

**FY 2014 Follow-Up Federal Annual Monitoring and Evaluation
(FAME) Report**

State of Oregon

Occupational Safety and Health Division

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Contents

I. Executive Summary	3
A. State Plan Activities, Themes, and Progress	3
B. State Plan Introduction	3
C. Data and Methodology	4
D. Findings and Observations	5
II. Assessment of State Plan Performance	5
A. Major New Issues	5
B. Assessment of State Plan Progress in Achieving Annual Performance Goals.....	6
C. Highlights from the State Activity Mandated Measures (SAMM)	10
III. Assessment of State Plan Corrective Actions	10

Appendices

Appendix A – New and Continued Findings and Recommendations.....	A-1
Appendix B – Observations Subject to New and Continued Monitoring.....	B-1
Appendix C – Status of FY 2013 Findings and Recommendations.....	C-1
Appendix D – FY 2014 State Activity Mandated Measures (SAMM) Report....	D-1

I. Executive Summary

A. State Plan Activities, Themes, and Progress

The purpose of this report is to assess the Oregon Occupational Safety and Health Division (Oregon OSHA) State Plan activities during Fiscal Year (FY) 2014 with regard to activities mandated by OSHA and to gauge the State Plan's progress toward resolving recommendations from the FY 2013 FAME. This report assesses the State Plan's achievement of its Annual Performance Plan goals, as well as its progress toward the goals in its Five-Year Strategic Plan.

Oregon OSHA has been responsive to previously identified findings and recommendations. There were no findings in the FY 2013 FAME Report and no findings again for this evaluation period. There were four observations noted in the previous FAME which are being monitored by OSHA and are anticipated to be resolved during the next comprehensive FAME evaluation period in FY 2015.

During the FY 2013 evaluation period, a review of the State Plan's Fall Protection Standard in Residential Construction was completed, and concerns were identified. A letter was sent requesting the State Plan provide information on the effectiveness of its standard. The State Plan provided OSHA with a detailed response. OSHA has continued to discuss this issue with Oregon OSHA and has concluded that its Fall Protection Standard must be changed. OSHA will send a letter to Oregon OSHA addressing the requirements which must be met, and OSHA will continue to work with Oregon OSHA to complete this process.

During FY 2014, the State Plan remained on target with or exceeded its annual performance goals. Oregon OSHA continues to be timely with responses to Federal Program Changes, adoption of standards, and notifying OSHA of any major State-Initiated Changes.

Oregon OSHA's performance, with respect to activities that are mandated by the Occupational Safety and Health Act, and its implementation of policies and regulations continue to be acceptable. The State Plan is successful in its overall enforcement presence for the safety and health of Oregon's workers.

B. State Plan Introduction

The State of Oregon, under an agreement with OSHA, operates an occupational safety and health program through Oregon OSHA, which is part of the Department of Consumer and Business Services. The Oregon State Plan was submitted on April 28, 1972, and was certified on September 15, 1982, after all developmental steps specified in the plan had been completed. In May of 2005, after a full opportunity for public review and comment and a comprehensive program evaluation, OSHA granted final approval to the Oregon State Plan, with the exception of temporary labor camp enforcement. The Temporary Labor Camp Standard was subsequently revised by Oregon OSHA to meet federal concerns; as of yet, the State Plan has not pursued a formal change to remove that narrow limitation on its final approval. Final approval is a

significant achievement confirming that Oregon OSHA's program, in actual operations, is at least as effective as the federal program with respect to issues covered by that approval.

The Administrator of Oregon OSHA is appointed by the director of the Oregon Department of Consumer and Business Services and serves as the designee for the State Plan. The current Administrator is Mr. Michael Wood.

Over the years, Oregon OSHA has adopted a number of major safety and health standards which, while deemed as effective as comparable federal standards, also have significant differences. Oregon OSHA has also adopted a number of state-initiated rules for which there are no federal counterparts, including Forest Activity Standards, Agricultural Standards, Firefighter Standards and Pesticide Worker Protection Standards. Oregon OSHA's rules, the Oregon Safe Employment Act, letters of interpretation, and recent rule activity can be accessed via the Rules and Compliance section of the Oregon OSHA website.

