

The Value of Voluntary Compliance

Special Districts Association of Oregon

Mark E. Hurliman, CSHM
February 6, 2026



Department of Consumer
and Business Services

Oregon OSHA's Voluntary Compliance Programs

CHALLENGE

Basic: Help employers become self-reliant in Safety and Health Management Systems (SHMS)
One year exemption



SHARP

Safety and Health Achievement Recognition Program
Intermediate: Assist employers to become self-sufficient as they develop and implement an effective SHMS
5-7 Years of exemption



VPP

Voluntary Protection Program
Advanced: Recognition of companies who have achieved exemplary SHMS Performance
Ongoing exemption as program participation is maintained



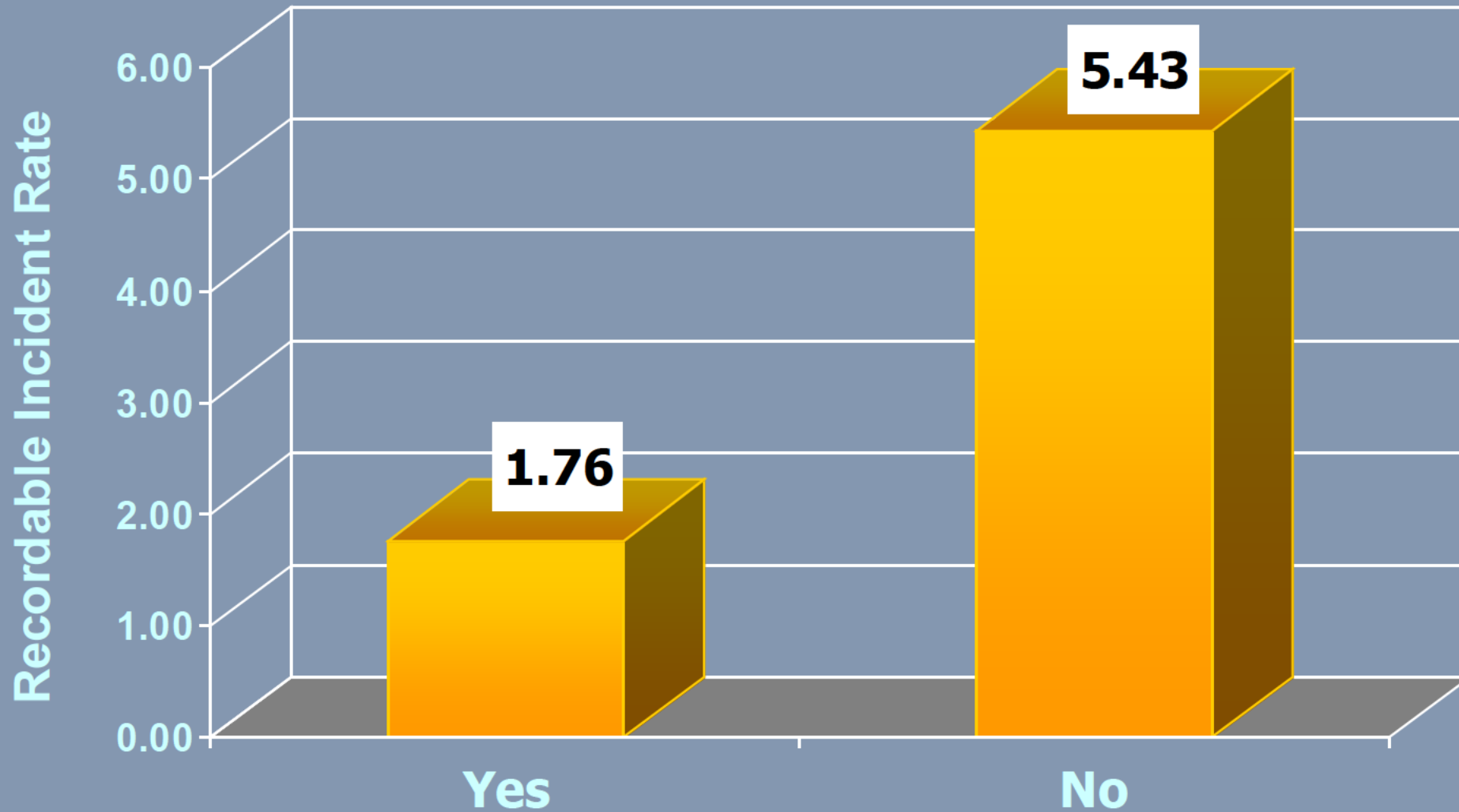
Interesting Information that supports SHMS

