

Digitizing the VPP Evaluation Workflow Without Changing the VPP Evaluation

How CLEAR Supported IPG's Evaluation Preparation and On-Site VPP Evaluation

1 NEW VPP STAR SITE	213 SUPPORTING DOCUMENTS REVIEWED	19 ACTIVE SITE AND EVALUATION TEAM USERS	8–10 ESTIMATED HOURS OF ADMINISTRATIVE WORK SAVED	4.5/5 POST-EVALUATION TEAM OVERALL EXPERIENCE RATING
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01 Executive Summary

As OSHA and State Plan programs consider how technology may support the future of the Voluntary Protection Programs, one question is fundamental:

Can technology improve the efficiency, collaboration and visibility of the VPP evaluation process without changing OSHA's methodology, evaluator authority, or the integrity of the program?

The experience of Intertape Polymer Group (IPG) provides insight into that potential.

CLEAR was used by the IPG site during preparation for its initial VPP evaluation and by members of the evaluation team before and during the on-site evaluation. The platform centralized the site's VPP responses, supporting documentation, evaluator inputs, findings, requests, progress tracking, and report preparation.

Importantly, the underlying evaluation methodology did not change.

Evaluators still determined whether evidence was sufficient. They still conducted employee interviews, performed worksite observations, identified and evaluated hazards, requested additional information when needed, developed recommendations, reached team consensus, and retained authority over the

final evaluation.

One experienced evaluator emphasized that written documentation alone cannot establish VPP performance. Effective evaluation still requires comparing documents against what evaluators observe and hear from employees.

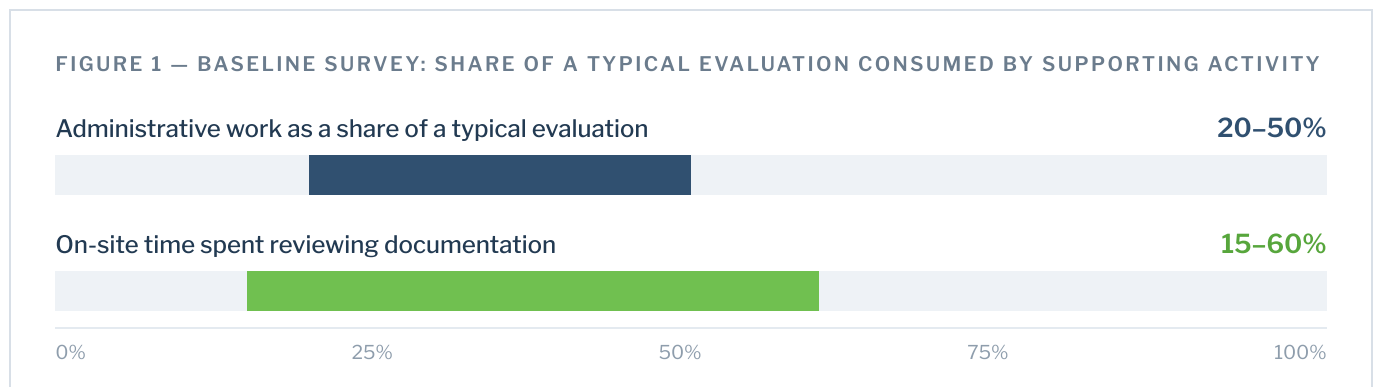
What changed was the infrastructure supporting that work.

The evaluation suggests that technology can move administrative activity away from the most time-constrained portions of the evaluation, improve team visibility, reduce duplicative work, and give evaluators greater opportunity to focus on the substantive components of VPP, namely the employee interviews and on-site observations.

02 The Challenge: VPP Evaluations Carry a Significant Administrative Workload

Before the IPG on-site evaluation, four evaluation team participants completed a survey describing their typical VPP evaluation experience.

Their responses illustrate how much of the evaluation process can be consumed by activities that support the evaluation rather than the evaluation itself.