In Oregon, the Bureau of Labor and Industries (BOLI) has statutory responsibility for accepting, processing, and making determinations on complaints alleging occupational safety and health discrimination. Rules pertaining to the processing of these complaints are contained in Division 438 of Oregon's Administrative Rules. Oregon OSHA reimburses BOLI for costs associated with conducting 11(c) whistleblower discrimination investigations.

Oregon OSHA exercises jurisdiction over state and local government workplaces and private sector employers not covered by OSHA in the State of Oregon. OSHA's inspection authority is limited to federal agencies; the U.S. Postal Service; contractors on U.S. military reservations; private employers and federal government employers at Crater Lake National Park; and private sector maritime employment on or adjacent to navigable waters, including shipyard operations and marine terminals. OSHA also covers private sector establishments on Native American reservations and tribal trust lands, including Native American-owned enterprises.

In FY 2014, the State Plan was staffed with 76 compliance officers and 31 consultants. The program covers approximately 1.6 million workers and 101,000 employers in more than 149,949 locations around the state. In FY 2014, Oregon's federally-approved State Plan was funded at \$23,969,533, of which \$5,304,144 were federal funds.

Oregon OSHA has staffed the Consultation Program with 27 consultants that are 100% state-funded and four additional consultants that provide private sector consultation under Section 21(d) of the Act.

C. Data and Methodology

OSHA has established a two-year cycle for the FAME process. This is the follow-up year, and as such, OSHA did not perform the level of case file review associated with a comprehensive FAME. This strategy allows the State Plan to focus on correcting deficiencies identified in the most recent comprehensive FAME.

Monitoring of the State Plan consisted of a variety of methods and tools. The opinions, analyses, and conclusions described herein are based on information that was obtained from these sources:

- Analysis and monitoring of the FY 2013 Oregon OSHA Corrective Action Plan, which provides the State Plan's status and response to the FY 2013 FAME (Appendix C);
- Statistical reports comparing State Plan performance to federal performance;
- State Activity Mandated Measures (SAMM) Report data (Appendix D);
- The FY 2014 Mandated Activities Report for Consultation;
- State Information Report data;
- The FY 2014 State OSHA Annual Report prepared by Oregon, which contains details of the State Plan's achievements with respect to its annual goals;
- Grant assurances;
- Quarterly monitoring meetings between OSHA and the State Plan; and
- Twenty-four accompanied visits that were conducted by OSHA in FY 2014 with no deficiencies noted.

In addition, OSHA's Portland Area Office meets monthly with the State Plan to maintain open communication. These informal discussions allow for issues and concerns to be freely discussed with the potential for resolution in between the normally scheduled quarterly meetings.

D. Findings and Observations

The FY 2014 Follow-Up FAME Report includes four observations carried over from the previous FY 2013 FAME. Three of the four observations carried over are related to the Whistleblower Program. It is anticipated that these observations will be resolved in the next FAME evaluation period when OSHA conducts a discrimination case file review. The fourth observation relates to fall protection in residential construction. OSHA is currently in discussion with the State Plan regarding this issue and anticipates it will be resolved in the next FAME evaluation period. For purposes of this report, this observation will continue to be monitored and will be continued into FY 2015.

There were no findings or recommendations made in the FY 2014 FAME.

II. Assessment of State Plan Performance

A. Major New Issues

On February 13, 2015, Governor John Kitzhaber announced his resignation. This should have no immediate effect on Oregon OSHA; however, administration changes always have the potential for future change. The new governor of Oregon, Kate Brown, was sworn in on February 18, 2015.

B. Assessment of State Plan Progress in Achieving Annual Performance Goals

Oregon OSHA has established three broad goals in its Five-Year Strategic Plan, which covers the period from October 1, 2010 (FY 2011) through September 30, 2015 (FY 2015). These goals include short-range (annual) and long-range (five-year) objectives aimed at improving safety and health for Oregon's workers. Each year, Oregon OSHA develops and submits its Annual Performance Plan as part of its application for federal funds.

Oregon's three strategic goals are as follows:

Strategic Goal #1

Reduce serious workplace injuries and the risks that lead to them.

Strategic Goal #2

Reduce serious workplace illnesses and the risks that lead to them.

Strategic Goal #3

Reduce workplace deaths and the risks that lead to them.

OSHA did not identify any issues or concerns regarding Oregon's performance in meeting its annual performance goals during this period. Three performance goals were met and deemed acceptable. The one goal which was not met is Annual Performance Goal (1,2,3)-6, Customer Service. The measure for meeting customer service performance is determined by a 90% positive response to survey questions in each of the seven separate Oregon OSHA surveys.

