



# OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

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DIRECTIVE NUMBER: CSP 04-01-002

EFFECTIVE DATE: July 29, 2015

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SUBJECT: OSHA Alliance Program

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## ABSTRACT

- Purpose:** This Directive establishes the Agency's revised policies and guidelines for the management and operation of the Agency's Alliance Program.
- Scope:** OSHA-wide
- Cancellations:** This directive supersedes OSHA Directive Number CSP 04-01-001 of June 10, 2004. It also incorporates the "Revised Alliance Program Participation Criteria" memorandum of July 8, 2010 by Assistant Secretary Dr. David Michaels.
- State Impact:** This instruction describes a Federal Program for which State implementation is not required.
- Action Offices:** National, Regional, and Area Offices
- Originating Office:** Directorate of Cooperative and State Programs (DCSP)
- Contact:** Office of Outreach Services and Alliances (OOSA)  
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By and Under the Authority of  
David Michaels  
Assistant Secretary

## Executive Summary

This Directive establishes the Agency's revised policies and guidelines for the management and operation of its Alliance Program. It is a revision of the June 6, 2004 directive that originally established the OSHA Alliance Program, and it incorporates the modifications to the original directive implemented through a July 8, 2010 memorandum from the Assistant Secretary. The directive modifies and clarifies the purposes and requirements of alliances, defines the duties of different Agency staff offices within OSHA in relation to alliances, and provides general direction for the development and conduct of alliances.

## Significant Changes

This revision:

- Incorporates the policy changes to the original alliance directive of the July 8, 2010 memorandum from the Assistant Secretary for OSHA, entitled "Revised Alliance Program Participation Criteria."
- Expands the types of organizations with which alliances are encouraged by explicitly including labor unions and other worker advocate labor groups, community- and faith-based organizations, and consulates. While these were not excluded in the past, most past alliances have been with trade associations, employers and professional associations.
- Explicitly and strongly encourages OSHA and trade association and employer alliance signatories to ensure, whenever possible, that alliances have active labor voices, preferably through the active participation of unions in these alliances. OSHA staff are encouraged to help recruit union or labor representatives for such alliances whenever possible.
- More explicitly defines the purposes and requirements for alliances, particularly the requirement for alliances to operate according to agreements with well-defined goals and specific objectives, including a written work plan that translates the agreement's broad goals into specific objectives, actions, products and activities, including information about how and when these objectives will be achieved.
- More explicitly states the expectations that alliances will evaluate the impact of their activities on workplace safety and health, and that OSHA staff will also evaluate the performance of alliances when determining whether to renew an alliance.
- Emphasizes the need for alliance products and activities to highlight the responsibilities of employers and the rights of employees under the *Occupational Safety and Health Act*.
- Reduces some of the administrative burdens and recordkeeping requirements of the alliances by reducing the required yearly meetings to twice per year, with more only as necessary.
- Defines the expected duration of initial and renewal alliance agreements.
- This instruction does not bind the Agency to approve or disapprove any particular Alliance, limit the Agency's discretion to enter into Alliances, or create any rights for private parties.

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I. Purpose

This Directive establishes the Agency's revised policies and guidelines for the management and operation of the Agency's Alliance Program.

II. Scope.

OSHA-wide.

III. Cancellations

This directive supersedes OSHA Directive Number CSP 04-01-001 of June 6, 2004, and incorporates the changes in the "Revised Alliance Program Participation Criteria" memorandum of July 8, 2010 by Assistant Secretary Dr. David Michaels.

IV. Action Information

A. Responsible Office.

The Directorate of Cooperative and State Programs.

B. Action Offices.

All National Office Directorates and Offices, Regional Offices, and Area Offices involved in the design, approval, and implementation of OSHA Alliances must adhere to these instructions.

C. Information Offices.

Regional Administrators (RAs) will ensure that the information contained herein is transmitted to all State Plan Designees and OSHA Consultation Projects.

V. State Program Change

This directive describes the ongoing implementation of a Federal Program for which state adoption is not required. However, OSHA encourages the States to join with OSHA in National and Regional Office Alliances and also to develop their own Alliance Programs, patterned after Federal OSHA's. In addition, states are encouraged to share with OSHA their alliance agreements, lessons learned and other information from their alliances that may be useful in furthering the common goal of reducing occupational fatalities, injuries and illnesses.

