



Voluntary Protection Programs Participants' Association, Inc.

Dear Members,

As leaders in occupational safety and health, it is *imperative* that we act now and contact our congressional representatives in support of **Senate Bill 3257 (S. 3257)** to codify the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs (VPP). S. 3257 will not only support and expand the program, especially for small businesses, but it will eliminate the idea of a user-fee system for VPP.

Despite a \$10 million increase for enforcement in the President's FY 2011 budget, Labor Secretary Hilda L. Solis announced that she will further decrease funding for compliance assistance, cutting financial support for VPP, and re-direct these resources toward enforcement. Furthermore, on March 4, 2010, Congressman George Miller (D-CA), chair of the House Committee on Education and Labor, supported a the shift of funding and resources away from VPP in favor of enforcement in his report to the House Budget Committee. He proposed to fund VPP *"through a user fee, and plans to work on establishing authority for augmenting the OSHA budget through a fee based system"*.

The members of the Voluntary Protection Programs Participants' Association, Inc. (VPPPA) have expressed opposition to a user fee system for certification. Some repeated concerns include:

- Industry directly funding the government to perform part of its required function under the OSH Act.
- Creating the perception that employers are "buying" the VPP flag.
- Creating a situation where employers can be perceived as purchasing "an exemption from routine OSHA inspections."
- Fees for VPP deterring small businesses from participating.
- Charging sites for participation in VPP despite of what VPP sites voluntarily give in the form of mentoring, outreach, assist visits, funding Special Government Employees for onsite evaluations and providing education and training opportunities via regional and national conferences.
- Paying a fee reduces the VPP to a government recognition program, rather than the valuable workplace safety culture change-agent and source of worker pride.

Unlike many fee-based certification programs, VPP is a comprehensive workplace safety and health management system that is built on cooperation among workers, employers and government. We cannot let the Department of Labor (DOL) back away from the partnership in VPP nor diminish the program by establishing a user fee for collaboratively working to go beyond OSHA's outdated standards.

VPP sites support OSHA's firm and fair enforcement. However, as the science of safety and health has matured, there is clear evidence that 40 years of OSHA enforcement has not produced the cultural change required in industry today to keep American workers safe and American

companies competitive in a global marketplace. We cannot regress and think more enforcement will produce different outcomes. VPP is the only progressive and comprehensive safety and health management system in OSHA's tool box that achieves measurable and sustainable improvements in the protection of the American workforce.

In its 27 years, VPP has done more to reduce injuries and illnesses in the workplace than all OSHA inspections and citations combined. This is evidenced by the fact that VPP sites have injury and illness rates at least 50% below their industry norms giving 921,000 employees a better opportunity to return home as whole and healthy people.

VPPPA is asking that you contact your congressional representatives along with members of the Senate and House Appropriation committee and members of the Senate and House Budget committee and Senate and House HELP subcommittee telling them to support S. 3257 and oppose a user fee system. Write Now, Right Now.

Thank you for your support!

A handwritten signature in black ink, appearing to read "David L. Jackson". The signature is fluid and cursive, with a large initial "D" and "J".

David L. Jackson, CIH, CSP
VPPPA National Board of Directors Chairperson
Mission Support Alliance, LLC