The satisfaction response to both the Appeals survey and Oregon OSHA's Lab survey fell below this goal. The Appeals survey results can vary depending upon an employer's satisfaction of their appeal outcome, and the Lab survey results are influenced by subjective variables that influence the internal staff who were surveyed. Oregon OSHA is making efforts to hone their survey questions to maximize their effectiveness. The results for Oregon's annual performance goals are as follows:

Performance Goal (1,2,3)-1 Recognition Programs: Oregon OSHA will promote SHARP and VPP through consultation, enforcement, technical services, and education.

Results: At the end of FY 2014, a total of 211 companies achieved SHARP status. This total includes 36 current employers, 132 graduates, and two new sites that received initial SHARP status during FY 2014. Oregon OSHA had 17 companies that became inactive in the SHARP process during FY 2014. Additionally, for the same period, a total of 20 Oregon companies were VPP approved. During the year, one new VPP site was added. Oregon OSHA recertified 10 existing VPP sites in FY 2014.

OSHA's Assessment: The State Plan met this goal.

Performance Goal (1,2,3)-2 Outreach: Continue outreach efforts to small employers and vulnerable or hard-to-reach populations by increasing publications, workshops, and conferences to those employers and workers.

Results: Oregon OSHA continued to develop and deploy online courses. Oregon OSHA has a long history of partnering with labor, business, and associations to coordinate safety and health conferences throughout the State Plan and, toward that effort, conducted eight conferences during this period. Oregon OSHA also continued its outreach to non-English speaking workers by making training and outreach materials available to the multicultural workforce; two four-hour workshops and one online course were presented in Spanish in FY 2014.

OSHA's Assessment: The State Plan met this goal.

Annual Performance Goal (1,2,3)-3 Partnerships: Use existing partnerships to advise Oregon OSHA management on where more specific focus would be fruitful.

Results: At the end of FY 2014, Oregon OSHA had 32 stakeholder collaborations and partnerships; 14 of those partnerships are in the target industries of agriculture, construction, transportation logging, and healthcare. Three Alliances were developed in FY 2014: the Oregon Coalition for Healthcare Ergonomics; the Oregon Restaurant and Lodging Association; and the Oregon Home Builders Association.

OSHA's Assessment: The State Plan met this goal.

Annual Performance Goal (1,2)-1 Safety and Health Hazards: Health enforcement will focus on targeting high-hazard industries and safety and health hazards at the following levels: safety enforcement, 75%; health enforcement, 60%; and consultation, 50%.

Results: In FY 2014, Oregon OSHA continued its focus on inspections in high-hazard industries. Oregon OSHA surpassed the goal of 75% of safety inspections in high-hazard industries. There were 2,813 safety inspections (84%) in high-hazard industries and 561 health inspections (62%) in high-hazard industries. The days away, restricted, or transferred (DART) rate for Calendar Year (CY) 2013, the most recent year available, was 2.2 for all sectors, same as last year. The total case incident rate has been decreasing overall from 5.6 in all sectors in CY 2003 to 4.1 in CY 2013. Oregon believes its approach of targeting high-hazard industries for safety and health inspections has contributed to Oregon OSHA achieving a DART rate of 2.2.

OSHA's Assessment: The State Plan exceeded this goal.

Annual Performance goal (2)-1 Health Hazards: Increase the number of severe chemical hazards identified (and therefore corrected) by at least 2% each year.

Results: For FY 2014, 748 serious hazards were identified. The five-year rolling average (FY 2009-2014) was 732. The five-year rolling average increased 12% compared to the FY 2010 base indicator. Overall, Oregon OSHA exceeded its annual performance goal from FY 2011 through FY 2014. Oregon's inspection priorities and resources are targeted in high-hazard industries with the current inspection scheduling system and emphasis programs.

OSHA's Assessment: The State Plan exceeded this goal.

Annual Performance Goal (1,2,3)-4 Emphasis: Implement all State Plan Local Emphasis Programs (LEPs) and appropriate National Emphasis Programs (NEPs).

