



OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

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SUBJECT: Safety Champions Program Policies and Procedures Manual

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ABSTRACT

Purpose: This instruction provides policies and procedures for OSHA's Safety Champions Program (SCP).

Scope: OSHA-wide

References: [Recommended Practices for Safety and Health Programs](#), OSHA Publication 3885, October 2016.

[Recommended Practices for Safety and Health in Construction](#), OSHA Publication 3886, October 2016.

Special Government Employee (SGE) Program Policies and Procedures Manual for the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs (VPP) and Safety Champions Program (SCP).

Cancellations: None

State Impact: Notice of Intent required; Adoption encouraged.

Action Offices: National Office

Originating Office: Directorate of Cooperative and State Programs

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By and Under the Authority of

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Assistant Secretary

Executive Summary

Safety Champions Program Policies and Procedures Manual

This instruction establishes policies and procedures for OSHA's Safety Champions Program (SCP). OSHA encourages employers at all phases of safety and health program development to participate in SCP. SCP aims to assist employers in their efforts to reduce the risk of occupational injuries, illnesses, and fatalities by supporting participants' development of new and/or improved safety and health programs (SHPs) at their worksites. SCP replaces OSHA Challenge.

SCP participants will work with Special Government Employees (SGEs) and advance through three progressive Steps (Introductory, Intermediate, and Advanced) that provide a framework for employers to develop SHPs that align with the seven core elements of OSHA's [Recommended Practices for Safety and Health Programs](#) (OSHA Publication 3885, October 2016) / OSHA's [Recommended Practices for Safety and Health Programs in Construction](#) (OSHA Publication 3886, October 2016). Upon successful completion of the Advanced Step of SCP, OSHA expects that participating employers will have developed a SHP that integrates all seven core elements and will be taking a proactive approach to safety and health within their organizations.

The seven core elements of OSHA's Recommended Practices for Safety and Health Programs are summarized as follows:

- **Management Leadership:** Set a clear vision and provide necessary resources to prioritize workplace safety and health initiatives.
- **Worker Participation:** Encourage engagement and feedback from employees to create a collaborative culture focused on safety and health.
- **Hazard Identification and Assessment:** Implement systematic processes for identifying and evaluating workplace hazards to inform preventive measures.
- **Hazard Prevention and Control:** Establish effective strategies to eliminate, prevent and control risks presented by identified hazards.
- **Education and Training:** Train employees to develop the knowledge and skills necessary to work safely.
- **Program Evaluation and Improvement:** Engage in periodic assessments of safety and health program components to identify areas for enhancement, ensuring continuous improvement.
- **Communication and Coordination for Host Employers, Contractors, and Staffing Agencies:** Facilitate effective communication and teamwork between host employers, contractors, and staffing agencies to ensure consistent safety and health protection for all workers at the site.

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I. Purpose.

This instruction provides policies and procedures for OSHA’s Safety Champions Program (SCP). This voluntary program replaces OSHA Challenge and is intended to help participating employers systematically improve workplace safety and health by supporting participants’ development of new and/or improved safety and health programs (SHPs). Through SCP, participants will work with Special Government Employees (SGEs) and progress through a framework of three Steps in developing SHPs that align with the seven core elements in OSHA’s [Recommended Practices for Safety and Health Programs](#).

II. Scope.

This instruction applies OSHA-wide.

III. References.

- A. [Recommended Practices for Safety and Health Programs](#), OSHA Publication 3885, October 2016.
- B. [Recommended Practices for Safety and Health Programs in Construction](#), OSHA Publication 3886, October 2016.
- C. Special Government Employee (SGE) Program Policies and Procedures Manual for the Occupational Safety and Health Administration’s (OSHA) Voluntary Protection Programs (VPP) and Safety Champions Program (SCP).

IV. Cancellations.

None.

V. Action Offices.

- A. **Responsible Office.**
Directorate of Cooperative and State Programs (DCSP).
- B. **Action Office.**
National Office.
- C. **Information Offices.**
State Designees, OSHA Directorates and Regional Offices, Office of Public Affairs, and Office of the Solicitor.

VI. Federal Program Change.

This instruction describes a federal program change. State Plans are strongly encouraged, but are not required, to adopt this instruction, and State Plans that adopt this instruction should implement it in an at least as effective manner.

