

**IOSHA STATE OSHA ANNUAL REPORT (SOAR)  
Federal Fiscal Year (FFY) 2011**

**Overview of Programs**

The Iowa Occupational Safety and Health Administration (IOSHA) is in the third year of its strategic plan cycle that began in FFY-2009.

Iowa OSHA is committed to supporting state wide economic growth and providing workplace environments that are safe, healthy, and productive and allow businesses to grow and flourish. We are committed to our strategic performance plan to ensure all employees a workplace with safe working conditions that is free of recognizable hazards and free of retaliation.

The budget continued to challenge our program

The Labor Commissioner has been a strong proponent of parity with our 50/50 funded programs and has spoken with our US Senators and Representatives and their staff to ensure actual funding at the 50% level. The Iowa Legislators have been very responsive to the Division of Labor Services' needs.

The Revenue Finance Estimating Committee did not ask for any additional state budget cuts before the end of the state fiscal year in June 2011. There were no furloughs or mandatory time off without pay for contract or non-contract staff. Budget issues remain hallmark to the Iowa OSHA program and its ability to weather future cuts. Iowa OSHA very much needs and appreciates the necessary Federal funding for its' programs.

Iowa OSHA submitted separate 23(g) grant and 21(d) cooperative agreement applications for FFY 2011. Therefore only a discussion of the portions of the 21(d) Consultation Activity Projection Plan (CAPP) that support 23(g) activities are incorporated in this 23(g) SOAR. A separate Consultation Annual Progress Report (CAPR) will also be submitted to the Regional and National Office.

The previous Labor Commissioner retired in April 2011 and the current Labor Commissioner was appointed to take his place.

The Deputy Labor Commissioner and Iowa OSHA Administrator remains the same. The enforcement section maintained the four Public Service Executive 2 managers with one of these positions also working as the Consultation and Education Project Manager. These positions are each responsible for the direct daily supervision of enforcement and consultation field staff, which includes safety inspectors and industrial hygienists. Duties included: daily work assignments for field staff inspections, training new staff through accompanied visits and assisting with complicated inspections; evaluation of each inspectors' work performance for annual evaluations; evaluation of additional training needs and requirements; providing technical assistance and answering questions from the public and coworkers; conducting informal settlement conferences and reviewing documentation for violation abatement and corrective

means and providing assistance to the Deputy Labor Commissioner / Iowa OSHA Administrator and the Labor Commissioner.

The enforcement supervisors also take an active role in fostering outreach and encourage Partnerships and Alliances. They routinely provide training sessions to our enforcement staff and public presentations when called upon by employers and interest groups.

Iowa OSHA has filled several inspector positions over the past fiscal year due to early retirements and contract transfers. Three safety inspectors were hired. An Investigator 2 position dedicated to discrimination complaints was also filled. All field inspection positions were filled during FY2011.

The Division of Labor Services had three (3) fluent Spanish speaking staff members at the beginning of FFY-2011. These individuals continue to provide assistance to the public and their co-workers through their bi-lingual skills. One of these individuals is with the Consultation and Education staff and provided the 10-hour course and other select training in Spanish as well as being a key member on the Iowa OSHA VPP audit team. Although not with the Iowa OSHA staff, the second staff member is with the contractor registration investigator field staff. She provides valuable field work for inspections involving Spanish translation and interpretation. The third individual worked with the wage group and transferred to a position out of this division. Both the contractor registration and wage investigators make referrals to Iowa OSHA.

The Division of Labor Services' organization chart is included in the SOAR on page 22.

Iowa OSHA has continued to foster a solid working relationship with the OSHA National Office. The Labor Commissioner, Iowa OSHA Administrator, enforcement and consultation / education supervisors participate in all Monday morning Region VII conference calls. We also continue to meet quarterly with the Area and Regional office staff to discuss Iowa OSHA's performance and goals.

The current Labor Commissioner has worked with National Association of Government Labor Officials (NAGLO), Occupational Safety and Health State Plan Association (OSHSPA), the Area and Regional OSHA offices and Iowa OSHA leadership to evaluate and ensure Iowa OSHA is meeting its' long-term goals.

Workers Memorial Day once again witnessed too many families, friends and loved ones paying tribute to those lost on the job. Fifty (50) workers were honored in this ceremony including two military personnel and those that died in events outside Iowa OSHA's jurisdiction. There were twenty five (25) Iowa OSHA fatality investigations in FFY 2011. In contrast, the period of October 2009 to September 2010 had sixteen (16) Iowa OSHA fatality investigations.

Iowa OSHA had one significant enforcement inspection in FFY 2011. On 09/13/2011 Iowa OSHA initiated an inspection in response to an employee complaint at the Heartland Co-Operative in Elkhart, Iowa. This inspection resulted in three (3) willful citations, 3 serious citations and one (1) other-than-serious citation for \$231,000 in penalties.

There were approximately nine hundred and sixty-nine (969) enforcement inspections during FFY-2011. There were approximately five hundred and twenty-eight (528) construction and four hundred and forty-one (441) general industry inspections. There were approximately two thousand, tree hundred and thirty-nine (2,339) violations (1,069 construction and 1,270 for general industry.)