Results: Oregon OSHA conducted 1,262 (30%) of all safety and health inspections in LEPs and NEPs. Oregon OSHA conducted 818 (32%) of all consultations in local and NEPs. Emphasis areas included Trenching, Falls in Construction, Struck-by Hazards in Logging, Assigned Risk Pool, Farm Labor Housing, Field Sanitation, Pesticide, Lead, Silica, Diisocyanate, Process Safety Management, Combustible Dust, Hexavalent Chromium, Amputation, Formaldehyde, Primary Metal Industries, and Nursing and Residential Care Facilities.

OSHA's Assessment: The State Plan met this goal.

Annual Performance Goal (3)-1 Fatalities: Reduce the recent three-year average rate of workplace fatalities by 20% by CY 2016 and by 16% by CY 2013 through inspections and interventions.

Results: During FY 2014, inspections in trenching, falls in construction, and struck-by hazards in logging accounted for 16% (686 of 4,243) of Oregon OSHA's total enforcement inspections. The compensable fatality count for CY 2013 was 29. This is 12 more than the record low of 17 in CY 2010, but it is still the third lowest ever reported since Oregon began tracking the statistic in 1943. The most recent three-year rolling average available in FY 2014 (CY 2011 through CY 2013) is 1.74, which represents a 19.3 percent reduction from the baseline rate of 2.15 (CY 2007-2009 three-year average rate).

OSHA's Assessment: The State Plan met this goal.

Annual Performance Goal (1,2)-2 Ergonomics: Increase awareness and reduce workplace injuries related to ergonomic factors by providing ergonomic assistance to employers.

Results: During this period, Oregon OSHA has developed a plan to reduce ergonomic hazards and targeted the healthcare sector, which has one of the highest claims rates for injuries. The Oregon Association of Hospitals and Health Systems has taken the initiative to move safe patient handling forward. Oregon OSHA has addressed the NEP in Nursing and Residential Care Facilities by conducting 80 inspections and 15 consultations in FY 2014. Beginning January 1, 2013, the department's claims coding system was changed to allow for more detailed reports. Musculoskeletal disorder claims rate data that has been entered in the claims coding system will be reviewed at the end of FY 2015, for its completeness and feasibility for future reporting. During this fiscal year, Oregon OSHA's Consultation Program tracked the level of ergonomic information and the assistance consultants provided to employers during consultations, including basic discussions, assessments, and ergonomic consultation referrals. The results of this tracking indicate that Oregon OSHA's consultants have some level of interaction with employers regarding ergonomics during 46.77% of all consultation activities.

OSHA's Assessment: The State Plan met this goal.

Annual Performance Goal (1,2,3)-5 Timely Response: Initiate investigations and inspections timely in 95% of all reported fatalities and hazard complaints; respond to complainants timely in 90% of all cases; notify family members timely in 100% of all cases; and process discrimination cases timely in 80% of all cases.

Results: Timely response to imminent danger complaints and complainant response goals were met. Timely response to the fatalities was 100% (31 of 31). Response to imminent danger complaints was 100% (26 of 26). The complaint response goal of 90% to send a letter within 10 working days was met. The goal for timely processing of 80% of discrimination cases was met for FY 2014, with 91 out of 109 (83%) cases completed within the expected 90-day timeframe. BOLI continues to monitor and manage this requirement.

OSHA's Assessment: The State Plan met this goal.

Annual Performance Goal (1,2,3)-6 Customer Service: Achieve and maintain customer satisfaction in the delivery of Oregon OSHA programs and services as evidenced by a survey rating of 90% or above on each program survey.

Results: Throughout the year, Oregon OSHA submits surveys to stakeholders for the purposes of determining the results of customer service satisfaction. Surveys were given to stakeholders regarding conferences, training courses, the use of audio-visual materials, appeals, and laboratory services at the completion of consultation and inspection activities. Two of the survey results, the Appeals and the Oregon OSHA Lab, fell below the 90% minimum benchmark. The Appeals survey results vary depending on the employer's satisfaction of their appeal outcome. The Lab survey is an internal survey that measures the satisfaction level of compliance officers and/or managers relating to their interaction with Lab personnel. The Lab manager is taking steps to improve communication based on recent survey results.

OSHA's Assessment: The State Plan did not meet this goal. OSHA considers the results to be acceptable since slight variations in survey results may occur from year to year based on employers' perceptions of the appeal process and the outcome. The State Plan is taking appropriate steps to reach its goal in the next evaluation period.

