



September 3, 2025

To the Members of the House Education and Workforce Committee:

The Coalition for Workplace Safety (CWS) writes to urge your support of the Michael Enzi Voluntary Protection Program Act ([H.R. 2844](#)), which would require the Secretary of Labor to establish a voluntary protection program (VPP), recognizing employers' voluntary commitment to establishing comprehensive safety and health management systems. Encouraging collaborative partnerships between the regulated community and the Occupational Safety and Health Administration (OSHA), such as VPPs, benefits both parties by improving compliance efficacy, reducing financial and administrative costs for both parties, and strengthening trust and transparency between the agency and employers.

The CWS is comprised of associations and employers who believe in improving workplace safety through cooperation, assistance, transparency, clarity, and accountability. The CWS believes that workplace safety is everyone's concern. Improving safety can only happen when all parties – employers, employees, and OSHA – have a strong working relationship.

Expanding compliance assistance initiatives such as VPPs, as proposed in H.R. 2844, would promote a more proactive approach to workplace safety. By encouraging employers to design and implement their own comprehensive safety and health management systems, VPPs empower businesses to take ownership of their safety performance and enable OSHA to formally recognize and reward employers who demonstrate a strong commitment to worker safety and compliance. These recognized employers benefit from the ability to undergo regular self-evaluations, maintaining high safety standards while avoiding routine inspections that disrupt daily workplace operations.

VPPs have a proven success rate at reducing occupational injuries and illnesses, according to OSHA's own data. The average VPP worksite has a Days Away Restricted or Transferred (DART) case rate of 52 percent below the industry average.¹ Further, self-reported 2021 injury and illness rates² suggest that site-based non-construction VPP participants avoided approximately 4,035 Total Case Incident Rate (TCIR) injuries within their respective industries, putting those businesses 54 percent below the Bureau of Labor Statistics (BLS) TCIR rate.³ The construction industry is no different; in the same year, construction and mobile workforce VPP participants were, on average, also 54 percent below the BLS TCIR Rate for their industry.⁴

¹ Occupational Safety and Health Administration. *All About VPP*.

Rates[https://www.osha.gov/vpp/all-about-vpp#:~:text=Statistical%20evidence%20for%20VPP's%20success,for%20its%20industry\(1\).](https://www.osha.gov/vpp/all-about-vpp#:~:text=Statistical%20evidence%20for%20VPP's%20success,for%20its%20industry(1).)

² 2021 is the most recent VPP annual evaluation of injury and illness rates available on OSHA's website.

³ Occupational Safety and Health Administration. (2021) *Voluntary Protection Programs Annual Evaluation of Calendar Year 2021 Injury and Illness Rates*. <https://www.osha.gov/vpp/evaluation2021>

⁴ I.d.



Moreover, VPPs help reduce financial and administrative costs for both employers and OSHA. As noted, employers that participate in VPPs experience fewer workplace injuries and illnesses, leading to lower workers' compensation costs, reduced downtime, and increased productivity. Further, by maintaining safety and health programs, these employers require fewer OSHA inspections, allowing the agency to focus its limited resources on higher-risk workplaces and truly bad actors who fail to commit to maintaining a safe workplace. This improved efficiency reduces the administrative burden for both parties, streamlines compliance processes, and fosters a culture of continuous improvement—ultimately saving time and money while enhancing workplace safety.

The establishment of VPPs significantly strengthens collaboration between OSHA and employers by fostering a cooperative approach to workplace safety. This collaboration builds mutual trust and transparency, helping employers to see OSHA as more than just an enforcement agency. The partnership, in turn, reinforces OSHA's credibility and effectiveness by demonstrating that compliance goals can be achieved through cooperation rather than enforcement alone.

CWS urges members of the committee to support the Michael Enzi Voluntary Protection Program Act ([H.R. 2844](#)) and continue to encourage OSHA's compliance assistance efforts.

Sincerely,

Coalition for Workplace Safety
Alliance for Chemical Distribution (ACD)
American Bakers Association
American Coke and Coal Chemicals Institute
American Foundry Society
American Fuel & Petrochemical Manufacturers
American Pipeline Contractors Association
American Subcontractors Association
Associated Builders and Contractors
Associated General Contractors of America
Brick Industry Association
Distribution Contractors Association
Essential Minerals Association
Foodservice Equipment Distributors Association
HR Policy Association
Independent Electrical Contractors
Institute of Makers of Explosives
International Warehouse Logistics Association (IWLA)
National Armored Car Association
National Association of Professional Employer Organizations (NAPEO)
National Association of Wholesaler-Distributors
National Council of Chain Restaurants
National Demolition Association



National Federation of Independent Business
National Oilseed Processors Association
National Retail Federation
Pennsylvania Utility Contractors Association
Plastics Pipe Institute
Power and Communication Contractors Association
PRINTING United Alliance
Small Business & Entrepreneurship Council
Tree Care Industry Association