Ranges reflect respondent estimates, which varied by type of evaluation and evaluator role.

Evaluators reported their most commonly identified challenges included accessing and understanding document organization, locating needed documentation, tracking team progress, communicating requests to the site, consolidating evaluator notes, tracking findings and corrective actions, and avoiding duplicated work.

2.5/5

The **baseline survey** also identified an important visibility gap. On a five-point scale, respondents rated visibility into overall and teammate progress at an average of 2.5 out of 5.

The issue is not that these activities are unnecessary. Documentation, communication, and reporting are integral to the evaluation. The opportunity is to reduce the administrative effort required to accomplish them.

03 The Evaluation: Using Technology as Infrastructure for the Existing VPP Process

During IPG's preparation, the site used CLEAR to work through the applicable VPP evaluation questions, develop responses, organize supporting evidence, and link documentation to the requirements it supported.

That information became available to the evaluation team one week prior to arrival on site.

For an initial evaluation, that distinction was significant.

The evaluation team leader explained that, for a new applicant, the team would traditionally have limited information beyond the site's application before the evaluation. With CLEAR, the team was able to review IPG's programs during the week before the evaluation, become familiar with site-specific terminology, and arrive with greater context.

Her description of the benefit was straightforward:

"You're hitting the ground running and it's a lot less pressure to get up to speed."

EVALUATION TEAM MEMBER

That advance preparation did not eliminate the need to evaluate the site's programs in practice. Instead, it allowed the team to begin the on-site portion with a stronger understanding of what the site said it was doing.

That matters because the critical question in VPP is not whether a written program exists. It is whether the program is understood, implemented, and effective.

04 What Changed, and What Did Not

WORKFLOW AREA	WHAT TECHNOLOGY CHANGED	WHAT REMAINED WITH THE VPP EVALUATION TEAM
Site preparation	Requirements, responses, documents, and readiness information were centralized in one environment.	The site remained responsible for the accuracy, completeness, and implementation of its programs.
Pre-evaluation document review	Evaluators could review supporting documentation before arriving on site and see the context in which the site believed each document supported a requirement.	Evaluators determined whether the documentation was relevant, sufficient, or required additional follow-up.
On-site evaluation	Team progress, findings, supporting information, and evaluator inputs could be maintained within a common system.	Evaluators continued conducting interviews, worksite observations, document verification, hazard assessment, and follow-up.
Evaluation conclusions	Information from multiple evaluators could be consolidated more efficiently.	Evaluator judgment, team consensus, findings, recommendations, and the VPP determination remained the responsibility of the evaluation team.
Communication between the site and evaluation team	Communication for additional documents, clarifying information and physical findings was streamlined and tracked in one central system.	Ultimate assessment status of requested info and logged findings remained with the evaluation team.
Final reporting	Evaluator inputs could populate a consolidated report instead of requiring extensive manual compilation.	Evaluators retained the ability to review, modify, and finalize their narrative before completing the report.
Technology participation	A site can use CLEAR for preparation and generate its information for an evaluation team even if the team chooses not to conduct the evaluation within the platform.	Participation in the technology does not need to become a prerequisite for participation in the VPP evaluation process.

This distinction is central to the potential role of technology in VPP modernization.

The platform supports the workflow. It does not change the criteria or make the evaluation decision.

05 Outcome 1: More Evaluation Work Could Move Before the On-Site

One of the clearest benefits identified by both the evaluation team and IPG was the ability to perform meaningful document review before the evaluation team arrived. The site utilized CLEAR to include 213 supporting documents as evidence of requirement compliance.

In the post-evaluation survey, an evaluation team member said advance access did not necessarily eliminate the time required to read documents. Instead, it changed when that work occurred and reduced the pressure associated with completing it during the on-site evaluation. According to the evaluation team, this also allowed the evaluation to be completed ahead of schedule.