Annual Performance Goal (1,2,3)-7 Staff Development: Ensure 90% of safety and health staff receives 24 hours of safety and health professional development training.

Results: Oregon OSHA exceeded the goal during this fiscal year with 94% of the safety and health Oregon OSHA's safety and health staff, which includes Consultation, Enforcement, Appeals, Technical, Training, and Laboratory safety and health professionals. For FY 2014, Oregon OSHA's "All-Staff Symposium" has already been held, which accounts for a large portion of the training hours. In addition, webinars and outside classes continue to be offered. Oregon OSHA is offering or developing the following classes for their staff: biohazards, basic training courses for new employees, and Construction Week. Construction Week addresses

different processes and hazards that may occur on a construction site. Specific rules and program directives are reviewed.

OSHA's Assessment: The State Plan met this goal. During the annual quarterly meeting, Oregon OSHA proposed that this performance goal be changed to "Ensure 90% of safety and health staff complete 48 hours of professional development training," and proposed it be calculated as a running total over a two-year period. OSHA concurred with the change.

C. Highlights from the State Activity Mandated Measures (SAMM)

The State Plan met or exceeded all of their mandated activity measures, with the exception of SAMM 18, *Average Penalty per Serious Violation*. This is an ongoing topic of discussion. Oregon OSHA is on average, \$840.00 lower than the federal averages for each of the ranges in this measure. OSHA continues to discuss this issue with the State Plan to determine ways to mine and evaluate data that will account for both penalty amount and enforcement presence.

Oregon OSHA consistently exceeds SAMM 19, *Three-Year Average of Inspections for Enforcement Presence*. Oregon's presence is highest among all State Plans. Oregon OSHA also exceeded its goals in SAMM 3, *Percent of Complaints Where Complainants Were Notified in a Timely Manner*, and SAMM 4, *Timely Response to Imminent Danger Complaints and Referrals*. In addition, the State Plan was below the average case lapse time for SAMM 23, for both safety and health inspections. The average number of violations for serious, willful, and repeats issued were slightly below the national standard by 0.19% but not considered outside the acceptable range. Complete SAMM results are provided in Appendix D.

III. Assessment of State Plan Corrective Actions

There were no findings or recommendations in the previous FAME Report. Observations identified in the FY 2013 FAME and their statuses are described below:

Observation FY 2013-OB-1 (Reclassified Finding FY 2012-4): All evidence must be adequately tested prior to dismissing or closing an 11(c) discrimination case. Use appropriate justification for any closure and document in the case file accordingly.

Status: Continued. OSHA will further address this item with Oregon OSHA and BOLI through additional monitoring and case file review of the discrimination program in FY 2015.

Observation FY 2013-OB-2 (FY 2012-OB-1): An initial interview with an 11(c) discrimination complainant must be completed to include obtaining a thorough understanding of the complainant's protected activity.

Status: Continued. OSHA will further address this item with Oregon OSHA and BOLI through additional monitoring and case file review of the discrimination program in FY 2015. This item will either be converted to a finding in the next period or closed out dependent on the outcome.

Observation FY 2013-OB-3: 11(c) discrimination settlement agreements should be consistent with the Whistleblower Investigation Manual with regard to provisions for waiving future employment. BOLI should ensure the factors outlined in Chapter 6 are addressed and documented in the case file.

Status: Continued. OSHA will further address this item with Oregon OSHA and BOLI through additional monitoring and case file review of the discrimination program in FY 2015.

Observation FY 2013-OB-4: Oregon OSHA's standards and enforcement program for fall protection in residential construction may not be at least as effective as OSHA's. OSHA and Oregon OSHA have been in dialogue about this issue, and it is currently under review by OSHA.

Status: Continued. Region X has continued to work with the OSHA National Office to determine whether Oregon OSHA will be required to change its Fall Protection Standard. OSHA will send a letter to Oregon OSHA outlining the next steps.

Appendix A – New and Continued Findings and Recommendations

FY 2014 Oregon OSHA Follow-Up FAME Report

FY 2014-#	Finding	Recommendation	FY 20XX-# or FY 20XX-OB-#
	None.		

