

**FY 2017 Comprehensive
Federal Annual Monitoring Evaluation (FAME) Report**

**State of Illinois
Illinois Department of Labor
Illinois OSHA**



Evaluation Period: October 1, 2016 – September 30, 2017

Initial Approval Date: September 1, 2009

State Plan Certification Date: Pending

Final Approval Date: None

**Prepared by:
U. S. Department of Labor
Occupational Safety and Health Administration
Region V
Chicago, Illinois**



Contents

I.	Executive Summary.....	3
II.	State Plan Background.....	4
	A. Background.....	4
	B. Major New Issues.....	4
III.	Assessment of State Plan Progress and Performance.....	5
	A. Data and Methodology.....	5
	B. Review of State Plan Performance	6
	1. Program Administration.....	6
	2. Enforcement.....	8
	3. Review Procedures.....	17
	4. Standards and Federal Program Changes (FPCs) Adoption.....	18
	5. Variances.....	19
	6. State and Local Government Worker Program.....	20
	7. Whistleblower Program.....	20
	8. Complaint About State Program Administration (CASPA).....	22
	9. Voluntary Compliance Program.....	23
	10.State and Local Government 23(g) On-Site Consultation Program.....	23

Appendices

Appendix A – New and Continued Findings and Recommendations.....	A-1
Appendix B – Observations and Federal Monitoring Plans.....	B-1
Appendix C – Status of FY 2017 Findings and Recommendations.....	C-1
Appendix D – FY 2017 State Activity Mandated Measures (SAMM) Report.....	D-1
Appendix E – FY 2017 State OSHA Annual Report (SOAR).....	E-1

I. Executive Summary

The purpose of this Federal Annual Monitoring Evaluation (FAME) Report is to assess the State Plan's performance for Fiscal Year (FY) 2017, and its progress in resolving outstanding findings from previous FAME reports. This report assesses the current performance of the Illinois Department of Labor (IDOL) – Occupational Safety and Health Division 23(g) program.

FY 2017 witnessed some improvement and progress by Illinois OSHA in maintaining overall program performance. The IDOL – Illinois OSHA Five-Year Strategic Plan identifies three fundamental strategic goals to reduce workplace injuries, illnesses, and fatalities in state and local government worksites throughout Illinois. To achieve these goals the State Plan established 13 individual performance goals that contain a focused strategy with detailed activity measures and performance indicators. Illinois OSHA was successful in meeting or exceeding all of their annual performance goals outlined in the FY 2017 23(g) grant application. A detailed description of the performance goals and the successful results are provided in Appendix E – FY 2017 State OSHA Annual Report (SOAR).

While Illinois OSHA improved in many areas, the State Plan's performance triggered the further review levels (FRLs) for several of the FY 2017 State Activity Mandated Measures (SAMM). These SAMM measures include:

- SAMM #7 - Planned vs. actual inspections – safety/health
- SAMM #14 – Percent of 11(c) investigations completed within 90 days
- SAMM #16 – Average number of calendar days to complete an 11(c) investigation

The State Plan failed to meet their overall projected inspection goal of 700 inspections. The program conducted 268 inspections, representing only 38% of the FY 2017 goal. The leading factor impacting Illinois OSHA's ability to meet their projected inspection goals was related to staff turnover and difficulty filling vacancies. The ability of the State Plan to achieve their projected inspection goals has been monitored through observations in previous years. Due to the continued struggle and decline in this area, this deficiency is being elevated to a finding. Detailed explanations and discussions of the finding are found in Section III, Assessment of State Plan Progress and Performance.

The State Plan made progress in addressing the previous nine findings and five observations from the FY 2016 Follow-up FAME Report. Seven findings were completed, one was converted to an observation, and one remains open. Two observations were closed, two are continued, and one is converted to a finding. During the FY 2017 FAME

assessment, two new findings address employee interview procedures and the proper access and handling of medical records. In addition, four new observations, regarding inquiry and inspection procedures and processes, along with the timeliness of whistleblower investigations, were identified. Appendix A describes the new and continued findings and recommendations. Appendix B describes observations subject to continued monitoring and the related federal monitoring plan. Appendix C describes the status of previous findings with associated completed corrective actions.

II. State Plan Background

A. Background

IDOL – Illinois OSHA operates a state and local government only OSHA State Plan. The Illinois State Plan was approved as a Developmental Plan on September 1, 2009. Mr. Ben Noven, Division Manager, administers the Illinois State Plan under the leadership of Mr. Joseph Beyer, Acting Director of IDOL. Illinois OSHA impacts state and local government by enforcing safety and health standards, providing consultation services, investigating occupational safety and health whistleblower discrimination complaints, adopting Federal OSHA standards, and providing outreach services.

Since approved as a Developmental Plan on September 1, 2009, Illinois OSHA has requested multiple extensions to complete its developmental steps. The last request for an extension was submitted on October 18, 2017, requesting an extension to September 30, 2018. This extension request was made to give the State Plan time to fill staff vacancies.

The Illinois OSHA FY 2017 grant included full-time equivalent (FTE) staffing of 19.75 positions. The State Plan's expected staffing level includes a Division Manager, two Assistant Enforcement Managers, two Administrative Assistants, 10 Safety Inspectors, four Industrial Hygienists, a State Plan Coordinator, and a Marketing/OIS Coordinator. Several of these positions split time between the 23(g) enforcement and the 21(d) consultation programs, as well as the whistleblower discrimination program support.

The FY 2017 grant included funding totaling \$3,054,200. The State Plan deobligated \$636,100 during the FY 2017 grant due to vacancies and the inability to fill vacant positions.

B. Major New Issues

None.

III. Assessment of State Plan Progress and Performance

A. Data and Methodology

OSHA has established a two-year cycle for the FAME process. FY 2017 is a comprehensive year and as such, OSHA was required to conduct an on-site evaluation and case file review. A four-person team, which included a whistleblower investigator, was assembled to conduct a full on-site case file review. The review was conducted at the Illinois State Plan office during the week of January 8, 2018. A total of 81 safety, health, and whistleblower case files were reviewed. The safety and health inspection files were randomly selected from closed inspections conducted during the evaluation period (October 1, 2016 through September 30, 2017). The selected population included:

- Two (2) fatality case files
- Twenty-two (22) complaint case files
 - Fifteen (15) safety and seven (7) health files
- Thirty-one (31) safety programmed inspection case files
- Twenty (20) non-formal complaint inquiry investigation files, and
- Six (6) closed whistleblower case files
 - Additionally, all twenty-four (24) whistleblower complaints received by Illinois OSHA were reviewed.

The analyses and conclusions described in this report are based on information obtained from a variety of monitoring sources, including the:

- State Activity Mandated Measures Report (Appendix D)
- State Information Report
- Mandated Activities Report for Consultation
- State OSHA Annual Report (Appendix E)
- State Plan Annual Performance Plan
- State Plan Grant Application
- Quarterly monitoring meetings between OSHA and the State Plan
- Full case file review

Each state activity mandated measure has an agreed-upon further review level (FRL) which can be either a single number, or a range of numbers above and below the national average. State Plan SAMM data that falls outside the FRL triggers a closer look at the underlying performance of the mandatory activity. Appendix D presents the State Plan's FY 2017 SAMM report and includes the FRL for each measure.

Throughout the entire process, Illinois OSHA was cooperative, shared information, and ensured staff was available to discuss cases, policies, and procedures. Illinois OSHA staff members were eager to work with the evaluation team.

B. Review of State Plan Performance

1. PROGRAM ADMINISTRATION

The Illinois OSHA program administration follows closely with federal initiatives. The plan serves as a mechanism for communicating a shared set of expectations regarding the results that Illinois OSHA expects to achieve and the strategies that it will use to achieve them. Illinois OSHA will adjust the plan as circumstances necessitate, use it to develop the annual grant application and performance plan, report on progress in annual performance reports, and monitor program accountability for achieving the goals and outcomes.

a) Training

Illinois OSHA follows OSHA's policy and guidelines for implementing competency-based training programs for compliance personnel (TED 01-00-019 Mandatory Training Program for OSHA Compliance Personnel). New compliance personnel attend, at a minimum, two initial courses in their first year and six courses specific to their job classification by the end of their third year. The staff attends the required training at the OSHA Training Institute (OTI), located in Arlington Heights, Illinois. Additionally, other opportunities outside of the organization are made available when it would improve staff knowledge and performance.

b) OSHA Information System

Illinois OSHA strives to operate as paperless a program as possible, with the use of OIS integral to the process. Complaint and fatality intakes, assignments, case file processing, and many other operations are performed in OIS.

In FY 2017, Illinois OSHA received 325 valid complaints, fatality/catastrophe reports, and referrals, with 84 resulting in on-site inspections and 88 non-formal complaints processed via the inquiry process. (Source: Unprogrammed Activity (UPA) report dated December 18, 2017) During the FAME review process, 20 of the non-formal inquiry complaints were evaluated. In six of 20 (30%) of the inquiry complaints reviewed, processing dates entered into OIS did not correspond with case file dates annotated in the case file diary sheets.

Observation FY 2017-OB-01: In six of 20 case files reviewed (30%), inquiry procedures associated with adequate abatement evidence were not adhered to in accordance with Chapter 9 of the Illinois OSHA FOM.

Federal Monitoring Plan FY 2017-OB-01: OSHA will discuss internal audits in this area conducted by Illinois OSHA during quarterly monitoring meetings.

c) State Internal Evaluation Program Report

Due to it being in its developmental period, the State Plan did not develop a State Internal Evaluation Program (SIEP) in FY 2017.

d) Staffing

Illinois OSHA continues to struggle to fill staff vacancies. The Illinois Department of Central Management Services (CMS) Bureau of Personnel Division of Examining and Counselling has oversight for over 950 position titles under the jurisdiction of the Governor. In previous years, the Illinois hiring process has had significant delays and a backlog in filling positions throughout the state. This has resulted in a hiring process that can take as long as 12 months. In FY 2017, CMS implemented changes that helped to reduce the hiring process backlog by as much as 10 weeks. Additional factors affecting Illinois OSHA's ability to fill positions in FY 2017 include state-imposed changes to internal IDOL staffing limits, as well as difficulty in attracting and retaining qualified candidates.

Staffing vacancies impacted the State Plan's ability to successfully achieve their targeting and programmed inspection goals established in their FY 2017 grant. Consequently, Illinois OSHA repeatedly adjusts their inspection goals throughout the year based on the number of trained and available investigators and support staff. See the "Targeting and Programmed Inspection" section below for a detailed discussion. The vacancies also result in significant dollar amounts being "deobligated" on an annual basis. Deobligation is the process whereby a state voluntarily returns federal funds previously awarded to the State Plan because they are either unable/unwilling to contribute the required match amount or they are unable/unwilling to carry out the full activities mandated by the grant. The State Plan and OSHA continue to have discussions exploring possible solutions to effectively address the issue of repeated de-obligations by the Illinois State Plan.

In an effort to free up investigative staff, Illinois OSHA entered a partnership for the Illinois Department of Labor Conciliation and Mediation Division to take over all of the whistleblower duties. This transition occurred in September 2017 and is expected to

allow Illinois OSHA investigators and the enforcement manager to focus primarily on conducting safety and health inspections in FY 2018.

During FY 2017, staffing levels fluctuated throughout the year, but mostly consisted of 10 safety and health inspectors, four short of the State Plan’s expected staffing benchmark. Of the 10, seven were fully trained, but during FY 2017, one retired, one was hired and terminated, two spent most of their time on whistleblower cases, and three resigned. There are currently 11 open positions at various stages in the hiring process. The open positions include six safety and two health investigators; one assistant enforcement manager; one marketing/OIS position; and one administrative assistant position. For a period of several months, the State Plan had no health inspectors on staff. As a stop gap measure, the State Plan contracted a former Illinois OSHA health inspector.