FIGURE 2 — WHEN DOCUMENT REVIEW HAPPENS

TRADITIONAL

Before arrival: the application, with limited additional site information

On site: document review shares the same hours as interviews and observation



WITH CLEAR

Week before arrival: responses and 213 linked documents available for review

On site: more of the period available for interviews, observation, and follow-up

Advance access did not reduce total reading time; it changed when that work occurred.

This is an important distinction.

The value is not simply fewer document-review hours. It is the ability to prevent document review from competing with limited on-site time.

IPG's Corporate Director of Safety observed that the team performed very little document review together on site because the site had prepared everything in a detailed and organized manner. As a result, "they really got to focus in on doing the interviews, which was helpful."

Technology created more capacity for evaluators to spend their limited on-site time validating implementation through interviews, observations, and follow-up rather than sitting in a conference room locating or reading documentation.

The evaluation team leader also noted the increased focus on employee interviews made possible by the pre-on-site documentation review:

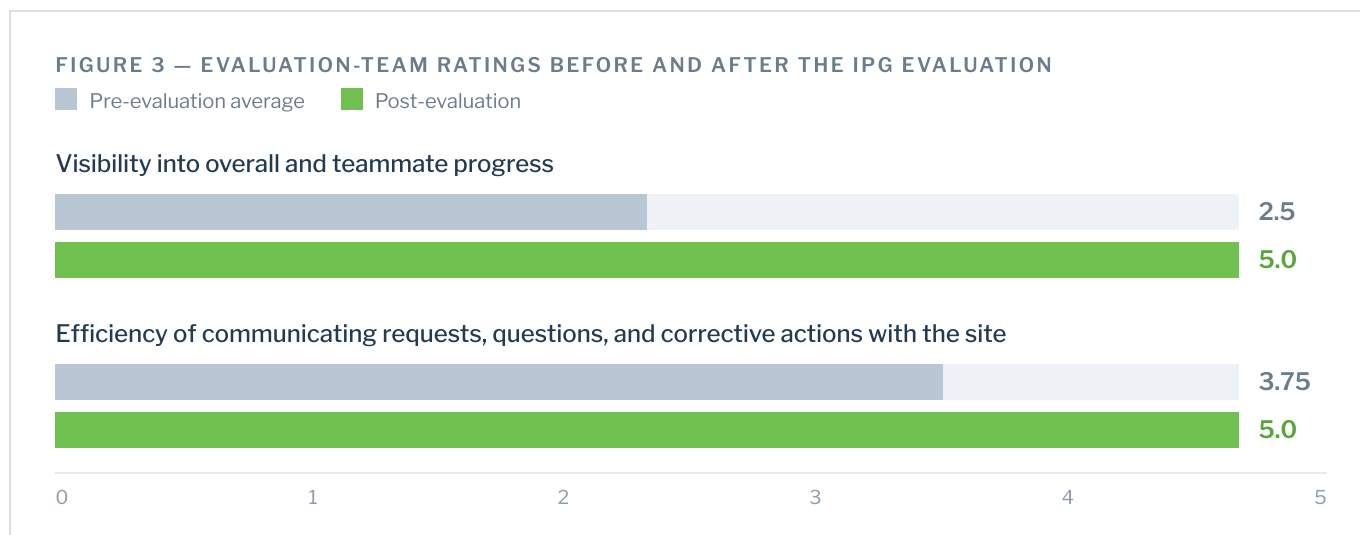
"...we ended up interviewing most of them, almost the whole place."

EVALUATION TEAM MEMBER ON INCREASED TIME FOR EMPLOYEE INTERVIEWS

06 Outcome 2: Team Visibility and Communication Improved

The on-site evaluation consisted of 19 active users across site and evaluation team members collaboratively working in the system for the duration of the evaluation.

The pre- and post-evaluation surveys showed a meaningful directional change in evaluation-team visibility.