Within 60 days of the effective date of this instruction, a State Plan must submit a notice of intent indicating whether they already have a similar policy in place, intend to adopt new policies and procedures, or do not intend to adopt this instruction. If a State Plan does not adopt it at first, but at some later point decides to adopt this instruction or an

at least as effective version of this instruction, the State Plan must notify OSHA of this change in intent. Within 60 days of adoption, the State Plan must provide an electronic copy of the policy or a link to where their policies are posted on the State Plan's website. The State Plan must also provide the date of adoption and identify differences.

Chapter 1 Definitions

- I. Directorate of Cooperative and State Programs (DCSP).**

The Directorate responsible for coordinating and overseeing OSHA's cooperative programs, located in the National Office.
- II. Orientation Training.**

Training designed for new SCP participants, covering SCP program requirements and expectations, information in this instruction, the SCP Step Guide and the Safety Champions Tracker (SCT).
- III. Participant.**

A worksite that OSHA has accepted to SCP to develop or improve their safety and health program (SHP).
- IV. Progress Reporting.**

Routine updates made by SCP participants to the SCT. Participants are expected to show progress throughout the program. The SCT allows participants to report incremental progress, and participants are encouraged to update it monthly.
- V. Removal.**

An action taken by OSHA to discontinue a worksite's participation in SCP.
- VI. Safety and Health Program (SHP).**

A program developed by an employer through participation in SCP, with the main goal of preventing workplace injuries, illnesses and deaths, as well as the suffering and financial hardship these events can cause for workers, their families, and employers. Safety and health programs foster a proactive approach to mitigating workplace hazards before they can cause injury or illness. SHPs developed through SCP are built around seven core elements that OSHA has determined make up a successful program: Management Leadership, Worker Participation, Hazard Identification and Assessment, Hazard Prevention and Control, Education and Training, Program Evaluation and Improvement, Communication and Coordination for Host Employers, Contractors, and Staffing Agencies.
- VII. SCP Coordinator.**

The DCSP staff member(s) responsible for administering and managing SCP for the National Office, connecting participants with SGEs, and communicating with and requesting SGEs from the SGE Coordinator.
- VIII. SCP Step Completion.**

A determination by an SGE that an SCP participant has completed all requirements for a particular Step that is reviewed and verified by the SCP Coordinator in accordance with the procedure in Chapter 4.V.F.

IX. Special Government Employee (SGE).

As defined at 18 U.S.C. § 202(a), an officer or employee of the executive or legislative branch of the United States Government who is retained, designated, appointed, or employed, to perform temporary duties either on a full-time or intermittent basis, with or without compensation, for not more than 130 days during any period of 365 consecutive days.

For SCP purposes, SGEs may assist in providing SHP expertise and evaluate participants' progress through the Steps in the program.

X. SGE Coordinator.

The DCSP staff member(s) responsible for coordinating and managing SGE activities.

XI. Steps.

The three progressive phases (Steps) of SCP: Introductory, Intermediate, and Advanced.

XII. Safety Champions Tracker (SCT).

A tracking tool for participants to monitor their progress through each SCP Step and for SGEs to review when determining whether an SCP participant has completed all Step requirements. Participants indicate their progress through the SCT and provide those updates to OSHA through routine progress reporting.

XIII. Step Guide.

A guide outlining actions and goals within each core element that are necessary for completion of each Step.

XIV. Withdrawal.

The decision by a worksite to discontinue participation in SCP.

Chapter 2 OSHA Responsibilities

I. Introduction.

This chapter describes OSHA's responsibilities for managing SCP. These responsibilities must be carried out by identified individuals or their designees.

II. Assistant Secretary.

The Assistant Secretary is responsible for signing a letter of recognition for participants who successfully completed the Advanced Step of SCP.

III. Directorate of Cooperative and State Programs (DCSP).

A. Policies and Procedures.

DCSP develops, interprets, and revises policies and procedures for the administration and management of SCP, including the SCP Policies and Procedures Manual.

B. Director, DCSP.

The Director of DCSP will sign letters of recognition for participants that complete the Introductory and Intermediate Steps of SCP. The Director will review and submit letters of recognition to the Assistant Secretary for signatures for participants who successfully complete the Advanced Step of SCP. The Director has overall responsibility for the execution and evaluation of SCP and making reports on its implementation to the Assistant Secretary.

