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OSHA Launches Safety Champions Program to Help Employers Develop and Implement Effective Safety and Health Programs

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Continuing the Trump Administration's efforts to support employer compliance through education and assistance, OSHA recently added a new option to its array of cooperative programs administered by the agency's Directorate of Cooperative and State Programs ("DCSP"). The stated "main goal" of the [Safety Champions Program](#) ("SCP" or "Program") is "to prevent workplace injuries, illnesses, and deaths," which OSHA plans to achieve by shepherding employers through a progressive three-step framework designed "to develop and implement . . . effective safety and health program[s]."

Participants will be guided by the [core elements](#) of OSHA's [Recommended Practices for Safety and Health Programs](#):

1. Management Leadership;
2. Worker Participation;
3. Hazard Identification and Assessment;
4. Hazard Prevention and Control;
5. Education and Training;
6. Program Evaluation and Improvement; and
7. Communication and Coordination for host employers, contractors, and staffing agencies.

The SCP's three steps include:

A. Introductory Step.

At this Step, SCP participants are introduced to the seven core elements of OSHA's Recommended Practices for Safety and Health Programs. Participants will assess their worksite for safety and health hazards and begin developing or revising safety and health programs to align with the seven core elements.

B. Intermediate Step.

At this Step, SCP participants focus on implementing their SHPs.

C. Advanced Step.

At this Step, participants have fully developed and implemented SHPS and routinely assess and improve their SHPs' policies and practices.

Feb. 24, 2026, Safety Champions Program Policies and Procedures Manual ("[Directive No. CSP-03-01-006](#)") at 10. And OSHA organized its SCP [Step Guide](#) around the core elements to break each step into actionable portions. For example, under Management Leadership, the Step Guide lists an initial goal for employers to communicate their commitment to their safety and health programs, and explains how that goal can be achieved in each Safety Champions step:

Element 1. Management Leadership

Goals	Introductory Step	Intermediate Step	Advanced Step
Communicate Commitment to Safety and Health Program	Develop and establish, with input from workers, a written policy signed by top management at the worksite, describing the organization's commitment to safety and health and pledging to establish and maintain a safety and health program for all workers. Communicate safety and health mission and policy statements to all current workers, temporary workers and contractors. Establish and communicate annual safety and health goals and objectives. Establish ways for management and all workers to communicate freely and often about safety and health issues, without fear of retaliation.	Continue to communicate safety and health mission and policy statements on a regular basis. Incorporate the statements into new worker/temporary worker/contractor orientation.	Ensure safety and health mission and policy statements are understood by all workers, temporary workers, and contract workers. Ensure these become a routine part of regular communication. Ensure worker visibility into management safety and health commitment in all aspects of operations. Discuss and review safety and health indicators and any outstanding safety items on a "to do" list at the beginning of work meetings.

OSHA plans to release a Safety Champions Tracker that will allow employers to memorialize their progress through each step. Special Government Employees ("SGE") "will evaluate participant progress and confirm this improvement." Directive No. CSP-03-01-006 at 8. OSHA uses SGEs to foster safety through collaboration with industry, including under Voluntary Protection Programs ("VPP"), and according to SCP information sessions presented on March 10 and 12, 2026, the agency is designating a specific group to support the SCP. The SCP Coordinator will run the SCP from OSHA's National Office, including "connecting participants with SGEs, and communicating with and requesting SGEs from the SGE Coordinator." Directive No. CSP-03-01-006 at 3.

While the Program is "self-paced," one of the Guiding Principles listed in the agency's Directive, calls for "Continuous Improvement." *See id.* at 8-9. So, to maintain participation, employers must be prepared to act in good faith to move through the SCP at a reasonable cadence, all the while communicating with OSHA and seeking needed feedback from SGEs. SGEs will consider participants' progress to consider when they have completed SCP steps, and the SCP Coordinator will verify completion. Employers will receive recognition certificates from the Director of DCSP upon completion of the Introductory and Intermediate steps, followed by one from the Assistant Secretary for OSHA after finishing the Advanced step.

OSHA has steadily increased resources addressing the SCP since its initial announcement – and launch of its minimalist website – including the Directive, Step Guide, information sessions, and a [Fact Sheet](#). Nonetheless, questions about the Program and concerns about participation remain, such as:

- **Will State Plan states implement SCPs?**

OSHA is "strongly" encouraging state plans to adopt the SCP, and during its initial information session, the

agency indicated it is working through details on how employers might participate even if their State Plan jurisdictions decide against implementing the Program – or an “as effective” state version.

- ***What carrot is OSHA offering to employers that open their operations to agency scrutiny by participating in the SCP?***

One of the SCP Coordinator’s responsibilities is to “[p]erform OSHA enforcement activity searches when worksites sign up to participate in SCP and any time a participant requests a Step completion review.” Directive No. CSP-03-01-006 at 5.

“[W]orksites with open OSHA enforcement activity will not be able to participate in SCP until the activity is closed in the OSHA Information System (OIS). In addition, new enforcement activity may delay Step completion and may affect continued participation on a case-by-case basis.” *Id.* at 10. And “OSHA may determine removal to be appropriate in some circumstances, such as OSHA enforcement actions, failure to maintain communication with OSHA, failure to adhere to the guiding principles . . . , or prolonged periods of failure to progress in the program.” *Id.* at 14.

Participating employers open themselves up to regular reviews of their enforcement activity through involvement and advancement in the SCP. Taking part in the Program may bolster an employer’s application to participate in VPP, if that is a company goal, but SCP involvement does not guarantee VPP acceptance.

- ***How should employers approach hazards identified during SCP participation?***

OSHA counsels that...

[a]ny workplace hazards that are uncovered through hazard assessments, self inspections, incident investigations, reviewing injuries and illnesses recorded on OSHA recordkeeping forms (300, 300A, and 301), SGE Step reviews, or any other means must be addressed promptly. Participants must provide effective interim protection as necessary to keep workers safe and address hazards while permanent corrections are made.

Id. at 8. Depending on the facts, circumstances, and context, citations could result when OSHA becomes aware of these hazards. The SCP “is a voluntary cooperative program and operates separately from OSHA’s enforcement of employers’ obligations under the OSH Act. Accordingly, participation has no impact on any OSHA enforcement activity or determination.” *Id.* at 8.

How Should Employers Proceed?

Cautiously. Despite optimism about the SCP, the Program is in its very early stages with no historical record to consider. Employers should look to join the SCP only if they are committed to the process. If OSHA perceives an employer’s effort to be lackadaisical or guarded, that perception could have negative repercussions. Welcoming OSHA to dig into enforcement history, the uncertainty surrounding State Plan involvement, and the expectation to identify and address interim hazards all carry risks – particularly when the benefits of participation are not yet clear.

Employers should gather as much information as possible about the SCP to make informed participation

decisions and should consult with competent counsel like CMC's experienced and nationally-recognized [Workplace Safety Team](#) before inviting a fox into their henhouses.