Appendix B – Observations Subject to New and Continued Monitoring

FY 2014 Oregon OSHA Follow-Up FAME Report

Observation # FY 2014-OB-#	Observation# FY 20XX-OB-# or FY 20XX-#	Observation	Federal Monitoring Plan	Current Status
FY 2014-OB-1	FY 2013-OB-1	All evidence must be adequately tested prior to dismissing or closing an 11(c) discrimination case. Use appropriate justification for any closure and document in the case file accordingly.	OSHA will further address this item with Oregon OSHA and BOLI through additional monitoring and case file review of the discrimination program in FY 2015.	Continued
FY 2014-OB-2	FY 2013-OB-2 FY 2012-OB-1	An initial interview with an 11(c) discrimination complainant must be completed to include obtaining a thorough understanding of the complainant’s protected activity.	OSHA will further address this item with Oregon OSHA and BOLI through additional monitoring and case file review of the discrimination program in FY 2015. This item will either be converted to a finding in the next period or closed out dependent on the outcome.	Continued
FY 2014-OB-3	FY 2013-OB-3	11(c) discrimination settlement agreements should be consistent with the Whistleblower Investigation Manual with regard to provisions for waiving future employment. BOLI should ensure the factors outlined in Chapter 6 are addressed and documented in the case file.	OSHA will further address this item with Oregon OSHA and BOLI through additional monitoring and case file review of the discrimination program in FY 2015.	Continued
FY 2014-OB-4	FY 2013-OB-4	Oregon OSHA’s standards and enforcement program for fall protection in residential construction may not be at least as effective as OSHA’s. OSHA and Oregon OSHA have been in dialogue about this issue, and it is currently under review by OSHA.	Region X has continued to work with the OSHA National Office to determine whether Oregon OSHA will be required to change its Fall Protection Standard. OSHA will send a letter to Oregon OSHA outlining the next steps.	Continued

Appendix C - Status of FY 2013 Findings and Recommendations

FY 2014 Oregon OSHA Follow-Up FAME Report

FY 2013-#	Finding	Recommendation	State Plan Response/Corrective Action	Completion Date	Current Status and Date
	None.				

Appendix D - FY 2014 State Activity Mandated Measures (SAMM) Report

FY 2014 Oregon OSHA Follow-Up FAME Report

U.S. Department of Labor

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)

State Plan: Oregon

FY 2014

OSHA is in the process of moving operations from a legacy data system (NCR) to a modern data system (OIS). During FY 2014, federal OSHA case files were captured on OIS, while most State Plan case files continued to be processed through NCR. Oregon opened 4,241 enforcement inspections in FY 2014. Of those, 4,241 inspections were captured in NCR, while 0 were captured in OIS. The SAMM Report, which is native to IMIS (a system that generates reports from the NCR), is not able to access data in OIS. Additionally, certain algorithms within the two systems are not identical. These challenges impact OSHA's ability to combine the data.

For FY 2014 we will use a format very similar to the one used for FY 2013. Below is an explanation of which data OSHA was able to use when calculating each metric.

- a. Measures 1 & 2 will use State Plan data for FY 2014 as captured in NCR and compared to the State Plan's negotiated number. Any State Plan data from OIS will not be considered due to irregularities in the algorithm between OIS and NCR.
- b. Measures 20a-b, 23, and 24 will use State Plan data for FY 2014 as captured in NCR and compared to the historical FY 2011 national average (FY 2009-2011). Any State Plan data from OIS will not be considered due to irregularities in the algorithm between OIS and NCR.
- c. Measures 5, 9, 11, 17, 19, 21, and 25 will use State Plan data for FY 2014 as tabulated manually to include both OIS and NCR data and compared to the fixed/negotiated/national numbers associated with them.
- d. Measures 13, 14, and 16 will be extracted from NCR (OIS conversion should not impact). National data will be pulled from WebIMIS for FY 2012-2014.
- e. Measures 18a-e will use State Plan data for FY 2014 as captured in NCR. Any data from OIS will not be considered due to irregularities in the algorithm between OIS and NCR. Much like FY 2013, no national data will be available for comparison.
- f. Measure 22 will be excluded from the report (other than as a placeholder to demonstrate that it is one of the agreed upon metrics, but not one we can currently generate).
- g. Measure 4 will use State Plan data for FY 2014 as captured in NCR.