From

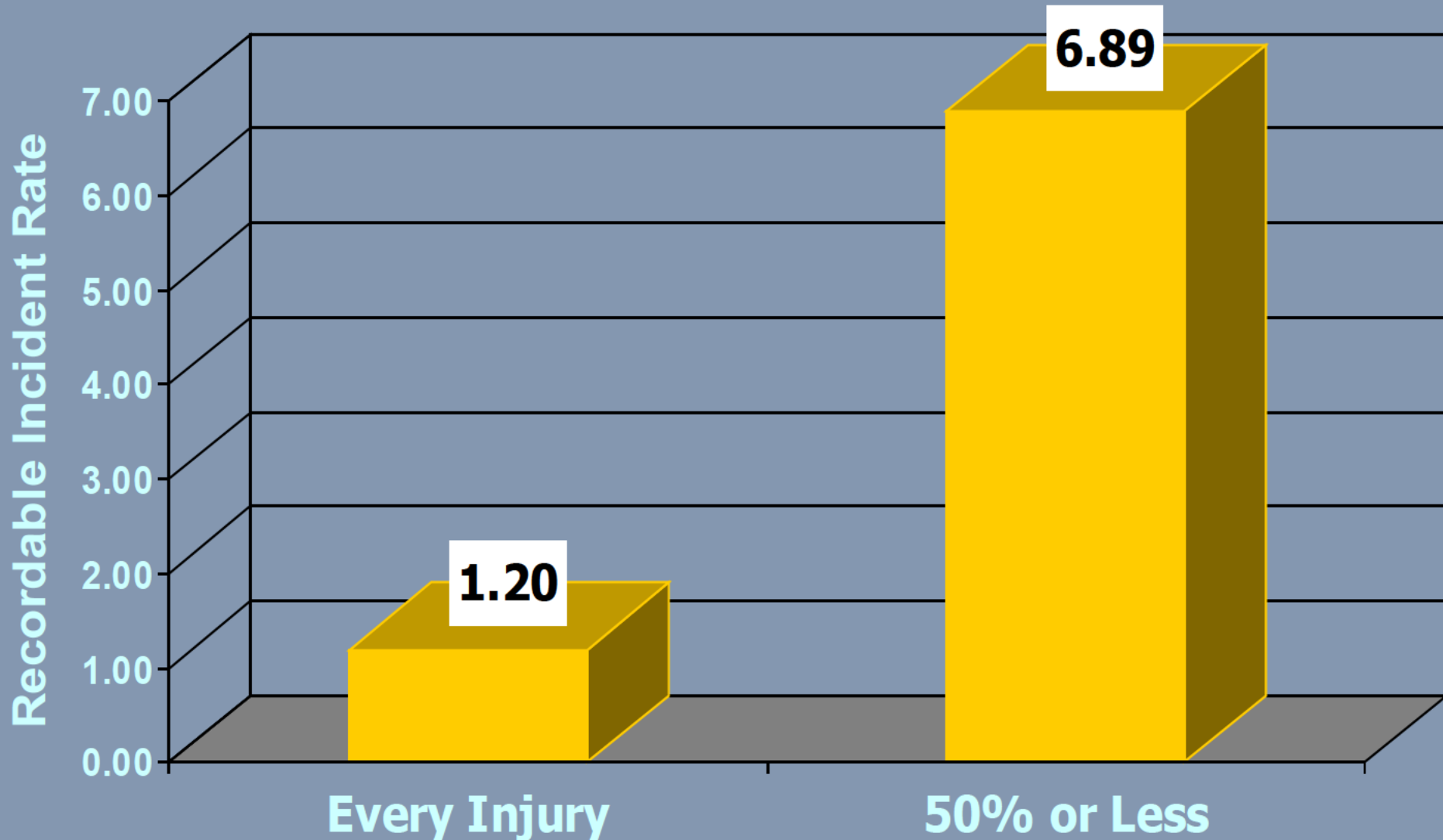


Shared with
Oregon OSHA Consultation and Services

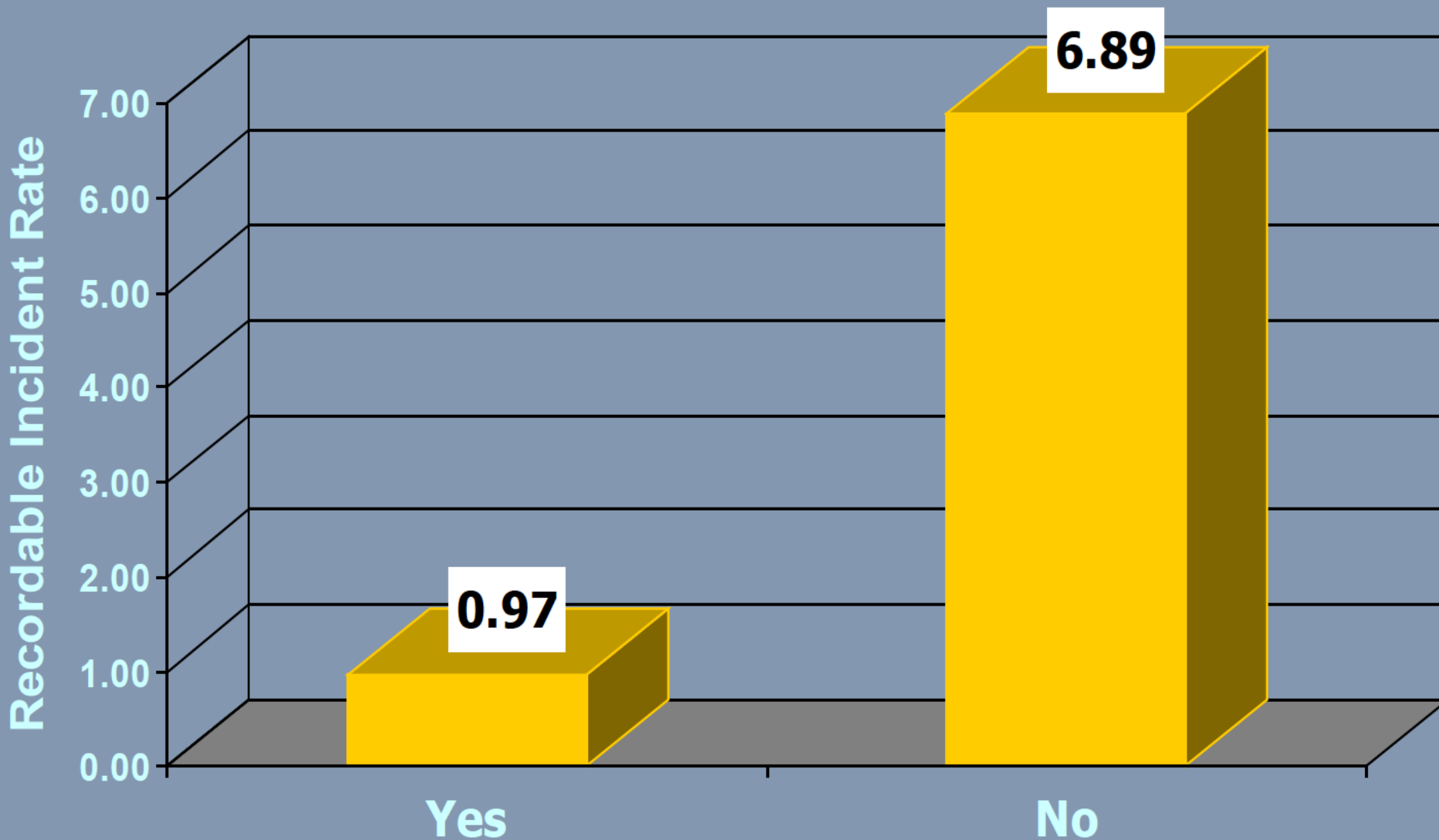
Is there a site-specific SHMS?



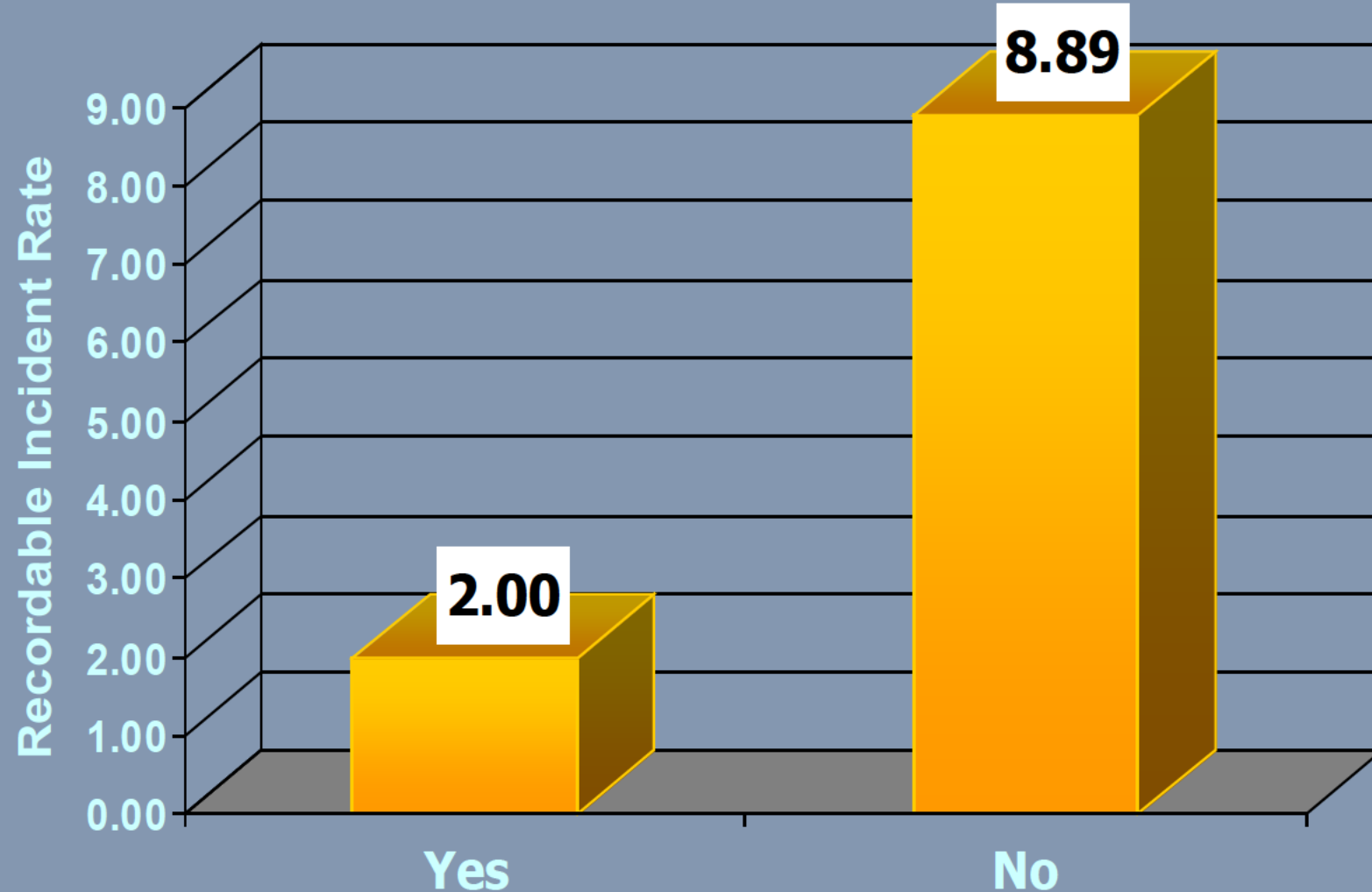
How frequently does top management participate in recordable incident investigation?