VI. Definitions

A. Alliances

OSHA Alliances are formal, voluntary, cooperative relationships between OSHA and employers and trade associations; labor unions and other labor groups; professional associations; educational institutions; community- and faith-based organizations; consulates; local, state, and federal government agencies; and other organizations or institutions. They may also include participation by State Plan States, Consultation Projects, and other stakeholders. The purpose of alliances is to improve worker safety and health; the requirements they must meet are described in Section VII of this Directive.

B. Alliance Agreement

A document that defines the agreement between the Agency and the alliance signatories. It is signed by senior representatives of both parties. The agreement describes the broad goals of the alliance and how it will generally meet the requirements in this Directive through specific objectives, as described in Section VII. For example, agreements commonly identify the hazard(s) in an industry segment or other topics which will be the focus of the alliance's work, the segments of the workforce towards which the efforts will be primarily directed, a description of the activities that are planned to address the hazard(s) or other topics (e.g., the tools planned, such as videos, text materials, social media--and the rationale for these choices). Work Plans, defined below, provide more specific detail about how the agreements will be implemented.

C. Alliance Work Plan

A written document developed yearly by the Alliance Implementation Team that describes the specific activities and products that the Alliance will complete in a given year. Work Plans will be consistent with the Alliance agreement, but provide more detail about the specific goals, tools, audiences, responsible parties, timelines, metrics for evaluating impact and success, and other aspects of the projected work of the alliance during the year. The basic outlines of the first year's Work Plan for a new alliance will be developed and agreed upon jointly by OSHA and the signatories during the discussions prior to signing the Alliance Agreement, and must be finalized in the first meeting of the Alliance's Implementation Team.

D. Alliance Program Signatory

Any party that signs an Alliance agreement with OSHA, signifying that it is willing to work collaboratively with OSHA to fulfill the alliance requirements described in Section VII. Examples of groups that may be alliance signatories can be found in the definition of Alliances above.

Signatories from the alliance participants should be senior officials, and OSHA signatories to Alliances should be the highest authority in the OSHA office that develops

the agreement. The Assistant Secretary (or designee) may sign national Alliances (except when the Secretary of Labor chooses to do so), the Regional Administrator(s) must sign regional Alliances and the Area Director(s) must sign Alliances developed in an Area Office(s).

E. Alliance Annual Reports

An annual report, prepared by the Alliance Coordinator (national alliances) or Regional Alliance Program Coordinator or area office representative (regional and area office alliances) for the purposes of documenting and evaluating each alliance's activities. The report is posted on OSHA's web pages. Information in the reports must include brief general descriptive information concerning the alliance, its goals and specific objectives; the dates signed/renewed; names of the Implementation Team members and other contributors; a list of the events, activities, products and other outcomes of the alliance in the reporting year; measures of its reach and impact; and a copy of the Work Plan for the reporting year.

F. National Alliance Coordinator

The National Alliance Coordinator is the staff person within DCSP who serves as the primary contact for a national alliance, typically also the person initially involved in its formation.

G. Regional Alliance Program Coordinator

The person designated by the Regional Administrator to track and facilitate alliance activity in the Region.

H. Implementation Team

The group of representatives from OSHA and the signatory organization(s) who meet in person or teleconference at least twice per year to plan and implement the actions to be undertaken by the alliance under its Agreement and Work Plan.

Implementation Team members include representatives from the signatory organizations, a representative from DCSP, and representatives from field office(s) and/or other Directorate(s) with the necessary subject matter expertise or ongoing relationships with the signatories (National Alliances), or regional subject matter experts and regional individuals with relationships to the alliance participants (regional and area office alliances). In national, regional, and area office alliances, representatives from State Plan States, OSHA Consultation Projects, unions, other agencies and/or other organizations that are relevant stakeholders but not signatories may also participate.

VII. Alliance Purposes and Requirements

A. Alliance Purposes

The primary purpose of the Alliance Program is to enable the Agency to work collaboratively with private and public sector organizations and institutions to reduce fatalities, illnesses, and injuries in the workplace, with a special focus on ensuring that workers have a voice in alliance efforts, that alliances reach worker and employer constituencies most in need of OSHA's assistance, and that employers and workers respectively increase knowledge of their responsibilities and rights under the *Occupational Safety and Health Act*.

B. Alliance Duration

Initial alliance agreements will have a duration of two years. Renewal agreements may have a duration of two to five years.

