

**North Carolina Department of Labor
Occupational Safety and Health Division**

Raleigh, North Carolina

Field Information System

CPL 02-18-01

Subject: Site-Specific Targeting 2016 (SST-16)

A. Scope.

This notice implements OSHA's *Site-Specific Targeting 2016 (SST-16)* inspection plan. This program does not include construction worksites or North Carolina public sector sites.

B. Discussion.

The North Carolina OSH Division has elected to adopt the inspection targeting plan established by federal OSHA for non-construction workplaces that have 20 or more employees and is based on data received from injury and illness information that employers submit for a calendar year under 29 CFR 1904.41. This targeting program uses the submitted data from federal OSHA and parallels the federal OSHA SST program set forth in OSHA's Directive 18-01 (CPL 02) – *Site-Specific Targeting 2006 (SST-16)*, October 16, 2018. This assignment schedule will also exclude any North Carolina public sector sites, which will otherwise be assigned through the North Carolina OSH Public Sector Targeting Schedule.

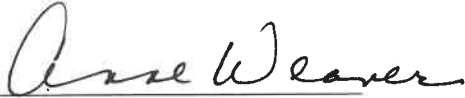
C. Action.

CSHOs will conduct inspections in accordance with the procedures described within this CPL and in other guidance documents. Inspections conducted under this plan will be either comprehensive programmed safety or comprehensive programmed health inspections as defined by the NC Field Operations Manual (FOM). Targeted inspections under this inspection program will receive the highest inspection priority among all other general industry programmed inspections (see FOM Chapter II – Compliance Programing, paragraph E.1. – Order of Priority). Programmed inspections under other NC OSH Division Special Emphasis initiatives including Health Hazards; Long Term Care; Logging and Arboriculture Fatality Reduction; Food Manufacturing; Grocery and Related Product Wholesalers; and Construction Fatality Reduction carry inspection priority equal to SST inspections.

The Targeting System Administrator in the Planning, Statistics and Information Management (PSIM) Bureau will supply the assignments to the East and West Compliance Bureaus via the NC OSH Targeting System webpage (SST Assignments) on the OSH One Stop Shop. Sections in the OSHA Directive relating to scheduling for federal jurisdiction Area Offices, Cycle Size (para. XI.B), Use of SST Software (para. XI.C), and Deletions (para. XII) will not be used by the NC OSH Division. Other provisions of the 18-01 (CPL-02) effective October 16, 2018, including a provision to clarify procedures when an establishment is an Office Only site (para. XI.D.2), are to be followed by OSH.

D. **Effective Date.**

This CPL is effective on the date of signature. It will remain in effect until revised or canceled by the director.



Anne Weaver
Bureau Chief



Kevin Beauregard
Director

3.8.19

Date of Signature



OSHA NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: 18-01 (CPL 02)

EFFECTIVE DATE: 10/16/2018

SUBJECT: Site-Specific Targeting 2016 (SST-16)

ABSTRACT

- Purpose:** This Notice implements OSHA's *Site-Specific Targeting 2016 (SST-16)* inspection plan. This program does not include construction worksites.
- Scope:** OSHA-wide
- References:** OSHA Instruction [CPL 02-00-025](#) *Scheduling System for Programmed Inspections*, January 4, 1995; OSHA Instruction [CPL 02-00-160](#), *Field Operations Manual (FOM)*, August 2, 2016; OSHA Instruction [CSP 01-00-004](#), *State Plan Policies and Procedures Manual*, September 22, 2015, and [Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR 1904.41\(a\)\(1\) and \(a\)\(2\)](#), February 21, 2018.
- Cancellations:** None
- Expiration Date:** One year from the effective date, unless replaced by a new Notice. Upon the expiration or replacement of this Notice, inspection cycles already underway must be completed as described in paragraph XI.B.
- State Impact:** Notice of Intent and Equivalency required. State Plan documentation of targeting system required if not current. See paragraph VII, *State Plan Impact*.
- Action Offices:** National, Regional, and Area Offices
- Originating Office:** Directorate of Enforcement Programs

Contact: Directorate of Enforcement Programs
Office of General Industry and Agricultural Enforcement
200 Constitution Avenue, NW, N3119
Washington, DC 20210
202-693-1850

By and Under the Authority of

LOREN SWEATT
Deputy Assistant Secretary

Executive Summary

This Notice implements OSHA's *Site-Specific Targeting (SST)* inspection program, using employer-submitted Calendar Year 2016 Form 300A data. The SST is OSHA's main site-specific targeting inspection plan for non-construction workplaces that have 20 or more employees and is based on the data received from injury and illness information that employers submitted for Calendar Year 2016 under 29 CFR 1904.41. Prior to 2014, SST programs used injury and illness information collected under the former OSHA Data Initiative.

