

North Carolina Department of Labor
Division of Occupational Safety and Health

Raleigh, North Carolina

Field Information System

Operational Procedure Notice 124 B

Subject: Site Specific Targeting of Inspection Assignments

A. Purpose.

This Operational Procedure Notice (OPN) establishes and implements a site specific special emphasis inspection program as authorized by North Carolina General Statute 95-136.1 to target for inspection those employers with a high rate of recordable work related illnesses or injuries. Specifically, those employers with high Lost Workday Injury and Illness Case Rates (LWDII) as reported through the Employer Data System and OSHA Data Initiative and further defined by this OPN, are those which may be targeted for inspection.

B. Scope.

This OPN applies to all assignments included in this special emphasis inspection program and is effective until cancelled by the Director.

C. Discussion.

OSHNC has adopted the inspection targeting plan established by Federal OSHA Directive CPL 2 "Site Specific Targeting". The plan is based on establishment-specific employer LWDII data obtained through the OSHA Data Initiative. The OSHA Data Initiative (a.k.a. Data Survey or ODI) is a nationwide collection of establishment-specific injury and illness data from employers. OSHNC collects data on certain employers within North Carolina. The targeting program outlined in this OPN uses data from the Data Initiative and parallel's the Federal OSHA SST program set forth in OSHA's Directive CPL-2 (00-05). The Federal OSHA directive is on file as 00-05 (CPL-2) September 8, 2000.

D. Objectives.

This special emphasis inspection program has been initiated to target for inspection, specific work sites where the LWDII is high.

E. Inspection Procedures.

1. Procedures and guidelines for inspections, administration of the SST program by OSHNC, and IMIS data entry are set forth in the OSHA Directive 00-05 (CPL-2) September 8, 2000. Some differences will exist, however. The ODI program administrator will supply the assignments to the East and West Compliance. Consequently, sections in the OSHA Directive relating to Supplemental Inspections Lists (para. IX. B.), Cycle Size (para. X. A), and Deletions (para. XI) will not be used by OSHNC. Other provisions of the 00-05 (CPL-2) September 8, 2000, including Appendix B "Compliance Officer Checklist" are to be followed by OSHNC.
2. Inspections conducted under this plan will be comprehensive programmed safety and health inspections as defined by the Compliance Operations Manual and conducted in accordance with the procedures described there and in other guidance documents. Targeted inspections under this inspection program shall receive the highest inspection priority among all other general industry programmed inspections. Programmed Inspections under other OSHNC

initiatives including Silica, and Lead in Construction, Long Term Care, Logging and Tree Felling Fatality Reduction, Construction Fatality Reduction and Fatality Site Reinspections carry inspection priority equal to SST inspections. Compliance Bureau management shall determine the appropriate strategy for meeting inspection activity levels in each area of strategic focus. Consultation deferrals shall apply to sites selected for inspection under this OPN.

3. Once an inspection is planned, the Supervisor should insure the development of an intervention strategy to address those safety and health problem areas identified through review of employer specific data included in the ODI and IMIS databases.
4. When a site is targeted for either a safety only or health only inspection and the CSHO determines that both safety and health hazards are present, a joint inspection is preferred but referrals may be considered when a joint inspection is not possible.
5. Inspections under the SST plan may be conducted either as one combined safety and health inspection by a cross-trained compliance officer (as established through specific training or demonstrated ability), or as separate safety and health inspections, or as joint safety and health inspections.

F. Calculation of LWDII.

1. During inspections under this notice, the OSHA 200 logs for three previous years will be reviewed. The LWDII rate for all three years will be recalculated and recorded on the OSHA 1 Form. See OSHA Directive 00-05 CPL-2, September 8, 2000 for additional guidelines.
2. The LWDII rate (calculated by the compliance officer) is to be compared to the LWDII rate (for the same year) reported by the employer to the OSHA Data Initiative data collection. CPL 2 contains a full discussion of the targeting program upon which this OPN is based. Consult the USOSHA directive 00-05 (CPL-2) September 8, 2000 for an example of LWDII calculations and additional details. A recalculation will not be performed if, for any reason, the relevant records are not available.
3. Compliance officers shall check OSHA 101 Forms (or equivalent), as they deem appropriate to validate the OSHA 200 Forms. If records are not available for compliance officers to make this determination, the workplace comprehensive safety and health inspection will proceed and appropriate citations under 29 CFR 1904 shall be considered.
4. If the establishment's recalculated rate is below the threshold LW DII, but the LWDII for the Data Initiative survey years identified in Appendix A of this OPN is at or above the threshold LWII, proceed with the inspection. If the establishment's recalculated rate using the establishment's records is less than the threshold LWDII for both years, do a records audit and then recalculate the establishment's LWDII rate. Classify the inspection as a "records only" inspection and exit the facility, if the rate for both years is below the threshold LWDII.
5. If recordkeeping violations are discovered, they shall be cited in accordance with OSHNC policy. A partial walkthrough may be conducted to interview workers in order to confirm and verify the injury and illness experience. Any serious violations that are observed in the vicinity or brought to the attention of the Compliance Officer shall be investigated and may be cited.