C. Criteria for New and Renewed Alliances

1. Alliance Program participants are committed to working closely with OSHA to develop and share information with workers and employers to help prevent injuries, illnesses, and fatalities in the workplace.
2. Alliance Program participants work to educate workers and employers about their rights and responsibilities under the *Occupational Safety and Health Act*, including the prevention of retaliation against employees engaging in protected activity.
3. Alliances provide a forum for employers and workers to work together to resolve workplace safety and health issues. To achieve this, Alliances with employers and employer groups (e.g. trade associations) must also include worker representatives. This is accomplished by:
  - a) Having a union signatory whenever possible (e.g., from a union with a presence and/or experience in the industry); or
  - b) Having worker involvement in the Alliance Agreement's development and implementation, including project workgroups; or
  - c) Having participation in the alliance of community-based labor groups or similar organizations knowledgeable and involved in the issues addressed by the alliance.
4. Alliances support the Department of Labor's strategic goals of enhancing worker voice and providing safe and secure workplaces. This is accomplished by the Alliance Program participants fulfilling all or part of the following criteria, as relevant and appropriate to each specific alliance:
  - a) Possessing sufficient knowledge and resources to fulfill the goals of the Alliance agreement.
  - b) Demonstrating the ability and commitment to reach one or more diverse, at-risk workforces through the Alliance (e.g., low literacy or non-English-speaking workers).

- c) Providing workers with effective training, workplace safety guidance materials, whistleblower outreach materials, and similar tools to participate with employers in their efforts to achieve compliance with OSHA standards and, whenever possible, go beyond compliance through best practices.
- d) Providing tripartite participation through which management, workers and their representatives and OSHA can collaborate in addressing workplace safety and health issues, recognizing whistleblower protection issues, resolving disagreements, and identifying innovative solutions to safety, health, and retaliation problems through forums, roundtables, stakeholder meetings and similar activities.
- e) Supporting OSHA enforcement initiatives, such as by sharing information on national or local emphasis programs and/or developing compliance assistance materials for these and other specifically-targeted hazards/industries.
- f) Communicating information through alliance channels about OSHA's new and revised standards, enforcement initiatives, OSHA's whistleblower protection program, emphasis programs, specific workplace hazards and their controls, OSHA strategic initiatives, and similar matters.
- g) Providing OSHA staff with training opportunities and/or unique and desired skills or resources.
- h) Operating according to a written Work Plan that defines the specific activities and products the alliance will seek to complete.
- i) Developing and implementing methods and metrics to evaluate the impact of alliance activities on workplace safety and health.
- j) Making their products available to the public free of any charges.
- k) For renewals, demonstrating a record of meeting Alliance Agreement goals, Work Plans, and program expectations.

The alliance agreements and work plans must describe how each alliance will address these requirements.

## VIII. Responsibilities

### A. Directorate of Cooperative and State Programs

DCSP is responsible for implementing the overall Agency Alliance Program, coordinating the development of Alliance policy, implementing individual national Alliances, helping to coordinate and track regional and area office alliance activities, and advising the Assistant Secretary concerning Alliance issues. Specifically, DCSP is responsible for:



1. Meeting with National Alliances at least twice a year, and more frequently if necessary, to facilitate the implementation of each Alliance's work plan.
2. Tracking, reporting on, and evaluating the impact of Alliance activities, including completing annual reports for national alliances and collecting and reviewing annual reports for regional and area office Alliances.
3. Sending draft National Office Alliance agreements to Regional Administrators and directorate heads for comment regarding resource implications, desire to participate in the alliance, relevant past experience with the potential Alliance Program participant(s) – including any enforcement or legal issues, or issues related to State Plan States, Consultation Projects or Regions – or other factors that could have an impact on an alliance.
4. Sending draft National Office Alliance agreements to the Solicitor of Labor (SOL) for OSHA to obtain formal approval to sign the agreement.
5. Reviewing Regional (Region-wide) Alliances to ensure they follow the guidelines in this directive and sending the draft alliance agreements to the SOL for approval.
6. Identifying, developing and disseminating to the Agency and the public at large alliance success stories to encourage their replication by other parties, and assisting the Regional and Area offices to do the same, in order to continuously improve the program and communicate its impacts.
8. Coordinating with the Office of Communications on press releases, publication of relevant notes in *QuickTakes* and social media outlets as appropriate, photographers, conference exhibits, and other alliance-related communication activities.
9. Coordinating periodic conference calls with Regional Alliance Program Coordinators.
10. Notifying the affected Regional Administrator and State Plan State of any Alliance-related activity that is to take place in their regions or states.
11. Encouraging the participation of the State Plan and Consultation Projects in the implementation of National, Regional and Area Office Alliances, including participation on individual implementation teams, as appropriate.

