OSHA’s Site-Specific Targeting Inspection Plan Focuses Initial Inspection on 14,000 Workplaces

The Occupational Safety and Health Administration (OSHA) has identified and sent letters to more than 14,000 workplaces with the highest occupational injury and illness rates, urging employers to take action to remove hazards.

The identification stems from OSHA’s latest initiative – known as the Site-Specific Targeting 2007 (SST-2007) inspection plan, which became effective on March 14, 2007. The new initiative, which replaces OSHA’s Site-Specific Targeting 2006 inspection plan, is OSHA’s main programmed inspection plan for non-construction workplaces that have 40 or more employees. The program attempts to direct enforcement resources to workplaces where the highest rate of injuries and illnesses have occurred.

In its effort to identify those workplaces seen as most hazardous, OSHA relied upon its Data Initiative – a nationwide collection of specific injury and illness data from approximately 80,000 employers collected using the “OSHA Work-Related Injury and Illness Data Collection Form,” which is required by law to be completed. The penalty for not completing it is automatic inclusion on the list of employers targeted for inspection. However, this does not necessarily mean a facility will be inspected.

OSHA inspections occur for a variety of reasons, including employee complaints, significant events at a facility (accidents, fires, etc.), random inspections and “programmed” inspections, which target specific industries or areas. OSHA also implements both local and national “emphasis” programs to target high-risk hazards and industries. Where an SST inspection coincides with some other type of inspection at a workplace (i.e., unprogrammed, special emphasis, etc.), the more comprehensive SST inspection likely will take priority.

From the beginning of this program, OSHA has focused on certain employers based on their DART rate. The initial selection, identified through the 2006 Data Initiative survey, consists of workplaces with DART rates at or above 11.0 or those with a DAFWII case rate at or above 9.0. DART is the rate of recordable injuries and illness cases per 100 full-time employees resulting in days away from work, restricted work activity and/or job transfer that a site has experienced in a given time frame or reference year. The annual DART rate is calculated by the number of recordable injuries and illnesses and multiplied by 200,000 and then divided by the number of employee hours worked. DAFWII is the number of “days away from work injury and illness” cases per 100 employees. It is calculated by taking the total number of cases involving days away from work for a given year and dividing that number by the total number of hours worked by all employees during that given year. This number is then multiplied by 200,000 which represents the base number of hours worked for 100 full-time employees.
The average DART rate for all employers nationwide is 2.4. The 14,000 employers were notified that injury and illness rates at their worksites were higher than average.

The SST-2007 plan defines key terms, describes three prioritized inspection lists, and provides scheduling and inspection procedures. States with their own “State Plans” for worker safety are required to have their own inspection targeting systems, which must include elements of, and be at least as effective as, the federal plan.

The initial selection represents approximately 4,150 sites which will constitute the “Primary Inspection List.” Also added to the Primary Inspection List are nursing and personal care facilities that are among the highest 50 percent of their industry in DART or DAFWII rates, as well as a random sample of establishments that did not respond to the 2006 OSHA Data Initiative survey.

The agency also will randomly select and inspect approximately 100 workplaces (with 100 or more employees) nationwide that reported low injury and illness rates for the purpose of reviewing the actual degree of compliance with OSHA requirements. These establishments are selected from those industries with DART and DAFWII rates that are higher than the national rate. Lower risk industries and others not on the Primary Inspection List may be on the Secondary or Tertiary Inspection Lists. Establishments with a DART rate of 7.0 or greater but less than 11.0, or a DAFWII case rate of 4.0 or greater but less than 9.0 will be on the Secondary inspection List. The Tertiary List will include establishments with a DART rate of 4.8 or lower, and a DAFWII case rate of 2.8 or lower.

If an employer is participating in one or more of the OSHA partnership or voluntary programs (such as the OSHA Strategic Partnership or the Voluntary Protection Program), the SST inspection may be deferred or the facility may be deleted from the inspection list. Establishments that have received a comprehensive safety inspection within the previous 24 months also may be deleted from the inspection list.

While the approach seems to make sense, it can penalize employers that over-report, or small employers that might experience several serious injuries in a calendar year.

A list of employers who received a letter from OSHA can be found at www.osha.gov/as/opa/foia/hot_13.html.

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