

**Testimony to the United States House of Representatives
Subcommittee on Workforce Protections
“Safe Workplaces, Stronger Partnerships: The Future of
OSHA Compliance Assistance”
July 16, 2025
Chris Williams, CAE; Executive Director**



Chairman Mackenzie, Ranking Member Omar and Members of the Subcommittee, I thank you for the opportunity to testify in support of OSHA’s cooperative and compliance assistance programs, specifically the Voluntary Protection Program.

My name is Chris Williams, and I serve as the Executive Director of the Voluntary Protection Programs Participants’ Association. For forty years, VPPPA has represented sites and companies involved in the Voluntary Protection Programs administered by OSHA and the Department of Energy. VPPPA’s more than 1400 members represent every industry. Collectively, VPPPA members represent nearly 300,000 workers across America – both union and non-union. More than half of VPPPA’s members are current VPP Star, Mobile Workforce or Merit sites. All of our members, and the nearly 1,900 VPP sites across the country, share in our mission to raise the standard for workplace health and safety excellence.

VPP itself is a program created on the foundation of collaboration. In 1979, the California Building Trades Council, National Constructors Association and Cal/OSHA came together to develop the “Cooperative Self-Inspection Program” aimed at preventing injuries and illnesses during construction of the San Onofre Nuclear Generating Station. This groundbreaking effort, led by labor and with full management buy-in and oversight by Cal/OSHA, resulted in levels of cooperation previously unseen and laid the groundwork for the program that we see today.

Since its “official” creation in 1982, OSHA’s VPP has maintained this bedrock commitment to employee involvement, management commitment and regulatory oversight to foster a culture of continuous improvement. All three cogs work together to produce a safer workplace.

The proof is in the numbers.

According to OSHA’s most recent data, VPP sites maintain an average injury and illness rate 53% below BLS industry averages¹. To put that in perspective, the average American workplace sees nearly 3 injured workers per 100 full time employees. For VPP sites, that number is closer to 1. Digging deeper, the average VPP site has a Days Away, Restricted or Transferred (DART) case rate 52% below BLS average². In layman’s terms, that means workers on a VPP site are half as likely to experience an injury or illness that necessitates time away from their jobs.

Yet, if you ask anybody on a VPP site, they’ll tell you that even 1 injury is too many. That culture where safety is THE core value upon which every decision is made, is why VPP works—and saves.

VPP’s impact isn’t limited to those sites and companies who participate, and believe, in the program. It’s felt across the more than 10 million workplaces in the United States through the countless process

¹ <https://www.osha.gov/vpp/evaluation2021>

² This information is calculated annually by the OSHA Office of Partnership and Recognition and is based upon the injury and illness data submitted every year by the VPP participants.

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innovations developed through VPP sites. It's felt by OSHA through the Special Government Employee program, with VPP companies committing their own personnel and resources to work alongside OSHA on certification and recertification audits, where new ideas are routinely adopted and developed.

Simply put—VPP is a shining example of what labor, management and government can do when working together toward a shared vision of what can be. Yet, VPP remains a discretionary program—it can be eliminated at any time, for any reason, by any party. And make no mistake—it's been under threat before.

That's why VPPPA was happy to see the introduction of H.R. 2844, the Michael Enzi Voluntary Protection Program Act. H.R.2844's aim is simple – to make VPP a permanent program within OSHA, and require that a percentage of OSHA's annual budget be set aside to fund VPP and create a pathway for every American workplace to reach VPP-level safety performance.

VPP enjoys broad support. Democrats and Republicans alike stand behind VPP. It's a program built on labor – nearly 500 local unions are signatories to VPP agreements. For example, more than 170 IBEW and 45 United Steelworkers locals support VPP as signatories. CEOs from the nation's biggest employers believe in the positive impact of VPP and commit substantial financial and personnel resources to participate in the program. VPP is the gold standard of safety and health management systems, and the only system available free to every workplace willing to commit to—and abide by—its stringent ongoing requirements.

VPP fosters a willingness to share because participants know that protecting workers isn't proprietary. It isn't a union or non-union issue. It's about sending our spouses, our children, our friends home in the same—or better—condition than which they arrived, every day.

