




State of Alaska
Department of Labor and Workforce Development
Division of Labor Standards and Safety

Effective June 10, 2026
AKOSH PD #26-05

To: All AKOSH Staff

From: Tanya Keith, Director of Labor Standards & Safety

DocuSigned by:

AFD59BBF720C48C...

Subject: 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).

AKOSH (Alaska Occupational Safety & Health) Program Directive (PD) provisionally adopts OSHA's CSP 03-01-004 regarding special government employee program policies and procedures manual for the occupational safety and health administration's voluntary protection programs and safety champions program, which is attached. This program directive does not adopt any SGE's not related to VPP, nor the SCP. This instruction outlines the requirements for these SGE's to apply for, receive training on, and participate in SGE activities.

This program directive is effective immediately. Please ensure that all members of your staff receive a copy of this program directive and understand how to implement it.

cc: James Wulff, Regional Administrator, OSHA, San Francisco Region
Abby Lopez, Assistant Regional Administrator, OSHA, San Francisco Region
Eric Christensen, State Programs Manager, OSHA, San Francisco Region
Brenda Smith, Team Leader for Cooperative and State Programs, OSHA, San Francisco Region
Mitch Wallace, Chief of Consultation & Training, Labor Standards & Safety



OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CSP 03-01-004

SUBJECT: 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).

DIRECTORATE: Directorate of Cooperative and State Programs

SIGNATURE DATE: February 26, 2026

EFFECTIVE DATE: March 25, 2026

ABSTRACT

- Purpose:** This instruction describes the policies and procedures governing the administration and operation of Special Government Employee (SGE) activity conducted in support of Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs (VPP) and Safety Champions Program (SCP).
- Scope:** OSHA-wide.
- References:** OSHA Instruction CSP 03-01-005, [Voluntary Protection Programs Policies and Procedures Manual, January 30, 2020.](#)
- OSHA Instruction CSP-03-01-006, [Safety Champions Program Policies and Procedures Manual, January 22, 2026.](#)
- [Ethics for Special Government Employees.](#)
- Cancellations:** OSHA Instruction CSP 03-01-004, Special Government Employee (SGE) Program Policies and Procedures Manual for the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs.
- State Impact:** Notice of Intent required; Adoption encouraged.
- Action Offices:** National and Regional Offices.
- Originating Office:** Directorate of Cooperative and State Programs.

Contact: Office of Partnerships and Recognition
Directorate of Cooperative and State Programs
Francis Perkins Building, N-3700
200 Constitution Ave., NW
Washington, DC 20210

By and Under the Authority of

David L. Keeling
Assistant Secretary

Executive Summary

The purpose of this manual is to provide the Occupational Safety and Health Administration (OSHA) policies and procedures for Special Government Employee (SGE) activity in support of OSHA's Voluntary Protection Programs (VPP) and Safety Champions Program (SCP). The manual outlines the requirements for these SGEs to apply for, receive training on, and participate in SGE activities.

OSHA began using SGEs in 1994 to leverage OSHA's limited resources by utilizing private sector safety and health professionals during VPP on-site evaluations. In 2015, OSHA expanded the role of SGEs in VPP and established several other activities that SGEs could participate in, beyond assisting OSHA personnel during on-site evaluations. In this instruction, OSHA has further expanded the use of SGEs to support SCP.

As used in this manual, SGE refers to an individual meeting the requirements of 18 U.S.C. § 202(a), who has been approved and trained by OSHA to assist OSHA in conducting VPP and/or SCP qualifying activities. While participating in SGE activities, an SGE is held to the same ethical and legal standards as a Federal Government employee.

This manual cancels and replaces OSHA Instruction CSP 03-01-004.

Significant Changes

- Expands the role of the SGE to provide support to SCP. SGEs that support VPP are referred to as SGE(V)s, and SGEs that support SCP are referred to as SGE(C)s.
- Distinguishes the SGE qualifying activities for SGEs that support VPP from those that support SCP.
- Changes application deadlines from quarterly to monthly. Application deadlines will now be the 15th of every month.
- Revises and streamlines the SGE application approval and renewal processes.
- Removes the SGE application package from this manual. SGE Application forms will be provided on OSHA's website and submitted electronically. Also removes the OF-612 form from the SGE Application.
- Transfers the duties and responsibilities of the SGE Program from OSHA's Directorate of Administrative Programs to DCSP.

Table of Contents

Chapter 1 – Introduction	1
I. Purpose.....	1
II. Scope.....	1
III. References.....	1
IV. Cancellations.....	1
V. Action Offices.....	1
A. Responsible Office.....	1
B. Action Office.....	1
C. Information Offices.....	1
VI. Federal Program Change.....	1
VII. Significant Changes.....	2
VIII. Responsibilities.....	2
A. Directorate of Cooperative and State Programs (DCSP).....	2
B. OSHA Regional Offices.....	3
C. State Plans.....	3
IX. Definitions.....	4
Chapter 2 – SGE Eligibility, Qualifications, Application Submission, and Qualifying Activities... 6	6
I. Eligibility.....	6
A. Citizenship Requirement.....	6
B. VPP SGEs - SGE(V)s.....	6
C. SCP SGEs - SGE(C)s.....	6
D. Ineligible Applicants/ Conflicts of Interest.....	6
II. SGE Qualifications.....	7
A. Qualifications for All SGEs.....	7
B. Qualifications for Safety and Health Professionals (including Process Safety Management (PSM)).....	7
C. Qualifications for Applicants who are not Safety and Health Professionals.....	8
III. SGE Application Submission, Review, and Approval.....	8
A. Application Deadlines.....	8