Iowa OSHA used the OSHA site-specific targeting or SST plan to schedule programmed inspections for general industry. As in previous years, the Iowa specific data that was collected through the OSHA Data Initiative (ODI) program for the previous year identified the facilities to be targeted for inspection. The University of Tennessee reports were again used for Iowa OSHA programmed construction inspections. Additional local emphasis programs (LEPs) were used for targeting purposes for: Construction by Zip Codes, hexavalent chromium, amputations, asbestos, fall and grain handling. National emphasis programs (NEPs) for combustible dust and silica were also used.

Construction activities in Iowa once again placed a greater demand on the enforcement staff with drive-by inspections, referrals from the Contractor Registration Field Investigators

There were forty-two (42) discrimination complaint investigations; 8 cases were determined have merit cases and (34) cases were dismissed (including 3 that were withdrawn.)

Voluntary Protection Program (VPP) activities continue to keep staff busy with re-certifications, renewals, and new VPP STAR Merit sites. Currently Iowa has forty-three (43) active VPP participants.

The Iowa OSHA formal Alliance with the Iowa Renewable Fuels Association (IRFA) expired in July 2011. The Project Manager for Iowa OSHA Consultation and Education is a member of the steering committee and is working with this association to renew the formal Alliance. The focus of this alliance is to share information on hazard recognition, control, and best management practices among association members and Iowa OSHA personnel through bi-monthly meetings. The IRFA covers Iowa's renewable ethanol and bio-fuels industries. There is a second alliance with the City of Cedar Rapids that involves flood recovery projects including new construction and remodeling flooded buildings.

An informal alliance with Master Builders of Iowa (MBI) provides quarterly meeting contact with this trade association of builders on outreach to the construction trades. Iowa OSHA has jointly participated in the MBI annual trade show and expo on topics such as fall protection and general construction safety and health. Iowa OSHA contributed to the MBI quarterly newsletter that gives their members general updates about Iowa OSHA's activities. These activities have generated additional opportunities for employers to utilize the Consultation and Education services. Iowa OSHA also participates in the annual Iowa OSHA/MBI safety award by sitting on the panel that gives out the awards.

There were six (6) total Safety and Health Recognition Program (SHARP) participants.

Iowa OSHA has looked at and taken the following action for the SOAR period on Federal program changes:

- H. Enforcement Policies Relating to Floors /Nets and Shear Connectors directive number CPL-02-00-048 2010 379 – state responded on 10/12/2010 that Iowa OSHA rescinds their decision to adopt this directive on 10/12/2010. Directive number CPL 02-01-046 was adopted by Iowa OSHA and will remain in effect;
- I. Severe Violator Enforcement Program (SVEP) directive number CPL-00-149 2010 380 – state responded on 08/27/2010 that Iowa OSHA will adopt portions of this directive;
- J. SST-10 directive number CPL-02-(10-06) 2011 400 – state responded on 12/17/2010 that Iowa OSHA will not adopt the provisions of paragraph XI.D2.a regarding a 90 deferral when an establishment has requested an initial full-services comprehensive consultation visit;
- K. Recordkeeping NEP – September 2010 Changes directive number CPL-02-(10-07) 2011 401 – state responded on 11/17/2010 that Iowa OSHA adopted identically on 03/01/2011;
- L. Compliance Guidance for Residential Construction standard number STD-03-11-002 2011 403 – state responded on 02/03/2011 that Iowa OSHA adopted identically on 03/01/2011;
- M. PPE in Shipyard Employment directive number CPL-02-01-049 2011 402 – state responded on 01/10/2011 that Iowa OSHA does not intend to adopt since there is no public or private sector shipyard employment in Iowa;
- N. NEP Microwave Popcorn Processing Plants directive number CPL-03(11-01) 2011 423 – state responded on 04/11/2011 that Iowa OSHA adopted identically on 04/15/2011;
- O. PPE in General Industry directive number CPL-02-01-050 2011 422 – state responded on 04/11/2011 that Iowa OSHA adopted identically on 04/15/2011;
- P. Revisions to Field Operations Manual directive number CPL-02-00-150 2011 442 – state responded on 06/23/2011 that Iowa OSHA will not adopt this program because Iowa OSHA has no jurisdiction over any private or public Maritime activities therefore the changes in chapters 10 and 13 are not applicable to Iowa OSHA;
- Q. NEP Primary Metals directive number CPL-03-00-013 2011 444 – state responded on 07/14/2011 that Iowa OSHA will adopt identically on 07/15/2011;
- R. Confined Spaces in Shipyards directive number CPL-02-01-051 2011 443 – state responded on 06/01/2011 that Iowa OSHA will not adopt since there are no shipyards within the jurisdiction of Iowa OSHA;
- S. Standards Improvement Project, Phase III standard number 1910, 15, 18, 19, 26, 28 2011 43 – state responded on 06/17/2011 that Iowa OSHA will adopt Part 1910, 1926 and 1928 identically on 10/26/2011;
- T. Commercial Diving Operations directive number CPL-02-00-151 2011 445 - state responded on 11/14/2011 and adopted on 11/14/2011;
- U. Cranes and Derricks in Construction standard number 1926 (various) 2010 41 – Final Rule: state adopted on 12/22/2010;
- V. Enforcement Procedures for Incidents of Workplace Violence directive number CPL-02-01-052 2011 462 – state responded on 10/26/11 that Iowa OSHA will adopt identically on 11/01/2011;
- W. Site-Specific Targeting 2011 (SST-11) directive number CPL-02-11-03 2011 463 – state responded on 11/10/2011 that Iowa OSHA will adopt on 12/01/2011; and

- X. Whistleblower Investigations Manual directive number CPL-02-03-003 2011 464 – state responded on 11/21/2011 that Iowa OSHA will adopt identically on 01/01/2012;

### ***IOSHA FFY 2011 Performance Plan***

Iowa OSHA dedicated their efforts this fiscal year toward reducing exposure to occupational hazards. The main goal was to reduce Iowa’s incident rate of occupational injuries and illnesses to at least the national average.

