OSHA ALLIANCE PROGRAM 2026
Annual Construction Roundtable Summary

On March 19, 2026, OSHA hosted its annual Construction Roundtable for Alliance members. The following is a summation of the most relevant information delivered throughout the day's presentations.

KEY POINTS

- OSHA is advancing the Safety Champions Program (SCP) as a primary pathway for improving safety performance at the site level, particularly for small and mid sized employers.
- A new Job Safety and Health Poster was introduced, reinforcing worker rights and employer responsibilities with an emphasis on visibility and accessibility.
- The Directorate of Construction used temporary worker safety as a vehicle to reinforce multi-employer responsibilities and clarify expectations for compliance under current enforcement policy.
- OSHA continues to emphasize a *we want to help* approach, encouraging participation in cooperative programs such as SCP, VPP, and On-Site Consultation.
- Construction research and data trends continue to focus on falls, struck-by hazards, and emerging risks associated with automation and technology.
- Overdose and suicide rates in construction are trending downward, representing a meaningful improvement, though still significantly elevated relative to other industries.

THEME

The central theme of this year's roundtable was a continued emphasis on collaboration as the mechanism for improving safety outcomes, paired with a renewed focus on practical implementation at the worksite level.

OSHA leadership reinforced that enforcement remains a constant, but the agency's current direction is to provide clearer pathways for employers to improve safety performance through structured programs, guidance, and direct engagement. The messaging was consistent: OSHA is not shifting away from enforcement, but it is actively expanding tools that help employers meet expectations before enforcement becomes necessary.

SAFETY CHAMPIONS PROGRAM (SCP)

https://www.osha.gov/safety-champions

The most significant initiative discussed was the continued rollout and expansion of the Safety Champions Program (SCP), which is being positioned as a primary pathway for improving safety performance across construction worksites, particularly among small and mid sized employers.

SCP is best understood as a site focused system for building and executing a functional safety and health management program, not a corporate level certification or abstract framework. The intent is to meet employers where they are and provide a structured, step based approach that translates directly into worksite level execution. ***Overall, the is SCP is a structured method for building, verifying, and sustaining safety performance at the worksite, with clear expectations, defined milestones, and increasing visibility from OSHA as organizations progress through the program.***

The program is built around OSHA's seven core elements of effective safety and health programs:

· Management Leadership
· Worker Participation
· Hazard Identification and Assessment
· Hazard Prevention and Control
· Education and Training
· Program Evaluation and Improvement
· Communication and Coordination among employers, contractors, and staffing agencies

These elements are operationalized through three progressive steps: Introductory, Intermediate, and Advanced. Each step breaks down the elements into defined, verifiable actions that must be completed before advancement. The use of a Step Guide and Tracker reinforces accountability and ensures that implementation occurs at the worksite level rather than remaining a documented intent.

A key component of SCP is the integration of Special Government Employees (SGEs), who support participants by reviewing progress, evaluating completion of required elements, and providing feedback. This introduces consistency and external validation without invoking formal enforcement, while still maintaining alignment with OSHA expectations.

In practical terms, SCP represents OSHA's effort to standardize how safety management systems are built, measured, and improved across construction operations. The program establishes a defined progression model, with increasing levels of recognition tied to demonstrated performance. It is also clearly positioned as a feeder system into VPP, reinforcing a pathway from foundational practices to more mature and validated safety programs.

Amanda Wood Laihow reinforced this direction by emphasizing OSHA's continued focus on working with employers rather than relying solely on enforcement. The messaging was consistent with prior presentations, highlighting accessibility of resources, structured guidance, and the expectation that employers actively engage in programs designed to improve safety outcomes.

OSHA JOB SAFETY AND HEALTH POSTER
https://www.osha.gov/publications/poster

Amanda Wood Laihow introduced the updated OSHA Job Safety and Health Poster, reinforcing its role as a foundational requirement for communicating worker rights and employer responsibilities.