B.	Required Application Forms for All SGEs (New and Reapproval Applications).....	8
C.	Management Signature.....	9
D.	Ethics Documents.....	9
E.	Confidential Financial Disclosure Report (OGE Form 450).....	9
IV.	Qualifying Activities for SGE Reapproval.....	9
A.	Qualifying Activities for SGE(V)s only.	10
B.	Qualifying Activities in Support of SCP – SGE(C) and SGE(V).	10
V.	SGE Evaluation Duties.....	11
A.	SGE(V) VPP On-site Evaluation Duties.	11
B.	SGE SCP Step Evaluation Duties.....	11
VI.	Continuing Requirements.....	12
	Chapter 3 – SGE Training, Oath of Office, and Terms of Service	13
I.	Special Government Employee (SGE) Training.....	13
A.	Training Notification.....	13
B.	Training Frequency.....	13
C.	Training Responsibilities.....	13
D.	Training Content.....	14
E.	SGE Training Certificates.	14
F.	Postponement or Cancellation of SGE Training.....	14
G.	Failure to Attend SGE Training.	14
H.	SGE(V) Training at a VPP site or Other Host Organization.....	14
II.	Oath of Office.	14
A.	New SGEs.	14
B.	Renewing SGEs.....	15
C.	Appointment Procedures.	15
D.	SGE Appointment Affidavit.....	15
III.	SGE Term of Service.....	15
A.	New SGEs.	16
B.	Renewing SGEs.....	16
C.	Termination of Service.	16
IV.	SGE Costs.....	16

V. Injury/Illness of an SGE.....	16
Chapter 4 – SGE Program Administration	17
I. DCSP Application Processing.....	17
A. Receipt of Applications.....	17
B. Processing the SGE Application Package.....	17
C. Confidentiality.....	17
D. Communication.....	18
II. Requesting SGE Assistance.....	18
A. Active SGEs.....	18
B. Requesting Permission for SGE Assignments.....	18
C. SGE Vetting.....	19
D. Site Concurrence in Using SGEs.....	19
III. Additional Protocols for SGE Pairing to an SCP Participant.....	20
IV. Composition of VPP On-Site Evaluation Team.....	20
V. SGE Data Management.....	20
A. SGE Data.....	20
B. Modifications to SGE Information.....	20
Chapter 5 – SGE Benefits and Awards	21
I. Benefits.....	21
A. Certification Points.....	21
B. Continuing Education Units (CEU).....	21
C. Tuition Waiver for OSHA Training Institute (OTI) Courses.....	21
D. Recognition for SGEs.....	21
II. VPP SGE of the Year Award.....	22
A. Purpose.....	22
B. Candidate Selection Process.....	22
C. Scoring.....	22
D. Announcement of Winner.....	22

Chapter 1 – Introduction

I. Purpose.

The Occupational Safety and Health Administration (OSHA) began using Special Government Employees (SGEs) in 1994 to leverage OSHA's limited resources by utilizing private sector safety and health professionals during on-site evaluations in support of its Voluntary Protection Programs (VPP). In 2015, OSHA expanded the role of SGEs in VPP and established several other activities that SGEs could participate in, beyond assisting OSHA personnel during on-site evaluations. This instruction further expands the use of SGEs to include roles in support of OSHA's Safety Champions Program (SCP).

This instruction sets forth the policies and procedures governing the administration and operation of OSHA's SGE Program in support of VPP and SCP.

II. Scope.

OSHA-wide.

III. References.

- A. OSHA Instruction CSP 03-01-005, [Voluntary Protection Programs Policies and Procedures Manual](#), January 30, 2020.
- B. OSHA Instruction CSP 03-01-006, [Safety Champions Program Policies and Procedures Manual](#), January 22, 2026.
- C. [Ethics for Special Government Employees](#).

IV. Cancellations.

OSHA Instruction CSP 03-01-004, Special Government Employee (SGE) Program Policies and Procedures Manual for the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Programs.

V. Action Offices.

A. Responsible Office.

Directorate of Cooperative and State Programs.

B. Action Office.

National, Regional, and Area Offices; State Plans.

C. Information Offices.

None.

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 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.

States that wish to use federally-approved SGE(V)s as members of VPP on-site review teams must enter into a Memorandum of Understanding (MOU) with Federal OSHA. Without a signed MOU between OSHA and the State Plan, federal SGE(V)s are not authorized for use by a State Plan. A sample State Plan Memorandum of Understanding (MOU) can be requested from Regional Staff or DCSP. State Plans cannot use federally approved SGE(C)s.

VII. Significant Changes.

- A.** Expands the role of the SGE to provide support to SCP. SGEs that support VPP are referred to as SGE(V)s and SGEs that support SCP are referred to as SGE(C)s.
- B.** Distinguishes the SGE qualifying activities for SGEs that support VPP from those that support SCP.
- C.** Changes the application deadlines from quarterly to monthly. Application deadlines will now be the 15th of every month.
- D.** Revises and streamlines the SGE application approval and renewal processes.
- E.** Removes the application package from this manual. SGE Application forms will be provided on OSHA's website and submitted electronically. Also removes the OF-612 form from the SGE Application.
- F.** Transfers the duties and responsibilities of the SGE Program from OSHA's Directorate of Administrative Programs to the Directorate of Cooperative and State Programs.

VIII. Responsibilities.

A. Directorate of Cooperative and State Programs (DCSP)

1. Policies and Procedures.

DCSP develops, interprets, and revises policies and procedures that govern the operation, monitoring, and evaluation of SGE activities. DCSP will conduct a program evaluation every three years to assist in the continuous improvement of the program.

2. Director, DCSP.

The Director has overall responsibility for the execution of the SGE program. The Director is responsible for approval of both new and

renewing SGEs. The Director is also responsible for any decisions regarding SGE termination.

3. SGE Coordinator.

The SGE Coordinator, located in DCSP:

- receives and processes SGE applications;
- provides final approval of SGE applications;
- evaluates, vets, and approves requests for SGE usage;
- maintains the SGE webpage;
- collects and maintains data on the SGE program;
- coordinates and administers oversight of SGE activities and training; and
- provides SGE support and assistance to the Regions, State Plans, and participants.