B. National Office Directorates

While national Alliances are coordinated through DCSP, other directorates may sometimes take the initiative in beginning negotiations that lead to Alliances. Successful

coordination is dependent on communication with DCSP. Likewise, the views and participation of policy, subject matter, and other experts from relevant directorates and field offices are important to the development of Alliances that have been initiated in DCSP. Thus, directorates are responsible for:

1. Including DCSP as soon as possible regarding a potential Alliance.
2. Responding promptly to requests to review draft alliance agreements, and for staff to participate in alliances (e.g., as subject matter experts).
3. Commenting regarding factors such as resource implications, desire to participate in the alliance, relevant past experience with the potential Alliance Program participant(s)--including any enforcement or legal issues, or issues related to State Plan States, Consultation Projects or Regions--or other factors that could have an impact on an alliance.
4. Alerting DCSP to any issues or problems that are relevant to the implementation of a national alliance.
5. Participating on Alliance Implementation Teams as subject matter or policy experts, as appropriate, and serving as reviewers of products developed by alliances.

C. Regional Administrators

Regional Administrators (RAs) or their designees are responsible for:

1. Designating a Regional Alliance Program Coordinator who will ensure that the originating office of each alliance establishes and maintains accurate oversight, coordination and documentation of alliance activities.
2. Signing alliances developed at the Regional Office level and ensuring that the Area Directors sign those alliances developed at the Area Office level.
3. Disseminating alliance information to Area Offices, State Plan States, and Consultation Projects, as appropriate.
4. Commenting promptly on draft National Office Alliance agreements, and thereafter if the need arises, regarding resource implications, desire to participate in the alliance, relevant experience with any potential alliance participant – such as legal, enforcement or whistleblower issues, issues within the State Plan States, Consultation Projects or the Region – or other factors that could have an impact on the alliance.
5. After appropriate internal review, submitting draft Regional Office Alliance agreements (Region-wide Alliances) to the National Office for transmittal to

the Office of the Solicitor for approval. Regional Offices must wait for approval from the Solicitor of Labor before signing regional alliance agreements.

6. Implementing Regional Office Alliances (Region-wide Alliances), including holding implementation team meetings at least twice per year, conducting and monitoring activities, and preparing annual reports.
7. Coordinating with DCSP to communicate alliance successes to both the Agency as a whole and the public at large to encourage their replication by other parties.
8. Coordinating local publicity efforts with the DOL Regional Office of Public Affairs and the National Office, including the OSHA Office of Communications.
9. Encouraging the participation of State Plan States and Consultation Projects in the implementation of National and Regional and Area Office OSHA Alliances, including participation on individual implementation teams, as appropriate; and collecting available information on state-initiated Alliances.

D. Area Directors

Area Directors (ADs) or their designees are responsible for:

1. Ensuring that draft alliances originating at the Area Office level are submitted to the Regional Office to be reviewed for programmatic consistency.
2. Signing alliances developed at the Area Office level.
3. Ensuring that copies of signed alliance agreements and annual reports are sent to the Regional Alliance Program Coordinator.
4. Implementing Area Office Alliances, including holding implementation team meetings as necessary, conducting and monitoring activities, and preparing annual reports.

E. National Alliance Coordinators

National Alliance Coordinators are responsible for the following tasks for the alliances assigned to them:

1. General oversight.
2. Ensuring timely operation according to their agreement and written work plan.

3. Convening the implementation team, twice/year at a minimum, or more often as needed, by teleconference or in person.
4. Maintaining adequate documentation, including the original agreement and subsequent renewal agreements, annual reports, notes of meetings, products, reports, and other relevant materials, as well as entering and updating alliance information in the Office's National Alliance Database.
5. Ensuring that the information on OSHA's Alliance Web page is current and accurate.
6. Keeping the Director of the Office of Outreach Services and Alliances apprised of significant events and issues.
7. Coordinating with directorates and national and regional offices as necessary for effective functioning, especially with regard to participation by appropriate subject matter experts and/or reviewers.
8. Responding to requests for information.
9. Identifying, developing and disseminating lessons learned from alliance implementation, including successes, setbacks, and obstacles faced and overcome, in order to stimulate continual improvement of the Alliance Program.