That's why VPPPA supports H.R.2844—to ensure that OSHA's Voluntary Protection Program will continue to protect America's workers well into the future.

Thank you for your time and I look forward to your questions.

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Supplementary Information

**Voluntary Protection Programs
Annual Evaluation of Calendar Year 2021 Injury and Illness Rates
Source: <https://www.osha.gov/vpp/evaluation2021>**

The Voluntary Protection Programs (VPP) promote effective worksite-based safety and health. In the VPP, management, labor, and OSHA establish cooperative relationships at workplaces that have implemented a comprehensive safety and health management program. Participation in the VPP requires each VPP participant to evaluate annually the effectiveness of their safety and health management programs. The self-evaluation must include assessments of all the VPP elements and sub-elements of the VPP participant's safety and health management program.

By February 15th of each year, VPP participants must submit their annual self-evaluation to their Regional VPP Manager. The injury and illness rates from the VPP participant's annual self-evaluations are forwarded to the National Office where OSHA uses the information to update records and statistics, to showcase successes related to implementation of the VPP requirements, and to demonstrate that VPP participants are committed to continuously improving employee safety and health at their worksites.

Below is a summary of the findings from the calendar year 2021 annual evaluation of VPP participants' injury and illness rates.

Site-Based Non-Construction VPP Participants

During calendar year 2021, the VPP participants experienced the following results. On average, rates for site-based non-construction VPP participants are 53 percent below the Bureau of Labor and Statistics (BLS) Total Case Incident Rate (TCIR) and 57 percent below the BLS Days Away from Work, Restricted Work Activity, or Job Transfer (DART) rate for their respective industries. This data was collected from 1,232 Federal jurisdiction site-based non-construction VPP participants representing more than 349,000 employees.

Other results from the 2021 VPP Annual Evaluation:

- Site-based non-construction VPP participants avoided an estimated 4,035 TCIR injuries when compared to expected results within their respective industries.
- Site-based non-construction VPP participants avoided an estimated 3,262 DART injuries when compared to expected results within their respective industries.
- The 1,224 site-based non-construction VPP Star participants are, on average, 54 percent below the BLS TCIR and 57 percent below the BLS DART for their respective industries.
- The four site-based non-construction VPP Merit participants are, on average, 40 percent below the BLS TCIR and 47 percent below the BLS DART for their respective industries.
- The 88 Federal, site-based non-construction VPP participants are, on average, 58 percent below the BLS TCIR and 56 percent below the BLS DART for their respective industries.

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- The 302 site-based non-construction VPP participants covered by the Process Safety Management (PSM) standard are, on average, 57 percent below the BLS TCIR and 59 percent below the BLS DART for their respective industries.
- There are 542 site-based non-construction VPP participants that experienced zero recordable injuries and illnesses during 2021.

Site-Based Construction and Mobile Workforce VPP Participants

During calendar year 2021, VPP participants experienced the following results. On average, site-based construction and mobile workforce VPP participants are 54 percent below the BLS TCIR rate and 72 percent below the BLS DART rate for their respective industries. This data was collected from 45 Federal jurisdiction site-based construction and mobile workforce VPP participants representing more than 21,000 employees.

Other results from the 2021 VPP Annual Evaluation:

- Site-based construction and mobile workforce VPP participants avoided an estimated 205 TCIR injuries when compared to expected results within their respective industries.
- Site-based construction and mobile workforce VPP participants avoided an estimated 163 DART injuries when compared to expected results within their respective industries.
- The 45 site-based construction and mobile workforce VPP Star participants are, on average, 54 percent below the BLS TCIR and 72 percent below the BLS DART for their respective industries.
- There were no site-based construction VPP Merit participants in calendar year 2021.
- The one site-based construction and mobile workforce VPP participant covered by the PSM standard is 100 percent below the BLS TCIR and 100 percent below the BLS DART for its respective industry.
- There are 14 site-based construction and mobile workforce VPP participants that experienced zero recordable injuries and illnesses during 2021.