		STAFFING				
		FY 13	FY 14	FY 15	FY 16	FY 17
Safety	Benchmark	10	10	10	10	10
	Positions Allocated	9	9	10	10	10
	Positions Filled	6	7	8	9	4
	Vacancies	3	2	2	1	6
	% Of Allocations Filled	67%	78%	80%	90%	40%
Health	Benchmark	4	4	4	4	4
	Positions Allocated	4	4	4	4	4
	Positions Filled	4	4	2	3	2
	Vacancies	0	0	2	1	2
	% Of Allocations Filled	100%	100%	50%	75%	50%

2. ENFORCEMENT

Illinois OSHA enforces safety and health standards only in state and local government workplaces. In FY 2017, Illinois OSHA conducted 268 inspections: 252 safety and 16 health. (Source: Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #7) Of those, 167 were programmed; 93 were complaints and referrals; four were monitoring; two were fatalities; and one was a follow-up. The total number of inspections was a 46% decrease from FY 2016. (Source: Inspection Summary Report dated March 6, 2018)

Illinois OSHA issued serious, willful, and repeat violations in 148 of their inspections, with another 29 inspections having other-than-serious citations issued. The FRL for the average number of violations per inspection with violations by violation type is 1.83 +/- 20% for serious, willful, repeat, unclassified (SWRU) violations, and 0.99 +/- 20% for other-than-serious (OTS) violations. The range of acceptable data not requiring further review is from 1.46 to 2.20 for SWRU violations, and from 0.79 to 1.19 for other-than-

serious (OTS). The Illinois State Plan's average number of violations per inspection for SWRU is 2.12, within the acceptable FRL range. The average number of violations per inspection for OTS is 0.64, slightly lower than the FRL. Since this fell outside the SAMM FRL, this issue was evaluated during the on-site case file review. The evaluation showed an acceptable level of performance for Illinois in this matter, as described below.

The Illinois State Plan's lower average number of violations per inspection for OTS is attributed to several items. First, the State Plan's average number of SWRU violations per inspection is in the upper FLR range, indicating that the State Plan is identifying, citing and properly classifying the hazards found during the inspections. This was confirmed during the on-site case file review. Only one file (2%) was found in which the violations were classified incorrectly and only two files (4%) were found where there appeared to be a failure to issue citations for hazards identified. The State Plan's percent in compliance rates, 29.24% for safety and 35.71% for health, are within the acceptable FLR rates, indicating that hazards are being addressed and are not being overlooked.

As a part of the FY 2017 assessment, a random sample of 55 safety and health inspection files, 27 with violations, were selected and evaluated. There were several concerns identified during the review that could be resolved through review and training associated with the inspection processes outlined in the Illinois OSHA Field Operations Manual (FOM) Chapter 3, Inspection Procedures. Seventeen (31%) of the files had concerns associated with the inspection opening conference process. The concerns varied, but included: five files (9%) in which the opening conference was conducted over the phone; four files (7%) did not have injury and illness records reviews completed; three files (5%) did not have emphasis programs reviewed; and two files (4%) had delays in entry that were not properly handled.

Observation FY 2017-OB-02: In 17 of 55 (31%) of the files reviewed, the inspection opening conference process was not followed as outlined in the Illinois OSHA FOM Chapter 3, Paragraph V, Opening Conference.

Federal Monitoring Plan FY 2017-OB-02: Prior to the next FAME, OSHA will conduct a limited scope review of selected case files to determine if this item was addressed.

a) Complaints

During FY 2017, Illinois OSHA received a total of 176 complaints, of which 45 (26%) were formal and 131 (74%) were non-formal. The average number of days to initiate a complaint inspection in FY 2017 was 4.88, well below the negotiated standard of five

days for safety and 10 days for health complaints. All complaint items were addressed in the 22 complaint inspections reviewed. The average number of days to initiate a complaint investigation was 1.84, below the negotiated standard of three days. The State Plan received two imminent danger complaints and both were initiated within one day. (Source: Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #1a and 2a)

Illinois OSHA's inquiry process reflects OSHA's established procedures. During the FY 2017 assessment, in six of the 20 (30%) files reviewed, the inquiry was closed without receiving adequate evidence of abatement from the employer. This is a continuing issue addressed in Finding FY 2016-06. At that time, 44% of the files reviewed had this same issue. The State Plan conducted training in August of 2016 to address this issue, along with a concern related to the employer's abatement response time. The abatement response time issue appears to have been addressed and completed. This issue has improved from the previous findings; however, it will continue to be monitored as a finding.

Finding FY 2017-01 (FY 2016-06): In six of the 20 (30%) case files reviewed, the inquiry procedures associated with adequate abatement evidence were not adhered to in accordance with Chapter 9 of the Illinois OSHA FOM.

Recommendation FY 2017-01: Illinois OSHA should ensure inquiry processing procedures are followed, to include appropriate information needed to answer an inquiry from an employer, as outlined in Chapter 9, Paragraph G of the Illinois Field Operations Manual (FOM).

b) Fatalities

Illinois OSHA had 13 fatalities reported during FY 2017. The State Plan appropriately screened out 10 as having no jurisdiction due to the fatalities being related to natural causes. The three remaining fatalities were inspected, with two being closed and finalized and available for review. These files were generally well-documented with hazards identified and citations issued appropriately. Contact and involvement of families of victims, including notification of enforcement action, was well-documented with copies of the next-of-kin letters found in the files.

During the FY 2017 assessment, two fatality files were reviewed. Illinois OSHA responded to both fatality notifications timely. However, Illinois OSHA inspection procedures were not followed in one fatality inspection case file reviewed, as outlined in the Illinois OSHA FOM Chapter 10. The fatality was reported after hours on a Friday

evening to the Illinois 24 Hour Reporting Hotline and a notification report was sent to an Illinois OSHA manager via email. Efforts made to open the inspection within the one day timeline were not clearly noted in the file. Illinois OSHA did not contact the employer until they held an opening conference the following Monday morning. The fatality involved a mower roll over into a stream. The employer initially stated that they suspected a heart attack was involved, but they did not provide any clear basis for this assumption. The State Plan opened the inspection and made contact with first responders and the coroner's office and started gathering information from the employer. An on-site visit and employee interview attempts were not conducted until six weeks after the event occurred, following the coroner's notification that the death was due to drowning and not natural causes. The Illinois OSHA FOM, Chapter 10, Paragraph II, D, 1, subparagraph a, states, "Identify and interview all persons with firsthand knowledge of the incident, including first responders, police officers, medical responders, and management, as early as possible in the investigation." Due to the delay in conducting the onsite inspection, the employees were reluctant and refused to be interviewed, preferring the investigator speak with a manager. The case file was very well-documented and the State Plan utilized their compulsory process, subpoena issuance, to obtain documentation from the employer. However, a lack of employee interviews appears to have contributed to the State Plan's decision to address the identified hazards through the issuance of a Hazard Alert Letter rather than through the citation issuance process.

Observation FY 2017-OB-03: In one of two (50%) of the fatality inspections reviewed, Illinois OSHA inspection procedures, as outlined in the Illinois OSHA FOM Chapter 10, were not followed. On-site visit and employee interview attempts were not conducted until six weeks after the event occurred.

Federal Monitoring Plan FY 2017-OB-03: OSHA will review and discuss fatality investigation processes on all new fatality investigations with the State Plan during quarterly monitoring meetings.

c) Targeting and Programmed Inspections

The FRL for the planned vs. actual inspections – safety/health is based on the number negotiated by OSHA and the State Plan through the grant application. Illinois OSHA established a projected goal of 700 inspections: 500 safety and 200 health. The range of acceptable number of inspections conducted is +/- 5% of the projected 500 safety inspections (475 to 525) and +/- 5% of the projected 200 health inspections (190 to 210). Illinois OSHA completed 252 safety and 16 health inspections for a total of 268 inspections. Illinois OSHA achieved 38% of their total projected inspection goal in FY 2017. The State Plan achieved 50% of their goal for safety inspections and only 8% of

their goal for health inspections, which is substantially lower than the FRL and a cause for concern. (Source: Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #7)

Staffing vacancies continued to impact the State Plan’s ability to successfully achieve the targeting and programmed inspection goals established in the FY 2017 grant. Due to the considerable number of vacancies and their inability to fill those vacant positions, Illinois OSHA repeatedly adjusts the projected inspection goal throughout the year. The State Plan adjusts their inspection goals based on the actual number of full-time equivalents (FTEs) on hand and the weeks they were available and fit for duty, in terms of necessary training, to conduct the inspections. The calculations are based on the number of inspections each FTE inspector is projected to complete on a weekly and monthly basis and the actual number of inspectors available to conduct inspections.

With the considerable number of resignations/retirements, two inspectors focusing most of their time on whistleblower cases and the inability to fill vacant positions, Illinois OSHA created a table to show their own year to date (YTD) projections based on the available staffing levels. (See Appendix E – FY 2017 State OSHA Annual Report (SOAR), Section VII Adjustments)

The State Plan’s inability to achieve their projected inspection goals is a concern that has directly impacted Illinois OSHA’s completion of their developmental steps. This issue has been monitored for several years as an observation, with the actual number of inspections conducted by Illinois OSHA monitored and discussed on a quarterly basis. Due to the significant shortfall of health inspections (8% of their projected goal) and the continued trend to decline in the actual number of inspections completed, Observation FY 2016-OB-01 is being converted to a finding. The State Plan and OSHA will continue to have discussions exploring possible solutions to effectively address this issue.

Finding FY 2017-02 (FY 2016-OB-01): Illinois OSHA conducted only 50% of the planned safety inspections (252 of 500) and 8% of health inspections (16 of 200).

Recommendation FY 2017-02: Illinois OSHA should establish a method and strategy for developing the planned inspection goals based on staffing and resources, establishing the projected number of inspections to be conducted, and a tracking system to ensure the planned inspection goals are achieved.

Observation FY 2016-OB-04 addressed Illinois OSHA’s “Percent In Compliance” for health inspections, SAMM #9, which was 48.08%, exceeding the FRL of 42.82% in FY 2016. This issue was monitored on a quarterly basis with the State Plan. The FRL for

percent in-compliance for health inspections is +/- 20% of the two year national average of 35.78%, which equals a range of 28.62% to 42.94%. In FY 2017, the State Plan's percent in compliance rates, 29.24% for safety and 35.71% for health, are both within the acceptable FLR rates. Due to the improvements in the health related "Percent In Compliance" level, Observation FY 2016-OB-04 is closed. (Source: Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #9)

Of the 55 inspections reviewed during the FY 2017 assessment, 31 were programmed inspections. As a developmental program, Illinois OSHA created a Site-Specific Targeting (SST) plan in FY 2015. Illinois OSHA's SST plan is their main Program Planned Inspection (PPI) program for state and local government employer establishments. Illinois OSHA uses a high hazard inspection targeting system based on OSHA Instruction CPL 02-00-025, *Scheduling System for Programmed Inspections* (January 4, 1995), which is based on Bureau of Labor Statistics (BLS) injury/illness rate data. The BLS data and the SST plan help Illinois OSHA meet activity measures and achieve its goal of reducing the number of injuries and illnesses that occur at public employer establishments by directing enforcement resources to those establishments where the highest rate of injury and illness has occurred. The state and local government occupations identified include:

- State Support Activities for Transportation (NAICS 488)
- State Nursing and Residential Care Facilities (NAICS 623)
- Local Fire Protection (NAICS 92216)
- Departments of Public Works (NAICS 926120)
- Water and Sewage Treatment Facilities (NAICS 2213)

Illinois OSHA was successful in achieving FY 2017 Strategic Goal #1. Illinois OSHA was successful in all five established annual performance goals associated with their programmed inspections and targeting of the high hazard public occupation goals. The State Plan met or exceeded almost every performance indicator and activity measure in all of these areas. For a detailed discussion, please review Appendix E – FY 2017 State OSHA Annual Report (SOAR) Summary of Annual Performance Plan Results section.

d) Citations and Penalties

In Illinois OSHA's FOM, Chapters 5 and 6 contain the requirements and policies for citations and penalties, respectively. The citations and penalties proposed for issuance are reviewed at multiple levels in the State Plan's management system prior to issuance.

During FY 2017, Illinois OSHA investigators conducted 268 inspections with 499

violations cited. With an average lapse time of 42.54 days for safety inspections and 60.11 days for health inspections, Illinois OSHA is within the FRL for both safety and health inspections. The FRL for the average lapse time is +/- 20% of the two year national average. The range of acceptable data not requiring further review is from 36.23 to 54.35 for safety, and from 44.82 to 67.24 for health inspections. Sixty-six percent (66%) of the inspections resulted in violations and 76.4% of those violations were classified as serious, willful, or repeat.