This program helps OSHA achieve its goal of ensuring that employers provide safe and healthful workplaces by directing enforcement resources to those workplaces with the highest rates of injuries and illnesses.

This Notice identifies key references, describes the inspection list, provides scheduling and inspection procedures, and gives information on OSHA Information System (OIS) coding.

TABLE OF CONTENTS

I.	PURPOSE.....	1
II.	SCOPE.....	1
III.	REFERENCES.....	1
IV.	CANCELLATIONS.....	2
V.	EXPIRATION DATE.....	2
VI.	ACTION INFORMATION.....	2
VII.	STATE PLAN IMPACT.....	2
VIII.	SIGNIFICANT CHANGES.....	3
IX.	BACKGROUND.....	3
	A. OSHA’S PROGRAMMED INSPECTION PROGRAMS.....	3
	B. CREATING THE SST INSPECTION LIST.....	4
X.	DESCRIPTION OF THE SST TARGETING LIST.....	4
	A. INSPECTION LIST CRITERIA.....	4
	1. HIGH-RATE ESTABLISHMENTS.....	4
	2. LOW-RATE ESTABLISHMENTS.....	4
	3. NON-RESPONDERS.....	4
XI.	SCHEDULING.....	5
	A. MAINTAINING INSPECTION LIST/CYCLES/DOCUMENTATION.....	5
	B. CYCLE SIZE.....	5
	C. USE OF SST SOFTWARE.....	6
	D. WORKSITE CLARIFICATION.....	6
	1. INDUSTRIES WITHOUT PERMANENT WORKPLACES.....	6
	2. OFFICE-ONLY SITES.....	6
	E. DEFERRALS.....	7
	1. OSHA ONSITE CONSULTATION PROGRAM.....	7
	2. VPP APPLICANTS.....	7
	F. INSPECTION PRIORITY.....	7
XII.	DELETIONS.....	8

A. PREVIOUS INSPECTIONS.....	8
B. PUBLIC SECTOR EMPLOYERS.....	9
C. VPP AND SHARP.....	9
XIII. INSPECTION PROCEDURES.....	9
A. SCOPE.....	9
B. VERIFY NAICS.....	10
C. CITATIONS.....	10
D. RECORDKEEPING VIOLATIONS.....	10
E. COLLECTION AND REVIEW OF INJURY/ILLNESS DATA.....	10
XIV. RELATIONSHIP TO OTHER PROGRAMS.....	10
A. UNPROGRAMMED INSPECTIONS.....	10
B. EMPHASIS PROGRAMS.....	10
XV. RECORDING AND TRACKING.....	11
A. SST-ONLY INSPECTIONS.....	11
B. SST COMBINED WITH OTHER UNPROGRAMMED.....	11
C. SST COMBINED WITH EMPHASIS PROGRAM.....	11
D. SST WITH UNPROGRAMMED AND OTHER PROGRAMMED.....	11
E. STRATEGIC MANAGEMENT PLAN.....	12

I. Purpose

This Notice implements OSHA's *Site-Specific Targeting* inspection program. This program does not include construction worksites.

II. Scope

This Notice applies OSHA-wide.

III. References

- A. [Occupational Safety and Health Act of 1970](#), 29 U.S.C. 651.
- B. [29 CFR Part 1904, Recording and Reporting Occupational Injuries and Illnesses](#).
- C. [29 CFR Part 1908, Consultation Agreements](#).
- D. [Revisions to the Voluntary Protection Programs to Provide Safe and Healthful Working Conditions](#), *Federal Register*, January 9, 2009 (74 FR 927).
- E. OSHA Directives
 - [ADM 03-01-005](#), *OSHA Compliance Records*, August 3, 1998.
 - [CPL 02-00-025](#), *Scheduling System for Programmed Inspections*, January 4, 1995.
 - [CPL 02-00-051](#), *Enforcement and Limitations under the Appropriations Act*, May 28, 1998.
 - [CPL 02-00-160](#), *Field Operations Manual (FOM)*, August 2, 2016.
 - [CPL 02-00-149](#), *Severe Violator Enforcement Program (SVEP)*, June 18, 2010.
 - [CSP 01-00-004](#), *State Plan Policies and Procedures Manual*, September 22, 2015.
 - [CSP 02-00-003](#), *Consultation Policies and Procedures Manual*, November 19, 2015.
 - [CSP 03-01-003](#), *Voluntary Protection Programs (VPP): Policies and Procedures Manual*, April 18, 2008.