Iowa OSHA planned to reach this main performance goal by breaking it down into three strategic and outcome goals. Improved targeting was used to direct resources for maximum effect. Strengthening infrastructure by improving training and targeting enabled Iowa OSHA to create effective and meaningful change to unsafe workplaces.

#### **Building Awareness**

Many of the activities in this goal are continued from previous strategic plans. Iowa OSHA will capitalize on this experience to provide a higher standard of service to Iowa’s workplaces.

<p><b>5-Year Outcome Goal 1:</b> Promote programmatic / systematic approaches to safety and health programs in the workplace by ensuring that Iowa workplace culture changes to increase the percentage of employers participating in Iowa OSHA outreach programs and increasing staff trained in compliance assistance skills by 2013.</p>
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<p><b>Iowa OSHA Strategic Goal 1:</b> Promote a safe and healthful culture through meaningful direct interventions and cooperative programs.</p>
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<p><b>Strategy:</b> Maximize the effective safety and health programs implemented in businesses in Iowa by fully developing Iowa OSHA’s outreach programs including Partnerships, Alliances, VPP, and SHARP. Also increase staff compliance assistance skills by improving staff professional development and training programs.</p>
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<p><b>Performance Goal 1:</b> Increase the percentage of employers participating in IOSHA outreach programs and increasing staff trained in compliance assistance skills by 2013.</p>
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<p><b>Performance Indicators:</b> Increases in employer and staff participation in outreach programs. Increases in the compliance assistance training courses included in the staff training protocol.</p>
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<p><b>Baseline:</b> Number of employer and staff participants in VPP, SHARP, Partnerships and Alliances in FFY 2007. Number of compliance assistance training classes that staff attended in FFY 2007.</p>
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**Iowa OSHA Performance Goal 1** *will be assessed by tracking outreach program development and participation:*

**Table 1. Activity Measures**

PERFORMANCE MEASURES	Baseline for FFY 2007	Targeted Employer Participation FFY 2011	Actual Activity Measures
1. Voluntary Protection Programs (VPP)	5	Increase by 2	increased by 2
2. Safety and Health Recognition Program (SHARP)	0	Increase by 2	increased by 1
3. Partnerships	3	Increase by 2	increased by 2
4. Alliances	3	Increase by 0	increased by 1
Number of employee outreach programs:			
1. Hispanic worker	0	Increase by 10	increased by 15
2. School to work	0	Increase by 10	increased by 10
Number of one-on-one contacts made through compliance assistance efforts:	9,614	21,000	26,768
Number of compliance assistance training courses Number of IOSHA staff participating Number of other employees attending	0	Increase by 1	0

**Strategy1-1:** Improve Iowa OSHA’s ability to identify and act on opportunities where direct interventions, compliance assistance, leadership, outreach and cooperative programs will maximize impact.

23 (g) Actions:

Iowa OSHA continued to use USDOL BLS data to identify industries with higher injury and illness incident rates specifically for Iowa. The targeting lists of businesses for all of the LEPs were based on Iowa data. Iowa Workforce Development (IWD), Labor Market and Workforce Information Division, Employment Statistics Bureau provided Iowa OSHA with randomized lists of employers by industry.

In the FFY 2011 Annual Plan, we identified the need to find new opportunities to significantly improve safety and health for youth, immigrant and other hard to reach employers and workers, agricultural workers and small businesses especially those impacted by LEPs.

The Compliance Assistant continued outreach efforts toward youth safety to high schools and community colleges in Iowa. There was youth participation in three 10-hour courses, one high school and two colleges.

The Hispanic outreach safety consultant has also promoted youth safety through contact with agricultural employers of corn detassellers and melon harvesting as well as social service agencies involved with immigrants. This consultant was responsible for seven of the ten youth outreach efforts.

The safety contact for a large retail grocery chain worked with Consultation and Education staff to improve their safety management programs and help reduce injuries to their employees who are primarily youth.

Iowa continues to receive workers' compensation reports of injuries involving employees under the age of eighteen and that data can be sorted to obtain information on types and causes of injuries as well as documenting employers who are most likely to have youth injuries.

A safety consultant in the Iowa OSHA Education section spends approximately 50% of her time in Hispanic outreach activities. This consultant who has the ability to teach the 10-hour general industry and construction course taught two Spanish General Industry 10-Hour courses during FFY2011. She has also made fifteen other contacts with social service agencies and employers who traditionally hire Spanish-speaking employees, primarily in agriculture.

The Education Section does maintain a small inventory of safety videos (19) in Spanish that are available for lending to those employers seeking assistance in training their employees.