G. Recording and Tracking.

1. Recording and tracking of SST inspections will follow OSHA procedures set forth in Directive 00-05 (CPL-2) September 8, 2000.
2. Conducting comprehensive inspections at employer sites selected for inspection on the basis of site specific data is a key strategic initiative of OSHNC. In addition, tracking improvement in injury and illness rates at these sites, reinspection of sites where improvements are needed and reporting employer results are an essential part of the SST program set forth in this OPN.

H. Managing the inspection assignment list

1. All sites on a SST Assignment Cycle list must be inspected prior to initiating inspections from subsequent OSHNC SST Assignment Cycle lists.
2. The Planning, Statistics and Information Management Bureau (PSIM) will provide each District Office with an inspection assignment list (SST Assignment Cycle list) generated by a software package and database. This database contains all the establishments in the Data Initiative List for the State.
3. Initially, the SST Assignment cycle size (number of assignments on the SST assignment list) will be based on consideration of available resources competing strategic priorities, geographic range of the office, and the number of employers in the SST data base who are above the Threshold LWDII. Within a list, the establishments may be scheduled and inspected in any order that makes efficient use of available resources. When a list is completed, the District Office may request a new list through their respective Bureau Chief. All of the establishments in a Cycle must either be inspected or removed from the list by the Statistics and Information Management before any establishments on a new list may be inspected.
4. District Supervisors along with the compliance Bureau Chiefs will be responsible for making recommendations regarding sites on a SST Assignment Cycle list that should be skipped or deleted from the current list of SST sites planned for inspection. For example, establishments that have received a recent comprehensive safety and health inspection (See Appendix A) may be skipped (deleted) from the current inspection assignment list/cycle. Notify the PSIM Bureau of sites that should be skipped or deleted and the reason for the requested deletion. All requested changes must be in writing to ODI program manager in PSIM.

K. Administration.

The OSHNC SST set forth in this Operational Procedure Notice will be administered through PSIM .

Signed on Original
Kevin Beauregard
Assistant Director

Signed on Original 4/19/01
John H. Johnson Date of Signature
Director

Appendix A
Current Site Specific Targeting Plan Parameters

The following format will be used to confirm management authorization of site selection criteria.

SST Programmed Inspection Plan

This form is to be completed to confirm OSHNC management authorization for inspection site assignment selection criteria. Inspection site assignments are prepared for a time limited cycle and all assignment listings expire on the date provided on this form. Existing SST Assignment Cycle lists may be extended or cancelled by the Director. Such extensions will also be documented using this form.

Selection Criteria for this SST Assignment Cycle

Data Initiative Sites with a reported LWDII of greater than or equal to: 14.0 (Threshold LWII) for survey years:

1997
1998
1999 X

Establishments that have received a comprehensive safety and health inspection within 24 months should be deleted from the inspection list. If an establishment has had only a comprehensive safety (alternatively, health) inspection within 24 month, then only a comprehensive health (alternatively, safety) inspection needs to be done, and the Compliance Officer may make a safety (alternatively, health) referral for any safety (alternatively, health) hazards observed. Inspections planned under SEP/LEP, accident, complaint or referral monitoring or follow-up procedures are not affected by this deferral.

Approximate number of sites included in this SST Assignment Cycle with LWDII at or above the threshold LWII: 168

The initial OSHNC SST plan targets individual worksites, as identified through the Data Initiative.

The OSHNC SST plan initially targets those worksites with a LWDII rate at or above the Threshold LWII rate selected for the planning cycle as set forth on this form.

The Planning, Statistics and Information Management Bureau will provide inspection assignments to the Compliance Bureau managers.

Expiration Date

Inspection assignments distributed under this authorization expire on: 12/31/01; (or when new assignments are distributed, whichever is later).

Signed on Original
Kevin Beauregard
Assistant Director

Signed on Original
John H. Johnson
Director

4/26/01
Date of Signature