Before the pilot, the evaluation team respondents rated visibility into overall and teammate progress at an average of 2.5 out of 5. After the IPG evaluation, all evaluation-team survey respondents rated visibility into overall and teammate progress 5 out of 5.

Communication showed a similar pattern. The pre-evaluation group rated the efficiency of communicating requests, questions, and corrective actions with the site at an average of 3.75 out of 5. Post-evaluation respondents rated communication efficiency 4.75 out of 5..

The evaluation team also identified simultaneous document access as a benefit. Traditional printed documentation can create a physical bottleneck when multiple evaluators need the same program. The team leader noted that shared digital access would allow multiple team members to review the same information at the same time.

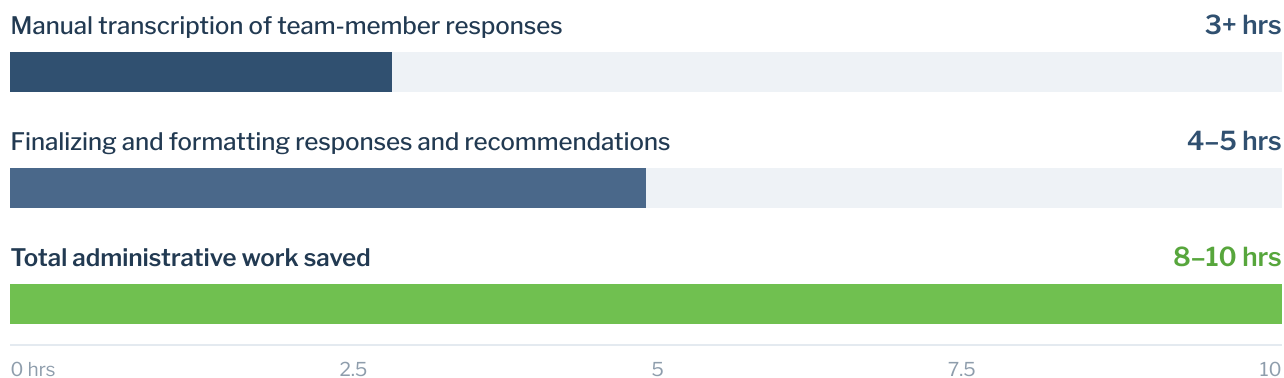
For a collaborative program such as VPP, increased visibility and communication may be one of the most significant opportunities presented by a centralized evaluation environment: not automating the evaluator's work, but ensuring the team is working from the same information with greater visibility into what has already been completed.

07 Outcome 3: Administrative Burden Was Reduced

Two post-evaluation respondents with prior evaluation experience provided estimates of the total time they believed CLEAR saved compared with their traditional processes.

The evaluation team estimated approximately 8 to 10 hours saved on administrative work.

FIGURE 4 — ESTIMATED ADMINISTRATIVE HOURS SAVED, AS REPORTED BY THE EVALUATION TEAM



Respondent estimates, not controlled measurements. Savings also occurred in document access and organization, document searching, and findings management.

The reported savings occurred across different parts of the workflow, including document access and organization, document searching, findings management, evaluation team member input compilation, and final report preparation.

One evaluation team leader estimated that eliminating most manual transcription of team-member responses alone saved at least three hours. The same respondent estimated another four to five hours of savings related to finalizing and formatting responses and recommendations for the final report.

Another evaluator described the report-generation capability even more directly after seeing the consolidated output:

"That's six hours of work that's in now three seconds."

EVALUATION TEAM MEMBER

That statement should not be interpreted as a controlled measurement of six hours saved. It does, however, illustrate the administrative burden associated with manually consolidating multiple evaluator notes and narratives into a final report.

The opportunity for technology is to automate that consolidation without automating the evaluator's conclusions.

08 Outcome 4: The Site Gained Structure and Readiness Visibility

The site experience provides the other half of the case study.