The 55 FY 2017 case files reviewed were evaluated to determine the success of the State Plan to effectively address several previous findings and observations associated with inspection citations. These include Finding FY 2016-02 - Violations were not addressed by a citation; Finding FY 2016-03 - Citation classification was not supported by the information in the case file; Finding FY 2016-04 - Adequate documentation of the information required to support the violations was lacking; and Observation FY 2016-OB-03 - The severity and probability information lacked clarity for the condition addressed in the citation.

As a result of the on-site case file review, two of the findings are completed, and one is converted to an observation. As previously noted, only 4% (2 of 55) of the case files were found where there appeared to be a failure to issue citations for hazards identified, completing Finding FY 2016-02. Only one of the 55 files had an issue identified in which the violation was classified incorrectly as an OTS rather than a serious, completing Finding FY 2016-03.

Finding FY 2016-04 addressed a lack of adequate documentation of the information required to support the violations in 75% of the files reviewed. The FY 2017 case file review revealed continuous improvement in this area. In FY 2017, only 33% (18 of 55) of the files lacked adequate documentation of the information required to support the violations. The specific concerns included: eight files (15%) lacked documentation of employee exposure; seven files (13%) lacked documentation of employer knowledge; and three files (5%) lacked documentation of the evidence gathered to support the violation. Due to the significant improvement in this area, Finding FY 2016-04 is being converted to an observation to allow for continued monitoring of this issue.

In 13 files (24%), there were concerns with the severity and probability justification in the violations. The severity and probability information was contained in each of the violations, but the information was contradictory or was not directly associated with the condition addressed in the violation. However, in only 11% of the files (six of 55) did the concern rise to a level impacting the citation at a serious level. Severity and probability concerns were previously addressed by Observation FY 2016-OB-03 and

there is a significant improvement identified by the reduction from 77% to 24%. However, concerns with the severity and probability justification will remain as an observation to allow for continued monitoring of this issue.

Observation FY 2017-OB-04 (FY 2016-04): Adequate documentation of the information required to support the violations was not included in 18 of 55 (33%) of the files reviewed.

Federal Monitoring Plan FY 2017-OB-04: OSHA will conduct a limited scope review of selected case files during the next FAME to determine if this item was addressed.

Observation FY 2017-OB-05 (FY 2016-OB-03): In 13 of the 55 (24%) cases, the severity and probability information lacked clarity due to contradictory information or the information was not clearly associated with the condition addressed in the citation.

Federal Monitoring Plan FY 2017-OB-05: OSHA will conduct a limited scope review of selected case files during the next FAME to determine if this item was addressed.

Illinois OSHA is a state and local government only state plan and penalties are not issued for first sanction serious citations. Penalties are issued for repeat and willful citations and during FY 2017, Illinois OSHA issued three repeat violations for a total penalty of \$2,250. The State Plan retained 55.56% (\$1,250) of the penalty issued. The FRL for the percent penalty retained is +/- 15% of the two year national average of 67.44%, which equals a range of 57.32% to 77.56%. While the State Plan's penalty retained level is 1.76% lower than the FLR range, it is not a cause for concern based on the limited number of penalty violations issued and its status as a state and local government only plan. (Source: Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #12)

e) Abatement

Illinois OSHA has continued to focus on proper abatement periods, adequate verification and evidence, and proper utilization of the Petition for Modification of Abatement date (PMA) process. Follow-up inspections were conducted when appropriate. The FY 2017 on-site case file review evaluated the success of the State Plan to effectively close out two previous findings associated with inspection abatement. These include Finding FY 2016-01 - Information documenting interim worker protection during the abatement period was not included in all of the PMAs, and Finding FY 2016-05 – A lack of adequate employer abatement in the case files.

In response to Finding FY 2016-01, Illinois OSHA created a PMA processing form to ensure all PMA requests document the interim worker protection during the abatement period. In all cases reviewed in which a PMA was requested, the form was utilized and clearly documented all of the justification information needed to process the PMA, including the interim worker protection being used by the employer. Finding FY 2016-01 is completed.

Of the 55 case files reviewed, 27 inspections included issued citations needing abatement. One file (4%) did not have abatement evidence found in the file. Another file indicated the hazards were abated on site, but did not include clear evidence in the file. This marks a significant improvement associated with Finding FY 2016-05, in which 29% of the files did not have adequate abatement. Finding FY 2016-05 is completed.

f) Worker and Union Involvement

Illinois OSHA's regulations and written procedures for worker and union involvement are equivalent to federal regulations and procedures. During the opening conference, inspectors are required to verify if workers at the facility are represented by a union. Local union contact information, including names, addresses, and phone numbers, was included in the files. If an "authorized union representative" was not available, any worker at the site, who was a member of the union, was asked to participate in the inspection. The State Plan achieved 100% of SAMM #13 – percent of initial inspections with worker walk around representation or worker interview. (Source: Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #13)

Employee interviews are an important part of any inspection and proper documentation of any interview is essential. The Illinois FOM, Chapter 3, Paragraph VII Walk-around Inspection, requires that employees will be interviewed and that inspectors will document interview statements in a thorough and accurate manner. Eighteen (33%) of the files reviewed had deficiencies associated with conducting and documenting employee interviews. In eight files (15%), there was no indication of any employee interviews and another 10 files (18%) had indications of employee interviews, but no interviews were documented.

Finding FY 2017-03: In 18 of 55 (33%) of the files reviewed, employee interviews were not conducted or properly documented as required by Chapter 3 of the Illinois OSHA FOM.

Recommendation FY 2017-03: Illinois OSHA should ensure employee interview procedures are followed, to include appropriate documentation of the employee

interviews, as outlined in Chapter 3, Paragraph VII of the Illinois OSHA FOM.

3. REVIEW PROCEDURES

a) Informal Conferences

Illinois OSHA's procedures for conducting informal conferences closely align with OSHA's and are outlined in Chapter 7, Post-Citation Procedures and Abatement Verification of the Illinois FOM. As a state and local government state plan, Illinois OSHA does only a handful of informal conferences a year. Employers are given 15 working days to request and participate in an informal conference.

Previous concerns with the documentation of the actions taken during the informal conferences not being included in the case files were identified and being monitored through Observation FY 2016-OB-02. The State Plan addressed the concerns by establishing documents to be used to capture the information and actions along with ensuring at least one person dedicated to take notes was present during every informal conference. As a part of the FY 2017 on-site review, two informal conferences were reviewed. Both files contained extensive meeting notes and documentation associated with the meeting and all actions taken. The employer's arguments and presented evidence was recorded along with the actions taken by the management team. Modifications to the citations, including changes to penalties and classifications, were well-documented and were appropriate for the circumstances, as were follow-up activities associated with the informal conferences. Due to the improvements made in this area, Observation FY 2016-OB-02 is closed.

b) Formal Review of Citations

The contest process is outlined in Chapter 7, Paragraph I, B. When an employer files a Notice of Intent to Contest, the Division Manager forwards the case to the Chief Administrative Law Judge (ALJ), at which time the case is considered to be in litigation. The Illinois Legal Division becomes involved and any action relating to the contested case must first have the concurrence of the Legal Division. Attempts are then made to reach a settlement prior to hearing.

In FY 2017, Illinois OSHA had one contested inspection. In the single contested case, the employer presented an affirmative defense and the citation was withdrawn. Based on the information collected during the inspection and the additional evidence provided by the employer during the contest period, the citation withdrawal is consistent with OSHA precedent.

4. STANDARDS AND FEDERAL PROGRAM CHANGES (FPCs) ADOPTION

a) Standards Adoption

Illinois OSHA’s Standards Adoption Process begins with the Joint Commission on Administrative Rules (JCAR) process within the Illinois General Assembly. During this process, administrative rules are drafted by the state agencies. The process involves two public notices and the ability for public participation. Illinois OSHA is developing an expedited process to address standards which are identically adopted.

Illinois OSHA consistently responds to requests for their intent and adoption of standards in a timely manner. During FY 2016, three applicable standards were required to be adopted by the State of Illinois. During FY 2017, there were three standards requiring adoption.

Illinois OSHA Standards Adoption				
Subject	Intent to Adopt	Adopt Identical	Date Promulgated	Effective Date
Final Rule on Walking-Working Surfaces and Personal Protective Equipment (Fall Protection Systems)	YES	YES	01-17-2017	01-17-2017
Final Rule on Occupational Exposure to Beryllium	YES	YES	07-09-2017	07-09-2017
Final Rule on the Implementation of the 2017 Annual Adjustment to Civil Penalties for Inflation	YES	NO	07-18-2017	07-18-17
Interim Final Rule on Maximum Penalty Increases (2016)	YES	NO	01-01-2017	01-01-2017
Final Rule for Occupational Exposure to Respirable Crystalline Silica	YES	YES	05-01-2016	05-01-2016
Final Rule to Improve Tracking of Workplace Injuries and Illnesses	YES	NO	01-17-2017	01-17-2017

Illinois OSHA mirrors the Federal Program and does not initiate state only rulemaking. Illinois OSHA adopted 83% percent (five of six) of the standards to be adopted during FY 2016 and FY 2017. The single standard not adopted on time was the Final Rule to Improve Tracking of Workplace Injuries and Illnesses. The inability of the federal system to address North American Industrial Classification System (NAICS) codes for state and local governmental entities, as well as the need for the State Plan to develop an alternative approach due to state requirements, delayed the adoption. Illinois OSHA adopted the alternative process shortly after the required adoption date of the Federal rule.

b) Federal Program Change (FPC) Adoption

Illinois OSHA Federal Program Changes Adoption					
Directive Number	Title	Adoption Required, Equivalency Required or Adoption Encouraged/Not Required	Intent to Adopt	Adopt Identical	State Adoption Date
CPL 02-03-007	Whistleblower Investigations Manual CPL 02-03-007	Equivalency Required	YES	YES	03/29/2016
TED 01-00-020	Mandatory Training Program for OSHA Whistleblower Investigators TED 01-00-020	Equivalency Required	YES	YES	12/01/2015
CPL 02-03-006	Alternative Dispute Resolution Process for Whistleblower Protection Program CPL 02-03-006	Adoption Encouraged / Not Required	YES	YES	12/01/2015
CPL 02-03-160	Field Operations Manual Directive CPL 02-00-160	Equivalency Required	YES	NO	04/01/2017
CPL 03-00-020	National Emphasis Program on Shipbreaking CPL 03-00-020	Adoption Required	YES	Yes	03/18/2017
CPL 02-00-159	Field Operations Manual Directive CPL 02-00-159	Equivalency Required	YES	NO	06/01/2016
CPL-02-01-058 2017 944	Enforcement Procedures and Scheduling for Occupational Exposure to Workplace Violence	Adoption Encouraged / Not Required	NO	N/A	02/03/2017
CPL 02-00-003	Consultation Policies & Procedures Manual, Directive CSP-02-00-003	Equivalency Required	YES	YES	11/19/2015

A majority of Illinois OSHA responses regarding FPCs were submitted timely, and the State Plan adopted all of the FPCs on time. Illinois OSHA had a timely response rate of 87%. Of the eight FPCs made during the 2016/2017 period, a response for one FPC was not timely. The State Plan responded 15 days after the response date associated with the Field Operations Manual Directive (CPL 02-00-159).

5. VARIANCES

With the creation of the Illinois Occupational Safety and Health Act [820 ILCS 219] in January 2015, the State Plan implemented administrative rules providing for the granting of temporary or permanent variances. There were no variance requests received or variances granted during FY 2017.

6. STATE AND LOCAL GOVERNMENT WORKER PROGRAM

Illinois OSHA is a state and local government only state plan; 100% of the 268 inspections were in state and local government. While penalties are not issued for first sanction serious citations, penalties are issued for repeat and willful citations. During FY 2017, Illinois OSHA issued repeat violations with a total penalty of \$2,250.

7. WHISTLEBLOWER PROGRAM

Illinois OSHA's whistleblower investigation program is parallel to section 11(c) of the OSH Act. Procedurally, the Illinois OSHA whistleblower program adheres to OSHA's Whistleblower Investigations Manual (WIM), CPL 02-03-005, which provides guidelines for the investigation and disposition of discrimination complaints. On July 1, 2017, the State Plan implemented a new WIM that was reviewed and approved by OSHA in August of 2017.