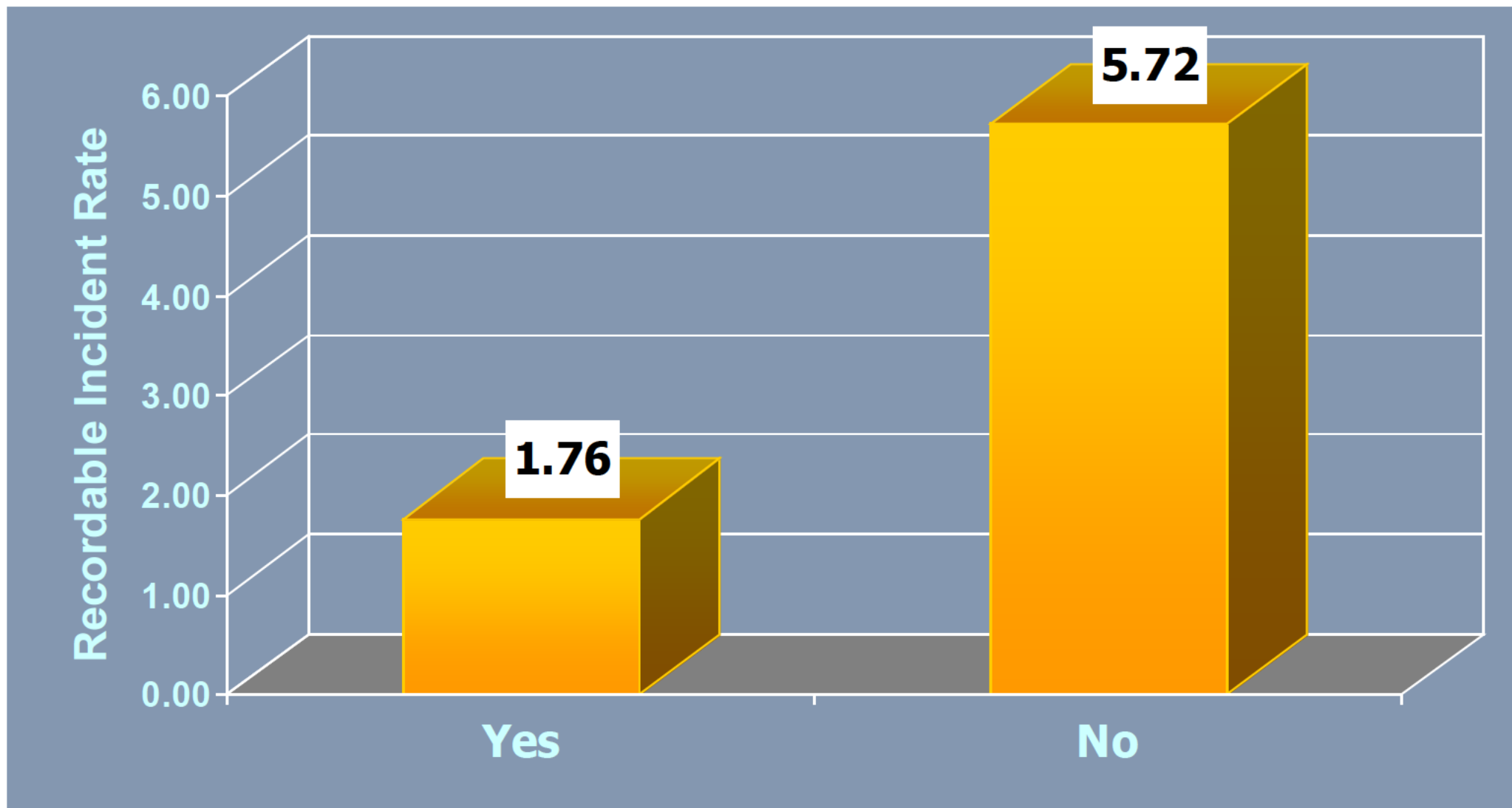
Does company president/senior management review safety performance reports?



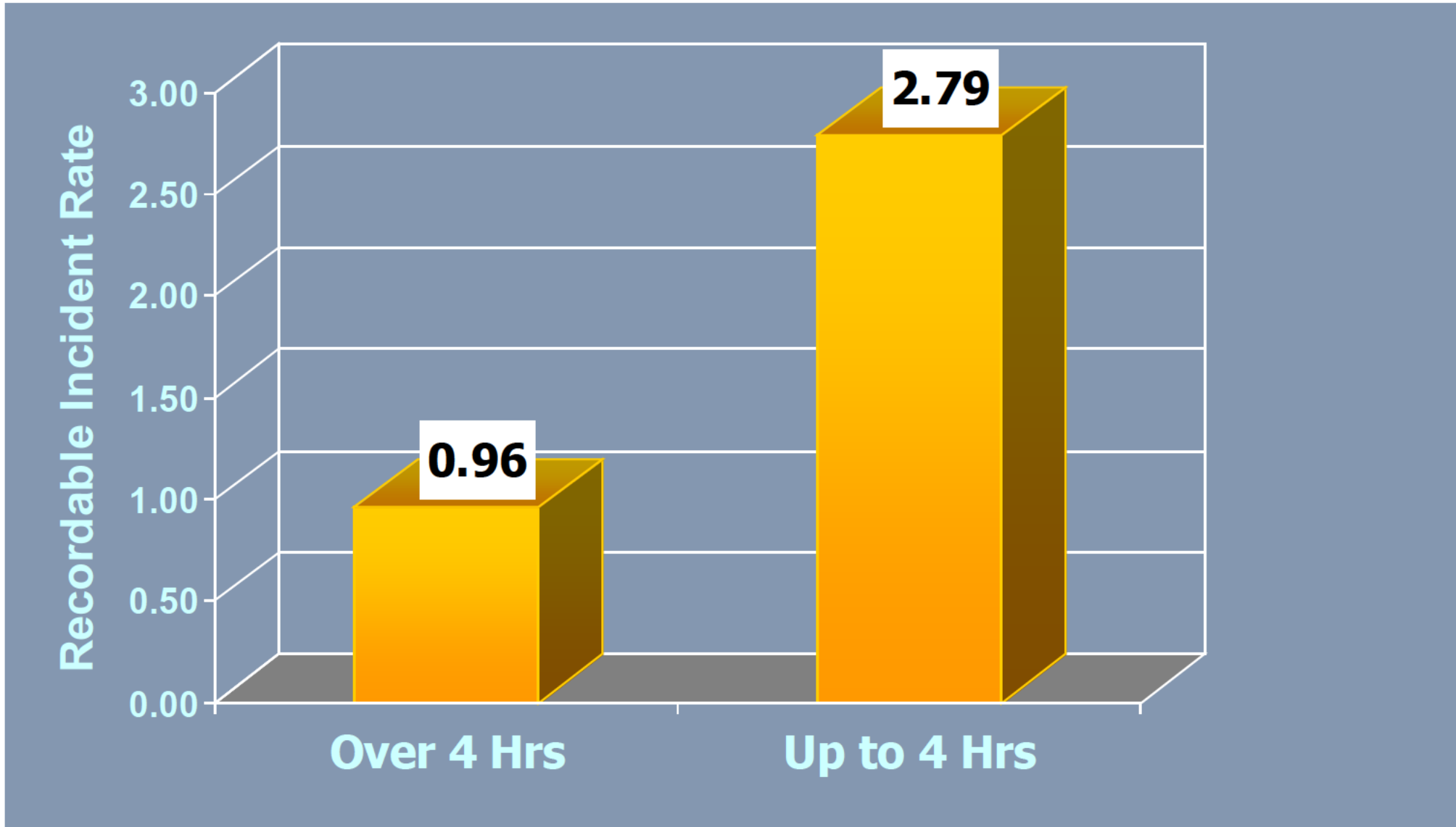
Are line supervisors evaluated on their safety performance?