The IPG site respondents rated their experience with CLEAR "Very satisfied" overall and "Very easy" to learn and use. The respondents were "Extremely likely" to both continue using CLEAR to manage the site's VPP program and to recommend it to another site.

SITE SURVEY RESPONSES

Overall experience	Very satisfied
Ease of learning and use	Very easy
Likelihood to continue using CLEAR	Extremely likely
Likelihood to recommend to another site	Extremely likely
Platform plus VPP implementation guidance	Extremely important

HIGHEST-RANKED SYSTEM FEATURES

- 1 Audit Question Organization
- 2 Document Library
- 3 Preparation Dashboard

The site strongly agreed that CLEAR helped the team understand what documentation was needed, provided greater visibility into VPP readiness, and made it easier to identify what remained incomplete before the evaluation.

The combination of the platform and VPP implementation guidance was rated "Extremely important" to successful preparation.

When asked to identify the most valuable aspect of CLEAR, the site respondent summarized the benefit as:

"Having everything in 1 place for everyone at the same time."

IPG SITE RESPONDENT

One member of the evaluation team noted, "For a new initial evaluation, I think this was also an observation of the team: they are much further along than we were expecting." He stated:

"So the discussion is this VPP, yes or no? Yes. Is this merit or is this star? Well, this feels star. That whole conversation went that fast, that smooth because I think the sheer amount of time and effort they put into going through the evaluation themselves, answering the question themselves, providing supporting documents, meeting with Mike, doing those mock interviews, mock evaluations, all of that paid dividends over and over."

EVALUATION TEAM MEMBER

09 In Progress System Changes: Driven by Evaluation-Team and Site Feedback

CLEAR conducted post-evaluation interviews with the site and evaluation team to identify where system improvements could be completed to further enhance user experience.

The following priorities emerged from that feedback.

FEEDBACK FROM THE PILOT	SYSTEM CHANGE	INTENDED RESULT	STATUS
Evaluators wanted ability to reference documents without navigating back to the requirement they are linked to	Have documentation files open in a separate tab	Make it easier to reference documents	COMPLETE
Evaluators wanted ability to view documents outside of requirement links	Allow evaluation team access to the complete document library in addition to the linked files	Allow easier reference of documents	IN PROGRESS
Large Excel files were difficult to review within the existing viewer.	Improve XLS document viewer	Allow evaluators to effectively view all supporting evidence file types	IN PROGRESS
Evaluators repeatedly returned to the top of the sections after exiting a question.	Preserve the evaluator's location when returning to the question overview.	Reduce unnecessary scrolling and repetitive navigation.	IN PROGRESS
A photograph was required before a finding could be entered, which required evaluators to return to the field when a photo had not been taken.	Allow findings to be initiated without a photograph and completed as additional evidence becomes available.	Ensure the technology supports the evaluator's field workflow rather than dictating its sequence.	IN PROGRESS
Team leaders wanted greater control over correcting finding entries.	Expand appropriate edit and delete permissions for evaluation-team leadership.	Allow correction of entry errors while maintaining appropriate role-based controls.	IN PROGRESS

10 Conclusion

CLEAR's objective is not to redefine that process. It is to work with VPP stakeholders to determine where technology can remove administrative friction while protecting the collaborative model, evaluator independence, and program integrity that distinguish VPP.

Taken together, the IPG evaluation demonstrates how a centralized digital workflow can support the existing VPP evaluation process while leaving evaluator judgment, field verification, team consensus, and final decision-making authority unchanged. In this case, technology shifted portions of document review and administrative coordination away from the most time-constrained on-site period, improved visibility across the team, and reduced manual consolidation work.

For VPP leaders considering modernization, the experience provides a practical model for how technology can strengthen the infrastructure around the evaluation without replacing the evaluation itself. The opportunity is to use digital tools where they can create efficiency, visibility, and collaboration, while preserving the evaluator independence, program integrity, and substantive on-site validation that define VPP.