For SCP, in addition to the above responsibilities, the SGE Coordinator:

- ensures SGEs receive training;
- provides administrative and programmatic support to SGE(C)s during the application, training, and reapplication process;
- facilitates the oath of office ceremony for new and renewing SGE(C)s; and
- works with the SCP Coordinator who assigns SGEs to SCP participants as needed to support the program.

B. OSHA Regional Offices.

OSHA Regional staff do not have direct responsibilities related to SGEs who support SCP (referred to as SGE(C)s).

In support of VPP, OSHA Regional staff:

- contact, recruit, and encourage interested VPP site employees to become SGEs;
- assist with training SGEs who support VPP (referred to as “SGE(V)s”);
- facilitate the oath of office ceremony for new and renewing SGE(V)s;
- schedule SGE(V) participation in support of VPP sites;
- report SGE(V) activity to DCSP; and
- request approval for SGE(V) use from the SGE Coordinator.

C. State Plans.

1. State Plans that want to use federally approved SGE(V)s for VPP on-site evaluations must work with DCSP to put in place a signed and dated MOU with OSHA. Without a signed MOU between OSHA and the State Plan, federal SGE(V)s will not be authorized for use by a State Plan.

2. Once an MOU is in place, State Plans may choose to use federally approved SGE(V)s to serve as members of a VPP on-site evaluation team within the State Plan.
3. Qualified individuals from approved VPP sites that are covered by State Plans may also serve as SGEs once they submit their SGE application to OSHA, receive OSHA's training, and obtain OSHA's approval.
4. A State Plan may establish its own SGE program and activities, independent of OSHA, for training SGEs from VPP sites within the State Plan to serve as members of a State Plan VPP on-site evaluation. These SGEs are only permitted to operate on behalf of the State Plan at VPP sites that do not fall within federal OSHA coverage.
5. If a State Plan has an MOU, the State Plan will work with OSHA to coordinate VPP SGE usage.
6. A State Plan may also establish its own SGE program, independent of OSHA, for purposes of supporting a State Plan-developed recognition program similar to SCP, and those SGEs would also be limited to State Plan activities at sites under the State Plan's coverage.
7. Qualified individuals located in states or U.S. territories with State Plans are permitted to apply and serve as SGE(C)s for SCP sites.

IX. Definitions.

A. Active SGE.

An SGE whose term of appointment has not expired and who has met the Continuing Eligibility Requirements (outlined in Chapter 2 of this manual) as expected during each three-year term.

B. Appointing Official.

An OSHA official who is, or is serving in the capacity of: Assistant Secretary; Deputy Assistant Secretary; Director of DCSP; Deputy Director of DCSP; Director of the Office of Partnerships and Recognition; Regional Administrator; Assistant Regional Administrator for Cooperative and State Programs; or Area Director, who administers the Oath of Office to the SGEs.

C. Process Safety Management (PSM) "Level 1" Auditor.

An individual who has successfully met the criteria outlined in OSHA's [Voluntary Protection Programs Policies and Procedures Manual](#) (VPP Manual).

D. Renewing SGE.

An individual presently serving as an SGE who takes action to continue their SGE qualification for another term. Alternatively, an individual who is reapplying after a lapse of SGE service.

E. Safety Champions Program (SCP) Coordinator.

The DCSP staff member(s) responsible for administering and managing OSHA's Safety Champions Program (SCP), connecting SCP participants with SGEs, and communicating and requesting SGEs from the SGE Coordinator.

F. 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 the purposes of this instruction, SGEs may perform duties that are in support of VPP and SCP.

1. Safety Champions Program Special Government Employee (SGE(C)).

An SGE (as defined by 18 U.S.C. § 202(a) and in this Instruction) who meets the eligibility criteria, applies, and is approved by OSHA to serve in support of SCP. An SGE(C) supports SCP by performing SCP qualifying activities. SGE(C)s are ineligible to participate in VPP qualifying activities.

2. Voluntary Protection Programs Special Government Employee (SGE(V)).

An SGE (as defined by 18 U.S.C. § 202(a) and in this Instruction) who meets the eligibility criteria, applies, and is approved by OSHA to serve in support of VPP. An SGE(V) supports VPP by performing VPP qualifying activities. In addition, SGE(V)s are allowed to perform SCP qualifying activities.

G. SGE Coordinator.

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

H. State Plan SGE Memorandum of Understanding (MOU).

A formalized, written agreement that a State Plan and OSHA must sign if the State Plan wants to use federal SGEs for its State Plan VPP applicant or participant on-site evaluations and other VPP qualifying activities.

I. Term of Service.

The three-year period for SGE participation. Individuals wishing to continue participation must reapply every three years.

Chapter 2 – SGE Eligibility, Qualifications, Application Submission, and Qualifying Activities

I. Eligibility.

OSHA accepts new and reapproval applications for both Voluntary Protection Program (VPP) and Safety Champions Program (SCP) SGEs from applicants that meet the criteria below.

A. Citizenship Requirement.

The Federal Government requires that an individual be a United States citizen to become an SGE.

B. VPP SGEs - SGE(V)s.

SGE(V) applicants must meet one of the following additional eligibility criteria:

1. Be employed by an active VPP participant and have been a permanent, full-time employee of a VPP worksite(s) for at least two years.

For current SGEs: An SGE who moves from a VPP worksite to a non-VPP worksite ***within the same company*** may continue to serve and requalify as an SGE, so long as company support continues. An SGE who is employed at a site that becomes VPP Emeritus may continue to serve as an SGE through their current three-year term. If that SGE's company has other active VPP sites, they may requalify as an SGE so long as company support continues.

2. Be employed by a company with at least one active VPP site at the time of application and have performed VPP-related duties within their company for at least two years. VPP-related duties include preparing worksites for VPP application; assisting in application preparation and review; assisting with SGE(V) training; assisting with site self-evaluations, etc. VPP duties must be reflected in their SGE application.