F. Regional Alliance Program Coordinators

Regional Alliance Program Coordinators are responsible for:

1. Maintaining regular communication with Alliance coordinators in the Area Offices to support them as needed, as well as communicating issues or concerns to the National Office, as needed or during coordinating conference calls.
2. Promptly providing +alliance agreements, other documents, photos and news releases within the Region to DCSP.
3. Submitting alliance annual reports for Regional and Area Office Alliances to DCSP within 60-days of the Alliance anniversary.
4. Encouraging, supporting, and facilitating appropriate State Plan and Consultation Project participation in Regional Alliances.

IX. Procedures for National Alliance Establishment, Operation, Renewal and Termination

A. Alliance Establishment

The Alliance Coordinator must:

1. Engage the proponent(s) of an alliance in a dialogue to explain the purposes, requirements and expectations of alliances, provide relevant information, including this directive, and obtain a brief written proposal that defines the projected participants and goals and objectives of the proposed alliance, and a draft version of its projected work plan.
2. Evaluate the proposal within DCSP for its potential value to the strategic goals of the agency and its alignment with this directive, obtain similar input from Regional Administrators and other Directorates as appropriate, and share the observations with the proponents to refine the proposal.
3. If the review of the proposed alliance judges it to be beneficial to the Agency, present the proposal to the leadership of DCSP and to the OAS for approval before pursuing it further.
4. Work with the proponents to develop an acceptable draft alliance agreement and preliminary work plan for the first year of the alliance. Follow the Process Flow Chart in Appendix A.
5. Engage appropriate OSHA directorate and field personnel to be part of an Implementation Team. Their selection depends on the subject matter of the alliance, the expertise needed, and the resources available.
6. Once the draft agreement and preliminary work plan are agreed upon by the Agency and the proponent(s), implement the steps necessary for a formal signing.
7. Coordinate and implement the formal signing, which can be done during an in-person ceremony or through an electronic exchange of signed correspondence. Alliance signatories must be senior executive representatives of both the proponent(s) and the Agency. In the case of OSHA the signatory may be the Secretary of Labor, the Assistant Secretary of Labor for OSHA, or their designees.

B. Alliance Operation

The Alliance Coordinator must:

1. Convene a meeting of the Implementation Team to finalize the Work Plan for the first year of the alliance (and yearly for subsequent periods).
2. Arrange meetings of the Implementation Team at least twice per year, or as needed, via teleconference or in person, to ensure the Alliance remains on track and the work plan is being successfully implemented. The work plan

and provisions for charting milestones of the Alliance are essential to track the progress of the alliance.

3. Maintain and communicate to the appropriate recipients appropriate documentation of the alliance and its activities, including official signature documents, work plans, annual reports, activities, products and other outcomes, evaluations, success stories, etc.

C. Alliance Renewal or Termination

To determine whether to renew or terminate an Alliance, OSHA staff will:

1. Conduct evaluation(s) on the performance and impacts of each alliance on a periodic basis, at least annually, against their identified goals and written work plan.(see VII,C, 4, i).
2. Discuss the evaluation with the alliance participants.
3. Based on the evaluation and discussion with alliance participants, recommend to management:
  - a. Renewal;
  - b. A conditional extension based on written expectations of improved performance within specified timelines; or
  - c. Termination.

A recommendation to conclude an alliance may be due to:

1. Failure of an alliance to meets its goals and work plan.
2. A change in OSHA's or the Alliance Program participants' strategic direction that results in the alliance no longer being aligned with agency priorities.
3. Evidence that the Alliance Program participant does not have the resources necessary to fulfill the alliance's goals and objectives.
4. All alliance participants reach a decision that the agreement has achieved its desired goal(s), and mutually agree to conclude the Alliance.

Any signatory may terminate its participation in an alliance at any time, provided that it gives 30 days written notice.

X. Procedure for Regional or Area Office Alliance Establishment, Operation, Renewal and Termination

The procedures for Regional and Area Office alliance follow the same pattern as those for national alliances, with review and authority for approval by the Area Office Directors and Regional Directors. See Process Flow Charts in Appendices B and C.