C. SCP Coordinator.

The SCP Coordinator, located in DCSP, must:

1. Review participant enrollment for completeness, request any information that is missing, and input data into SCP database.
2. Provide orientation training to participants.
3. Perform OSHA enforcement activity searches when worksites sign up to participate in SCP and any time a participant requests a Step completion review.
4. Assist the SGE Coordinator with training the SGEs.
5. Assign SGEs upon participants' requests and for purposes of determining completion of Steps.
6. Submit vetting requests to the SGE Coordinator when a participant requests SGE assistance or Step completion determination. (Note: SGEs will be vetted through the SGE Coordinator to ensure they are active and that no conflict of interest will arise from their participation.)
7. Provide the SGE's contact information to the participant once

approval has been received from the SGE Coordinator.

8. Review participants' progress by checking the SCT monthly.
9. Verify participants' Step completion by reviewing the SGE's notification and any comments provided by SGE assigned to review the Step.
10. Submit letters of recognition to the Director of DCSP for signature upon verification of Introductory and Intermediate Step completion. The SCP Coordinator will send the signed letter to the participant.
11. Submit letters of recognition to the Assistant Secretary for signature upon verification of Advanced Step completion. The SCP Coordinator will send the signed letter to the participant.
12. As necessary, make recommendations to the Director -of DCSP to remove participants in accordance with Ch. 4.VII.
13. Maintain the SCP database.
14. Develop and maintain the SCP website.
15. Review and analyze SCP implementation and recommend changes as necessary.
16. Assist in providing outreach and training materials on SCP for OSHA personnel. The SCP Coordinator may also develop informative briefing materials on SCP.
17. Notify the SGE Coordinator if informed by a participant of any concerns regarding SGE conduct. For more information, see the [Special Government Employee \(SGE\) Policies and Procedures Manual](#).

IV. SGE.

SGEs must adhere to required federal ethical obligations. SGEs are prohibited from receiving compensation from an SCP participant for an activity that is undertaken as part of the SGEs' official duties in support of that participant. Further information on the SGE role, including eligibility, permissible activities, and additional applicable policies and expectations, is addressed in the [Special Government Employee \(SGE\) Policies and Procedures Manual](#).

SGEs designated by the SCP Coordinator may be required to help SCP participants with the following tasks:

- A.** Help participants with SHP development, including reviewing SHP documentation, providing feedback to participants about their progress, communicating what data or information may be needed for their SCTs,

and answering questions from participants on an as-needed basis as they progress through the SCP Steps.

- B.** Conduct initial review of new participants' existing safety and health programs to determine what Step to place them in.
- C.** Evaluate participants' SHPs using the Steps Guide and SCT at the completion of a Step to determine whether they have successfully met the requirements for Step completion. The SGE will not typically visit the participant's worksite in making this determination.
- D.** Once the SGE has determined the participant has completed the Step, the SGE will notify the SCP Coordinator at SafetyChampions@dol.gov.

Chapter 3 Guiding Principles

I. Introduction.

This chapter addresses principles underlying SCP.

II. Guiding SCP Principles.

SCP participants are expected to adhere to the following principles:

A. Continuous Improvement.

Participants will demonstrate continuous improvement in the development, implementation, and success of their SHP. Continuous improvement is built into the program's Steps. Each participant's SCT helps that participant measure success, identify areas for improvement, determine needed changes, and track the implementation of these changes. SGEs will evaluate participant progress and confirm this improvement.

B. Compliance with the OSH Act.

Participants will comply with the Occupational Safety and Health Act (OSH Act), all OSHA standards and regulations, and in the case of Federal agency worksites, 29 CFR 1960. Safety Champions Program 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.

C. Addressing Hazards.

Any 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.

D. Workers and Employer Rights and Responsibilities.

Participation in SCP does not diminish worker and employer rights and responsibilities under the OSH Act, OSHA regulations and standards, and, for Federal agencies, 29 CFR 1960.

E. Cooperative Relationship.

Participation in SCP is strictly voluntary. OSHA expects participants to work cooperatively and proactively with the SCP Coordinator and SGEs, as applicable, both in the resolution of safety and health problems and in the promotion of an effective SHP. When an employer joins SCP, they will provide assurances that they will make good faith efforts to meet the program's requirements, including

submitting all requested information by established deadlines and demonstrating continuous improvement to their SHP.