C. SCP SGEs - SGE(C)s.

SGE(C) applicants may be full-time employees of worksites within the United States, self-employed individuals, retired individuals within the United States, including retired VPP SGEs, and previous VPP SGEs who left their VPP worksite. SGE(C) applicants' current and former relevant employment must be reflected in their SGE application. Note that qualified individuals located in states or U.S. territories with State Plans are also permitted to apply and serve as SGE(C)s for SCP sites.

D. Ineligible Applicants/ Conflicts of Interest.

DCSP will review applications and disqualify any applicant whose employment or financial relationships present a conflict of interest or the appearance of impropriety, or who are deemed unsuitable for other reasons. All applicants, including those who do consulting work outside of their regular employment and

self-employed applicants, should review DOL guidance on ethics rules for SGEs in determining eligibility and contact the SGE Coordinator with any questions regarding potential conflicts that could be disqualifying.

II. SGE Qualifications.

In addition to meeting all applicable eligibility criteria above, SGE applicants must meet the following qualifications:

A. Qualifications for All SGEs.

All SGEs must have the following qualifications:

1. Experience in applying OSHA standards and regulations.
2. Currently performing safety and health-related duties with at least two years of experience; or, for SGE(C), individuals may have retired not more than three years prior to initial application and must have performed safety and health responsibilities at the time of retirement.
3. Knowledgeable about safety and health programs. For SGE(V) applicants, this means knowledge of safety and health management systems (SHMS), as defined in OSHA's VPP Manual. For SGE(C) applicants, must have a sufficient understanding of safety and health programs to support SCP participants in their development of safety and health programs (SHPs) as defined in OSHA's SCP Manual.
4. Strong interpersonal skills.
5. Sound reading and writing skills.
6. Physically able to perform activities required during an on-site evaluation (SGE(V)s only).

B. Qualifications for Safety and Health Professionals (including Process Safety Management (PSM)).

In addition to meeting the criteria in paragraph A, individuals who are safety and health professionals:

1. Must spend at least 50 percent of work time conducting or managing worksite or company safety and/or health activities.
2. Applying with PSM experience: PSM experience is not required to serve as an SGE(V) or an SGE(C). However, to be considered a PSM "Level 1" Auditor for VPP, SGE(V)s must meet the criteria for PSM "Level 1" Auditor outlined in the [VPP Manual](#).

An SGE(V) with PSM experience, but who does not meet the above requirements, may participate as a member of a VPP on-site evaluation team conducting the PSM review and provide their feedback to the PSM "Level 1" Auditor.

An SGE(C) with PSM experience may provide PSM-related assistance to SCP participants.

C. Qualifications for Applicants who are not Safety and Health Professionals.

SGEs need not be safety and health professionals. They may be hourly employees or individuals who have experience implementing an effective safety and health program. In addition to meeting the eligibility criteria and qualifications in paragraph A above, applicants who are not safety and health professionals must have experience in at least four of the following activities (or their equivalent):

1. Chairing a worksite safety and health task team/committee.
2. Training others in safety and health procedures.
3. Writing and reviewing safety and health programs and activities such as Job Safety Analyses (JSA) and/or Behavioral Job Analyses (BJA)
4. Coordinating accident investigations.
5. Coordinating proactive safety and health activities such as wellness days.
6. Leading worksite hazard inspection teams.
7. Coordinating hazard abatement activities.
8. Administering safety and health policies or programs for worksites.
9. Having other experience that demonstrates knowledge of safety and health programs.
10. Working directly with the OSHA VPP on-site evaluation team during the previous on-site evaluation.

III. SGE Application Submission, Review, and Approval.

A. Application Deadlines.

DCSP processes SGE applications twelve times per year. Applications must be received in DCSP on or before the 15th of each month. If the deadline falls on a weekend or a federal holiday, applications are due on the first federal business day following the holiday. Applications received after a deadline are held and processed following the next deadline.

Failing to attend SGE training within one year of SGE application approval will result in the prospective SGE having to reapply.

B. Required Application Forms for All SGEs (New and Reapproval Applications).

It is the applicant's responsibility to submit a completed SGE application package by the deadline. The required application forms for all SGEs can be found on OSHA's website under [SGE Application Documents](#). The forms and application materials that must be submitted to DCSP are as follows:

1. SGE Eligibility Information Sheet.

2. Confidential Financial Disclosure Report (OGE-450).
3. A copy of the SGE's current resume or work history.

If, at any time during an individual's term of service as an SGE, OSHA discovers that the applicant knowingly withheld information or provided information that was untrue, that individual's participation as an SGE will be terminated by OSHA.

C. Management Signature.

SGE applicants and renewing SGEs must obtain the valid signature of their supervisor or manager on the SGE Eligibility Information Sheet, if applicable, prior to submission. A valid signature is an ink signature or digital signature which has an encrypted stamp of authentication that confirms identity. The signature implies that management agrees with the skills and qualifications of the applicant as provided in the SGE application and supports the applicant's participation in OSHA's SGE program. If an SGE(C) applicant is not employed or self-employed, a manager signature is not required.

D. Ethics Documents.

The SGE application package includes DOL's Office of the Solicitor's document entitled "[Ethics for Special Government Employees](#)". All SGE applicants must review this document and acknowledge in writing on the application that they have read and they understand all ethics requirements and must adhere to these requirements in their service as SGEs. While an SGE may continue to receive compensation from their direct employer while serving in this role, the SGE serves OSHA in performing voluntary functions for the benefit of VPP worksites or SCP participants in the capacity of an uncompensated employee and may not receive compensation from these VPP worksites or SCP participants in carrying out their SGE duties.

E. Confidential Financial Disclosure Report (OGE Form 450).

The SGE application package includes the Office of Government Ethics (OGE) Form 450, a document that provides a mechanism for determining actual or potential financial conflicts between the SGE's public and private interests and activities. This allows the SGE and OSHA to fashion appropriate protection against such conflicts. The report shall be:

1. Reviewed and accepted by the SGE Coordinator as part of the SGE application process.
2. Updated and submitted to DCSP by February 15th by the SGE on an annual basis.