In FY 2017, the Illinois OSHA whistleblower protection program consisted primarily of an enforcement assistant manager and two public safety inspectors/investigators that split their time between State Plan enforcement and whistleblower investigation duties. Both investigators attended at least one OTI whistleblower course. All intakes were reviewed by the enforcement assistant manager in Springfield, who then assigned them to an investigator for screening.

As a part of the focus to maximize the existing staffing resources available, Illinois OSHA and the IDOL Conciliation and Mediation Division (Con/Med) executed a memorandum of understanding (MOU) on September 29, 2017 to allow Con/Med Labor Conciliators to conduct the investigations of Illinois OSHA whistleblower complaints. The Labor Conciliators bring expertise in whistleblower complaint investigations pursuant to other acts under their enforcement authority. This MOU allows uninterrupted service to all whistleblower complainants and allows Illinois OSHA inspectors to remain focused on safety and health inspections. The MOU does not affect the legal authority to investigate workplace retaliation or whistleblower complaints under state law. Illinois OSHA and all its regulations remain in effect.

During FY 2017, Illinois OSHA received 24 whistleblower complaints. Of those complaints, 14 were administratively closed (58%) and 10 (42%) were docketed. Six of the docketed complaints were reviewed. Of those reviewed, three (50%) were dismissed, two (20%) were settled, and one (17%) was withdrawn.

The previous FY 2015 comprehensive FAME audit resulted in three findings associated with the Illinois OSHA whistleblower program. The findings were:

- FY 2016-07 - Whistleblower intakes/complaints, being dismissed as administratively closed, did not document supervisor concurrence, nor did the closing letters to the complainants document the complainant's concurrence in accordance with the Illinois Whistleblower Investigations Manual Chapter 2.
- FY 2016-08 - Whistleblower intakes/complaints were not reviewed for protected activity, knowledge, adverse action and/or nexus and screened in a timely manner in accordance with the Illinois WIM Chapter 2. On average it took five and a half months to screen a complaint from the date of filing.
- FY 2016-09 - Whistleblower intakes/complaints did not include documentation that an interview or telephone conversation was conducted with the complainant in accordance with the Illinois WIM Chapter 3.

During the FY 2017 review, the intakes and closed complaints were evaluated to determine the status of the previous findings. The intake files were arranged in an order that was easily recognizable and nearly all information was accurate when compared to WebIMIS entries. All of the intakes were properly screened for the prima facie elements and on average it took the State Plan 14 days to screen a complaint from the date of filing. The longest time between filing and screening was 74 days and the shortest was just one day. All of the reviewed cases and intakes were properly documented in WebIMIS. With the substantial improvement in the whistleblower intake and complaint process and management, all three of the previous findings are completed.

The three dismissed and two settled case files were evaluated for proper management and three of the five (60%) files were incorrectly organized. Administrative and evidentiary materials were placed on the wrong side of the file, and two of the files contained medical records. Medical records can be returned to the complainant after completion of the investigation, or if they are not needed at completion of the investigation, they can be destroyed, with the destruction documented in the file. Because medical records require special handling, investigators must familiarize themselves with the requirements of OSHA Instruction CPL 02-02-072, rules of agency practice and procedure concerning OSHA access to employee medical records, dated August 22, 2007.

The whistleblower case files were evaluated for timeliness: the time it took to screen and file complaints, and the time necessary to complete a docketed case file. While the Illinois WIM does not stipulate acceptable times for screening and case file completion, investigators need to be afforded sufficient time to conduct a complete and thorough investigation. The time necessary to complete a case file will vary based on the complexity of the complaint issues,

the cooperation of the complainant and the employer, and the success in gathering all of the necessary evidence. Ideally, employee/employer disputes are resolved between the parties themselves to their mutual benefit without third-party interference. The investigator encourages the complainant and respondent to resolve complaints by agreement before making an administrative determination. Whistleblower investigators have 60 calendar days from the date a complaint is filed to initiate the formal investigation to allow for pre-determination settlement agreements to be made. The Illinois OSHA SAMM report, SAMM #14 and #16, address timeliness of whistleblower case completion. The FRL level for all states is fixed at 90 days for case file completion. Appendix D – FY 2017 State Mandated Measures (SAMM) Report, SAMM #16, indicates that Illinois OSHA averaged 345 days to complete an 11(c) investigation. The on-site docketed cases review found that Illinois OSHA had a 173 day average to complete an investigation. While the discrepancy between the two was not determined, completing investigations in an appropriate time frame is important. The timely completion of Whistleblower investigations was previously addressed by Observation FY 2016-OB-05. Continued changes in the Whistleblower program have resulted in improvement in the completion time frame from an average of 345 calendar days down to a current average of 258 days. The recently implemented changes to allow Con/Med Labor Conciliators to conduct the investigations is expected to continue to have a positive impact in this area. However, the timely completion of Whistleblower investigations will remain as Observation FY 2017-OB-06 to ensure investigation completion timeliness.

Finding FY 2017-04: In two of five (40%) of the files reviewed, medical records were not identified and sequestered as required per the WIM, CPL 02-03-007 Chapter 3.

Recommendation FY 2017-04: Illinois OSHA should provide staff with appropriate training on the rules of agency practice and procedure concerning OSHA access to employee medical records in OSHA Instruction CPL 02-02-072 and ensure employee medical records are identified and sequestered per the WIM, CPL 02-03-007 Chapter 3.

Observation FY 2017-OB-06 (FY 2016-OB-05): All five of Illinois OSHA's 11(c) investigations (100%) took more than 90 days to complete, with an average of 345 days to complete. This is beyond the fixed FRL of 90 days.

Federal Monitoring Plan FY 2017-OB-06: OSHA will discuss internal audits in this area conducted by Illinois OSHA at quarterly monitoring meetings.

8. COMPLAINT ABOUT STATE PROGRAM ADMINISTRATION (CASPA)

In FY 2017, there were three CASPAs filed with OSHA. In all three cases, the State Plan responded openly and cooperatively with all stages of the investigation and provided all of

the requested documentation in a timely manner. Staff was made available for private interviews upon request.

Both CASPA 2017-10 and CASPA 2017-11 alleged that Illinois OSHA did not follow established policies concerning an employee dispute with the findings of a safety and health complaint investigation. It was determined in both of these cases that the State Plan followed their procedure regarding the handling of employee disputes per the requirements of Chapter 9 of the Illinois FOM.

CASPA 2017-12 included three specific allegations: 1) Illinois OSHA did not follow established policies concerning the proper and timely intake, screening and investigation of a discrimination complaint; 2) Illinois OSHA did not review and consider all of the facts when the initial determination was made to resolve the discrimination complaint; and 3) Illinois OSHA did not follow the proper appeals process when the complainant filed a written objection following Illinois OSHA's initial determination of a discrimination complaint. During the course of the CASPA investigation, the complainant withdrew his complaint and indicated that his concerns about Illinois OSHA's administration no longer existed and the CASPA was closed.

9. VOLUNTARY COMPLIANCE PROGRAM

Illinois OSHA created a Safety and Health Achievement Recognition Program (SHARP) for small state and local government employers in FY 2015, which will continue through FY 2020. Illinois OSHA's Annual Performance Goal # 2.2 established a goal to include and award five new state and local government employers by FY 2020. In FY 2017, SHARP recognition was awarded to one site. The State Plan is on target to achieve the FY 2020 goal. (Source – FY 2017 State OSHA Annual Report (SOAR))

10. STATE AND LOCAL GOVERNMENT 23(g) ON-SITE CONSULTATION PROGRAM

Illinois OSHA provides consultation services to state and local government employers through the sharing of 21(d) Consultation Program employees. In the annual performance plan for FY 2017, the State Plan 23(g) On-Site Consultation Program projected 30 total (20 safety and 10 health) state and local government consultation visits. In FY 2017, the State Plan conducted 28 (93%) total visits (13 safety and 15 health). The visits consisted of 28 first time initial visits. All (100%) of the initial visits were in high hazard establishments and 26 (93%) of the establishments had less than 250 employees. The consultants conferred with employees on all 28 visits. The visits resulted in 39 serious hazards being identified, with 100% of the hazards being corrected in a timely manner.

Appendix A – New and Continued Findings and Recommendations

FY 2017 Illinois Comprehensive FAME Report

FY 2017-#	Finding	Recommendation	FY 20XX-# or FY 20XX-OB-#
FY 2017-01	In six of 20 case files reviewed (30%), inquiry procedures associated with adequate abatement evidence were not adhered to in accordance with Chapter 9 of the Illinois OSHA FOM.	Illinois OSHA should ensure inquiry processing procedures are followed, to include appropriate information needed to answer an inquiry from an employer, as outlined in Chapter 9, Paragraph G of the Illinois Field Operations Manual (FOM).	FY 2016-06
FY 2017-02	Illinois OSHA conducted only 50% of the planned safety inspections (252 of 500) and 8% of health inspections (16 of 200).	Illinois OSHA should establish a method and strategy for developing the planned inspection goals based on staffing and resources, establishing the projected number of inspections to be conducted and a tracking system to ensure the planned inspection goals are achieved.	FY 2016-OB-01
FY 2017-03	In 33% (18 of 55) of the files reviewed, employee interviews were not conducted or properly documented as required by Chapter 3 of the Illinois OSHA FOM.	Illinois OSHA should ensure employee interview procedures are followed, to include appropriate documentation of the employee interviews, as outlined in Chapter 3, Paragraph VII of the Illinois OSHA FOM.	
FY 2017-04	In two of five (40%) of the files reviewed, medical records were not identified and sequestered as required per the WIM, CPL 02-03-007 Chapter 3.	Illinois OSHA should provide staff with appropriate training on the rules of agency practice and procedure concerning OSHA access to employee medical records in OSHA Instruction CPL 02-02-072 and ensure employee medical records are identified and sequestered per the WIM, CPL 02-03-007 Ch. 3.	

Appendix B – Observations Subject to New and Continued Monitoring
 FY 2017 Illinois State Plan FAME Report

Observation # FY 2017-OB-#	Observation # FY 20XX-OB-# or FY 20XX-#	Observation	Federal Monitoring Plan	Current Status
FY 2017-OB-01		In six of 20 (30%) of the inquiry complaints reviewed, processing dates entered into OIS did not correspond with case file dates annotated in the case file diary sheets.	OSHA will discuss internal audits in this area conducted by Illinois OSHA during quarterly monitoring meetings.	New
FY 2017-OB-02		In 17 of 55 (31%) of the files reviewed, the inspection opening conference process was not followed as outlined in the Illinois OSHA FOM Chapter 3, Paragraph V, Opening Conference.	Prior to the next FAME, OSHA will conduct a limited scope review of selected case files to determine if this item was addressed.	New
FY 2017-OB-03		In one of two (50%) of the fatality inspections reviewed, Illinois OSHA inspection procedures, as outlined in the Illinois OSHA FOM Chapter 10, were not followed. An on-site visit and employee interview attempts were not conducted until six weeks after the event occurred.	OSHA will review and discuss fatality investigation processes on all new fatality investigations with the State Plan during quarterly monitoring meetings.	New
FY 2017-OB-04	FY 2016-04	Adequate documentation of the information required to support the violations was not included in 18 of 55 (33%) of the files reviewed.	OSHA will conduct a limited scope review of selected case files during the next FAME to determine if this item was addressed.	New
FY 2017-OB-05	FY 2016-OB-03	The Severity and Probability information lacked clarity due to contradictory information or the information was not clearly associated with the condition addressed in the citation.	OSHA will conduct a limited scope review of selected case files during the next FAME to determine if this item was addressed.	Continued
FY 2017-OB-06	FY 2016-OB-05	All five of Illinois OSHA's 11(c) investigations (100%) took more than 90 days to complete with an average of 345 days to complete. This is beyond the fixed FRL of 90 days.	OSHA will discuss internal audits in this area conducted by Illinois OSHA during quarterly monitoring meetings.	Continued

