

**Appendix A**  
**Arizona State Plan (ADOSH)**  
**FY 2010 Findings and Recommendations**

No.	Findings	Recommendations	Related FY 2009 No.
10-01	Documentation in case files were not organized according to established case file set-up procedures.	Ensure diary sheets or similar daily/chronological logs are maintained.	09-7 Pending
10-02	ADOSH did not always ensure that citation penalties were appropriate based on the hazard.	Ensure that citation penalties are assessed in accordance with the FOM.	09-9 Pending
10-03	ADOSH did not meet their inspection goals in FY 2009.	Evaluate resources and schedule inspections to ensure inspection goals are met.	09-13 Pending
10-04	ADOSH did not adopt new Federal OSHA standards in a timely manner.	Ensure standard adoption is within six months of the federal promulgation date.	09-19 Pending
10-05	Arizona has not submitted an appropriate Plan Change Supplement to OSHA for review of their formal training program for compliance personnel and for their targeting system which differ from the Federal system.	Adopt a formal training program for compliance personnel and submit a Plan Change Supplement for OSHA's review.	09-20 Pending
10-06	ADOSH took an average of 190 days to complete each discrimination investigation.	Continue efforts to complete discrimination investigations within 90 days.	09-21 Pending
10-07	ADOSH did not always send letters to Complainants and Respondents, informing them that the investigation has been opened or closed as appropriate.	Discrimination investigators need to be appropriately trained. Discrimination complainants and respondents of discrimination complaints should be notified when the investigation is opened.	09-22 Pending
10-08	ADOSH did not appropriately accept and docket orally filed discrimination complaints.	ADOSH should accept, docket and investigate orally filed discrimination complaints.	09-23 Pending
10-09	ADOSH allowed 23(g) grant funds to be lapsed and failed to timely notify Federal OSHA. Arizona again returned unspent funds at the end of FY 2010.	Ensure funds that will not be spent by September 30 are appropriately returned to Federal OSHA with adequate time to allocate.	09-32 Pending
10-10	ADOSH was unable to maintain a fully staffed program in that they experienced up to 7 safety and 2 health position vacancies during this evaluation period.	Ensure the inspector positions are fully staffed to the extent possible and develop a plan to address the challenges in hiring and retaining experienced personnel.	09-33 Pending
10-11	Several of the compliance staff has not received all the required classes.	Ensure that compliance staff receives at least the basic required courses as required by Federal OSHA's directive.	09-34 Pending
10-12	Arizona conducted 50 inspections of framing contractors, which was below their goal of 150. This resulted in the identification of 88 hazards, which was below their goal of 300.	Evaluate [Performance Goal 1.1] and implement a plan to ensure that resources are available to meet the targeted number of inspections.	09-35 Pending

No.	Findings	Recommendations	Related FY 2009 No.
10-13	<p>The injury and illness rates in the architectural and structural metals manufacturing industry increased during this evaluation period and from the CY 2006 baseline (11.1%) for the Five-Year Strategic Plan goal.</p> <p>ADOSH should re-evaluate annual performance goal 1.4 in light of the BLS NAICS change or implement additional methods to measure this goal.</p>	<p>Re-evaluate [Performance Goal 1.4] efforts in reducing injury and illness in the architectural and structural metals manufacturing industry.</p> <p>Re-evaluate performance goal 1.4 and determine if the BLS data for this industry can be broken out.</p>	09-36 Pending
10-14	Citation lapse time for safety citations remains above the FY 2007.	Develop a plan to reduce safety citation lapse time.	09-37 Pending
10-15	There were 27 S/W/R violations in the private sector where the employer abated after receiving follow-up letters, phone calls and, in some cases, a follow-up inspection.	Ensure all managers and compliance personnel know that they can cite an employer for failure to verify abatement rather than continued requests to employers about sending abatement verification.	New
10-16	ADOSH's policy on classifying violations does not ensure violations that would be considered "Serious" under the Federal FOM are classified as Serious.	Adopt Violation Classification policies and procedures equivalent to Federal OSHA regarding descriptions on Supporting "Serious" Classification (Federal FOM, page 4-10 to 4-11), Supporting "Willful" Violations (Federal FOM, page 4-30 to 4-32), and Combining/Grouping Violations (Federal FOM, page 4-37 to 4-39).	New
10-17	ADOSH did not meet FY 2010 annual performance goal 1.2 because their TRCR increased from 11 to 11.6, or by 5.46%.	Implement additional measures to target the structural steel and precast concrete industry to ensure the injury and illness rate turns in a downward direction.	New
10-18	ADOSH did not meet FY 2010 annual performance goal 1.3 because their TRCR increased from 7.2 to 7.4, or by 2.8%.	Implement additional measures to target the wood products manufacturing industry to ensure the injury and illness rate turns in a downward direction.	New