Do all workers receive a Safety Orientation ?



How much training do workers receive after orientation?



Safety and Health Management System

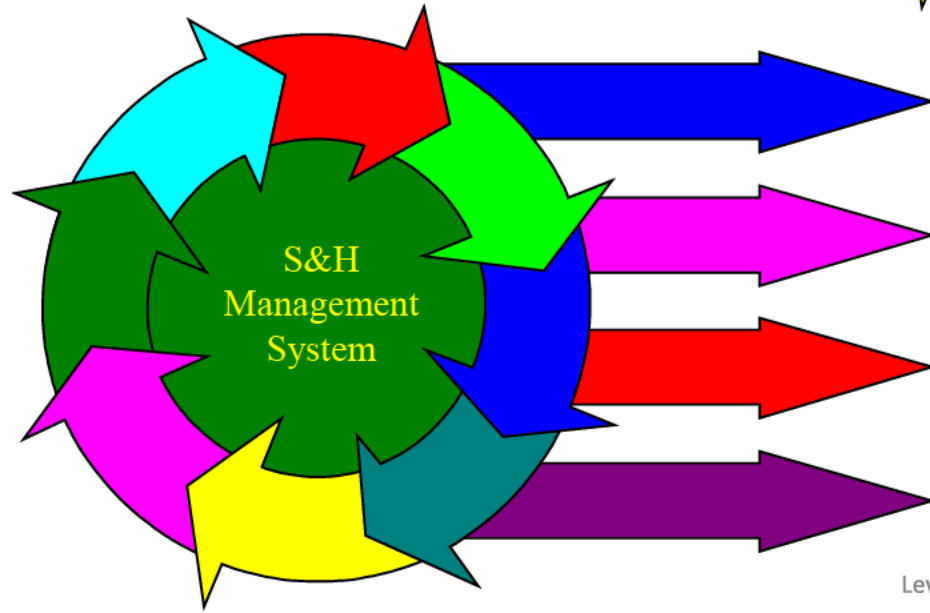
- SMHS can be defined as a...:
 - businesslike approach to safety.
 - systematic, explicit and comprehensive process for managing safety risks.
 - system that provides for goal setting, planning, and measuring performance.
 - system that is woven into the fabric of an organization.
 - part of the culture, the way people do their jobs.

Safety and Health Management System (SHMS)

A System for
Managing Systems



Intended to
explain the
arrangement
or working
of a whole



- Within the system
 - 3 Components
 - 7 Subcomponents

Making a “Safety and Health Management System” Work

Management must **install** a management system which encompasses every aspect of how we perform our tasks and measure our performance.

Management must **instill** a system of reviews, oversights, critiques, measurements, and self-audits which allow for total employee involvement, up to, and including the “fix(es)” to the problem(s).

The **system** should **cover** how we **communicate**, how we plan out resources, how we manage change, how we assess our performance, and finally, how we manage corrective actions, monitor their effectiveness, and measure the results.

What is Compliance?

- Adherence to the applicable rules and laws
 - the state of being in accordance with established guidelines or specifications, or the process of becoming so.
 - Synonyms: obedience, observance, submission , deference, subordination, acquiescence, conformity, conforming, agreement, fulfillment , concurrence, congruity.
- **Minimum Acceptable Standard?**

Manage to Succeed!

- Good safety management programs that go beyond OR-OSHA standards can **protect employees more effectively** than simple compliance.
- The strongest safety programs are usually **management LED**, but **employee DRIVEN**
- OR-OSHA's time is more effectively spent helping employers learn to manage S&H
 - Catch them a fish? ... or
 - Teach them to fish!

Voluntary Compliance Programs

CHALLENGE: Newest program. Entry level, designed for companies who need help. Provides these companies with one year of enforcement exemption, during which they can take full advantage of Oregon OSHA Consultative Services.



SHARP (Safety & Health Achievement Recognition Program): Since 1995. Smaller companies (<250 site or <500 Corp) work with consultation to achieve SHARP level and maintain for 5 years. Comes with multiple exemptions.



VPP (Voluntary Protection Program): Since 1982. Premier Safety & Health management systems in USA. You get yourself there, OSHA verifies. Can earn exemption for duration of participation.



Oregon OSHA CHALLENGE Program

(Appendix N of Consultation Reference Guide)

- Challenge participants, through a series of consultations over the course of one year, will work with Oregon OSHA Consultation to find and correct hazards, develop and implement effective safety and health systems and progress toward becoming self-reliant in managing their workplace safety and health.
- Employers will be provided a one-year deferral from scheduled Oregon OSHA enforcement inspections while they are working with consultation during their Challenge year. Can be extended if needed.

CHALLENGE

- Goal
 - Reduce injuries & illnesses
 - Help employer become self-reliant in SHMS
 - Provide a means to confirm hazard abatement
- Eligibility
 - Employer agrees to correct
 - Employer not under Enforcement
 - No SHARP or VPP
 - 1 time every 5 years



Challenge Program Commitment Letter Starts The Process With Consultation

Oregon OSHA Challenge Program Commitment Letter

The management and employees of _____ would like to formally declare our commitment to work with Oregon OSHA Consultation as a participant in the Oregon OSHA Challenge Program. The Challenge Program was explained to us by _____ on _____.

By signing this letter we agree to:

1. Participate in comprehensive consultations of all conditions and operations at our work site(s), including a complete safety and health system review.
2. Involve employees in the development, operation and improvement of all elements of our safety and health program.
3. Work diligently to accomplish the following:
 - a. Correct all identified safety and health hazards and provide Oregon OSHA Consultation with written confirmation that each identified hazard has been corrected within an agreed upon time frame.
 - b. Develop, implement or improve all elements of an effective safety and health management system.
4. Inform Oregon OSHA consultation prior to making any changes in working conditions or work processes that might introduce new hazards into the workplace.
5. Inform Oregon OSHA consultation in the event of an Oregon OSHA enforcement inspection or accident investigation.