- F. [Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR 1904.41\(a\)\(1\) and \(a\)\(2\)](#), February 21, 2018.

IV. Cancellations

None

V. Expiration Date

This Notice will terminate one year from the effective date, unless replaced by a new Notice. Upon the expiration or replacement of this Notice, inspection cycles already underway must be completed as provided in paragraph XI.B.

VI. Action Information

A. Responsible Office

Directorate of Enforcement Programs (DEP)

B. Action Offices

National, Regional, and Area Offices

C. Information Offices

State Plan States, OSHA Training Institute, Consultation Project Managers, VPP Managers and Coordinators, Compliance Assistance Coordinators, and Compliance Assistance Specialists.

VII. State Plan Impact

- A. Notice of Intent and Equivalency required. State Plan documentation of targeting system required.
- B. This Notice describes a Federal program change which establishes policies and procedures regarding general industry inspection targeting under the SST program. States with OSHA approved State Plans are required to have their own inspection targeting systems (a “core inspection policy”), which must be documented in their State Plans and revised as necessary to reflect current practices. These inspection policies and procedures must be at least as effective as Federal OSHA’s and be available for review. State Plans are required to notify OSHA whether they intend to adopt policies and procedures identical to the SST program or adopt or maintain different policies and procedures for targeting of

general industry inspections.

Within 60 days of the date of issuance of this directive, State Plans must submit a notice of intent indicating if the State Plan will adopt or already has in place targeting policies and procedures that are identical to or different from the federal program. State adoption, either identically or different, should be accomplished within 6 months. If adopting identically, the State Plan must provide the date of adoption to OSHA, due within 60 days of adoption. If the State Plan adopts or maintains enforcement policies that differ from this SST, the State Plan must either post its different policies on its State Plan website and provide a link to OSHA, or provide OSHA with an electronic copy and the name and contact information of an official within the State Plan who can assist the public with obtaining a copy. This action must occur within 60 days of the date of adoption.

VIII. Significant Changes

- A. None

IX. Background

A. OSHA's Programmed Inspections

The SST program is OSHA's main site-specific programmed inspection initiative for non-construction workplaces that have 20 or more employees. The SST program uses data from injury and illness information that employers submit under 29 CFR 1904.41. Prior to 2014, the SST program used injury and illness information collected under the former OSHA Data Initiative. This current program helps OSHA achieve the goal of ensuring that employers provide safe and healthful workplaces by directing enforcement resources to the workplaces with the highest rate of injuries and illnesses.

In addition to the SST, OSHA implements national and local emphasis inspection programs to target high-risk hazards and industries. OSHA currently has nine National Emphasis Programs (NEPs) focusing on lead, ship-breaking, trenching/excavations, process safety management, hazardous machinery, hexavalent chromium, primary metal industries, and combustible dust. OSHA currently has approximately 100 Regional/Local Emphasis Programs (REPs/LEPs).

B. Creating the SST Inspection List

By applying industry and establishment-size criteria, OSHA focuses data collection towards establishments that are most likely to be experiencing elevated rates and numbers of occupational injuries and illnesses. The SST-16 plan selects

individual establishments for inspection based on their required (by 29 CFR 1904.41) submission of CY 2016 Form 300A data.

X. Description of the Site-Specific Targeting 2016 (SST-16) Plan

A. Inspection List Selection Criteria

OSHA will create inspection lists of establishments with elevated Days Away, Restricted or Transferred (DART) rate, together with a random sample of establishments that did not provide the required 2016 Form 300A data to OSHA. To verify data accuracy, OSHA will include a random sample of low-rate establishments for quality control purposes.

1. High-Rate Establishments

The SST-16 selects individual establishments for inspection based on CY 2016 Form 300A data.