IV. Qualifying Activities for SGE Reapproval.

SGEs participate in a range of functions, called qualifying activities, in support of OSHA's VPP and SCP. SGE(V)s must request permission from Regional OSHA staff (or State Plan staff, if in a State Plan with a VPP MOU), and must be vetted by the SGE Coordinator,

prior to starting a qualifying activity. SGE(C) qualifying activities must be assigned by the SCP Coordinator and approved by the SGE Coordinator.

SGEs are approved for three-year terms. For an SGE to be reapproved for an additional three-year term, the SGE must have been actively involved during their previous term of service. To gain reapproval, the SGE must have performed a minimum of three (3) qualifying activities listed below. OSHA may allow appropriate activities not listed below on an ad hoc basis. OSHA (and State Plan staff, where applicable) will determine if the SGE has adequately performed the activities to receive credit. If an SGE does not meet the participation requirements, OSHA will not approve the SGE for renewal. An SGE who was not approved for renewal due to failing to meet these requirements must wait at least one year before reapplying.

A. Qualifying Activities for SGE(V)s only.

1. At least one of the three required qualifying activities for an SGE(V) must be participation in a VPP On-site Evaluation Team. (However, failure to meet this requirement due to OSHA's cancellation of an on-site or other activity will not adversely affect the SGE(V)'s ability to renew their status.)
2. An SGE(V) may also choose two other activities from the list below to meet the reapproval requirements of three qualifying activities:
 - a. Assist with additional VPP On-site Evaluation Teams.
 - b. Assist Regional OSHA or State Plan staff with the review of a site's VPP application.
 - c. Assist Regional OSHA or State Plan staff with the review of sites' VPP annual self-evaluation reports.
 - d. Serve as an instructor/co-instructor for the VPP SGE course.
 - e. Serve as an instructor/co-instructor for the VPP application workshop.
 - f. Provide mentoring to a potential or reapproving VPP site.
 - g. Present a VPP or related safety and health topic at a Regional or National Voluntary Protection Program Participants' Association (VPPPA) Conference.
 - h. Participation in any of the additional activities listed below.

B. Qualifying Activities in Support of SCP – SGE(C) and SGE(V).

Both SGE(C)s and SGE(V)s can perform qualifying activities in support of SCP. These include, but are not limited to, the following:

1. Perform an initial evaluation of a new SCP participant's existing SHP to assist with determining participant's initial Step in the program.
2. Evaluate an SCP participant's Safety Champions Step progress, using the

Safety Champions Tracker (SCT) and supporting documentation from the site, to determine whether a SCP participant has completed a Step.

3. Assist SCP participants with questions or concerns about safety and health programs or specific safety and health topics, or in completing required actions.
4. Present a safety and health topic at conferences discussing and promoting SCP.

V. SGE Evaluation Duties.

One type of SGE qualifying activity is participation in a VPP on-site evaluation. As noted above, only SGE(V)s can participate in VPP on-site evaluations, and SGE(V)s must participate in at least one on-site evaluation during each three-year SGE term of service.

Another SGE qualifying activity is conducting an SCP participant Step evaluation. SGE(V)s and SGE(C)s can both conduct SCP participant Step evaluations.

SGE roles in both of these evaluations are described below:

A. SGE(V) VPP On-site Evaluation Duties.

SGE(V)s must serve as members of VPP on-site evaluation teams. SGE(V) assignments during VPP on-site evaluations may include, but are not limited to, the following:

1. Reviewing company documents that describe or verify the worksite's SHMS.
2. Conducting a walkaround of the worksite to ensure that the site's SHMS is operating effectively.
3. Interviewing employees of the company and contractors to determine their level of involvement in and perceptions of the worksite's SHMS.
4. Assisting in the preparation of a team report that evaluates the adequacy of the worksite's SHMS using VPP criteria.

B. SGE SCP Step Evaluation Duties.

SGEs (both SGE(V)s and SGE(C)s) may be assigned to review and evaluate whether a SCP participant has completed one of the three Steps of SCP (Introductory, Intermediate, or Advanced). (Note that an SGE will not be assigned to work with or evaluate a particular SCP participant through all three Steps of the program.)

An SCP Step evaluation will minimally include the following:

1. Reviewing the SCP participant's Safety Champions Tracker (SCT).
2. Reviewing relevant company documents that describe or verify the development and implementation of a worksite's SHP.
3. Determining if the SCP participant has met all the requirements for

completion of a Step. The SGE would not typically visit the participant's worksite.

4. Notifying the SCP Coordinator that the SCP Step requirements have been met. If the SGE determines that the participant has not met all the requirements of a Step, then the SGE will inform the participant.

VI. Continuing Requirements.

SGEs must reapply every three years. To obtain reapproval, all renewing SGEs must continue to meet the initial SGE eligibility requirements and qualifications contained in Sections I-III of this chapter, in addition to the qualifying activities outlined in Sections IV-V of this chapter.

Chapter 3 – SGE Training, Oath of Office, and Terms of Service

I. **Special Government Employee (SGE) Training.**

SGE applicants are required to complete OSHA's SGE training course(s) that provide an overview of OSHA's Voluntary Protection Programs (VPP) and/or Safety Champions Program (SCP) and the roles and responsibilities of SGEs. SGE training is required for all approved applicants before they are sworn in as SGEs. SGEs supporting VPP must take the VPP SGE training, and SGEs supporting SCP must take the SCP SGE training. OSHA provides the training free of charge.

A. **Training Notification.**

The SGE Coordinator must send attendees the course logistics at least one month prior to the training. Renewing SGEs do not need to re-attend SGE training unless there is a lapse in their service greater than three years.

B. **Training Frequency.**

SGE training is conducted several times throughout the year. The total number of trainees in any one session may not exceed 35 unless approved by DCSP following consultation with the course instructor(s).

Request for an ad-hoc class(es) will be considered on a case-by-case basis.