XI. Consulate Alliances

OSHA's Regional and Area Offices may sign alliances with consulates from countries with nationals in the U.S. workforce.

XII. Other General Alliance Considerations

A. Potential Conflicts of Interest

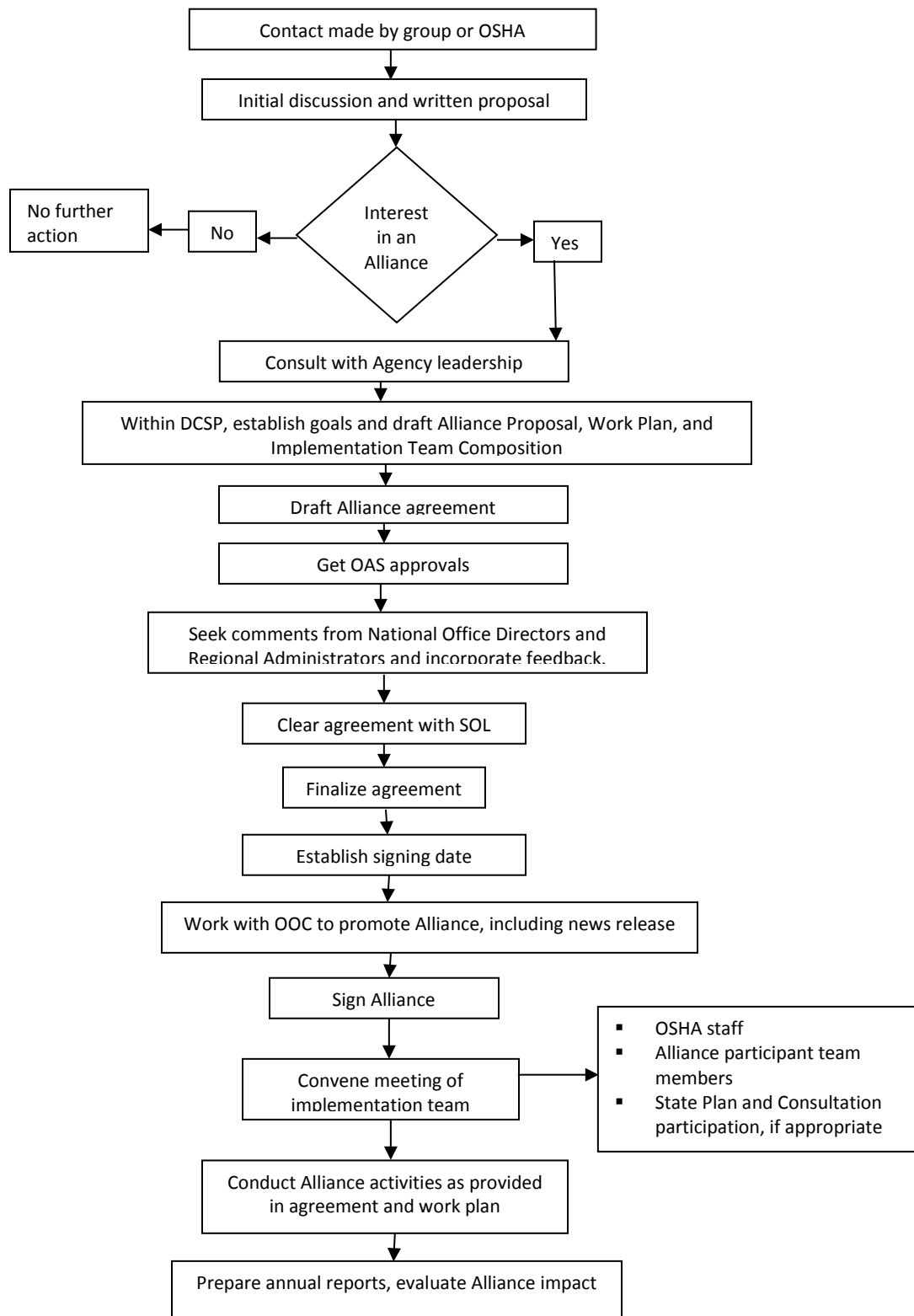
Whether the alliance participants are private or non-profit organizations, the Agency must be careful to avoid any appearance of governmental sanction of the organizations' products, services or perspectives. Alliance agreements and other documents must not include any language that suggests or implies that alliance participants will receive any preferential treatment related to any statutory function of the agency.