#### 21(d) Consultation Program Activities:

Iowa Consultation and Education continued to support the Local and National Emphasis Programs of Iowa OSHA Enforcement. The Grain Handling Local Emphasis Program became effective in July of 2011 and Iowa Education staff performed outreach to agricultural associations and agri-insurance representatives through emails and telephone calls. Four training sessions were performed throughout the state in the grain handling industry to call attention to the danger of grain engulfment. These efforts were made in addition to the letters sent by Federal OSHA to grain processing establishments during FFY2011.

Iowa Education continued outreach on the Hexavalent Chromium Local Emphasis Program. In March of 2011, fifty-five letters were sent to establishments where employees may be exposed to the hazard. A health consultant was asked to speak on her experience with a company who had requested her assistance in reducing their employee exposure at the Governor's Safety Conferences held in Sioux City and Des Moines.

Several sessions were scheduled through homebuilders associations for outreach on the residential fall protection directive. Those sessions included the South Central Homebuilders Association in April, the Greater Des Moines Homebuilders and the Coralville Homebuilders Association in May, Quad Cities Homebuilders Association and the Ames Homebuilders in June and the Cedar Rapids Homebuilders in July. There were 243 participants in these sessions where the Compliance Assistant and Iowa OSHA Enforcement Supervisor spoke.

Other conferences where Consultation and Education staff participated include the Governor's Safety Conferences, the ABC Safety Conference, Master Builders of Iowa Safety Conference, Nebraska Safety Council, and Iowa-Illinois Safety Council.

Strategy 1-2: Promote a safe and healthy workplace culture throughout Iowa's work sites.

23 (g) Actions:

Iowa OSHA adopted the CSHO training directive TED 01-00-018 on January 1, 2009. The Public Service Executive 2 supervisors developed protocols to track individual training. The Consultation Project Manager and Administrative Assistant 2 works with the consultation and education staff to track the individual training protocols for the field staff working on compliance assistance and 21(d) programs.

Iowa OSHA did not dedicate an inspector meeting to specifically provide compliance assistance training to enforcement field staff. Iowa OSHA plans to include the compliance assistance focus during field staff meetings in FFY 2012.

The Compliance Assistant is the primary contact for partnerships in the State of Iowa. He visits with each partnership on a regularly scheduled monthly basis. He is accompanied by the designated representatives from the general contractor and the subcontractors on a walkthrough of the jobsite. The parties identify hazards and other issues on the walk-around and these become the basis for focused training for the employees. On the average there were seven active partnerships during this timeframe. The compliance assistant is responsible for all documentation as required by IACSP 03-02-002. This includes the signed partnership document, documentation of hazards identified during the jobsite walkthroughs along with the annual and final partnership evaluations.

Iowa's partnerships remained constant throughout the fiscal year with an average of 7 active per quarter. The Compliance Assistance staff person was onsite at each partnership jobsite at least once a month in addition to staying in contact through email and cell phone. There were no serious injuries however a fatality occurred on the U.S. Courthouse jobsite in Cedar Rapids, Iowa. A subsequent OSHA inspection found no violation of the occupational safety and health standards and no citations were issued. The jobsite TRC/DART rates were below the state and national average for general contractors. Construction partnerships during FFY2011 covered approximately 2,140 employees.

Six partnerships were closed out in the 1<sup>st</sup> Quarter and one in the 4<sup>th</sup> Quarter. The majority of these partnerships were public school buildings throughout the state. One large project that finished during the fiscal year involved the new Wellmark insurance building in Des Moines. Two new partnerships for this fiscal year include a new University of Iowa Hospital building in Coralville and the remodeling of Vets Auditorium in Des Moines. It is anticipated that the University of Iowa will request partnerships for projects over the next five years. These projects may include the Children's Hospital and the Practice Arena for the Football program. There were two alliances active during FFY2011. The alliance with the Renewable Fuels Association, which was signed in July of 2009, expired in July of 2011. This alliance may be renewed in FFY2012. The primary contact for this alliance is the Project Manager for the

Consultation and Education Section. Members of this alliance met every other month for training on safety and health topics pertinent to the industry.

The second alliance was signed in the 4<sup>th</sup> Quarter. This alliance is with the City of Cedar Rapids and involves flood recovery projects. Nine municipal buildings are scheduled to be remodeled, torn down, built new, or renovated in a historical manner with FEMA money. The compliance assistant is working with the second alliance.

<b>Partnership Name</b>	<b>Start Date</b>	<b>Estimated End Date</b>
Broadmoor Development West Des Moines	08/19/2009	August of 2011
CSI Construction High School Ankeny	08/25/2009	03/01/2011
Garling Construction Williamsburg	May of 2010	May of 2012
JE Dunn – University of Iowa Coralville	03/29/2011	July of 2012
Story Construction/JE Dunn ISU Vet Med – Ames	04/19/2010	May of 2012
Story Construction High School, Keokuk	07/14/2011	November of 2012
Miron Construction Linn County Options Facility Cedar Rapids	09/07/2010	August of 2011
Miron Construction Convention Center Cedar Rapids	12/06/2011	March of 2013
Old Veterans Construction Muscatine	July of 2010	11/01/2011
Ryan Companies USA U.S. Courthouse Cedar Rapids	08/03/2009	May of 2012
Story Construction Public Works Norwalk	08/18/2010	April of 2011
Story Construction Secondary School Norwalk	04/14/2010	July of 2011
Weitz Construction Vets Auditorium Remodel Des Moines	02/25/2011	01/03/2012
Weitz Construction Wellmark Insurance Des Moines	07/28/2008	December of 2010

Two new VPP companies were added in FFY2011 bringing the total of companies in the Iowa achievement program to 43. An industrial hygienist serves as the VPP team leader and spends 100% of his time working with companies already in the program and assisting those that are working toward it. Four safety and health consultants assist him with the VPP audits as needed. There were three pending VPP Applications during the fiscal year and the VPP team performed two re-certifications – C.F. Industries in Spencer and TFT in West Des Moines. Signode Engineered Products in West Union moved their Iowa operation to their corporate office in Glenview, Illinois.