Because average DART rates vary widely among industries, different DART rates for manufacturing and non-manufacturing are set as selection criteria to achieve a 50/50 representation on the list.

2. Low-Rate Establishments

To verify the reliability of the Form 300A data reported to OSHA, the agency will generate a random sample of establishments [identified by two asterisks (**)] with low DART rates.

3. Non-Responders

OSHA will generate a random sample of establishments [identified by three asterisks (***)] that failed to provide the required Form 300A data to OSHA on the inspection targeting list. Inclusion of these non-responding employers is intended to discourage employers from not reporting injury and illness information in order to avoid inspection.

If, upon arrival, compliance officers learn that a listed establishment is only an office, refer to paragraph XI.D.2, Office-Only Sites.

XI. Scheduling

The Office of Statistical Analysis will provide each Area Office with access to software and databases that include the establishments on the Inspection List. Only OSHA and State Plan States will have access to this information.

A. Maintaining Inspection List/Cycles and Documentation

The Area Director is responsible for maintaining documentation necessary to demonstrate that the Area Office has used the SST inspection list and cycles in accordance with the requirements of this Notice, including documenting all deletions, deferrals, or other modifications (modifications such as rationale for expanding inspections to cover health hazards based on (a) prior inspection history of the establishment, or (b) knowledge of an establishment's industry classification). The Area Office must maintain all such inspection lists, cycles, and documentation for a period of three years after all inspections conducted under this SST plan are closed. See paragraph B.1.b.(1)(c)3 in [CPL 02-00-025](#), *Scheduling System for Programmed Inspections* (1/4/1995) and Appendix D, *Compliance Records Disposition Schedule*, in [ADM 03-01-005](#), *OSHA Compliance Records* (8/3/1998).

B. Cycle Size

Area Offices must generate inspection cycles using the SST software that randomly selects the establishments, and will determine cycle size (i.e., 5 to 50 establishments) based on available resources and geographic range of the office. Larger cycle sizes will allow greater flexibility and efficiency of scheduling, but once initiated, the cycle must be completed. If a cycle larger than 50 would provide the Area Office with more efficient use of staff, the office must request Regional Office approval.

Within a cycle, the office may schedule and inspect the establishments in any order that makes efficient use of available resources.

After opening an inspection, use the "Update" function of the SST application to enter the inspection number in the activity ID field.

After completing a cycle, the Area Office may generate a new cycle using the SST software.

The Area Office must inspect (open an inspection) all the establishments in a cycle before inspecting any establishments in a new cycle. However, OSHA Instruction [CPL 02-00-025](#), *Scheduling System for Programmed Inspections* (1/4/1995), paragraph B.1.b(1)(e)1, lists permissible carryovers from one cycle to another cycle. In addition, when this Notice expires, the Area Office must complete any cycle begun but not yet completed even if the inspections for the remaining establishments are opened after the expiration date.

C. Use of SST Software

Each Area Office must use the “Create” function of the SST web-based application to create cycles from the SST inspections lists, and also use the application to update the inspection lists to enter deletions and inspections conducted. Area Offices shall not create cycles manually.

D. Worksite Clarification

As part of the pre-inspection process, the Area Office shall verify proper targeting. If the worksite is not subject to the 2016 data submittal criteria, do not conduct the inspection.

Contact the Office of Statistical Analysis to correct any data discrepancies as discussed below. Report any discrepancies through the SST application.

1. Industries without Permanent Workplaces

For industries like NAICS Code 561730, Landscaping Services, which do not have permanent workplaces, the establishment list will normally only identify the employer’s central office. The Area Office will, so far as possible (e.g., by visiting the central office), determine active worksites based on the type of work scheduled for each site and the length of time remaining to complete the work at the sites.

2. Office-Only Sites

The SST is not intended to include establishments that are only office environments. Therefore, if a CSHO arrives at an establishment and discovers that there is only an office at the site, the CSHO should determine to what site or sites the OSHA Form 300A data applies. If the Form 300A data includes data for a site (or sites) in addition to an office, then inspect that site (or one of the sites) if it is within the Area Office’s jurisdiction.

NOTE: Recordkeeping rule §1904.30 requires an employer to keep a separate OSHA 300 Log for each establishment that the employer expects to be in operation for one year or longer.