Appendix C - Status of FY 2016 Findings and Recommendations

FY 2017 Illinois Comprehensive FAME Report

FY 2016-#	Finding	Recommendation	State Plan Response/ Corrective Action	Completion Date (if Applicable)	Current Status (and Date if Not Completed)
FY 2016-01	In 100% of the Petition for Modification of Abatement Date (PMA) requests, information documenting interim worker protection during the abatement period was not included as required by Chapter 7 of the Illinois FOM.	Illinois OSHA should ensure that all PMA requests include information documenting interim worker protection during the abatement period.	On May 19, 2016, Illinois OSHA created a new PMA form that will help ensure that all PMA requests document interim worker protection during the abatement period.	May 19, 2016	Completed
FY 2016-02	In 37% (17 of 45) of case files reviewed, apparent violations were not addressed by a citation as required by Chapter 5 of the Illinois FOM.	Illinois OSHA should verify pre-citation review of case files focusing on identifying and ensuring all apparent violations are addressed through the citation process.	Training was held August 23-26, 2016 for all staff members to help ensure pre-citation review of case files focusing on identifying and ensuring all apparent violations are addressed through the citation process. This is also part of CSHO training for new team members.	August 26, 2016	Completed
FY 2016-03	In 29% (13 of 45) of the files reviewed, citation classification was not supported by the information in the case file violation worksheet as required by Chapter 5 of the Illinois FOM.	Illinois OSHA should ensure case file violation worksheets describe the observed hazardous conditions or practices, including all relevant facts to support the citation classification.	Training was held August 23-26, 2016 for all staff members to ensure case file violation worksheets describe the observed hazardous conditions or practices, including all relevant facts to support the citation classification. This is also part of CSHO training for new team members.	August 26, 2016	Completed
FY 2016-04	Adequate documentation of the information required to support the violations was not included in 75% (33 of 45) of the files reviewed.	Illinois OSHA must provide staff with appropriate training on the necessary elements needed to be documented to support each violation.	Training was held August 23-26, 2016 for all staff members on the necessary elements needed to be documented to support each violation. This is also part of CSHO training for new team members.	August 26, 2016	Converted to Observation

Appendix C - Status of FY 2016 Findings and Recommendations

FY 2017 Illinois Comprehensive FAME Report

FY 2016-05	Documentation of adequate employer abatement was not included in 29% (11 of 38) of the case files reviewed as required by Chapter 7 of the Illinois FOM.	Illinois OSHA should ensure that employer abatement verification documentation, including abatement certification, documents, plans, and progress reports, are included in the case file.	Training was held August 23-26, 2016 for all staff members to help ensure that employer abatement verification documentation, including abatement certification, documents, plans, and progress reports, are included in the case file. This is also part of CSHO training for new team members.	August 26, 2016	Completed
FY 2016-06	Inquiry procedures associated with adequate abatement evidence (44% of the files reviewed) and employer abatement response times (56% of the files reviewed) were not adhered to in accordance with Chapter 9 of the Illinois FOM.	Illinois OSHA should ensure inquiry processing procedures are followed, to include appropriate response times and information needed to answer an inquiry from an employer, as outlined in Chapter 9, Paragraph G of the Illinois FOM.	Training was held August 23-26, 2016 for all staff members to help ensure inquiry processing procedures are followed, to include appropriate response times and information needed to answer an enquiry from an employer, as outlined in Chapter 9, Paragraph G of the Illinois FOM. This is also part of CSHO training for new team members.	August 26, 2016	Open
FY 2016-07	Whistleblower intakes/complaints, being dismissed as administratively closed, did not document supervisor concurrence nor did the closing letters to the complainants document the complainant's concurrence in accordance with the Illinois Whistleblower Investigations Manual Chapter 2.	Illinois OSHA should utilize administrative closure letters and review procedures in accordance with the Illinois Whistleblower Investigations Manual.	On April 18-22, 2016 Illinois OSHA Whistleblower staff members received technical assistance from OSHA Whistleblower staff, which included training staff on a number of Whistleblower policies and procedures. On May 13, 2016, Illinois OSHA created administrative closure letter templates; Enforcement Assistant Managers (EAM) reviewed procedures with designated Whistleblower staff; and the EAM and designated Whistleblower staff members will continue to work with OSHA to better ensure compliance with the Illinois Whistleblower Manual procedures.	Administrative Closure Letter, May 13, 2016 Whistleblower Training with OSHA, April 18-22, 2016	Completed

Appendix C - Status of FY 2016 Findings and Recommendations

FY 2017 Illinois Comprehensive FAME Report

FY 2016-08	Whistleblower intakes/complaints were not reviewed for Protected Activity, Knowledge, Adverse Action and/or Nexus and screened in a timely manner in accordance with the Illinois Whistleblower Investigations Manual Chapter 2. On average, it took 5 ½ months to screen a complaint from the date of filing.	Illinois OSHA should implement a tracking system to help ensure specific time frames are met, complaints are being screened as soon as possible upon receipt, and supervisors are verifying applicable coverage requirements.	On April 18-22, 2016, Illinois OSHA Whistleblower staff members received technical assistance from OSHA Whistleblower staff, which included training staff on a number of Whistleblower policies and procedures. On March 23, 2016, Illinois OSHA implemented a tracking system to help ensure specific time frames are met, complaints are being screened as soon as possible upon receipt, and supervisors are verifying applicable coverage requirements.	March 23, 2016	Completed
FY 2016-09	Whistleblower intakes/complaints did not include documentation that an interview or telephone conversation was conducted with the complainant in accordance with the Illinois Whistleblower Investigations Manual Chapter 3.	Illinois OSHA should ensure that all telephone conversations with complainants are documented by way of a memorandum to file or on the case/activity log.	On April 18-22, 2016 Illinois OSHA Whistleblower staff members received technical assistance from OSHA Whistleblower staff, which included training staff on a number of Whistleblower policies and procedures. On May 13, 2016, the Enforcement Assistant Manager (EAM) reviewed procedures with designated Whistleblower staff, and the EAM and designated Whistleblower staff members will continue to work with OSHA to better ensure compliance with the Illinois Whistleblower Manual procedures. Whistleblower intakes/complaints now include documentation that an interview or telephone conversation was conducted with the complainant in accordance with the Illinois Whistleblower Investigations Manual Chapter 3.	May 13, 2016	Completed

Appendix D - FY 2017 State Activity Mandated Measures (SAMM) Report

FY 2017 Illinois Comprehensive FAME Report

U.S. Department of Labor				
Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)				
State Plan: Illinois – ILLINOIS OSHA			FY 2017	
SAMM Number	SAMM Name	State Plan Data	Further Review Level	Notes
1a	Average number of work days to initiate complaint inspections (state formula)	4.88	5 days for safety; 10 days for health	The further review level is negotiated by OSHA and the State Plan.
1b	Average number of work days to initiate complaint inspections (federal formula)	2.02	N/A	This measure is for informational purposes only and is not a mandated measure.
2a	Average number of work days to initiate complaint investigations (state formula)	1.84	TBD	The further review level is negotiated by OSHA and the State Plan.
2b	Average number of work days to initiate complaint investigations (federal formula)	0.15	N/A	This measure is for informational purposes only and is not a mandated measure.
3	Percent of complaints and referrals responded to within one workday (imminent danger)	100%	100%	The further review level is fixed for all State Plans.
4	Number of denials where entry not obtained	0	0	The further review level is fixed for all State Plans.
5	Average number of violations per inspection with violations by violation type	SWRU: 2.12	+/- 20% of SWRU: 1.83	The further review level is based on a two-year national average. The range of acceptable data not requiring further review is from 1.46 to 2.20 for SWRU and from 0.79 to 1.19 for OTS.

Appendix D - FY 2017 State Activity Mandated Measures (SAMM) Report

FY 2017 Illinois Comprehensive FAME Report

		Other: 0.64	+/- 20% of Other: 0.99	
6	Percent of total inspections in state and local government workplaces	100%	100%	Since this is a State and Local Government State Plan, all inspections are in state and local government workplaces.
7	Planned v. actual inspections – safety/health	S: 252	+/- 5% of S: 500	The further review level is based on a number negotiated by OSHA and the State Plan through the grant application. The range of acceptable data not requiring further review is from 475 to 525 for safety and from 190 to 210 for health.
		H: 16	+/- 5% of H: 200	
8	Average current serious penalty in private sector - total (1 to greater than 250 workers)	N/A	+/- 25% of \$2,516.80	N/A – This is a State and Local Government State Plan. The further review level is based on a two-year national average.
	a. Average current serious penalty in private sector (1-25 workers)	N/A	+/- 25% of \$1,706.10	N/A – This is a State and Local Government State Plan. The further review level is based on a two-year national average.
	b. Average current serious penalty in private sector (26-100 workers)	N/A	+/- 25% of \$2,867.94	N/A – This is a State and Local Government State Plan. The further review level is based on a two-year national average.
	c. Average current serious penalty in private sector (101-250 workers)	N/A	+/- 25% of \$3,952.26	N/A – This is a State and Local Government State Plan. The further review level is based on a two-year national average.
	d. Average current serious penalty in private sector (greater than 250 workers)	N/A	+/- 25% of \$5,063.48	N/A – This is a State and Local Government State Plan. The further review level is based on a two-year national average.
9	Percent in compliance	S: 29.24%	+/- 20% of S: 29.53%	The further review level is based on a two-year national average. The range of acceptable data not requiring further review is from 23.62% to 35.44% for safety and from 28.62% to 42.94% for health.
		H: 35.71%	+/- 20% of H: 35.78%	

Appendix D - FY 2017 State Activity Mandated Measures (SAMM) Report

FY 2017 Illinois Comprehensive FAME Report

10	Percent of work-related fatalities responded to in one workday	100%	100%	The further review level is fixed for all State Plans.
11	Average lapse time	S: 42.54	+/- 20% of S: 45.29	The further review level is based on a two-year national average. The range of acceptable data not requiring further review is from 36.23 to 54.35 for safety and from 44.82 to 67.24 for health.
		H: 60.11	+/- 20% of H: 56.03	
12	Percent penalty retained	55.56%	+/- 15% of 67.44%	The further review level is based on a two-year national average. The range of acceptable data not requiring further review is from 57.32% to 77.56%.
13	Percent of initial inspections with worker walk around representation or worker interview	100%	100%	The further review level is fixed for all State Plans.
14	Percent of 11(c) investigations completed within 90 days	0%	100%	The further review level is fixed for all State Plans.
15	Percent of 11(c) complaints that are meritorious	1%	+/- 20% of 25%	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 20% to 30%.
16	Average number of calendar days to complete an 11(c) investigation	345	90	The further review level is fixed for all State Plans.
17	Percent of enforcement presence	N/A	+/- 25% of 1.26%	N/A – This is a State and Local Government State Plan and is not held to this SAMM. The further review level is based on a two-year national average.

NOTE: Fiscal Year 2017 is the second year since the transition from the NCR (OSHA's legacy data system) began that all State Plan enforcement data has been captured in OSHA's Information System (OIS). As such, the further review levels for SAMMs typically referencing a three-year rolling average will instead rely on a two-year average this year. Unless otherwise noted, the data contained in this Appendix D is pulled from the State Activity Mandated Measures (SAMM) Report in OIS and the State Plan WebIMIS report run on November 13, 2017, as part of OSHA's official end-of-year data runs.

Appendix E - FY 2017 State OSHA Annual Report (SOAR)

FY 2017 Illinois Comprehensive FAME Report

ILLINOIS DEPARTMENT OF LABOR

STATE OF ILLINOIS

ILLINOIS OSHA

FY 2017 State OSHA Annual Report (SOAR)

October 1, 2016 through September 30, 2017

Joe Beyer
Acting Director

Bruce Rauner
Governor



DECEMBER 2017

**ILLINOIS DEPARTMENT OF LABOR STATE PLAN
FY 2017 STATE OSHA ANNUAL REPORT**

Table of Contents

I. Executive Summary..... p. 2

II. State Plan Overview..... p. 3

III. Summary of Annual Performance Plan Results..... p. 4-18

IV. Progress Toward Strategic Plan Accomplishments..... p. 19-21

V. Mandated Activities..... p. 22-26

VII. Adjustments..... p. 27-28

EXECUTIVE SUMMARY

The Illinois Department of Labor (IDOL) Illinois OSHA Division submits this State OSHA Annual Report (SOAR) to the Federal Occupational Safety and Health Administration (OSHA) for evaluation of the State program. The SOAR covers activity from October 1, 2016 through September 30, 2017. This submission is in accordance with the State Plan Policies and Procedures Manual dated September 22, 2015.