The VPP Team Leader and one safety consultant attended the Region VII VPPPA Conference held in St. Louis, Missouri, from May 15 – May 19, 2011.

A list of the current VPP companies can be found in the table in Appendix B. on pages 23 to 26.

#### 21(d) Consultation Program Activities:

All but two Iowa Consultation and Education staff members attended at least one OSHA Training Institute (OTI) safety or health class this fiscal year. Their courses were chosen through an assessment of their skill needs as well as by using the training track provided by the OSHA Regional Office.

Iowa Consultation and Education continued to promote SHARP and to improve tracking capabilities for those companies who work toward achieving that status. No new companies achieved SHARP status during FFY 2011.

Strategy 1-3: Improve the effectiveness of IOSHA by directing outreach programs to the industries that need the most improvement in safety and health programs.

#### 23(g) Actions:

The Iowa OSHA leadership team includes the Labor Commissioner, Iowa OSHA Administrator, and the four Public Service Executive supervisors for enforcement and consultation and education. It evaluates compliance assistance, and cooperative program activities and mandated activities each week. This team also meets with Federal OSHA quarterly as well as tracking progress through the quarterly Division of Labor Services newsletter distributed by the Labor Commissioner. These quarterly meetings serve as an opportunity to determine if changes in operating procedures are effective. The USDOL BLS rates are published annually in October so this annual summary report provides the best opportunity to evaluate Iowa OSHA's impact on fatality, injury and illness rates.

Iowa Education staff continued to promote and educate employers on the use of safety and health management programs through direct contact as well as through training programs.

#### 21(d) Consultation Program Activities:

Iowa Consultation reviewed injuries and illness rates for those industries where we had concentrated efforts in past fiscal years as well as those companies worked with individually to assess outreach efforts.

Consultants continued to use the report feature of the OSHA web-based Form 33 to educate employers on the use of safety and health management assessment to assist them in reducing injuries, illnesses and fatalities.

Consultants worked with small employers striving to achieve SHARP status. These employers are educated on safety and health management tools and how to use them to evaluate their company programs.

**Broadening Support**

IOSHA will continue to provide traditional direct interventions through mandated enforcement activities, consultation activities as well as compliance assistance and outreach activities.

<b>5-year Outcome Goal 2:</b> Improve Iowa business participation in IOSHA cooperative programs and staff professional and technical development by 2013.
<b>IOSHA Strategic Goal 2:</b> Maximize IOSHA effectiveness and efficiency by strengthening its capabilities and infrastructure.
<b>Performance Goal 2:</b> Secure public confidence through excellence in the development and delivery of IOSHA programs and services.
<b>Strategy:</b> To continually review IOSHA procedures to ensure resources are focused on strategic plan issues, efficiency is maximized and services provided are continually improved.
<b>Performance Indicators:</b> Increases in the number and variety of IOSHA outreach and training programs.
<b>Baseline:</b> Number of employer associations participating in IOSHA outreach programs in FFY 2007.

*How Progress in Achieving **IOSHA Performance Goal 2** will be assessed by tracking direct intervention and compliance assistance program outcomes:*

**Table 2. Activity Measures**

PERFORMANCE MEASURES	Baseline FFY 2007	Targeted Employer Participation FFY 2010	Actual Activity Measures
Number of outcome measurement reports:			
1. Compliance assistance outcomes	0	Increase by 1	1
2. Direct safety intervention outcomes	248	Increase by 1	653
3. Direct health intervention outcomes	56	Increase by 1	98

Number of local emphasis programs implemented:

3. Safety	2	Increase by 1	1
4. Health	1	Increase by 1	0
Number of internal and external public relations analysis projects:	1	Increase by 1	0
Number of IOSHA staff participating			
Number of other employees attending			

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Strategy 2-1: Improve IOSHA’s capability to gather and analyze information used to target interventions, and track performance measurements.

23 (g)Actions:

The Iowa OSHA leadership team used weekly meetings on Monday morning to continue discussing safety and health issues as well as direct intervention activities that include feedback from employers participating in informal conferences, and issues inspectors have experienced on their cases the previous week. This team carefully monitors staff performance using the “red / green” report provided weekly by the Federal Area OSHA office that identifies performance measures that meet regional expectations by highlighting them in green and highlighting those that do not in red.

This team reviewed the USDOL BLS occupational safety and health incident rates and reports that were published for the 2009 data in October 2010. The IWD Division of Workers’ Compensation is testing new software that is expected to be implemented in FFY 2012. This new software application has improved reports capability using the workers compensation data collected by the State of Iowa. The current database does not track worker comp cases by event and therefore has very limited value for targeting. The new software will need to collect data for at least one year so the reports will not be available until FFY 2013.

The Compliance Assistant reviews the youth injury and amputation logs to identify trends in injuries and illnesses.