E. Deferrals

1. OSHA On-Site Consultation Program

If an establishment is an approved participant in the Pre-Safety and Health Achievement Recognition Program (SHARP), it may be granted a deferral from OSHA programmed inspections.

If an On-Site Consultation visit is “in progress” at an establishment it will take priority over OSHA programmed inspections. An On-Site Consultation visit will be considered “in progress” in relation to the working conditions, hazards, or situations covered by the visit from the beginning of the opening conference through the end of the correction due dates and any extensions thereof (29 CFR 1908.7(b)(1)).

If an establishment has requested an initial full-service comprehensive consultation visit for safety and health from an On-Site Consultation program and that visit has been scheduled by the On-Site Consultation program, a programmed inspection may be deferred for 90 calendar days from the date of the notification by the On-Site Consultation program to the Regional Office. No extension of the deferral beyond 90 calendar days is possible unless the consultation visit is “in progress.” OSHA may, however, in exercising its authority to schedule inspections, assign a lower priority to worksites where consultation visits are scheduled (Field Operations Manual, CPL-02-00-160, Section VI.G.2.c).

2. Voluntary Protection Programs (VPP) Applicants

When the Area Director receives notification from the VPP Manager that a VPP on-site review has been scheduled, the Area Director will remove the applicant from any programmed inspection list for a period of up to 75 days prior to the scheduled on-site review. The Area Director will also remove the Applicant workplace from any programmed inspection list for the duration of VPP participation, unless the site chooses otherwise (see paragraph XII.C., Deletions – VPP or SHARP). See *Federal Register* (65 FR 45650), which is also referenced earlier in paragraph III.D.

F. Inspection Priority

While normally the priority for Area Offices is to conduct unprogrammed inspections, this Notice adds the following procedures:

1. Area Offices that have started but not completed a cycle of inspections from the SST-16 plan must normally complete that cycle before moving to inspections under a subsequent SST plan. See [CPL 02-00-025](#), *Scheduling System for Programmed Inspections*, at paragraph B.1.b.(1)(e)1 for permissible carryovers from one cycle to another cycle.

2. An Area Office must inspect all establishments on the SST Inspection List unless, in view of resource considerations, such as agency emphasis programs, the Regional Administrator authorizes the Area Director to conduct a smaller number of inspections from the list. Such authorization will normally require the Area Office to complete all inspections in the current cycle. The Regional Administrators will submit their yearly targets in the annual performance plan which states how many SST inspections the Region shall conduct.
3. All Federal OSHA offices having jurisdiction over sites in State Plan States are expected to inspect all establishments on their inspection lists (i.e., U.S. Post Offices, ship and boat building and repairing sites) over which Federal OSHA has coverage. With regard to establishments in NAICS 3366, Ship and Boat Building, Federal OSHA and the State Plan must coordinate to determine whether the State Plan, Federal OSHA, or both have jurisdiction over the establishment.
4. Area Offices will continue to conduct other programmed inspections under NEPs, REPs, LEPS, or other initiatives as the Area Office and Regional goals dictate.

XII. Deletions

Area Offices will be responsible for making appropriate deletions, as stated below, from the inspection cycle. Deletions will also include those establishments, such as those no longer in business, in accordance with [CPL 02-00-025](#), *Scheduling System for Programmed Inspections*, at B.1.b.(1)(b)6.d.

Deletion criteria for Previous Inspections, Public Sector Employers, VPP, or SHARP establishments may be applied to establishments either before or after creating a cycle.

A. Previous Inspections

Delete an establishment from the inspection list if it has received a comprehensive safety or health inspection within 36 months of the creation of the current inspection cycle. For deletion purposes, an establishment's comprehensive inspection date is the *opening conference date* of that inspection. If the opening conference date occurred within the previous 36 months of the current SST inspection cycle, delete the establishment from the SST inspection list.

Note: Do not use criteria H# (Health inspection) and S# (Safety inspection) at B.1.b.(1)(b)6.d. of [CPL 02-00-025](#), *Scheduling System for Programmed Inspections*.

The SST software tracks the opening conference date entered for establishments deleted for the above listed reason (previous comprehensive inspection). Once the 36-month period passes, the software will make that establishment available again for selection.

NOTE: Do not delete SVEP establishments or establishments related to an SVEP case. These establishments are not entitled to an inspection deferral.