The signatures below represent the commitment of the management and employees of _____ to use Oregon OSHA Challenge Program to improve our safety and health management systems.

Date: _____

Name/Title

Name/Title

Signature

Signature

Primary Contact Person:

Name

541/xxx-xxxx- Office

541/xxx-xxxx- Cell

Challenge Process

- Signed Letter of Commitment
- Comprehensive Consultations (S, H, & E*)
 - All operations, mobile sites, SHMS, SC, etc.
 - During Closing:
 - Describe hazards & Identify SHMS element
 - Discuss Correction with time frames (ID interim measures)
 - Schedule follow-up (to verify abatement, provide further assistance or training)
 - Discuss potential referrals
 - Written report w/findings & abatement dates which must be responded to.
 - **1-yr Enforcement Deferral begins when report is received**

Challenge Report

- ID accompanying Employer representatives
- Describe site and process
- Describe how company is meeting 7 SHMS elements
- Include DART rate
- Describe S & O hazards, w/rule and recommendation
- Include verification attachment for employer to return
 - **Note: The 1-yr Enforcement Deferral begins when report is received**

Challenge Deferral

- Consultation Manager notifies Manager of Enforcement, who defers site from scheduling lists
- Deferral limited to one year
 - No deferral from Imminent Danger, Fatality/Catastrophe, Serious Accidents and Complaints or Referrals
 - Participants must follow recordkeeping rule
 - Enforcement activities take precedence

Challenge Expectations

- **Notify FCM prior to changes**
 - Conditions, processes, relocations, change in organizations or leadership changes, additions, new lines, new processes, etc.
- **Deferral terminated if participant fails to meet or maintain requirements**
 - May apply again after 5 years
- **Program evaluated annually to determine effectiveness**

Challenge program offers fire districts free help with safety, health improvements

RESOURCE

[Learn seven steps to improve ATV safety](#)

[As temperatures rise, employers must protect workers](#)

[Training, communication among keys to addressing wildfire smoke](#)

[Is fall protection required for short-duration work?](#)

[Rulemaking coming in response to legislation on worker safety in health care](#)

[Investigating a work-related injury or illness? Here's what you need to know.](#)

[Where are the requirements for powered industrial trucks in the workplace?](#)

[Do you know the hazards of using earbuds on the job?](#)

[Unsecured aerial work platform](#)

[Oregon workers' compensation conference coming May 7-8, 2026](#)

[How do we protect those who protect us from fires?](#)

[Challenge program offers fire districts free help with safety, health improvements](#)

[Look up: Oregon OSHA billboard ads deliver key safety, health messages](#)

[Unprotected fall from roof](#)

[Oregon OSHA's Resource Center expands streaming video offerings](#)



Published 10/28/2025 by Greig Lowell

Oregon OSHA has recently begun enrolling fire districts in the Challenge program, a voluntary program that offers an opportunity to work closely with [Oregon OSHA Consultation Services](#) for one year to make their workplaces safer and healthier.

Challenge is open to all Oregon employers, but fire districts can be particularly well-suited for the multiple safety and health consultations available in the Challenge program. Oregon OSHA has several consultants with background and experience in fire service. These consultants understand fire district work and culture, and will provide recommendations that best suit those districts.

Challenge is a one-year program that includes multiple safety and health consultations with three key benefits:

1. Identify and eliminate hazards that cause workplace injuries and illnesses.
2. Learn how to become self-reliant in managing your safety and health program.
3. Receive a one-year deferral from most Oregon OSHA enforcement inspections. (No exemptions from [inspections for cause](#) or from inspections that result from imminent danger situations, fatalities and catastrophes, serious

Oregon Occupational Safety and Health : Challenge program offers fire districts free help with safety, health improvements : Resource : State of Oregon

The challenge program is free, and, as with all Oregon OSHA consultations, the program's evaluations are confidential and held apart from Oregon OSHA's enforcement section.

Fire districts save lives and preserve property in their regular work duties. District officials train their entire career for this service. But tending to their own employees' safety and health in non-emergency situations is also important. Based on their work with many fire districts, Oregon OSHA consultants have identified some common areas for improvement. Addressing these areas, consultants note, is not always costly.

Examples include:

- Hazards with cleaning products in the station house, including secondary container labeling
- Unprotected storage areas, such as mezzanines
- Tire management – tread depth and expiration dates
- Annual maintenance on fire apparatus
- Evaluations of physical capabilities
- Eyewash locations, both in the bays and living areas
- Smoke and gas detectors
- Exit signs and routes
- Alignment of the district's organization statement with the actual work being performed.

Consultants can assist fire districts in program development, addressing concerns such as hazard communication, respiratory protection, and bloodborne pathogens. Consultants also have access to resources to help districts on the requirements and expectations for live fire training simulations.

Districts don't need to feel helpless in the face of limited resources, according to Oregon OSHA consultants. Consultations are free, and consultants can help districts connect with neighboring districts to partner up on safety and health efforts, and strengthen their resources.

Contact your local [Oregon OSHA office](#) to learn more about [Oregon OSHA's Challenge program](#) and to participate.

Oregon OSHA Challenge Brochure

What to know before you get started



You must agree to correct all hazards the consultant identifies during the comprehensive consultation.



You must not have any outstanding Oregon OSHA enforcement actions, including cases under appeal.



No SHARP or VPP sites – they are already in a recognition program.



You can participate in the program only once every five years.

Contact Oregon OSHA

Reach out to your local Oregon OSHA office to learn more about the Challenge Program and to participate.

Salem Central Office

Phone: 503-378-3272

Toll-free: 800-922-2689

Fax: 503-947-7461

en Español: 800-843-8086

Website: osha.oregon.gov

Portland
503-229-6193

Bend
541-388-6068

Salem
503-373-7819

Medford
541-776-6016

Eugene
541-686-7913

Pendleton
541-276-2353



NO COST CONSULTATION PROGRAM

Take your safety and health program to the next level



440-9122 (01/25/COM)



Want to take your safety and health program to the next level?

Enroll in Oregon OSHA's Challenge program!

Oregon OSHA's Challenge Program gives you a unique opportunity to work closely with [Oregon OSHA Consultation Services](#) for one year to make your workplace safer and healthier.

There is no charge to participate and no information is shared with Oregon OSHA's enforcement section.

With step-by-step support from Oregon OSHA consultants, it's also a great way to boost morale and earn recognition for your commitment to safety.

Participation offers three key benefits:

1. You will eliminate hazards that cause workplace injuries and illnesses.
2. You will learn how to become self-reliant in managing your safety and health program.
3. You will receive a one-year deferral from some Oregon OSHA inspections. (You are not exempt from [inspections for cause](#) or from inspections that result from imminent danger situations, fatalities and catastrophes, serious accidents, complaints, or referrals.)

How does the program work?