Less time has been spent on 10-hour training during the FY2011 fiscal year due to changes in the way the cards are issued to the students. Iowa OSHA began a collaborative effort with the IWD Employer’s Councils of Iowa to schedule 10-hour training in different locations throughout the state during the last fiscal year. The training was publicized by both Iowa OSHA and the Employer’s Council in order to reach both companies and individuals needing this type of training. Two construction 10-hour classes were given with 49 students and 5 general industry 10-hour classes had 139 students. In addition to the classes given through the Employer’s Councils, individual companies requested and received classes including two given for youth and two given for Spanish-speaking participants.

The Iowa Governor’s Safety Conference is held twice a year, once in November in Des Moines and the second in February. The February 2011 conference was held in Sioux City, Iowa. A booth at both safety conferences is manned with both consultation and education personnel to

answer questions and promote services. Promotional materials as well as OSHA safety materials are distributed.

Iowa OSHA established a goal of 21,000 outreach participants for FFY2011. The goal was exceeded with a total of 26,768 outreach participants.

There were 17 public sector consultation visits where 43 serious hazards were identified. The majority of requests from the public sector continue to involve mold or indoor air quality issues.

21(d) Consultation Program Activities:

Consultants review the Iowa fatality log to identify new issues for training and outreach. The news clips sent via email from the National Office are an invaluable source of information on OSHA investigations, fatalities, injuries and illnesses. The consultants use the information from these news clips during training sessions.

An assessment form is sent to employers when a visit case file is closed. The form can be emailed or faxed back to the office which increases the response rate. This form is used to assess strengths and weaknesses in the Iowa consultation program.

Strategy 2-2: Improve Iowa OSHA's impact on occupational safety and health outcomes.

23 (g) Actions:

Iowa OSHA posted an imminent danger at a construction site in April 2011 but the general contractor Evercore voluntarily shut the site down. Iowa OSHA CSHOs worked with Ryan the contractor hired to correct the hazards at this site to provide compliance assistance so the employees at the site had the necessary fall protection. Iowa OSHA continues to track imminent danger interventions manually.

Iowa OSHA implemented one new LEP for grain handling in FFY 2011. A health NEP for primary metals exposure was also adopted. There were 653 inspections for Iowa OSHA safety LEPs and 98 inspections for health LEPs.

Iowa OSHA will continue to focus on amputations and research successful LEPs in other states and regions as well as reviewing opportunities for targeting programs unique to Iowa.

<b>Iowa OSHA LEP</b>	<b>Number of Inspections</b>	<b>Number of citations</b>
Amputations	168	569
Asbestos	80	201
Blood	0	0
Hexavalent Chromium	18	101
Fall	234	543
Grain	1	4
Scaffold	105	295
SW2000	0	0
Zip Code Construction	145	331

The LEP enforcement inspections that Iowa OSHA completed averaged at more than two violations per inspection. These LEPs were effective in identifying Iowa's more hazardous workplaces. The blood and SW2000 LEPs are currently inactive.

The Public Service Executive supervisors reviewed enforcement case files carefully to ensure that both safety and health direct interventions were coded appropriately and that enforcement case files were completed correctly. The Consultation Project Manager and Administrative Assistant complete the same review process for the 21(d) direct interventions.

21(d) Consultation Program Activities:

Iowa Consultants have been trained in the report features of the web-based safety and health program assessment form and how to tie it to a company's injury and illness rates and hazards identified. Tracking for companies working toward SHARP has improved as well as administrative processes for individual file maintenance.

Strategy 2-3: Improve the strength of IOSHA infrastructure and internal public relations.

23(g) Actions:

The Iowa OSHA Administrator and Labor Commissioner have worked with the Public Service Executive supervisors as well as the administrative support staff and field inspectors to improve internal processes and internal feedback communication. Iowa OSHA is focusing resources to improve all outreach programs for both the enforcement and consultation and education sections. The individual training plans implemented according to the new training directive have resulted in better communication between supervisors and enforcement field staff. One-time Federal funding enabled Iowa OSHA to schedule several training classes during FFY 2011 including a course on excavations, Process Safety Management (PSM), electrical safe work practices and a variety of webinars.

21(d) Consultation Program Activities:

Iowa Consultation continues to use individual training plans for each consultant. These training plans are used in conjunction with individual skills assessments to enroll consultants in OTI training classes.

Strategy 2-4: Improve the strength of IOSHA external public relations.

23 (g) Actions:

Iowa OSHA continues to participate in regular meetings with business associations as well as using direct interventions as an opportunity to develop outreach assistance. Iowa OSHA is working with the University of Iowa Fatality Assessment Control and Evaluation (FACE) program to review fatality investigations and to develop opportunities for students to participate in intervention activities.

Strategy 2-5: Improve the efficiency of IOSHA processes and activities.

23 (g) Actions:

Iowa OSHA works with the IWD financial services section to track operating costs and improve planning for training activities and turn-over in personnel. At the Labor Commissioner's request, the IWD financial services section began to run reports that allowed Iowa OSHA to compare penalty reports from OSHA's Integrated Management Information System (IMIS) to the penalty collection reports in the State of Iowa's I3 accounting database.

These review efforts will enable Iowa OSHA to maximize intervention activities by ensuring resources are used cost effectively. For example, staff members share resources such as car travel and training and reference materials.