During FY 2017, Illinois OSHA continued to improve processes, policies and procedures to ensure that program performance goals were met. The following summary of Illinois OSHA's FY 2017 Annual Performance Goals details Illinois OSHA's progress toward meeting all grant requirements and fostering safe and healthful workplaces for all Illinois public sector employees.

STATE PLAN OVERVIEW

IDOL – Illinois OSHA operates a public sector-only OSHA developmental state program. The Division Manager of Illinois OSHA administers the Illinois State Plan under the leadership of the Director of IDOL. Illinois OSHA enforces safety and health standards in public sector workplaces, provides public sector consultation services, investigates public sector occupational safety and health whistleblower complaints, adopts “at least as effective as Federal OSHA standards” and provides public sector outreach services. In Illinois, the U.S. Department of Labor, Occupational Safety and Health Administration enforces private sector safety and health standards.

Safety and health inspectors conduct public sector enforcement activities. Each inspector conducts Programmed Planned Inspections (PPIs), responds to worker complaints and investigates serious accidents, including fatalities. Illinois OSHA ensures employee participation and offers compliance assistance throughout every inspection. A strong enforcement presence establishes an effective deterrent for public sector employers who fail to meet their occupational safety and health responsibilities.

Consultation services, partnerships, and alliances enable state and local government employers to initiate a proactive approach to improving their safety and health management programs and eliminate hazards in their workplaces. Illinois OSHA consultants assist Illinois public sector employers in establishing quality safety and health programs, preventing occupational deaths, injuries and illnesses, identifying and eliminating workplace hazards and interpreting the Illinois Occupational Safety and Health Act and OSHA standards. The consultants note any workplace hazards without issuing citations, penalties or enforcement actions. Illinois OSHA created a Safety and Health Achievement Recognition Program (SHARP) for small public-sector employers in FY 2015, which will continue through FY 2020.

Illinois OSHA’s Whistleblower Investigation Program is parallel to section 11(c) of the OSH Act, with policies and procedures for occupational safety and health whistleblower protection at least as effective as the Federal 11(c) policies. Illinois OSHA and the IDOL Conciliation and Mediation Division (Con/Med) executed a memorandum of understanding (MOU) to allow Con/Med Labor Conciliators to handle Illinois OSHA whistleblower complaints. The Labor Conciliators bring expertise in whistleblower complaint investigations pursuant to other acts under their enforcement authority. This MOU allows uninterrupted service to all whistleblower complainants and allows Illinois OSHA inspectors to remain focused on safety and health inspections. The MOU does not affect the legal authority to investigate workplace retaliation or whistleblower complaints under state law. The Illinois State Plan and all its regulations remain in effect.

SUMMARY OF ANNUAL PERFORMANCE PLAN RESULTS

<p>Strategic Goal #1: Improve workplace safety and health for all public employees as evidenced by fewer hazards, reduced exposures and fewer injuries, illnesses and deaths.</p>															
<p>Annual Performance Goal # 1.1</p>	<p>Reduce the number of worker injuries and illnesses by focusing statewide attention and resources on the most prevalent types of injuries and illnesses in the most hazardous public occupations and workplaces.</p>														
<p>Strategy</p>	<p>Decrease injury and illness rates in state, county and/or local agencies in the specific NAICS segments by two percent by FY 2020.</p> <p>1.1 State Support Activities for Transportation (NAICS 488)</p> <p>OSHA Directive: CPL 02-01-054, Inspection and Citation Guidance for Roadway and Highway Construction Work Zones</p>														
<p>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</p>	<p>Activity Measure:</p> <ul style="list-style-type: none"> • 5 inspections conducted in targeted NAICS • 1 public sector consultation visit conducted in targeted NAICS • 1 outreach/training and education seminar conducted in targeted NAICS • 50 marketing materials distributed <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Each year, track and document targeted NAICS BLS total recordable case data. Evaluate decrease in total recordable cases by 0.4% each year. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Decrease injury and illness rates (total recordable cases) in state, county and/or local agencies in the specific NAICS segments by 2% by FY 2020. 														
<p>FY 2017 Results</p>	<ul style="list-style-type: none"> • 31 inspections conducted • 2 public sector consultation visits conducted • 2 outreach/training and education seminars conducted • 211 outreach materials distributed 														
<p>Conclusion</p>	<p>Illinois OSHA met and exceeded all activity measures for FY 2017.</p> <p>Averaged 2015 & 2016 BLS data revealed a 2% reduction in total recordable cases.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>BASELINE</th> <th>FY 2020 TARGET</th> </tr> </thead> <tbody> <tr> <td>7.3 Total Recordable Cases (TRC) (averaged BLS 2009-2012 for NAICS 488)</td> <td>2% Reduction in TRC</td> </tr> </tbody> </table> <table border="1" style="margin-left: auto; margin-right: auto; margin-top: 10px;"> <thead> <tr> <th>FY 2016 RESULTS</th> <th>FY 2017 RESULTS</th> <th>AVERAGE</th> <th>OVERALL % CHANGE</th> </tr> </thead> <tbody> <tr> <td>7.7 2015 TRC BLS Data</td> <td>6.6 2016 TRC BLS Data</td> <td>7.15</td> <td>2% Reduction in TRC</td> </tr> </tbody> </table>			BASELINE	FY 2020 TARGET	7.3 Total Recordable Cases (TRC) (averaged BLS 2009-2012 for NAICS 488)	2% Reduction in TRC	FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE	7.7 2015 TRC BLS Data	6.6 2016 TRC BLS Data	7.15	2% Reduction in TRC
BASELINE	FY 2020 TARGET														
7.3 Total Recordable Cases (TRC) (averaged BLS 2009-2012 for NAICS 488)	2% Reduction in TRC														
FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE												
7.7 2015 TRC BLS Data	6.6 2016 TRC BLS Data	7.15	2% Reduction in TRC												

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 1.2	Reduce the number of worker injuries and illnesses by focusing statewide attention and resources on the most prevalent types of injuries and illnesses in the most hazardous public occupations and workplaces.												
Strategy	<p>Decrease injury and illness rates in state, county and/or local agencies in the specific NAICS segments by two percent by FY 2020.</p> <p>1.2 State Nursing and Residential Care Facilities (NAICS 623)</p> <p>OSHA Directive: CPL 02-01-052, Enforcement Procedures for Investigating or Inspecting Workplace Violence Incidents</p>												
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	<p>Activity Measure:</p> <ul style="list-style-type: none"> • 1 inspection conducted in targeted NAICS • 1 public sector consultation visit conducted in targeted NAICS • 50 marketing materials distributed <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Each year, track and document targeted NAICS BLS total recordable case data. Evaluate decrease in total recordable cases by 0.4% each year. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Decrease injury and illness rates (total recordable cases) in state, county and/or local agencies in the specific NAICS segments by 2% by FY 2020. 												
FY 2017 Results	<ul style="list-style-type: none"> • 4 inspections conducted • 0 public sector consultation visits conducted • 51 marketing materials were distributed 												
Conclusion	<p>Illinois OSHA met most activity measures for FY 2017. Illinois OSHA made great efforts to perform public sector consultations.</p> <p>Averaged 2015 & 2016 BLS data revealed a 3% reduction in total recordable cases.</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">BASELINE</th> <th style="text-align: center;">FY 2020 TARGET</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">13.2 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 623)</small></td> <td style="text-align: center;">2% Reduction in TRC</td> </tr> </tbody> </table> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">FY 2016 RESULTS</th> <th style="text-align: center;">FY 2017 RESULTS</th> <th style="text-align: center;">AVERAGE</th> <th style="text-align: center;">OVERALL % CHANGE</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">12 2015 TRC BLS Data</td> <td style="text-align: center;">13.7 2016 TRC BLS Data</td> <td style="text-align: center;">12.85</td> <td style="text-align: center;">3% Reduction in TRC</td> </tr> </tbody> </table>	BASELINE	FY 2020 TARGET	13.2 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 623)</small>	2% Reduction in TRC	FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE	12 2015 TRC BLS Data	13.7 2016 TRC BLS Data	12.85	3% Reduction in TRC
BASELINE	FY 2020 TARGET												
13.2 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 623)</small>	2% Reduction in TRC												
FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE										
12 2015 TRC BLS Data	13.7 2016 TRC BLS Data	12.85	3% Reduction in TRC										

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 1.3	Reduce the number of worker injuries and illnesses by focusing statewide attention and resources on the most prevalent types of injuries and illnesses in the most hazardous public occupations and workplaces.												
Strategy	Decrease injury and illness rates in state, county and/or local agencies in the specific NAICS segments by two percent by FY 2020. 1.3 Local Fire Protection (NAICS 92216)												
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	<p>Activity Measure:</p> <ul style="list-style-type: none"> • 65 inspections conducted in targeted NAICS • 2 public sector consultation visits conducted in targeted NAICS • 1 outreach/training and education seminar conducted in targeted NAICS • 50 marketing materials distributed • 1 alliance/partnership established <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Each year, track and document targeted NAICS BLS total recordable case data. Evaluate decrease in total recordable cases by 0.4% each year. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Decrease injury and illness rates (total recordable cases) in state, county and/or local agencies in the specific NAICS segments by 2% by FY 2020. 												
FY 2017 Results	<ul style="list-style-type: none"> • 67 inspections conducted • 7 public sector consultation visits conducted • 4 outreach/training and education seminars conducted • 4,558 marketing materials distributed • 1 partnership established with the Illinois Fire Service Institute 												
Conclusion	<p>Illinois OSHA met and exceeded all activity measures for FY 2017.</p> <p>Averaged 2015 & 2016 BLS data revealed a 10% reduction in total recordable cases.</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <tr> <td style="padding: 5px;">BASELINE</td> <td style="padding: 5px;">FY 2020 TARGET</td> </tr> <tr> <td style="padding: 5px;">10.6 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small></td> <td style="padding: 5px;">2% Reduction in TRC</td> </tr> </table> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="padding: 5px;">FY 2016 RESULTS</th> <th style="padding: 5px;">FY 2017 RESULTS</th> <th style="padding: 5px;">AVERAGE</th> <th style="padding: 5px;">OVERALL % CHANGE</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">9.5 2015 TRC BLS Data</td> <td style="padding: 5px;">9.5 2016 TRC BLS Data</td> <td style="padding: 5px;">9.5</td> <td style="padding: 5px;">10% Reduction in TRC</td> </tr> </tbody> </table>	BASELINE	FY 2020 TARGET	10.6 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small>	2% Reduction in TRC	FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE	9.5 2015 TRC BLS Data	9.5 2016 TRC BLS Data	9.5	10% Reduction in TRC
BASELINE	FY 2020 TARGET												
10.6 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small>	2% Reduction in TRC												
FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE										
9.5 2015 TRC BLS Data	9.5 2016 TRC BLS Data	9.5	10% Reduction in TRC										

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 1.4	Reduce the number of worker injuries and illnesses by focusing statewide attention and resources on the most prevalent types of injuries and illnesses in the most hazardous public occupations and workplaces.												
Strategy	<p>Decrease injury and illness rates in state, county and/or local agencies in the specific NAICS segments by two percent by FY 2020.</p> <p>1.4 Departments of Public Works (NAICS 926120)</p>												
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	<p>Activity Measures:</p> <ul style="list-style-type: none"> • 65 inspections conducted in targeted NAICS • 2 public sector consultation visits conducted in targeted NAICS • 1 outreach/training and education seminar conducted in targeted NAICS • 50 marketing materials distributed • 1 alliance/partnership established <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Each year, track and document targeted NAICS BLS total recordable case data. Evaluate decrease in total recordable cases by 0.4% each year. <p>Primary Outcome Measures:</p> <p>Decrease injury and illness rates (total recordable cases) in state, county and/or local agencies in the specific NAICS segments by 2% by FY 2020.</p>												
FY 2017 Results	<ul style="list-style-type: none"> • 73 inspections conducted • 9 public sector consultation visits conducted • 2 outreach/training and education seminars conducted • 2,619 marketing materials distributed • 1 alliance/partnership established with the Illinois American Water Works Association. 												
Conclusion	<p>Illinois OSHA met and exceeded all activity measures for FY 2017.</p> <p>Averaged 2015 & 2016 BLS data revealed a 13% reduction in total recordable cases.</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <tr> <td style="padding: 5px;">BASELINE</td> <td style="padding: 5px;">FY 2020 TARGET</td> </tr> <tr> <td style="padding: 5px;">7.7 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small></td> <td style="padding: 5px;">2% Reduction in TRC</td> </tr> </table> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center; width: 80%;"> <thead> <tr> <th style="padding: 5px;">FY 2016 RESULTS</th> <th style="padding: 5px;">FY 2017 RESULTS</th> <th style="padding: 5px;">AVERAGE</th> <th style="padding: 5px;">OVERALL % CHANGE</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">7.0 2015 TRC BLS Data</td> <td style="padding: 5px;">6.4 2016 TRC BLS Data</td> <td style="padding: 5px;">6.7</td> <td style="padding: 5px;">13% Reduction in TRC</td> </tr> </tbody> </table>	BASELINE	FY 2020 TARGET	7.7 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small>	2% Reduction in TRC	FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE	7.0 2015 TRC BLS Data	6.4 2016 TRC BLS Data	6.7	13% Reduction in TRC
BASELINE	FY 2020 TARGET												
7.7 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small>	2% Reduction in TRC												
FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE										
7.0 2015 TRC BLS Data	6.4 2016 TRC BLS Data	6.7	13% Reduction in TRC										