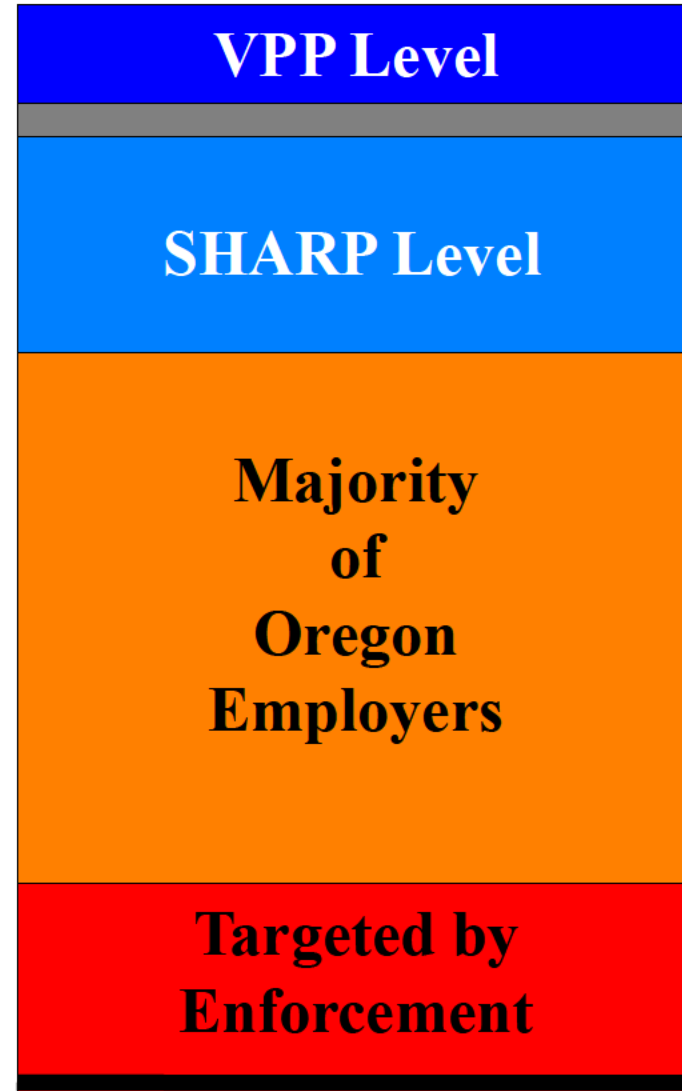
- After you decide to participate, you will meet with an Oregon OSHA consultant who will review the Challenge Program's requirements with you and make sure you understand the commitment necessary to stay in the program for one year.
- The consultant will conduct a comprehensive safety and health consultation of your workplace, including any mobile sites, and review any materials covering your existing safety and health program.
- After the comprehensive consultation, the consultant will talk to you about hazards identified during the consultation and help you determine how to correct them.
- The consultant will send you a written report explaining the findings of the comprehensive consultation, including the hazards identified, and a schedule for correcting them. You will work with consultation quarterly or more frequently depending on your needs. Your one-year enforcement deferral begins when you receive the report.



Visit the Oregon OSHA website to get started!
osha.oregon.gov

SHARP: A Process

- Encourages work toward self-sufficiency
- Utilize OR-OSHA consultation staff
- Initially
 - Recognition program
 - Aimed at smaller companies that need more help

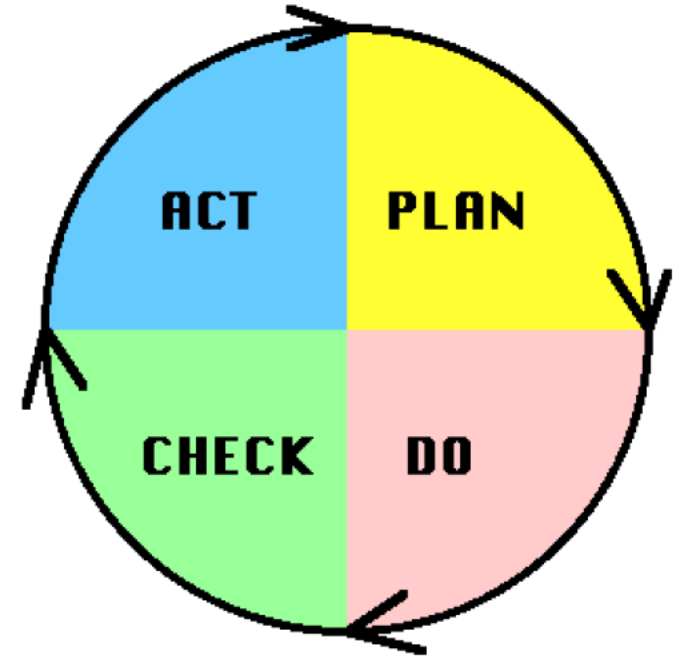


Creating a World-Class Safety Culture



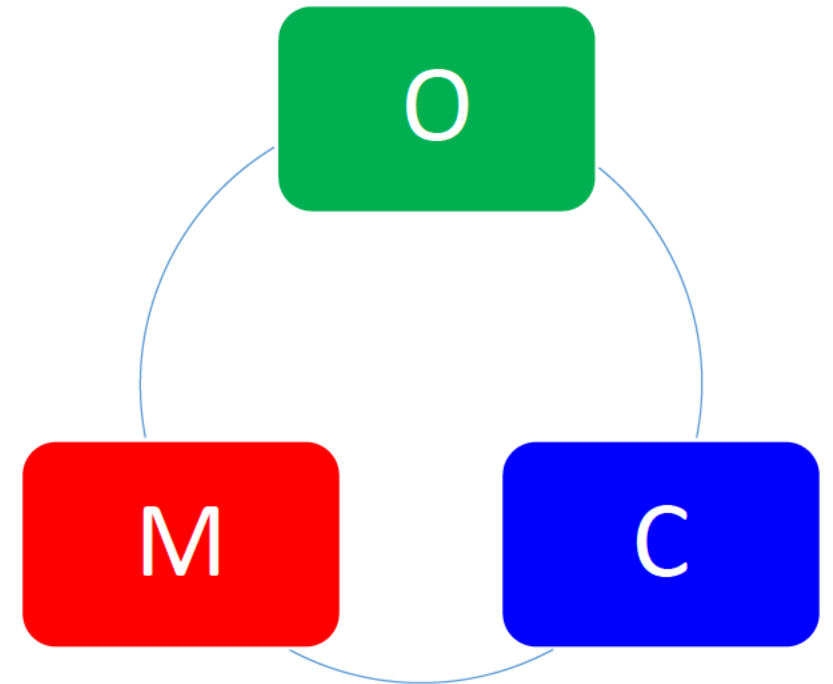
Action Planning (Goal Setting)

- **White Rabbit (*Alice in Wonderland*)**
 - If you don't know where you're going, any road will get you there!
- **Plan – Do – Check – Act**
 - *W. Edwards Demming – 1950's*
- **A job well planned is a job well done!**
 - Plan the Work, Work the Plan



Three Components of SHMS

- **Operational**
 - *(Find/Fix, Field/Facility)*
- **Managerial**
 - *(Programs, Policies & Procedures)*
- **Cultural**
 - *(How We Do the Work)*