C. **Training Responsibilities.**

Regional OSHA staff have primary responsibility organizing and planning SGE (V) training. DCSP has primary responsibility for organizing and planning SGE(C) training. The SGE Coordinator is responsible for attendee registrations, communicating training logistics, ensuring instructors have needed training materials, and assisting the SCP Coordinator with SGE(C)s training.

1. **SGE(V) Training.**

Regional OSHA staff are responsible for planning SGE (V) training courses for SGE(V)s in order to meet training needs in their geographic area and notifying the SGE Coordinator of date of training and location. The SGE Coordinator will create an overall SGE training schedule that is updated each fiscal year. Ad-hoc classes will be considered on a case-by-case basis.

The lead instructor for SGE(V) training is generally Regional OSHA staff with extensive VPP experience in evaluating effective safety and health management systems (SHMS). The lead instructor may request assistance from experienced SGEs, Compliance Safety and Health Officers (CSHOs), Compliance Assistance Specialists (CASs), or other knowledgeable persons designated by OSHA.

2. **SGE(C) Training.**

DCSP has primary responsibility for planning SGE(C) training courses for SGE(C)s as well as SGE(V)s that wish to perform qualifying activities in support of SCP. The lead instructor for SGE(C) training is generally an OSHA safety and health professional or other knowledgeable person designated by OSHA who has experience in evaluating effective safety and health programs (SHPs).

D. Training Content.

Training content will be determined by DCSP with assistance from other OSHA staff.

E. SGE Training Certificates.

The SGE Coordinator will prepare and disseminate SGE training certificates for individuals who complete requisite SGE training.

F. Postponement or Cancellation of SGE Training.

If a training class needs to be postponed or canceled, the SGE Coordinator will notify all attendees.

G. Failure to Attend SGE Training.

Failure to attend SGE Training within one year of SGE application approval will result in the applicant having to reapply.

H. SGE(V) Training at a VPP site or Other Host Organization.

If a VPP site or other organization offers to host SGE(V) training, Regional OSHA staff will determine if the SGE training at that site would be feasible and otherwise appropriate. At the conclusion of training, the SGE Coordinator will email the host site a Certificate of Appreciation.

II. Oath of Office.

SGEs may not participate in qualifying activities as an SGE until an OSHA appointing official empowered by the head of the Agency under the authority of 5 U.S.C. 2903 administers the oath of office. OSHA appointing officials include an OSHA official who is or is serving in the capacity of: Assistant Secretary; Deputy Assistant Secretary; Director of DCSP; Deputy Director of DCSP; Director of the Office of Partnerships and Recognition; Regional Administrator; Assistant Regional Administrator for Cooperative and State Programs; or Area Director. Federal employees serving as SGEs need not take the oath of office, as it was administered upon their employment with the Federal Government.

A. New SGEs.

The oath of office must be administered to newly approved SGEs after the completion of the SGE training. Regional OSHA staff or the SCP Coordinator is responsible for securing an appointing official to administer the oath and for coordinating the swearing-in activities.

B. Renewing SGEs.

If the SGE's current term of service has not expired at the time of reapproval, the term will automatically be extended for another three years, without the need to retake the oath of office or sign a new appointment affidavit.

However, if the SGE's term of service has expired, but the SGE has been reapproved, the SGE must contact Regional OSHA staff or the SCP Coordinator for assistance in: (1) re-taking the oath of office and (2) signing a new appointment affidavit, which will extend the SGE's term of service for another three years.

C. Appointment Procedures.

Each SGE appointee may elect to either "swear" or "affirm" the oath of office. An American flag must be present. The appointing official must meet the qualifications as described in Section II(B) of this chapter.

1. The appointing official must ascertain if the appointee elects to swear or affirm the oath of office. If the individual wishes to affirm the oath, then the words "So help me God" in the oath and the word "swear" should be stricken wherever these words appear. Only these words may be stricken and only when the appointee elects to affirm the affidavit.
2. The appointing official must ask all persons present to rise for the administration of the oath of office. The appointing official must stand facing the appointee(s) with the American flag between them and instruct the appointee(s) to raise their right hand. The appointing official must read the oath of office in short phrases, waiting for the appointee(s) to repeat each phrase before proceeding to the next.
3. When the administration of the oath of office is complete, the appointing official and SGE must complete and sign the Appointment Affidavit (SF-61). The position of appointment must be "Special Government Employee."

D. SGE Appointment Affidavit.

An [Appointment Affidavit \(SF-61\)](#) must be completed for each SGE who takes the oath of office. Both the SGE and the appointing official must sign the form after the oath of office has been administered. After the Appointment Affidavit has been signed by both parties, Regional OSHA staff or the appointing official is responsible for sending the signed Appointment Affidavit to the SGE Coordinator at SGECoordinator@dol.gov.

III. SGE Term of Service.

All SGEs are initially appointed to a three-year term of service. SGEs serve at the pleasure of the Assistant Secretary of Labor for Occupational Safety and Health. Service is contingent upon proper ethical conduct.

A. New SGEs.

The term of service for new SGEs must be calculated after the SGE application has been approved *and* the SGE's training has been completed, *and* the Appointment Affidavit has been signed by both parties following the administration of the oath of office. The term's starting date is whichever is last, the completion of SGE training, the SGE application approval date, or the date that the Appointment Affidavit is signed.

B. Renewing SGEs.

The term of service for renewing SGEs must be calculated from the date the application is reapproved by the Director of DCSP.

C. Termination of Service.

Service as an SGE must be terminated immediately without advanced notice by the Agency if the SGE no longer meets the eligibility requirements set forth in Chapter 2 of this manual.

If OSHA determines that an SGE exhibits inappropriate conduct or receives a complaint from a worksite about an SGE's performance, the SGE must discontinue the qualifying activity. Such inappropriate conduct includes, but is not limited to, misuse of SGE status for the personal gain of the SGE or others.