While the poster itself is not a new concept, the update reflects OSHA's continued emphasis on visibility, accessibility, and baseline compliance at the worksite level. The expectation is not simply that the poster is present, but that it is clearly displayed, understood, and integrated into the broader communication of safety expectations.

From a practical standpoint, the poster functions as a minimum threshold indicator of compliance and culture. It establishes the baseline for worker awareness of rights, including the ability to report hazards, access information, and engage in safety related dialogue without fear of retaliation.

For employers, particularly those operating across multiple sites or jurisdictions, the update reinforces the need to ensure that required postings are current, properly displayed, and aligned with applicable federal and state requirements. Failure to maintain this baseline is often viewed as an early signal of broader gaps in program execution.

Within the context of the broader roundtable, the poster serves as a reminder that OSHA's expectations begin with fundamental requirements and extend upward into more structured programs such as SCP and VPP. Even as the agency advances more sophisticated initiatives, compliance continues to be evaluated starting with the most visible and accessible elements at the worksite.

DIRECTORATE OF CONSTRUCTION UPDATE

Kenny Koroll, the Directorate of Construction presentation, gave an excellent presentation on OSHA's Temporary Worker Initiative Bulletin for construction employment, using it as a framework to communicate broader compliance expectations and enforcement strategy.

At its core, the presentation reinforced a consistent and consequential position: safety responsibility on a construction site is nondelegable and expands in proportion to the level of control exercised. Temporary workers do not reduce employer responsibility. They introduce additional complexity that must be actively managed through defined roles, coordination, and verification across all participating employers.

OSHA continues to distinguish responsibilities across three primary categories:

- Host Employer: responsible for site specific protections, hazard controls, procedures, and supervision
- Staffing Agency: responsible for baseline training, worker qualification, and general hazard awareness
- Joint Responsibility: shared accountability for hazard evaluation, personal protective equipment, and overall worker protection

These distinctions provide structure, but they do not function as liability boundaries. They serve as the basis for evaluating performance under OSHA's Multi Employer Citation Policy, which allows multiple employers to be cited for the same hazardous condition depending on their role as creating, exposing, correcting, or controlling entities.

Enforcement continues to focus on whether each party exercised reasonable care. This is not a passive standard. It requires active inspection, prompt hazard correction, and enforcement of safety requirements across all employers on site. In practice, OSHA evaluates execution rather than contractual structure, reinforcing that responsibility cannot be transferred through agreements alone.

A critical component of this framework is the division and verification of training responsibilities. Subcontractors and staffing agencies are expected to ensure workers arrive with baseline qualifications. However, host employers and general contractors retain responsibility to ensure that workers are properly trained for the specific conditions

and hazards present on the site. This includes a clear expectation to vet, confirm, and supplement training as necessary. Reliance on upstream assurances without verification is treated as a failure of reasonable care.

This distinction is further reinforced by OSHA's explicit clarification that outreach programs such as OSHA 10 and 30 do not satisfy regulatory training requirements. Compliance depends on task specific and site specific instruction tied directly to the hazards of the work environment. Credentials alone are insufficient when evaluated against actual exposure conditions.
From an ownership and risk management perspective, the implications are direct. Any entity with authority over site conditions, sequencing of work, or subcontractor activity will be evaluated as a controlling employer and held to the highest standard of oversight. This includes verification of training, enforcement of hazard controls, and coordination across all trades, including temporary labor. The administration's strategy reflects a clear alignment between control and accountability, regardless of how responsibilities are distributed contractually.

Taken together, this section reflected a consistent enforcement posture defined by clear expectations, shared and nondelegable responsibility, and a continued emphasis on execution at the worksite level.

TOP TEN (+2) CONSTRUCTION VIOLATIONS
Data Range: October 1, 2024 through September 30, 2025

1. 1926.501 – Fall Protection
2. 1926.1053 – Ladders
3. 1926.451 – Scaffolds
4. 1926.503 – Fall Protection Training
5. 1926.102 – Eye and Face Protection
6. 1926.100 – Head Protection
7. 1926.20 – General Safety and Health Provisions
8. 1926.502 – Fall Protection Systems Criteria and Practices
9. 1926.1153 – Respirable Silica
10. 1926.453 – Aerial Lifts
11. *1926.651 – Excavation Hazards*
12. *1926.652 – Cave-in Protection*

Additional high-ranking items included excavation hazards and cave-in protection signify OSHA's move towards enforcing causation in the same manner they cite fall protection training as an underlying of fatalities from falls. The consistency of this list continues to demonstrate that the industry's most significant risks remain tied to ***basic hazard recognition, control implementation, and training execution***.