**Building Commitment / Buy In**

Iowa OSHA continued to acknowledge entities that have worked as champions to promote a positive safety and health culture at workplaces throughout Iowa. These champions were both internal and external and included the businesses that participated in cooperative programs, legislators that have supported Iowa OSHA programs, the Governor's Safety Advisory Council and other state agencies in Iowa such as the Department of Administrative Services, the Department of Economic Development, the Department of Natural Resources and the Homeland Security Emergency Management Division of the Department of Public Defense.

Iowa OSHA will monitor progress toward reducing injuries and illnesses by tracking the effectiveness of direct interventions and cooperative programs.

<p><b>Iowa OSHA Strategic Goal 3:</b> Improve workplace safety and health for all Iowa workers and employers as evidenced by fewer hazards, reduced exposures, and fewer injuries, illnesses and fatalities.</p>
<p><b>5-year Outcome Goal 3:</b> Continually decrease incidences of fatalities, injuries, illnesses and amputations to meet or exceed the national average by the year 2013.</p>
<p><b>Performance Goal 3:</b> Reduce injuries, illnesses and fatalities by five percent (5%) as listed below.</p>
<p><b>Strategy:</b> Focus Iowa OSHA resources by coordinating both enforcement and consultation and education interventions to maximize effectiveness for each workplace and employee impacted. Also utilize enforcement inspections, consultation surveys, and outreach interventions synergistically to reduce injuries and illnesses throughout the state.</p>
<p><b>Performance Indicators:</b> Percent difference in Total Recordable Case Rate (TRC) and change in number of fatalities.</p>
<p><b>Baseline:</b> US Department of Labor, Bureau of Labor Statistics - Table 6. Incident rates of nonfatal occupational injuries and illnesses by industry and case types, 2007.</p>

**Iowa OSHA Performance Goal 3** *will be assessed by tracking intervention numbers:*  
**Table 3a. Activity Measures**

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PERFORMANCE MEASURES	Baseline for FFY 2007	Targeted Employer Participation FFY 2011	Actual Activity Measures
Number of work sites inspected / hazards abated	736 / 1,215	Increase by 62 inspections / 124 violations	969/ 2,339
Number of private sector Consultation surveys / hazards corrected	315 / 1,800	Increase by 6 visits / 10 hazards	424 / 2,214
Number of public sector Consultation surveys made in emphasis areas / hazards corrected	57 / 21	Increase by 2 visits / 5 hazards	17 / 42
Number of 10-hour and other training sessions / number of participants	70 / 9,070	Increase by 70 sessions / 9,070 participants	152 / 16,620
Number of LEP inspections and hazards abated:			
Safety	0	establish baseline	653
Health	0	establish baseline	98

**Iowa OSHA Strategic Goal 3** will be assessed by tracking the number of fatalities:

**Table 3b. Fatalities**

FATALITY OUTCOME MEASURES	Baseline for FFY 2007	Targeted Employer Participation FFY 2010	Actual Activity Measures
Change in total number of fatalities:	22	Decrease by 3%	25 56.3 % increase
Change in number of General Industry fatalities:	15	Decrease by 1.5%	13 30.0% increase
Change in number of Construction fatalities:	7	Decrease by 1.5%	12 100% increase

**Iowa OSHA Performance Goal 3** will be assessed by tracking the non-fatal injury and illness rate changes:

**Table 3c. Non-Fatal Injury and Illness Rates**

NON-FATAL OUTCOME MEASURES	Baseline for FFY 2007	Targeted Employer Participation FFY 2010	Actual Activity Measure
Percent change in the injury and illness Total Recordable Case rates for Iowa:	5.9 <sup>1</sup>	Decrease by 3%	4.5 4.3% decrease

Percent change in the injury and illness Total Recordable Case rates for General Industry in Iowa:	8.7 <sup>1</sup>	Decrease by 1.5%	6.6 9.1% decrease
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Percent change in the injury and illness Total Recordable Case rates for the Construction Industry in Iowa:	7.9 <sup>1</sup>	Decrease by 1.5%	6.9 13.4% decrease
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<sup>1</sup>US Department of Labor, Bureau of Labor Statistics - Table 6. Incident rates of nonfatal occupational injuries and illnesses by industry and case types, 2007.

Strategy 3-1: Improve targeting to maximize the impact of direct interventions.

23 (g) Actions:

The Iowa OSHA leadership team continues to review the effect of direct interventions not only at the quarterly review with the Federal Area OSHA office but also when preparing the Division of Labor Services Newsletter that is posted on the IWD website:  
[http://www.iowaworkforce.org/labor/statcard\\_newsletter.htm](http://www.iowaworkforce.org/labor/statcard_newsletter.htm).

The Compliance Assistant and all Consultation and Education staff continue to inform employers of their responsibilities and inclusion under the emphasis programs. These emphasis programs include combustible dust, silica, hexavalent chromium and amputations. Construction partnerships gave Iowa OSHA access to some smaller subcontractors that may not be reached through the enforcement inspection process.

21(d) Consultation Activities:

The Iowa private sector consultation program has supported the LEPs and NEPs adopted by Iowa through consultation visits and outreach.

Strategy 3-2: Reduce hazards by intervening at targeted work sites.

23 (g) Actions:

- a. Inspect work sites that experience fatalities, employee complaints, and high injury rates.
- b. Increase participation of high-hazard work sites in recognition programs.
- c. Protect whistleblowers from adverse employment practices.

