



Division of Occupational Safety and Health

MEMORANDUM

To: OSH Compliance

From: Kevin Beauregard, Asst. Director

RE: Program Improvements

Date: August 15, 2013

The purpose of this memorandum is to clarify inspection and/or intervention related coding documentation requirements associated employer program improvements. Specifically, there have been questions regarding when to use the strategic plan activity code "Program Improvements" (field 25f on the OSHA-1). This code is to be used to track when OSHNC inspection or intervention activities result in improvements to an employer's safety and health program. The code is only to be used a maximum of one time for each inspection/intervention. This coding is being used to measure the relationship between a specific compliance inspection/intervention and the resulting safety and health program improvement(s). For consistency, the following should be used as guidelines for documenting and tracking "Program Improvements":

1. If the employer is cited for a violation of a specific standard that requires a particular safety/health program or procedure (i.e. hazard communication program, LOTO program, respiratory protection program, hearing conservation program, etc....) then the CSHO shall utilize the "Program Improvements" code when the abatement verification has been entered on the NCR for the associated violation(s).
2. If there are no program violations but the CSHO provides assistance for the employer that directly results in improvements to the employer's safety and health program, the CSHO shall utilize the "Program Improvements" code when the OSHA-1 is entered on the NCR (in these instances, the specific improvement(s) must be documented in the case file narrative).
3. If the CSHO has not already utilized the "Program Improvements" code on the OSHA-1, the District Supervisor shall enter the "Program Improvements" code following an informal conference, if there is specific language in a signed Settlement Agreement that would directly result in specific improvements to the employer's safety and health program.
4. In addition to compliance inspection activity, an OSHA-55 (intervention form) shall be completed utilizing the "Program Improvements" code whenever more than $\frac{1}{2}$ hour is spent on an intervention activity that provides assistance to an employer that will lead to improvements to the employer's safety and health program.

Any safety and health program improvement specifically related to the emphasis on exposures to health hazards that are covered by the OSH Strategic Plan, should also be coded in accordance with OPN 135.