B. Public Sector Employers

Delete any public sector employers (i.e., federal, state, or local government) on the inspection lists.

NOTE: The OSH Act was amended in 1998 to consider the U.S. Postal Service a private sector employer.

C. VPP and SHARP

1. If an establishment is an approved participant in OSHA's Voluntary Protection Programs (VPP), delete it from the inspection lists.
2. If an establishment is an approved participant in SHARP, delete it from the inspection lists (29 CFR 1908.7(b)(4)(i)(B)).

XIII. Inspection Procedures

A. Scope

SST inspections shall be comprehensive in scope. An Area Director may open an inspection conducted under this program as either a comprehensive safety or health inspection, based on the Area Office's knowledge of the workplace characteristics. In addition, if the site has been inspected previously, the Area Director may expand the inspection to cover both health and safety hazards based on that prior inspection history. The Area Director must fully explain and document the rationale for the expanded inspection.

B. Verify NAICS

At the opening conference, verify the establishment's NAICS code. As needed, establish activities occurring at the workplace before determining the appropriate NAICS code.

C. Citations

Citations for violations and corresponding proposed penalties shall be made in accordance with the FOM (OSHA Instruction [CPL 02-00-160](#)), and other pertinent policy and procedure documents.

D. Recordkeeping Violations

When conducting an inspection of Non-Responder employers, CSHOs must follow the guidance listed in OSHA's [Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR 1904.41\(a\)\(1\) and \(a\)\(2\)](#), February 21, 2018, for citing failure to submit violations.

E. Collection and Review of Illness and Injury Data

During inspections under this Notice, CSHOs will review the OSHA 300 Logs for CY 2016, 2017, and 2018 to date. Refer to the FOM, Chapter 3, Section VI, *Review of Records* for further guidance on review of injury and illness data.

XIV. Relationship to Other Programs

A. Unprogrammed Inspections

Conduct unprogrammed inspections according to OSHA's FOM or other pertinent policy and procedure documents. If an unprogrammed event (e.g., complaint, fatality, or referrals) occurs at an establishment that is also slated for inspection under this SST program, the two inspections may be conducted either concurrently or separately. See paragraph XV.B.

B. Emphasis Programs

Some establishments may be selected for inspection under the SST program and also under one or more other OSHA initiatives (emphasis programs). Inspection programs based on specific hazards (such as combustible dust or lead) or specific industries (such as logging, scrapyards, shipbreaking, or petroleum refineries) can run concurrently with the SST program.

Whenever an establishment is scheduled for inspection based on the current cycles of both the SST and another emphasis program, both inspections may be

scheduled at the same time. CSHOs will apply all applicable OIS codes to the inspection. See paragraph XV.C.

XV. Recording and Tracking

OSHA inspections conducted in response to this directive, shall be coded in OIS as described in this section. All consultation activities (Request, Visit, and Compliance Assistance) conducted by On-Site Consultation programs in relation to this directive shall also be coded in OIS as described in this section.

A. SST-Only Inspections

The inspection must be coded as programmed planned in OIS. Record the value **SSTARG16** as the primary code in the NEP section.

B. SST Combined with Unprogrammed Inspections

For all unprogrammed inspections conducted in conjunction with an SST inspection, code the inspection type as unprogrammed in OIS. Add a secondary inspection type for programmed and record the value **SSTARG16** in the NEP section.

NOTE: Inspections opened as referrals are unprogrammed. However, these inspections must also record the value **SSTARG16** in the NEP section.

C. SST Combined with Emphasis Program Inspections

For all emphasis program inspections such as NEPs, REPs, and LEPs conducted in conjunction with an SST inspection, mark the inspection as “programmed planned” in OIS. In addition, record the value **SSTARG16** as the primary code in the NEP section, and list all other applicable NEP and LEP codes as secondary.

D. SST Combined with Unprogrammed and Other Programmed Inspections

If an SST inspection is combined with an unprogrammed (e.g., complaint) inspection and a programmed inspection, such as an NEP or LEP, code the inspection type as unprogrammed with a secondary inspection type of programmed. Record the value **SSTARG16** as the primary code in the NEP section, along with any other applicable NEP or LEP codes as secondary.

E. Strategic Management Plan

Enter all applicable Strategic Management Plan hazard/industry codes in OIS under Strategic Plan Activity (e.g., amputations, ergonomics, lead, silica).