F. Protecting Whistleblower Rights.

Private sector employees are protected from retaliation for exercising their rights under the OSH Act. See Section 11(c) of the OSH Act, 29 U.S.C. § 660(c). Depending on their circumstances, employees may also be covered under other whistleblower statutes enforced by OSHA. Whistleblower protection for federal employees is provided by the Whistleblower Protection Act of 1989. SCP participants will train managers on the anti-retaliation protection included in the statutes applicable to their employment and will post OSHA publications on whistleblower rights in places visible to workers. Information on the whistleblower statutes enforced by OSHA can be found on www.whistleblowers.gov.

Chapter 4 Participant Eligibility and Program Requirements

I. Introduction.

This chapter details SCP participant eligibility and requirements for participating in the program.

II. Participant Eligibility.

SCP is open to private and public-sector worksites that are covered by OSHA and interested in improving safety and health in their workplace. Interested worksites must sign up to participate on OSHA's website.

Worksites that have enforcement history with OSHA may participate in SCP. However, worksites 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.

Continued participation in SCP also requires that the participants work in good faith toward improving their SHPs and continued adherence to the guiding principles discussed in Chapter 3.

III. Program Overview.

SCP participants participate in the program by developing and improving their SHP. SCP supports participants in their progress through a framework of three Steps of SHP development and implementation – Introductory, Intermediate, and Advanced. OSHA has developed resources to guide participants through the program's three Steps, which help participants develop SHPs that incorporate the seven core elements of OSHA's [Recommended Practices for Safety and Health Programs](#). OSHA resources, including the SCP Step Guide and the SCT, identify specific actions that participants must take at each Step of the program.

A summary of the three Steps is provided below:

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.

IV. Seven Core Elements.

The SCP SHP framework is based on the seven core elements of the [Recommended Practices for Safety and Health Programs](#). As previously noted, a SHP that includes these elements, when fully integrated into a site's daily operations, helps prevent workplace injuries and illnesses.

The seven core elements are summarized as follows:

A. Management Leadership.

Set a clear vision and provide necessary resources to prioritize workplace safety and health initiatives.

B. Worker Participation.

Encourage engagement and feedback from employees to create a collaborative culture focused on safety and health.

C. Hazard Identification and Assessment.

Implement systematic processes for identifying and evaluating workplace hazards to inform preventive measures.

D. Hazard Prevention and Control.

Establish effective strategies to eliminate, prevent, and control risks presented by identified hazards.

E. Education and Training.

Train employees to develop the knowledge and skills necessary to work safely.

F. Program Evaluation and Improvement.

Engage in periodic assessments of safety and health program components to identify areas for enhancement, ensuring continuous improvement.

G. Communication and Coordination for Host Employers, Contractors, and Staffing Agencies.

Facilitate effective communication and teamwork between host employers, contractors, and staffing agencies to ensure consistent safety and health protection for all workers at the site.

V. Participant Requirements.

After a worksite has joined SCP as a participant, they are responsible for the following:

A. Responsibility for SHP Development and Implementation.

Participants must take sole responsibility for developing and improving their SHPs. SGEs are available to work with participants and to evaluate progression through the program. However, the participants are solely responsible for implementing their SHP and meeting the program's requirements.

B. Progress Reporting.

Participants must continually document their progress throughout the program using the SCT. In the SCT, OSHA has identified specific actions that participants

must complete at each Step of the program to progress to the next Step. The participants will use the SCT to track their progress through each Step. Space will be provided in the SCT for participants to provide information about their progress and specific actions.

Participants are encouraged to update the SCT monthly. This is intended to ensure the participant is progressing through the program and demonstrating continuous improvement.

Participants must inform the SCP Coordinator of any changes in contact information or major changes at the site that would impact communication or progress.

C. Orientation Training.

Orientation training will be made available periodically as needed based on the number of new participants. Training will introduce participants to the program's Directive, Step Guide, and SCT. A participant must attend orientation training in order to complete the Introductory Step.

D. Initial Step Determination.

OSHA encourages employers at all phases of SHP development to participate in SCP. SCP participants will begin the program at the appropriate Step. OSHA will typically accept participants at the Introductory Step, but if an SCP participant believes they already have a SHP that meets the Intermediate or Advanced Step criteria, the participant can request an initial review by an SGE to determine what Step they should be placed in.

E. Step Progression.

Participants should show progress through the program by the completion of actions on the SCT and continued development and improvement of the SHP. The SCP Coordinator will conduct reviews of each participant's progress through the SCT. If no progress is made, the SCP Coordinator will contact the participant and determine whether the participant wants to continue.