SHARP Assessment of 3 Components of an Organizational Safety and Health System

- **Operational
Component**

Hazard Anticipation & Detection
Hazard Prevention & Control

- **Managerial
Component**

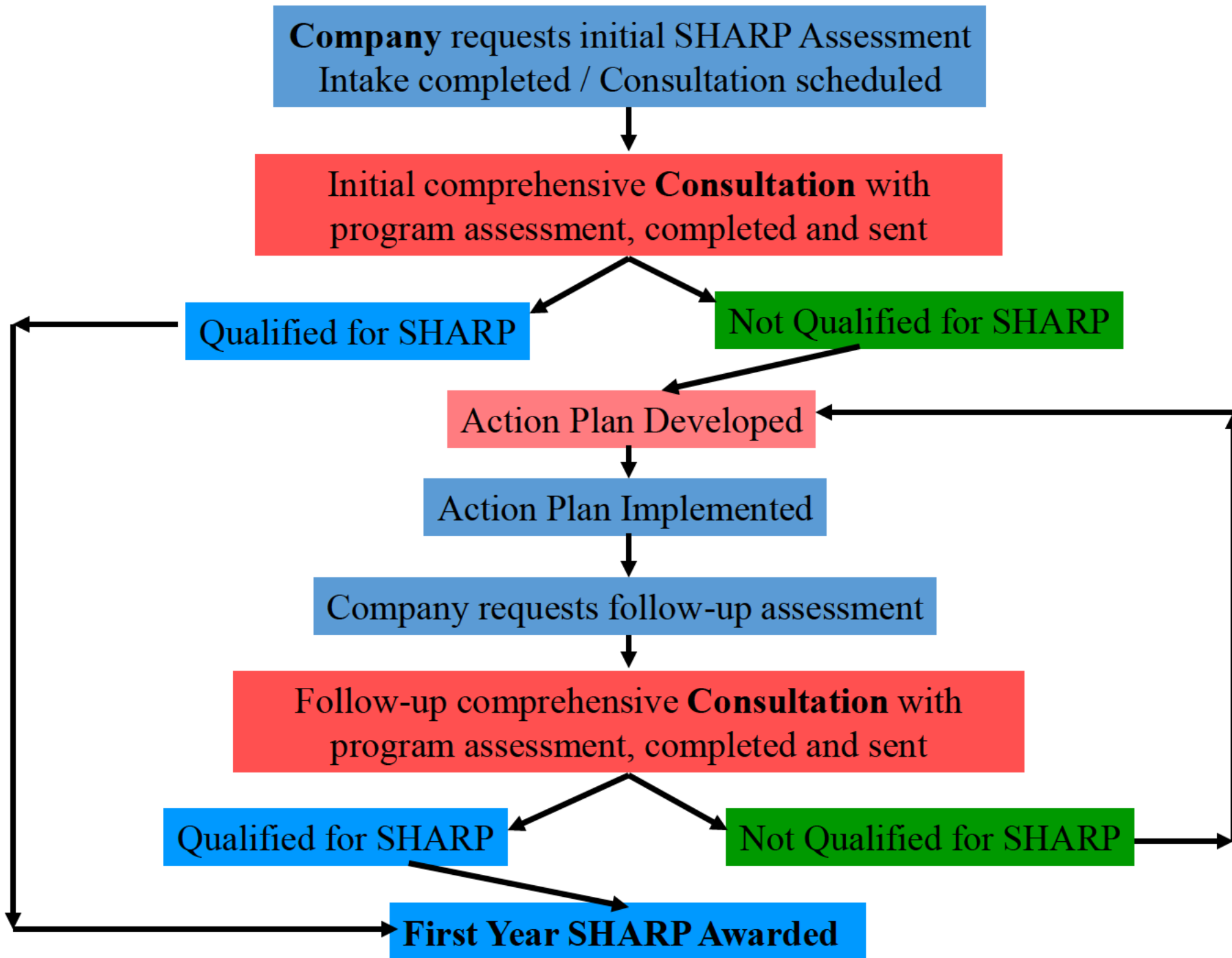
Evaluation & Improvement
Communication & Coordination
Safety & Health Training

- **Cultural
Component**

Management Leadership
Employee Participation

Rating Scale
0 1 / 2 3

Must rate
2 < x58
to be
awarded
SHARP

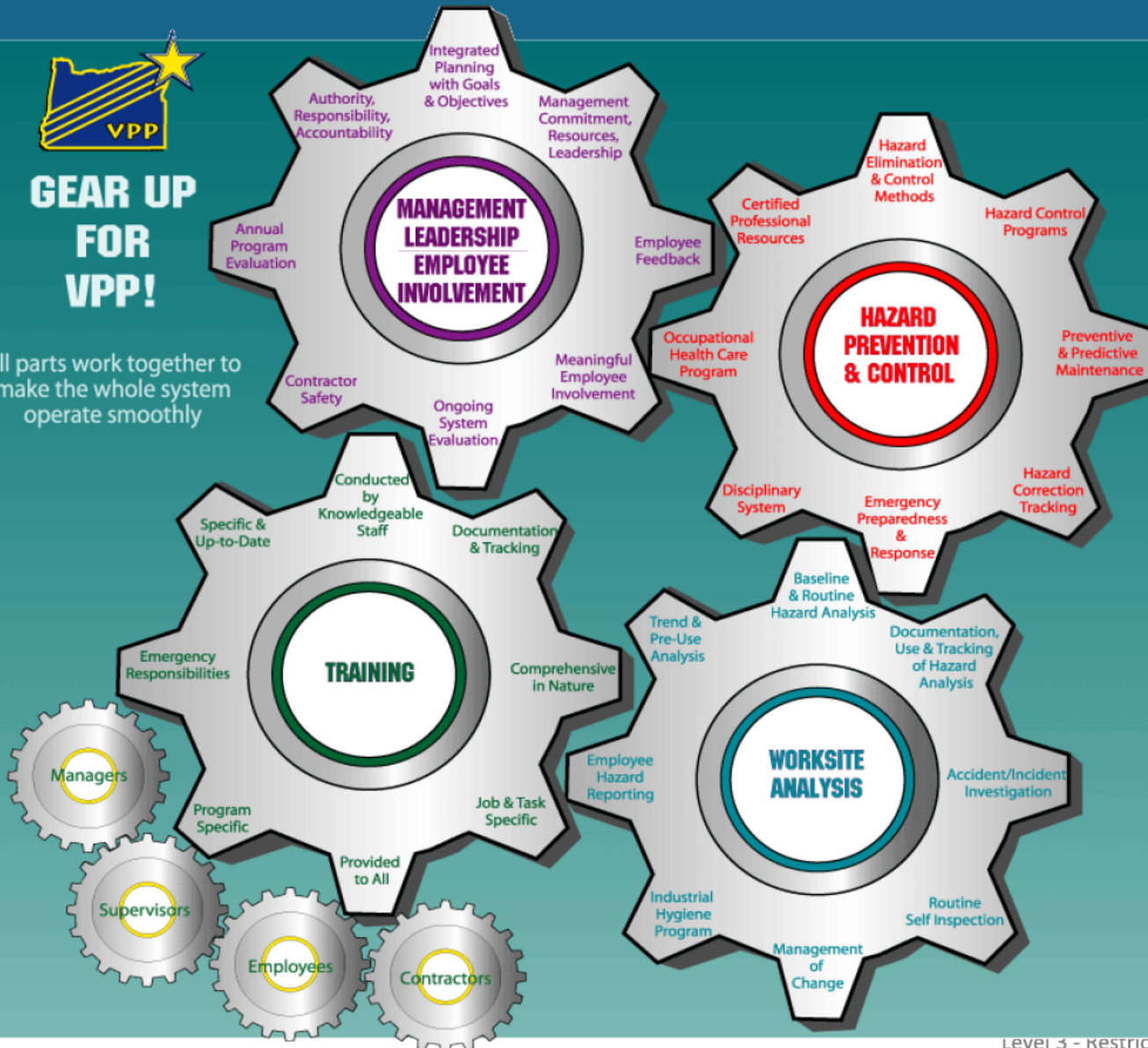


Oregon's VPP



GEAR UP FOR VPP!

