Fatality/Catastrophe;
3. Formal complaints; and

4. Only referrals from person(s) acting as an agent for the employee(s) (e.g. doctor), to an enforcement office, regarding working conditions will be treated as a formal complaint.

- I. Fatalities or Catastrophes at a SHARP site. In the case of a fatality or catastrophe, 3 or more hospitalized in one incident, at a SHARP site, the employer must notify the OSHA Area Office within 8 hours of the incident. The Area Director must notify the Consultation Project Manager as soon as possible after notification of the incident. Until all citations have been issued, Consultation personnel must not discuss with the employer any issues related to the fatality or catastrophe. After all citations have been issued, the Consultation Project Manager must evaluate the SHARP status of the work site.

- J. Failure to Maintain Program Requirements. If an employer fails to maintain the participation criteria outlined in this chapter, the Consultation Project Manager should give the employer the opportunity to voluntarily withdraw from the program.

- K. Voluntary Withdrawal from the Program. Any approved SHARP participant may withdraw at any time. Withdrawal may occur as a result of plant closing, economic difficulty, change in management, or at the request of the Consultation Project Manager. To withdraw, the employer must send a letter explaining the withdrawal and return the SHARP certificate to the Consultation Project Manager. The withdrawal is effective immediately upon receipt of the letter. The Consultation Project Manager will notify the Regional Administrator or State Designee on the employer's withdrawal from SHARP.

- L. Termination. If an employer fails to maintain the participation criteria outlined in this chapter and refuses the opportunity to voluntarily withdraw from the program, the Consultation Project Manager will request that the Regional Administrator or State Designee terminate the employer's participation in SHARP. The employer and the Area Office must be notified in writing when SHARP participation is terminated. The written notice must contain the reason(s) for termination and outline the requirements for re-entry into the program.

Days Away, Restricted work activity, and/or job Transfer (DART) Case Incidence Rate.

Rate of recordable injuries and illness cases per 100 full-time employees resulting in days away from work, restricted work activity, and/or job transfer that a site has experienced in a given time frame.

The annual DART rate is calculated according to the following formula:

$$\text{DART rate} = \frac{\# \text{ of Recordable injuries and illnesses} \times 200,000}{\# \text{ Employee hours worked}}$$

Where:

Recordable injury and illnesses = sum of entries in Columns H and I from the OSHA Forms 300 (and 300A) in the reference year.

Employee hours worked = sum of employee hours worked in the reference year.

200,000 = base for 100 full-time workers working 40 hours per week, 50 weeks per year.

Sample One-Year Rate Calculation:

In calculating the DART rate of an establishment scheduled for inspection in October 2004, injury and illness cases and employment data for the preceding calendar year is used.

DARTs in 2003 = 5

Workers employed in 2003 = 54

Employee hours worked in 2003 = 54 workers x 40 hours x 50 weeks = 108,000

$$\text{DART rate} = \frac{5 \times 200,000}{108,000}$$

$$= \frac{1,000,000}{108,000}$$

$$= 9.26 \text{ (rounded to 9.3)}$$

Total Recordable Case (TRC) rate

The Total Recordable Case (TRC) is the rate of total non-fatal injuries and illnesses for the calendar year reviewed. The TRC is the total of all recordable injury and illness cases. This includes cases that experience days away from work (column H), job transfer or restriction (column I) and other recordable cases (column J) from the OSHA's Form 300 multiplied by 200,000 and then divided by the number of employee hours worked.

The annual TRC is calculated according to the following formula:

$$\text{TRC} = \frac{(\# \text{ days away from work} + \# \text{ job transfer or restriction} + \# \text{ other recordable}) \times 200,000}{\# \text{ Employee hours worked}}$$

Where:

Recordable injuries and illnesses = sum of Columns H, I, and J from the OSHA Form 300 and 300A in the reference year.

Employee hours worked = sum of employee hours worked in the reference year.

200,000 = base for 100 full-time workers working 40 hours per week, 50 weeks per year

Sample One-Year TRC Calculation:

An establishment scheduled for inspection in October 2004 employed an average of 54 workers in 2003. Therefore, injury and illness cases and employment data for the preceding calendar year will be used.

Recordable injuries = 9

Recordable illnesses = 4

Employee hours worked in 2003

3 = 54 workers x 40 hours x 50 weeks = 108,000 hours

$$\begin{aligned} \text{TRC} &= \frac{(9 + 4) \times 200,000}{108,000} \\ &= \frac{2,600,000}{108,000} \\ &= 24.07 \text{ (rounded to 24.1)} \end{aligned}$$