Anyone who identifies the inappropriate conduct should provide information about the incident to DCSP within 15 business days of the conclusion of the activity.

After an evaluation of allegations of inappropriate SGE conduct by OSHA, the SGE Coordinator or other OSHA personnel may recommend that the SGE's term of service be terminated or take other appropriate action as needed. The Director of DCSP will make final decisions regarding SGE service termination.

IV. SGE Costs.

All costs associated with attending the VPP SGE training and participating in VPP on-site evaluations and other VPP SGE duties are the responsibility of the SGE(V)'s employer.

All costs associated with attending the SCP SGE training and providing support to SCP participants are the responsibility of the SGE(C).

V. Injury/Illness of an SGE.

If an SGE experiences an occupational safety or health injury or illness while conducting a qualifying activity, the SGE must report the injury/illness to their employer and OSHA immediately. Consistent with Federal law, OSHA assumes no responsibility for any injury or illness experienced by an individual while carrying out SGE activities.

Chapter 4 – SGE Program Administration

I. DCSP Application Processing.

A. Receipt of Applications.

The SGE Coordinator is responsible for tracking and managing each SGE application.

1. Evaluating the Application. All initial and reapproval SGE applications must contain the following completed forms and materials:
 - a. SGE Eligibility Information Sheet
 - b. Confidential Financial Disclosure Report (OGE-450).
 - c. A copy of the applicant's current resume or work history.

The SGE Coordinator must verify that the resume contains position-specific safety and health experience.

2. Verifying all Required Valid Signatures. The applicant must sign all applicable signature fields of the SGE Application and the Confidential Financial Disclosure Report (OGE-450). A valid signature is an ink signature or digital signature which has an encrypted stamp of authentication that confirms identity.

B. Processing the SGE Application Package.

1. Application Review and Acceptance. The SGE Coordinator will review all applications to determine whether candidates meet eligibility criteria and qualifications, and that they are suitable for appointment to the SGE(V) or SGE(C) role, as described in Chapter 2 of this Manual. If the application is complete and the applicant meets these requirements, the application package will be accepted by the SGE Coordinator.
2. Application Approval. The SGE Coordinator will request application approval from the Director of DCSP for both new and renewing SGEs.
3. SGE Notification. The SGE Coordinator will notify the applicants of approval/reapproval decisions.
4. SGE Information. The SGE Coordinator will ensure approved applicants' information is added to the SGE database.

C. Confidentiality.

1. SGE Applications. Due to the sensitivity of some information contained on the SGE application, all SGE applications are securely maintained to prevent unauthorized access and disclosure.
2. Confidential Financial Disclosure Report (OGE-450). This information is confidential and must not be transmitted or discussed with any other staff member not involved with the SGE Program.

D. Communication.

1. The SGE Coordinator is primarily responsible for maintaining communication with applicants, renewing SGEs, and Regional OSHA staff related to the SGE application process.
2. The SGE Coordinator must send each SGE, Regional OSHA/State Plan staff, or SCP Coordinator a reapplication e-mail notification 30 days before expiration of the SGE's 3-year term of service.

II. Requesting SGE Assistance.

Regional OSHA staff (or State Plan staff, where a State Plan SGE MOU is in place) are primarily responsible for communicating with SGE(V)s to request assistance with specific VPP on-site evaluations. The SCP Coordinator is primarily responsible for communicating with SGE(C)s to request assistance with SCP Step evaluations and participant requests for support. Regional staff (or State Plan staff, where a State Plan SGE MOU is in place) and the SCP Coordinator may communicate directly with SGEs to request assistance or contact the SGE Coordinator in DCSP for assistance in identifying available SGEs. State Plan staff, where a State Plan SGE MOU is in place, may coordinate their requests for SGE assistance with Regional staff.

A. Active SGEs.

Only SGEs whose status is "active" may be requested. An SGE is in "active" status when the SGE has submitted and received approval of an application within the past three years, has completed all training requirements, has taken the Oath of Office, and has timely submitted a current Confidential Financial Disclosure Report (OGE-450) with OSHA.

An SGE is in "inactive" status when any of the following situations apply: the SGE's three-year term has lapsed; the SGE does not have a current appointment affidavit; or the SGE has not submitted the annual Confidential Financial Disclosure Report (OGE-450) to OSHA.

B. Requesting Permission for SGE Assignments.

Once an SGE has confirmed that they are available to perform a specific qualifying activity, Regional OSHA staff or the SCP Coordinator (or State Plan staff, where a State Plan SGE MOU is in place) must request permission from the SGE Coordinator to use that SGE for the specific qualifying activity. Requests for SGE assistance must be submitted to the SGE Coordinator, at a minimum, no later than two weeks prior to the scheduled activity. Late requests, however, may be approved on a case-by-case basis. Requests must be e-mailed and must include the following information:

1. The full name and employing company/organization of the SGE requested.
2. The name, city, and state of the worksite that needs SGE assistance.

3. The beginning date and expected duration of the qualifying activity.

C. SGE Vetting.

1. The SGE Coordinator reviews requests for SGEs from Regional OSHA staff, State Plan staff, or the SCP Coordinator and approves or denies those requests. The SGE Coordinator may deny a request for an SGE based on the following criteria:
 - a. The request does not include complete information included in II.B. above.
 - b. The requested individual is not yet approved, has not been sworn in, their term of service has expired, or they have not submitted an annual confidential financial disclosure report.
 - c. A financial conflict of interest or the appearance of impropriety precludes participation of the requested SGE. The SGE's Confidential Financial Disclosure Report will be reviewed to ensure there are no financial conflicts between the requested SGE and the site to be evaluated.
 - d. Regional OSHA staff or the SCP Coordinator should also consult with the site being evaluated prior to the SGE being approved (see Ch. 4.II.D.), and ensure any assignment is consistent with the principles articulated in 5 C.F.R. 2635.502 regarding business and personal relationships which could affect an SGE's appearance of impartiality.
 - e. The SGE Coordinator must use discretion to avoid potential conflicts of interest or appearance of conflict beyond possible financial conflicts of interest identified on SGE disclosure reports. Such examples may include, but are not limited to, Department of Defense SGEs evaluating the same service branch/Defense Department for which they are employed, or same/similar industries for private sector SGEs. Regional OSHA staff, State Plan staff, or the SCP Coordinator should raise any such potential conflict of interest concerns they may be aware of with the SGE Coordinator prior to approval.
2. The SGE Coordinator must respond to a request for an SGE via e-mail within ten (10) working days of receipt. If a request is denied, the SGE Coordinator may assist Regional OSHA/State Plan staff or the SCP Coordinator in finding a replacement SGE in time for the qualifying activity.