All parts work together to make the whole system operate smoothly



- Outstanding Safety & Health Management
- Systems Approach
- Cooperative / Effective
- Beyond Standards
- Exemptions



VPP is About:

A management system

Work Together
Analyze Workplace
Control Hazards
Understand safety

•Roadmap

–A Guide to:



•State

A way of doing

•Status

•Condition

•A state of being

•Position

VPP is NOT:

- An off-the-shelf, fill-in-the-blank safety & health program
- A series of steps to follow
- Something a company can:
 - Buy
 - Have done for them
 - Join
 - Implement overnight



VPP Elements - I

Management Leadership and Employee Involvement

- Managers at all levels need to be **actively involved** in the VPP process and **demonstrate their commitment** to worker safety and health **by establishing and maintaining programs** for identifying hazards and reducing risks to employees.
- Employees must be **actively involved** to order to **share ownership** and foster an active role in the programs that are in place to protect employee safety and well being



VPP Elements - II

Worksite Analysis

- Effective safety and health management must begin with a thorough understanding of all potentially hazardous situations to which employees may be exposed
- Every worksite and task needs to be reviewed to identify hazards and potential hazards to the workers. This goes far beyond a simple safety review of the work to be performed.



VPP Elements - III

- **Hazard Prevention and Control**
 - Once the hazards have been identified and analyzed, they must be prevented or controlled
 - The safety of the employee must be protected by eliminating the hazards or providing effective engineering and/or administrative controls



Safety and Health Training

- The appropriate level of **training** should be provided to every employee. The type of **training** will **depend** on the **nature** of the employee's **job** and the **hazards** encountered **in** the **workplace**



VPP

3 ways to participate

**Site
Based**

**Mobile
Workforce**

**VPP
Corporate**

3 VPP Designations

STAR



Merit

Demonstration

- **Effective Employee Participation and Total Management Commitment**
- 3-year days away, restricted or transferred case incident rate (**DART**) **and** total case incident rate (**TCIR**) **below industry average**
- First Star evaluation 30-42 months after approval, with subsequent evaluations every 3-5 years

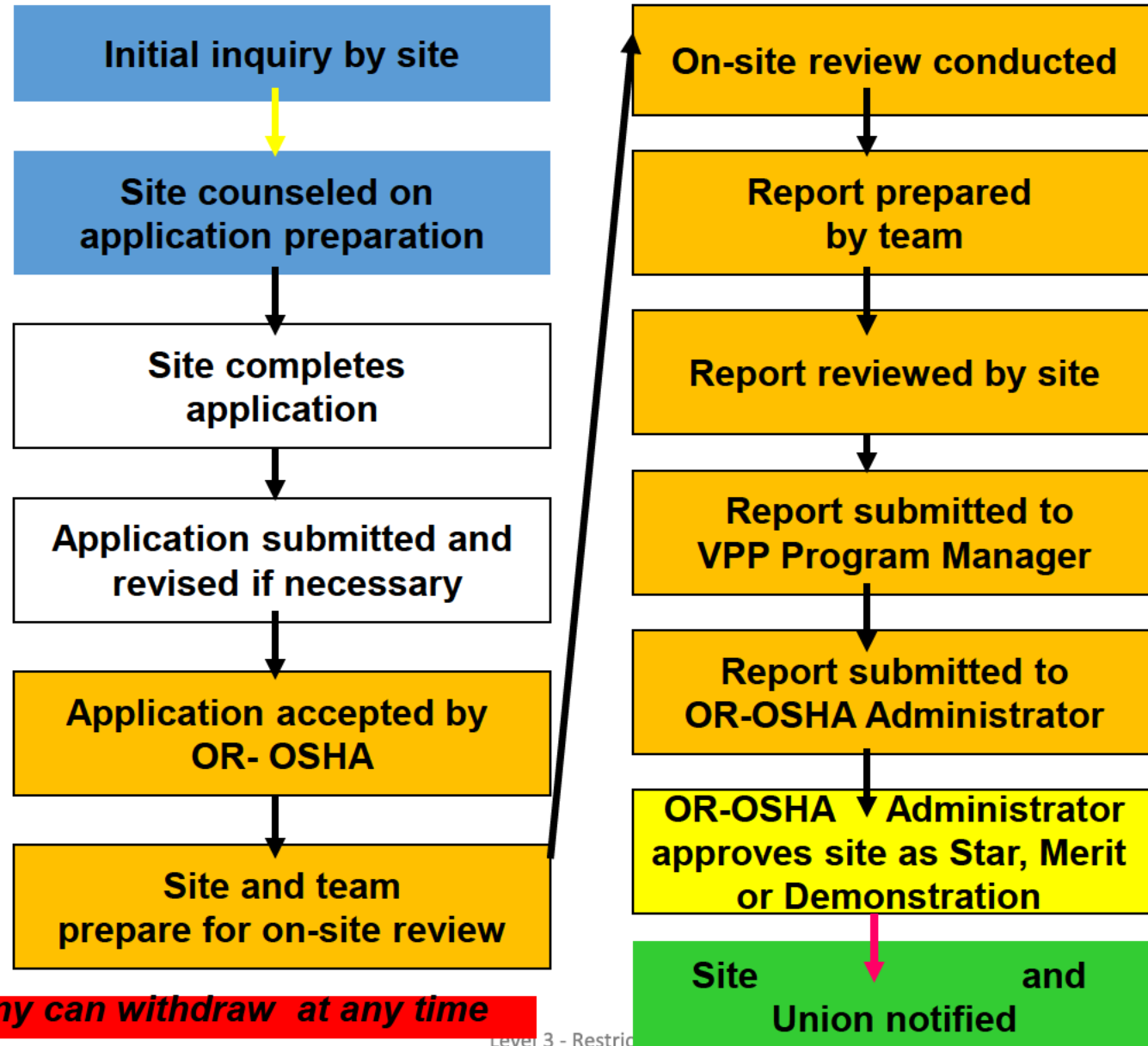
VPP Merit

- **Stepping-stone to VPP Star**
- If the three-year TCIR and/or DART are above the national average, the site must have a **realistic plan** to reduce the rates to below the national average within two years
- Established **Merit** system improvement **goals**
- Evaluated in 18-36 months
- **Limited to one three-year term**

VPP Demonstration

- Requires the **same level of excellence** as the VPP Star program but reserved for **alternative methods of achieving safety and health program excellence**
- **Outstanding** S & H Programs
- Evaluation every 12-18 months
- The Administrator must approve demonstration programs before implementation

VPP Application Process



Voluntary Compliance Benefits:

- Improved safety and health management **systems** and **performance**
 - Decline in injury, illness, days away and days restricted
 - Increased program efficiency
- **Enhances** labor and management **relations**
 - Higher morale, increased ownership, stronger safety culture, improved communications, “all on the same team”
- Creates **economic benefits**
 - **Reduction in:** workplace injuries; insurance premiums; compensation costs; re-work and customer loss; absenteeism rates;
 - **Improvements in:** productivity; teamwork, quality; communication; and understanding

Bottom Line

- Voluntary Compliance (CHALLENGE, SHARP & VPP) works because:
 - Techniques learned are successful
 - Successful techniques are repeated
 - Repeated techniques become habit
- **Positive Culture Change is Inevitable**
 - Success breeds success
 - Safety improvements foster improvements in production, quality, teamwork and satisfaction

Questions?

Comments?

Concerns?

Thank you!



Department of Consumer
and Business Services