B. OSHA Recognition of Alliances

OSHA officially recognizes alliances through press releases, postings on the OSHA Web page, and coverage in the Agency's print and electronic publications, such as *QuickTakes*.

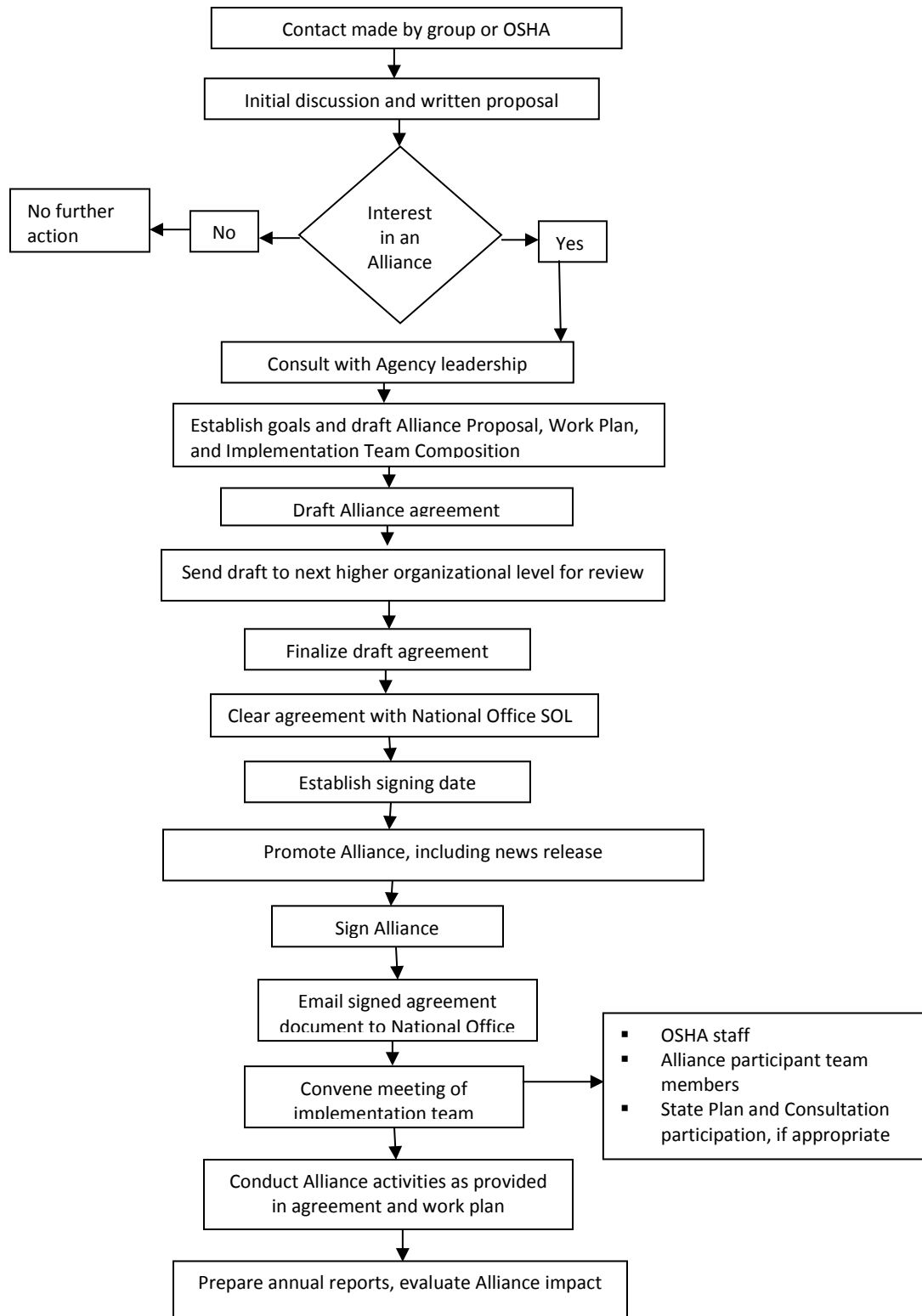
In addition, OSHA makes available to each signatory an Alliance Program logo to recognize its relationship with OSHA. Alliance Program participants are authorized to appropriately use the OSHA Alliance logo on documents or Web pages relating to the Alliance for as long as the Alliance remains in effect. The logo may not be used for fundraising or lobbying efforts or to imply that OSHA endorses a particular entity or its actions or products.