F. Step Completion.

Participants must take the necessary actions to meet the requirements for each Step. When a participant believes they have completed a Step, they will notify the SCP Coordinator. The SCP Coordinator will check OIS to determine whether there is ongoing OSHA enforcement activity at the participant's worksite. If there is ongoing enforcement activity at the worksite the SCP Coordinator will notify the participant that they are not eligible for Step completion review until the enforcement activity is closed in OIS.

Once the SCP Coordinator confirms there is no ongoing enforcement activity at the worksite, the SCP Coordinator will assign an SGE to review the participant's

SHP to determine if they have met all the requirements of a Step. The participant is required to demonstrate that their SHP satisfies the criteria for advancement to the next Step by demonstrating knowledge, actions, documentation, and specific outcomes as defined in the Step Guide and SCT.

The SGE will review the SHP, SCT, and other relevant documentation, provide feedback in the SCT, and determine whether the SCP participant has successfully met the requirements for Step completion. If the SGE determines that the participant completed a Step, the SGE will notify the SCP Coordinator of this as detailed in Chapter 2. After an SGE determines a participant's completion of a Step, and the SCP Coordinator reviews and verifies the SGE's determination, the participant will receive recognition as detailed below. The SGE will not typically visit the participant's worksite in making this determination.

If the SGE determines that the participant has not met all the requirements of a Step, then the SGE will inform the participant. The SCP Coordinator and SGEs are also available to assist participants in these circumstances, to help them evaluate how to move forward with actions that are not yet satisfied. If the participant disagrees with the assessment, the SGE or participant may contact the SCP Coordinator for further guidance. If the SCP Coordinator finds that additional review is necessary, the SCP Coordinator can assign another SGE as appropriate.

G. SCP Program Completion.

After an SGE determines a participant has completed the Advanced Step, and the SCP Coordinator reviews and verifies the SGE's determination, the participant has successfully completed SCP and will receive recognition as detailed below. Participants who successfully complete SCP are encouraged to consider applying for recognition in OSHA's Voluntary Protection Programs (VPP).

VI. Recognition.

A. Publicity.

OSHA may determine to publicize participants' successes in a variety of ways, including through stories on the agency's website, www.osha.gov, or through press releases and agency social media. Participants will be recognized on the OSHA website when they complete the Advanced Step.

B. Letters of Recognition.

Participants will receive letters of recognition as they progress through Introductory to Advanced Steps. Participants that complete the Advanced Step will receive a letter of recognition from the Assistant Secretary.

C. Use of SCP Logo.

Participants in the Advanced Step may choose to use the SCP logo on items that they purchase for themselves at their own expense. Examples of items are

letterheads, shirts, mugs, pins, and magnets. More detailed guidance concerning participants' use of the SCP logo will be published on the OSHA website.

VII. Removal.

OSHA enforcement actions may affect participation in SCP. OSHA retains discretion to reevaluate any participant's current Step, or to remove participants from the program, if deemed appropriate. 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 explained in Chapter 3, or prolonged periods of failure to progress in the program.

VIII. Voluntary Withdrawal.

Participants may withdraw from SCP at any time and at any Step by contacting the SCP Coordinator at SafetyChampions@dol.gov.

IX. SGE Ethics Feedback.

SGE responsibilities and ethical obligations are set forth in Chapter 2 of this instruction and in the SGE Program Policies and Procedures Manual. OSHA asks that participants provide feedback to OSHA if an SGE's conduct is not in accordance with these requirements and responsibilities. Participants may submit a complaint or concern about SGE conduct to the SCP Coordinator. The SCP Coordinator will inform the SGE Coordinator of the concern and/or complaint, and the SGE Coordinator will take appropriate action as needed.

Chapter 5 Performance Measures

I. Introduction.

This chapter discusses how OSHA, through the SCP Coordinator, will review SCP for program effectiveness.

II. Performance Measures.

OSHA will measure the performance of SCP by tracking and evaluating the following:

- A. Number of worksites participating in the program.
- B. Number of worksites participating in each Step.
- C. Number of participants completing the Steps in the program.
- D. Number of SGEs involved in the program.
- E. SGE activities performed for SCP.
- F. Qualitative information reported by participants in their Progress Reporting.

III. Program Evaluation.

The National Office through the DCSP will review the SCP annually.