Iowa OSHA enforcement completed 969 inspections resulted in 2,339 violations issued. While there were 6% fewer inspections than anticipated in the annual plan, the number of alleged violations were nearly 6% higher. These results represent a 31.7% increase over the baseline year. The changes in Iowa OSHA enforcement targeting programs in the past several years have proved effective.

In addition to the direct intervention inspections Iowa OSHA continued to dedicate one Sr. Industrial Hygienist as a duty officer who addressed 221 informal complaints by phone and fax. Dedicating one staff member to act as duty officer has allowed Iowa OSHA to handle these informal complaints more consistently with better hazard correction and verification. By having one person process complaints trend and repeat offenders are more easily detected.

The majority of the VPP companies are in high-hazard industries. Only one of the partnerships is not considered high-hazard and is in the public sector.

Public Sector Consultation visits for FFY 2011 totaled 17 with 42 serious hazards identified and corrected.

#### 21(d) Consultation Activities:

IOSHA projected 355 private sector consultation visits with 1,800 hazards identified. The final Mandated Activity Report for Consultation (MARC) report shows 424 private sector visits with 2,214 hazards identified.

Iowa Consultation and Education supports the NEPs and the LEPs adopted by Iowa OSHA through outreach, education and consultation visits. A detailed discussion of these activities may be found in the “Discussion of Results in Achieving Annual Plan (AP) Performance Goals” section of the FFY 2011 Iowa Consultation Annual Project Report (CAPR.)

Strategy 3-3: Improve effectiveness of direct interventions.

#### 23 (g) Actions:

The Iowa OSHA leadership team has improved their use of performance reports and has developed and implemented targeting programs for direct interventions that are far more effective than they were in the past. Iowa OSHA did meet expectations in decreasing all non-fatal injury and illness rates and also the total number of occupational fatalities.

The USDOL BLS injury and illness rates for the State of Iowa dropped 23.7% from 5.9 in the baseline year 2007 to 4.5 in 2010. These rates represent the number of injuries and illnesses surveyed per 100 full-time workers. The rates for general industry in Iowa dropped 31.0% from 8.7 in 2007 to 6.0 in 2010. The rates for the construction industry in Iowa dropped 24.1% from 7.9 in 2007 to 6.0 in 2009.

Iowa OSHA conducted 25 occupational fatality inspections in FFY 2011; this was a 13.6% increase over the baseline year for 2007. There were 13 fatality inspections in general industry facilities resulting in a 13.3% decrease over the baseline year 2007. There were 12 fatality inspections in construction facilities. This represented a 71.4% decrease over the baseline year 2007.

The non-fatal occupational injury and illness rates for the nation and Iowa have been decreasing over the past four years. Following table shows how Iowa’s total recordable case rate (TRC) has dropped also as the national TRC rate has dropped over most of the past five years.

USDOL-BLS Non-Fatal Occupational Injury and Illness Total Recordable Case Rate Comparison										
	2006		2007		2008		2009		2010	
	National <sup>1</sup>	Iowa <sup>2</sup>								
TRC for all industries	4.4	5.9	4.2	6	4.5	5.0	3.9	4.7	3.8	4.5
TRC for Construction industries	5.9	7.9	5.4	6.5	4.7	6.0	4.3	6.9	4.0	6.0
TRC for Manufacturing Industries	6.0	9.0	5.6	8.2	5.0	7.1	4.3	5.7	4.4	6.0
TRC for Service Industries	3.9	4.8	3.8	4.5	3.6	4.3	3.4	4.2	3.4	3.8

<sup>1</sup>US Department of Labor, Bureau of Labor Statistics Table 1: Incident Rate per 100 full-time workers

<sup>2</sup>US Department of Labor, Bureau of Labor Statistics Table 6: Incident Rates per 100 full-time workers

Iowa OSHA must continue to find better ways to target resources to ensure that their performance outcome measures are impacting their strategic and performance goals. The improved non-fatal occupational injury and illness rate and occupational fatality rate reductions for FFY 2010 show that Iowa OSHA is responding to the changing economic condition to provide services that positively impact safety and health working conditions for both employees and employers in Iowa.

### **Impact Factors**

Once again, the budget was a significant factor and will continue to impact Iowa OSHA's ability to carry out its' mission, vision, strategic goals and the ability to measure the impact of its' programs.

The average statewide unemployment rate for Iowa dropped to 5.9% in the fourth quarter of 2011. Businesses continue to be challenged by the economic climate.

If state dollars become less available, additional Federal dollars for state-plan-state are vital to ensure minimal impact to Iowa OSHA's mission, vision, goals, and strategic plan achievements.

Iowa OSHA does not have staff dedicated only to data system programming so it will have to rely primarily on measurements that can be obtained from the IMIS.

### **Conclusion**

In FFY 2012 Iowa OSHA's budget will continue to be a challenge. Iowa OSHA is optimistic as the state slowly edges through these budget issues. Iowa OSHA will continue to direct their available resources to support their strategic performance goals and aggressively work to protect all Iowa workers.

The Iowa Division of Labor's OSHA enforcement and consultation programs are committed to coordinating their activities to be consistent with the State of Iowa, IWD and its own strategic performance plan to ensure every working Iowan is provided a safe and healthful workplace.