INDUSTRY TRENDS IMPACTING SAFETY AND HEALTH

Construction research continues to focus on high-severity hazards and practical control improvements. NIOSH's Division of Safety Research emphasized three primary areas:

· Fall protection performance in non-standard conditions (e.g., low anchorage points)
· Industrial helmet design and traumatic brain injury reduction
· Robotics and automation safety in construction environments

The common thread across this research is the translation of technical findings into practical field applications, including improvements to standards, equipment design, and training.

From a workforce perspective, trends in overdose and suicide are moving in a positive direction:

· Overdose deaths decreased significantly from 2022 to 2024
· Suicide rates also declined over the same period

While still elevated relative to other industries, these improvements indicate that increased focus on mental health, awareness, and intervention is beginning to produce measurable impact.

COLLABORATION AND PARTNERSHIP STRATEGY

OSHA continues to expand its focus on collaborative programs to drive safety improvements including:

· On-Site Consultation Program: no-cost, confidential support for small and mid sized employers
· State Plans: 29 OSHA-approved programs operating with enforcement and outreach authority
· Alliance and Partnership Programs: coordinated efforts to deliver training, tools, and outreach

Research presented indicates that increased consultation activity is directly correlated with reduced fatality rates, reinforcing the value of these programs as a complement to enforcement. The overarching strategy is clearly to expand access to resources while maintaining enforcement as the baseline expectation.

ALLIANCE PROGRAM UPDATES AND INITIATIVES

OSHA continues to expand outreach through:

- Non-traditional hazard focus: workplace stress, suicide, and opioid use and overdose framed as direct safety risks requiring active management
- OSHA communication platforms: QuickTakes, digital resources, and ongoing distribution of regulatory updates and safety messaging
- Social media outreach: expanded use of platforms to increase accessibility of safety information and reinforce hazard awareness
- Consultation and partnership programs: on-site consultation, alliance support, hazard trending, and direct engagement at the worksite
- Trenching and excavation partnerships: national collaboration efforts supporting planning, protective systems, and prevention of predictable failures
- Increased engagement through alliances and partnerships: coordinated outreach, shared tools, and expanded collaboration across the construction industry

There is an additional emphasis on this year's National Workers Memorial Day, with expanded outreach and participation intended to reinforce awareness of workplace fatalities and prevention efforts.
https://www.osha.gov/workers-memorial-day

CONCLUSION

The 2026 Construction Roundtable reinforced a consistent direction from OSHA: enforcement expectations remain intact, while the agency continues to define more clearly what acceptable performance looks like at the worksite. The Safety Champions Program represents the most direct expression of this strategy, providing a structured, site focused pathway for building and validating safety management systems with expectations tied to execution rather than written programs.

At the same time, the Directorate of Construction reinforced that responsibility on a jobsite remains nondelegable, and that increasing complexity in workforce structure raises expectations for coordination, training verification, and oversight. Control of the work continues to drive accountability, and multi-employer environments will be evaluated based on how effectively that control is exercised in practice.

The consistency of the Top Ten violations confirms that the industry's primary challenges remain tied to fundamental execution, particularly in fall protection, access systems, training, and hazard control. These are not emerging risks, but persistent gaps in application. In contrast, trends related to overdose and suicide show measurable improvement, demonstrating that focused attention can produce results, although these risks remain elevated and require continued engagement.

OSHA is establishing a clearer operating model while maintaining full enforcement authority, and organizations that align with these expectations through structured programs, verified training, and deliberate control of site operations will be better positioned to manage both risk and regulatory exposure.