U.S. Department of Labor

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)

State Plan: Oregon

FY 2014

SAMM Number	SAMM Name	State Plan Data	Reference/Standard	Notes
1	Average number of work days to initiate complaint inspections	5.15	5 day for Serious hazards/30 days for Other than Serious	State Plan data taken directly from SAMM Report generated through IMIS. The reference/standard is a negotiated number for each State Plan.
2	Average number of work days to initiate complaint investigations	4.22	10	State Plan data taken directly from SAMM Report generated through IMIS. The reference/standard is a negotiated number for each State Plan.
4	Percent of complaints and referrals responded to within 1 work day (imminent danger)	100.0%	100%	State Plan data taken directly from SAMM Report generated through IMIS.
5	Number of denials where entry not obtained	0	0	State Plan data taken directly from SAMM Report generated through IMIS and Open Inspection OIS Report.
9a	Average number of violations per inspection with violations by violation type	1.25	SWR: 1.99	State Plan data taken from SAMM Report generated through IMIS and the Inspection Summary Report generated in OIS; national data was manually calculated from data pulled from both IMIS and OIS for Fiscal Years (FY) 2012-2014.
9b	Average number of violations per inspection with violations by violation type	1.25	Other: 1.22	

U.S. Department of Labor

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)

State Plan: Oregon			FY 2014	
11	Percent of total inspections in the public sector	4.06%	3.58%	State Plan data taken from SAMP Report generated through IMIS and the Inspection Summary Report generated in OIS. The reference/standard is derived from the FY 14 grant application.
13	Percent of 11c Investigations completed within 90 calendar days	83%	100%	State Plan data taken directly from SAMP Report generated through IMIS; national data was pulled from WebIMIS for FY 2012-2014.
14	Percent of 11c complaints that are meritorious	12.84	24.8% meritorious	State Plan data taken directly from SAMP Report generated through IMIS; national data was pulled from WebIMIS for FY 2012-2014.
16	Average number of calendar days to complete an 11c investigation	81.34	90 Days	State Plan data taken directly from SAMP Report generated through IMIS; national data was pulled from WebIMIS for FY 2012-2014.
17	Planned vs. actual inspections - safety/health	3328/913	3400/900	State Plan data taken from SAMP Report generated through IMIS and the Inspection Summary Report generated in OIS; the reference standard number is taken from the FY 2014 grant application. The reference/standard is a negotiated number for each State Plan.

U.S. Department of Labor

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)

State Plan: Oregon			FY 2014	
18a	Average current serious penalty - 1 -25 Employees	310.92		State Plan data taken directly from SAMM Report generated through IMIS.
18b	Average current serious penalty - 26-100 Employees	415.04		
18c	Average current serious penalty - 101-250 Employees	478.94		
18d	Average current serious penalty - 251+ Employees	461.84		
18e	Average current serious penalty - Total 1 - 250+ Employees	356.25		
19	Percent of enforcement presence	4.95%	National Average 1.51%	Data is pulled and manually calculated based on FY 2014 data currently available in IMIS and County Business Pattern data pulled from the US Census Bureau.
20a	20a) Percent In Compliance – Safety	31.06	Safety - 29.1	State Plan data taken directly from SAMM Report generated through IMIS; current national data is not available. Reference data is based on the FY 2014 national average, which draws from the collective experience of State Plans and federal OSHA for FY 2009-2011.
20b	20b) Percent In Compliance – Health	26.07	Health - 34.1	
21	Percent of fatalities responded to in 1 work day	90%	100%	State Plan data is manually pulled directly from IMIS for FY 2013.

U.S. Department of Labor

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)

State Plan: Oregon			FY 2014	
22	Open, Non-Contested Cases with Abatement Incomplete > 60 Days	n/a		Data not available.
23a	Average Lapse Time - Safety	29.46	43.4	State Plan data taken directly from SAMM Report generated through IMIS; current national data is not available. Reference data is based on the FY 2011 national average, which draws from the collective experience of State Plans and federal OSHA for FY 2009-2011.
23b	Average Lapse Time - Health	44.84	57.05	
24	Percent penalty retained	100	66	State Plan data taken directly from SAMM Report generated through IMIS; current national data is not available. Reference data is based on the FY 2011 national average, which draws from the collective experience of State Plans and federal OSHA for FY 2009-2011.
25	Percent of initial inspections with employee walk around representation or employee interview	100	100%	State Plan data taken from SAMM Report generated through IMIS and the Inspection Where Workers Involved Report generated in OIS.