D. Site Concurrence in Using SGEs.

Before a particular SGE is assigned, as part of the vetting process described in Ch.4.II.C., Regional OSHA or State Plan staff or the SCP Coordinator must inform

the VPP applicant/participant site or SCP participant site of the intention to use a particular SGE for a qualifying activity, and the applicant/participant site must agree with this arrangement.

If the applicant/participant site rejects or objects to an SGE, including based on concerns that there may be a conflict of interest or perceived conflict of interest, Regional OSHA or State Plan staff or the SCP Coordinator will notify the SGE as soon as possible that they cannot participate in the qualifying activity.

III. Additional Protocols for SGE Pairing to an SCP Participant.

- A. Through the SCP Coordinator, SCP participants may request SGE support as they progress through the Steps of the program, as well as to determine Step completion. When SGE support is requested, the SCP Coordinator will seek the requested assistance from available active SGEs.
- B. Once the SCP Coordinator submits the request for SGE assistance to the SGE Coordinator, in addition to conducting the vetting process, the SGE Coordinator will review the SGE's safety and health experience and status to determine whether the SGE's safety and health qualifications match the needs of the SCP participant.

IV. Composition of VPP On-Site Evaluation Team.

The VPP on-site evaluation team must include at least one Regional OSHA staff (or State Plan staff for a State Plan VPP site where a State Plan SGE MOU is in place) serving in the capacity of Team Leader.

Only SGE(V)s may serve on VPP On-Site Evaluation Teams. SGE(V)s may not serve as Team Leaders or Backup Team Leaders. See VPP Policies and Procedures Manual.

With approval by the Regional Administrator and the Team Leader, an unlimited number of SGEs may serve on a VPP on-site evaluation team.

V. SGE Data Management.

A. SGE Data.

The SGE Coordinator must enter the information from each approved SGE application into the SGE database. When an SGE is approved to participate in a qualifying activity, the SGE Coordinator must enter the information into the SGE Database.

B. Modifications to SGE Information.

It is the responsibility of each SGE to provide the SGE Coordinator with any changes in employment or contact information in a timely manner. If an SGE does not update contact information and cannot be reached, the SGE's term of service will be converted from "active" to "inactive."

Chapter 5 – SGE Benefits and Awards

I. Benefits.

In the interest of encouraging SGE participation and recognizing SGEs' value to OSHA, the Agency offers the following benefits below. It is the responsibility of SGEs to communicate with certifying bodies regarding possible credit.

A. Certification Points.

SGEs may earn Certified Safety Professional (CSP) or Certified Industrial Hygienist (CIH) certification points by doing the following:

1. Attending and successfully completing the SGE training course.
2. Participating in qualifying activities.

B. Continuing Education Units (CEU).

SGEs may receive continuing education units upon attending and successfully completing the SGE training course.

C. Tuition Waiver for OSHA Training Institute (OTI) Courses.

Active SGEs are eligible to attend in-person OTI courses in Arlington Heights, Illinois and have their tuition waived as course availability allows. To qualify for the benefit, the SGE must be in active status and have completed at least one qualifying activity within their current term. SGEs must contact the SGE Coordinator directly to register. The SGE Coordinator will work with OTI to register the SGE. To facilitate the registration process, each SGE must:

1. Email the OTI Student Support Services Branch at oti.registration@dol.gov to acquire the current course schedule.
2. Make a course selection and note the course number, course title, and date offered.
3. Forward the course information to the SGE Coordinator.

The SGE Coordinator will notify the respective Regional OSHA staff or SCP Coordinator and process the SGE course registration through OTI. An e-mail notification will go directly from OTI to the SGE, confirming their slot for the selected course. NOTE: Travel arrangements should not be made until e-mail confirmation is received.

D. Recognition for SGEs.

1. After an SGE(V) participates in a VPP on-site evaluation, the Regional staff will send the SGE's manager a letter of appreciation for the SGE's contributions to the on-site evaluation.
2. After an SGE(V) assists with SGE training, the SGE Coordinator will send a certificate of appreciation to SGE(V)s.

3. After an SGE(C) or SGE(V) evaluates an SCP participant's Step completion submission, the SGE Coordinator will send the SGE a letter of appreciation for the SGE's contribution to SCP.

II. VPP SGE of the Year Award.

A. Purpose.

This award is designed to recognize an SGE(V) who epitomizes and exhibits exceptional support, effort, and action in VPP, and in so doing sets themselves apart from other SGEs. The person selected must meet the following criteria:

1. Be actively involved in volunteer activities that benefit VPP.
2. Perform outreach and assistance to employers/employees outside their own company.
3. Demonstrate an outstanding commitment to the partnership ideals of VPP.

B. Candidate Selection Process.

DCSP will solicit one candidate from each Region and forward the names and supporting recommendations to the SGE Coordinator.

C. Scoring.

Each candidate will be reviewed and scored by Regional and National Office VPP staff based on the criteria outlined in Section A.1.-3., above. The National Office score will be the average of the scores submitted by National Office VPP staff. The SGE of the Year will be determined by tallying the candidates' Regional and National Office scores. The SGE with the top score will be the winner.

D. Announcement of Winner.

Each year DCSP will determine the appropriate venue for announcing the winner of the SGE of the Year award.