### Appendix A: Process Flow Chart for National Alliance

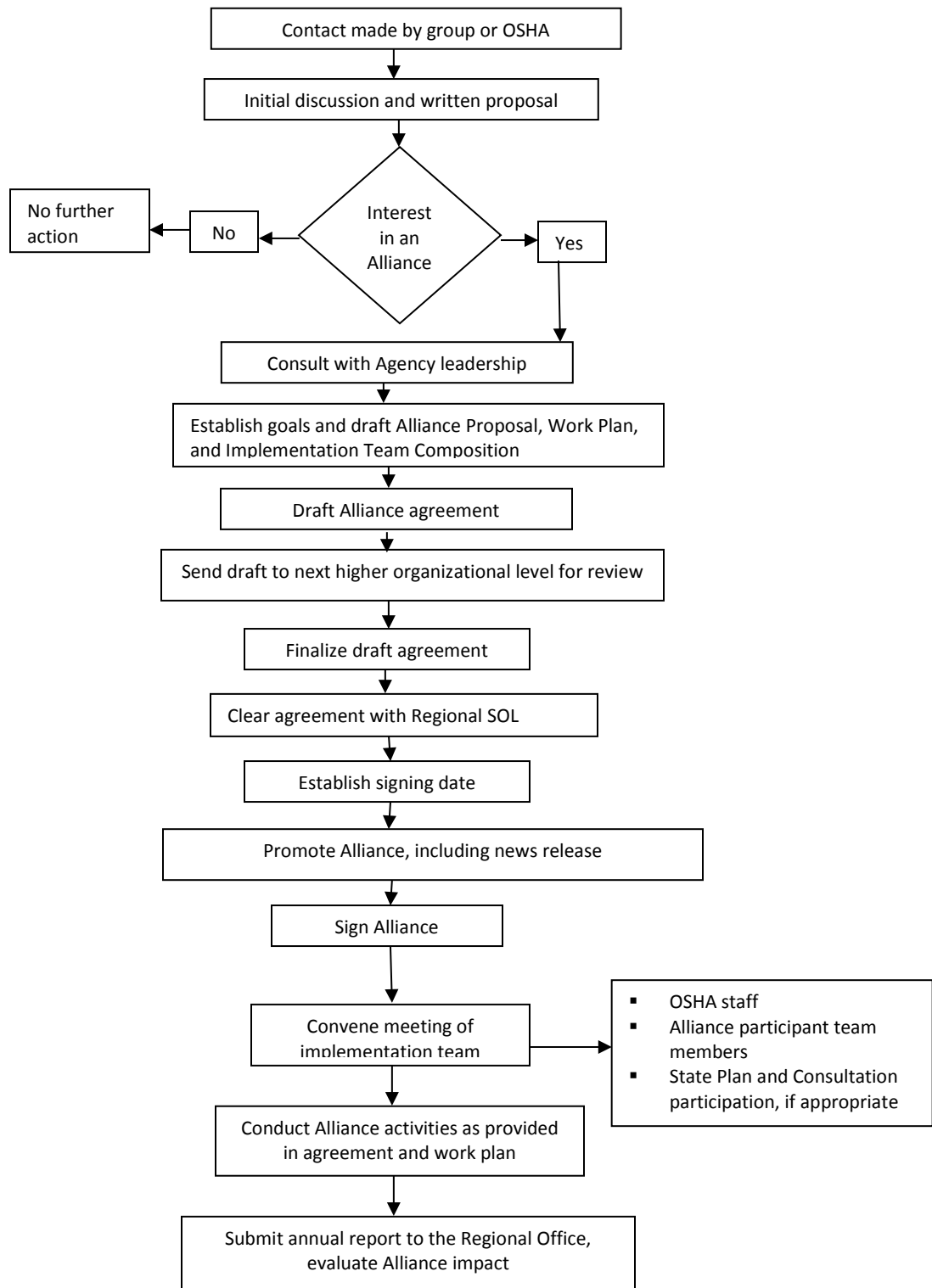




### Appendix B: Process Flow Chart for Regional Office Alliance



### Appendix C: Process Flow Chart for Area Office Alliance



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