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 1.5	Reduce the number of worker injuries and illnesses by focusing statewide attention and resources on the most prevalent types of injuries and illnesses in the most hazardous public occupations and workplaces.												
Strategy	Decrease injury and illness rates in state, county and/or local agencies in the specific NAICS segments by two percent by FY 2020. 1.5 Water and Sewage Treatment Facilities (NAICS 2213)												
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	<p>Activity Measure:</p> <ul style="list-style-type: none"> • 26 inspections conducted in targeted NAICS • 1 public sector consultation visit conducted in targeted NAICS • 50 marketing materials distributed <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Each year, track and document targeted NAICS BLS total recordable case data. Evaluate decrease in total recordable cases by 0.4% each year. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Decrease injury and illness rates (total recordable cases) in state, county and/or local agencies in the specific NAICS segments by 2% by FY 2020. 												
FY 2017 Results	<ul style="list-style-type: none"> • 32 inspections conducted • 2 public sector consultation visits conducted • 2,537 marketing materials distributed 												
Conclusion	<p>Illinois OSHA met and exceeded all activity measures for FY 2017.</p> <p>Averaged 2015 & 2016 BLS data revealed a 7% reduction in total recordable cases</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <tr> <td style="padding: 5px;">BASELINE</td> <td style="padding: 5px;">FY 2020 TARGET</td> </tr> <tr> <td style="padding: 5px;">6.2 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small></td> <td style="padding: 5px;">2% Reduction in TRC</td> </tr> </table> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="padding: 5px;">FY 2016 RESULTS</th> <th style="padding: 5px;">FY 2017 RESULTS</th> <th style="padding: 5px;">AVERAGE</th> <th style="padding: 5px;">OVERALL % CHANGE</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">6.2 2015 TRC BLS Data</td> <td style="padding: 5px;">5.3 2016 TRC BLS Data</td> <td style="padding: 5px;">5.75</td> <td style="padding: 5px;">7% Reduction in TRC</td> </tr> </tbody> </table>	BASELINE	FY 2020 TARGET	6.2 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small>	2% Reduction in TRC	FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE	6.2 2015 TRC BLS Data	5.3 2016 TRC BLS Data	5.75	7% Reduction in TRC
BASELINE	FY 2020 TARGET												
6.2 Total Recordable Cases (TRC) <small>(averaged BLS 2009-2012 for NAICS 488)</small>	2% Reduction in TRC												
FY 2016 RESULTS	FY 2017 RESULTS	AVERAGE	OVERALL % CHANGE										
6.2 2015 TRC BLS Data	5.3 2016 TRC BLS Data	5.75	7% Reduction in TRC										

SUMMARY OF ANNUAL PERFORMANCE GOALS

Strategic Goal #2 To promote safety and health values in public sector workplaces in Illinois.															
Annual Performance Goal # 2.1	To promote public sector employer and employee awareness of, commitment to, and active participation in safety and health.														
Strategy	Performance Goal 2.1 2.1 100% of Illinois OSHA activities will include employee involvement.														
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	<p>Activity Measures:</p> <p><u>Enforcement</u> 700 inspections conducted 700 inspections conducted where employees were conferred with</p> <p><u>Consultation</u> 30 public sector consultation visits conducted 30 public sector consultation visits conducted where employees were conferred with 3 compliance assistance activities (outreach, seminars, etc.) where employees were targeted/involved</p> <p>Intermediate Outcome Measures: Use OSHA's OIS database management system to track and verify 100% of Illinois OSHA activities will include employee involvement.</p> <p>Primary Outcome Measures:</p>														
FY 2017 Results	<p><u>Enforcement</u> 267 inspections conducted. 267 (100%) inspections conducted where employees were consulted with</p> <p><u>Consultation</u> 28 public sector visits conducted 28 (100%) public sector visits conducted where employees were consulted with 6 compliance assistance activities where employees were targeted/involved</p>														
Conclusion	<p>Illinois OSHA met this performance goal for FY 2017.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 35%;">BASELINE</th> <th style="width: 15%;">FY 2017 TARGET</th> <th style="width: 15%;">FY 2017 RESULTS</th> <th style="width: 35%;">% CHANGE</th> </tr> </thead> <tbody> <tr> <td rowspan="3" style="vertical-align: top;"> 100% of Illinois OSHA Enforcement and Consultation activities will include employee involvement. </td> <td style="text-align: center;">267 Inspections conducted</td> <td style="text-align: center;">267 Inspections included employee involvement</td> <td style="text-align: center;">100%</td> </tr> <tr> <td style="text-align: center;">28 Consultations conducted</td> <td style="text-align: center;">28 Consultations included employee involvement</td> <td style="text-align: center;">100%</td> </tr> <tr> <td style="text-align: center;">6 Compliance assistance activities</td> <td style="text-align: center;">6 Compliance assistance activities included employee involvement</td> <td style="text-align: center;">100%</td> </tr> </tbody> </table>	BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	100% of Illinois OSHA Enforcement and Consultation activities will include employee involvement.	267 Inspections conducted	267 Inspections included employee involvement	100%	28 Consultations conducted	28 Consultations included employee involvement	100%	6 Compliance assistance activities	6 Compliance assistance activities included employee involvement	100%
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE												
100% of Illinois OSHA Enforcement and Consultation activities will include employee involvement.	267 Inspections conducted	267 Inspections included employee involvement	100%												
	28 Consultations conducted	28 Consultations included employee involvement	100%												
	6 Compliance assistance activities	6 Compliance assistance activities included employee involvement	100%												

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 2.2	To promote public sector employer and employee awareness of, commitment to, and active participation in safety and health.										
Strategy	Performance Goal 2.2 2.2 Award Safety and Health Achievement Recognition (SHARP) to five new public-sector worksites by FY 2020. Recognize other outstanding contributions to worker safety and health.										
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Activity Measures: <ul style="list-style-type: none"> • 0 new public-sector Safety and Health Achievement Recognitions awarded Intermediate Outcome Measures: <ul style="list-style-type: none"> • 2 new public-sector Safety and Health Achievement Recognitions awarded in FY 2018 or FY 2019. Primary Outcome Measures: Award Safety and Health Achievement Recognitions to five (5) new public-sector worksites by 2020.										
FY 2017 Results	One new public-sector SHARP was awarded to the Staunton Fire Protection District, located in Staunton, Illinois.										
Conclusion	Illinois OSHA met this performance goal for FY 2017. <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">BASELINE</th> <th style="text-align: center;">FY 2017 TARGET</th> <th style="text-align: center;">FY 2017 RESULTS</th> <th style="text-align: center;">% CHANGE</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"> Award Safety and Health Achievement Recognition (SHARP) to one new public-sector worksites per year. *Due to vacancies in the Consultation program and the time necessary to fully conduct a SHARP consultation, IL OSHA will not focus FY 2017 efforts toward finding a new public sector SHARP worksite. In FY 2017, priority will be given to private sector consultation goals. </td> <td style="text-align: center; vertical-align: middle;">0</td> <td style="text-align: center; vertical-align: middle;">1</td> <td style="text-align: center; vertical-align: middle;">100%</td> </tr> </tbody> </table>			BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	Award Safety and Health Achievement Recognition (SHARP) to one new public-sector worksites per year. *Due to vacancies in the Consultation program and the time necessary to fully conduct a SHARP consultation, IL OSHA will not focus FY 2017 efforts toward finding a new public sector SHARP worksite. In FY 2017, priority will be given to private sector consultation goals.	0	1	100%
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE								
Award Safety and Health Achievement Recognition (SHARP) to one new public-sector worksites per year. *Due to vacancies in the Consultation program and the time necessary to fully conduct a SHARP consultation, IL OSHA will not focus FY 2017 efforts toward finding a new public sector SHARP worksite. In FY 2017, priority will be given to private sector consultation goals.	0	1	100%								

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 2.3	To promote public sector employer and employee awareness of, commitment to, and active participation in safety and health.										
Strategy	Performance Goal 2.3 2.3 100% of Illinois OSHA’s public sector initial consultation visits will include site-specific recommendations to improve the safety and health program management system at that facility.										
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Activity Measures: Consultation Activities <ul style="list-style-type: none"> • 30 public sector consultation visits conducted will include site specific • recommendations to improve safety and health program management systems Intermediate Outcome Measures: <ul style="list-style-type: none"> • Use OSHA’s OIS Database Management system to track and verify 100% of Illinois OSHA’s public-sector consultation visits will include site-specific recommendations to improve the safety and health program management system at that facility. Primary Outcome Measures: <ul style="list-style-type: none"> • 100% of Illinois OSHA’s public-sector consultation visits will include site-specific recommendations to improve the safety and health program management system at that facility. 										
FY 2017 Results	<ul style="list-style-type: none"> • 28 public sector consultation visits conducted • 100% of public sector initial consultation visits conducted included site-specific recommendations to improve safety and health program management systems. 										
Conclusion	Illinois OSHA met this performance goal for FY 2017. <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">BASELINE</th> <th style="text-align: center;">FY 2017 TARGET</th> <th style="text-align: center;">FY 2017 RESULTS</th> <th style="text-align: center;">% CHANGE</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">100% of public sector consultation visits conducted included site-specific recommendations to improve safety and health program management.</td> <td style="text-align: center;">28 consultation visits conducted</td> <td style="text-align: center;">28 consultation visits included site specific recommendations</td> <td style="text-align: center;">100%</td> </tr> </tbody> </table>			BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	100% of public sector consultation visits conducted included site-specific recommendations to improve safety and health program management.	28 consultation visits conducted	28 consultation visits included site specific recommendations	100%
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE								
100% of public sector consultation visits conducted included site-specific recommendations to improve safety and health program management.	28 consultation visits conducted	28 consultation visits included site specific recommendations	100%								

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 2.4	To promote public sector employer and employee awareness of, commitment to, and active participation in safety and health.								
Strategy	Performance Goal 2.4 2.4 Conduct compliance assistance activities for high hazard industry organizations/groups concerning the hazards of relevant National Emphasis Programs (NEPs) and OSHA Directives and promoting Illinois OSHA’s On-Site Consultation services.								
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Activity Measures: <u>Consultation Activities</u> <ul style="list-style-type: none"> Number of activities for high hazard industry groups where NEPs and OSHA Directives and public-sector consultation services are promoted including 488, 926120,2213,92216. Intermediate Outcome Measures: <ul style="list-style-type: none"> Use OSHA’s OIS database management system to track compliance assistance activities for high hazard industry organizations/groups concerning the hazards of relevant NEPs and OSHA Directives and promoting Illinois OSHA’s On-Site Consultation services. Increase compliance assistance activities by a minimum of one (1) each year. Primary Outcome Measures: Conduct compliance assistance activities for high hazard industry organizations/groups concerning the hazards of relevant NEPs and OSHA Directives and promoting Illinois OSHA’s On-Site Consultation services. Increase compliance assistance activities by a minimum of one (1) each year for a total of 12 activities by 2020.								
FY 2017 Results	12 compliance assistance activities performed (see detailed list on page 20-21).								
Conclusion	Illinois OSHA met and exceeded this performance goal for FY 2017. <table border="1" data-bbox="544 1476 1396 1808" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: left;">BASELINE</th> <th style="text-align: center;">FY 2017 TARGET</th> <th style="text-align: center;">FY 2017 RESULTS</th> <th style="text-align: center;">% CHANGE</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;"> Illinois OSHA will use FY 2015 as a baseline and will increase compliance assistance activities by a minimum of one each year for a total of 12 by FY 2020. FY 2015 = 7 FY 2016 = 8 FY 2017 = 9 </td> <td style="text-align: center; vertical-align: middle;">9</td> <td style="text-align: center; vertical-align: middle;">12</td> <td style="text-align: center; vertical-align: middle;">133%</td> </tr> </tbody> </table>	BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	Illinois OSHA will use FY 2015 as a baseline and will increase compliance assistance activities by a minimum of one each year for a total of 12 by FY 2020. FY 2015 = 7 FY 2016 = 8 FY 2017 = 9	9	12	133%
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE						
Illinois OSHA will use FY 2015 as a baseline and will increase compliance assistance activities by a minimum of one each year for a total of 12 by FY 2020. FY 2015 = 7 FY 2016 = 8 FY 2017 = 9	9	12	133%						

SUMMARY OF ANNUAL PERFORMANCE GOALS

<p>Strategic Goal #3 To generate public confidence through excellence in the development and delivery of Illinois OSHA’s programs and services.</p>	
<p>Annual Performance Goal # 3.1</p>	<p>Respond to legal mandates (adoptions) so that Illinois public sector workers are provided full protection under the Occupational Safety and Health Act. Increase and improve the number of frontline contacts with appropriate agencies, organizations and services that involve the public sector.</p>
<p>Strategy</p>	<p>Performance Goal 3.1</p> <p>3.1 Investigate 100% of events that result in the death or in-patient hospitalization of one or more employees or an employee’s amputation or an employee’s loss of an eye, as a result of a work-related incident of a public-sector employee within 24 hours.</p>
<p>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</p>	<p>Activity Measures:</p> <ul style="list-style-type: none"> • Number of fatalities, in-patient hospitalizations, amputations, or loss of eye(s) as a result of a work-related incident. • Number of fatalities, in-patient hospitalizations, amputations, or loss of eye(s) as a result of a work-related incidents investigated within one working day of notification. • Number of fatalities, in-patient hospitalizations, amputations, or loss of eye(s) as a result of a work-related incidents that are under NEPs. <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Use OSHA’s OIS database management system to track 100% of events that result in the death or in-patient hospitalization of one or more employees or an employee’s amputation or an employee’s loss of an eye, as a result of a work-related incident of a public-sector employee are investigated within 24 hours. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Investigate 100% of events that result in the death or in-patient hospitalization of one or more employees or an employee’s amputation or an employee’s loss of an eye, as a result of a work-related incident of a public-sector employee within 24 hours.
<p>FY 2017 Results</p>	<p>Through a partnership with the Illinois Emergency Management Agency (IEMA), Illinois OSHA offers a 24 hour, seven days per week answering service which affords Illinois OSHA the ability to respond expeditiously to fatal events or catastrophes at all times.</p> <ul style="list-style-type: none"> • 44 fatalities/catastrophes received • 44 fatalities/catastrophes investigated within one working day of notification.

SUMMARY OF ANNUAL PERFORMANCE GOALS

Conclusion	Illinois OSHA met this performance goal for FY 2017.			
	BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE
	Initiate inspections of fatal incidents and catastrophes within one working day of notification.	44 FAT/CAT received	44 FAT/CAT investigated within one day.	100% Within one working day

SUMMARY OF ANNUAL PERFORMANCE GOALS

<p>Annual Performance Goal # 3.2</p>	<p>Respond to legal mandates (adoptions) so that the Illinois workers in the public sector are provided full protection under the Occupational Safety and Health Act. Increase and improve the number of frontline contacts with appropriate agencies, organizations and services that involve the public sector.</p>
<p>Strategy</p>	<p>Performance Goal 3.2</p> <p>3.2 A. Safety – Initiate 100% of safety complaint inspections within five days of notification. B. Health – Initiate 95% of health complaint inspections within five days of notification, excluding indoor air quality and sanitation issues.</p>
<p>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</p>	<p>Activity Measures</p> <p><u>Safety</u></p> <ul style="list-style-type: none"> • Number of safety complaints received • Number of safety complaint inspections initiated within five days • Number of safety complaints under NEPs <p><u>Health</u></p> <ul style="list-style-type: none"> • Number of health complaints received (non-indoor air quality or sanitation) • Number of health complaint inspections (non-indoor air quality or sanitation) initiated within five days. <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Use OSHA’s OIS database management system to track 100% of safety complaint inspections and 95% of health complaint inspections are initiated within five days of notification. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Safety – Initiate 100% of safety complaint inspections within five days of notification. • Health – Initiate 95% of health complaint inspections within five days of notification, excluding indoor air quality and sanitation issues.

SUMMARY OF ANNUAL PERFORMANCE GOALS

FY 2017 Results	<p>In FY 2017, a total of 174 safety and health complaints were received, 42 of them warranted an inspection.</p> <p><u>Safety</u></p> <ul style="list-style-type: none"> • 93 safety complaints received • 29 of the 93 safety complaints received warranted an inspection. In FY 2017 it took an average of 4.88 days to initiate an inspection. <p><u>Health</u></p> <ul style="list-style-type: none"> • 74 health complaints received • 10 of the 74 health complaints received warranted an inspection. In FY 2017 it took an average of 4.88 days to initiate an inspection. <p><u>Safety & Health</u></p> <ul style="list-style-type: none"> • 7 safety and health complaints received • 3 of the 7 safety and health complaints received warranted an inspection. In FY 2017 it took an average of 4.88 days to initiate an inspection. 																
Conclusion	<p>Illinois OSHA met this performance goal for FY 2017.</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 50%;">BASELINE</th> <th style="width: 15%;">FY 2017 TARGET</th> <th style="width: 15%;">FY 2017 RESULTS</th> <th style="width: 20%;">% CHANGE</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;">Safety – Initiate 100% of safety complaint inspections within five days of notification.</td> <td style="text-align: center; padding: 5px;">29 Safety complaints received</td> <td style="text-align: center; padding: 5px;">29 Investigated within an average of 4.88 days.</td> <td style="text-align: center; padding: 5px;">100% Investigated within five days</td> </tr> <tr> <td style="padding: 5px;">Health – Initiate 95% of health complaint inspections within five days of notification, excluding indoor air quality and sanitation issues.</td> <td style="text-align: center; padding: 5px;">10 Health complaints received</td> <td style="text-align: center; padding: 5px;">10 Investigated within an average of 4.88 days</td> <td style="text-align: center; padding: 5px;">100% Investigated within five days</td> </tr> <tr> <td style="padding: 5px;">Safety & Health – Initiate 100% of safety complaint inspections within five days of notification.</td> <td style="text-align: center; padding: 5px;">3 Safety and Health complaints received</td> <td style="text-align: center; padding: 5px;">3 Investigated within an average of 4.88 days</td> <td style="text-align: center; padding: 5px;">100% Investigated within five days</td> </tr> </tbody> </table>	BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	Safety – Initiate 100% of safety complaint inspections within five days of notification.	29 Safety complaints received	29 Investigated within an average of 4.88 days.	100% Investigated within five days	Health – Initiate 95% of health complaint inspections within five days of notification, excluding indoor air quality and sanitation issues.	10 Health complaints received	10 Investigated within an average of 4.88 days	100% Investigated within five days	Safety & Health – Initiate 100% of safety complaint inspections within five days of notification.	3 Safety and Health complaints received	3 Investigated within an average of 4.88 days	100% Investigated within five days
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE														
Safety – Initiate 100% of safety complaint inspections within five days of notification.	29 Safety complaints received	29 Investigated within an average of 4.88 days.	100% Investigated within five days														
Health – Initiate 95% of health complaint inspections within five days of notification, excluding indoor air quality and sanitation issues.	10 Health complaints received	10 Investigated within an average of 4.88 days	100% Investigated within five days														
Safety & Health – Initiate 100% of safety complaint inspections within five days of notification.	3 Safety and Health complaints received	3 Investigated within an average of 4.88 days	100% Investigated within five days														

SUMMARY OF ANNUAL PERFORMANCE GOALS

Annual Performance Goal # 3.3	Respond to legal mandates (adoptions) so that the Illinois workers in the public sector are provided full protection under the Occupational Safety and Health Act. Increase and improve the number of frontline contacts with appropriate agencies, organizations and services that involve the public sector.								
Strategy	<p>Performance Goal 3.3</p> <p>3.3 To survey customer satisfaction rates for consultation visits in the public sector and ensure that 90% of the services are rated four or higher on a scale of one to five, with five being the most effective. This shows the effectiveness of the program and services from the consumer perspective.</p>								
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	<p>Activity Measures</p> <ul style="list-style-type: none"> • Number of public sector consultation visits conducted • Number of survey responses received where employer rated the consultation visit as highly effective (score of four or higher, on a scale of one to five with five being the most effective). <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Consultation Supervisors will send public sector employers a survey after each consultation visit. All surveys received will be reviewed by the Supervisor to verify a score of four or higher, on a scale of one to five with five being the most effective has been achieved. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • To survey customer satisfaction rates for consultation visits in the public sector and ensure that 90% of the services are rated four or higher on a scale of one to five, with five being the most effective. This shows the effectiveness of the program and services from the consumer perspective. 								
FY 2017 Results	<ul style="list-style-type: none"> • 28 public sector consultation visits conducted • 28 public sector surveys sent. Five were returned and all had a score of four or higher 								
Conclusion	<p>Illinois OSHA met this performance goal for FY 2017.</p> <table border="1" style="margin-left: auto; margin-right: auto; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 40%;">BASELINE</th> <th style="width: 15%;">FY 2017 TARGET</th> <th style="width: 15%;">FY 2017 RESULTS</th> <th style="width: 30%;">% CHANGE</th> </tr> </thead> <tbody> <tr> <td>Customer satisfaction surveys for consultation visits in the public sector are rated four or higher.</td> <td>5 consultation surveys received</td> <td>5 scored four or higher</td> <td>100% scored four or higher</td> </tr> </tbody> </table>	BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	Customer satisfaction surveys for consultation visits in the public sector are rated four or higher.	5 consultation surveys received	5 scored four or higher	100% scored four or higher
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE						
Customer satisfaction surveys for consultation visits in the public sector are rated four or higher.	5 consultation surveys received	5 scored four or higher	100% scored four or higher						

SUMMARY OF ANNUAL PERFORMANCE GOALS

<p>Annual Performance Goal # 3.4</p>	<p>Respond to legal mandates (adoptions) so that the Illinois workers in the public sector are provided full protection under the Occupational Safety and Health Act. Increase and improve the number of frontline contacts with appropriate agencies, organizations and services that involve the public sector.</p>								
<p>Strategy</p>	<p>Performance Goal 3.4</p> <p>3.4 Each year, increase the number of compliance assistance activities (i.e. direct mailings, advertising, newsletters, etc.) conducted or distributed in the public sector.</p>								
<p>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</p>	<p>Activity Measures</p> <ul style="list-style-type: none"> • Number of compliance assistance activities conducted/distributed (i.e. direct mailings, hazard alerts, newsletters) <p>Intermediate Outcome Measures:</p> <ul style="list-style-type: none"> • Use OSHA’s OIS database management system to track compliance assistance activities. Increase compliance assistance activities by a minimum of one each year. <p>Primary Outcome Measures:</p> <ul style="list-style-type: none"> • Each year, maintain and/or exceed the number of compliance assistance activities (i.e. direct mailings, advertising, newsletters, etc.) conducted or distributed in the public sector. Increase compliance assistance activities by a minimum of one each year for a total of 12 activities by FY 2020. 								
<p>FY 2017 Results</p>	<p>12 compliance assistance activities performed (see detailed list on page 20-21).</p>								
<p>Conclusion</p>	<p>Illinois OSHA met and exceeded this performance goal for FY 2017.</p> <table border="1" data-bbox="532 1335 1386 1690"> <thead> <tr> <th data-bbox="532 1335 867 1396">BASELINE</th> <th data-bbox="867 1335 1023 1396">FY 2017 TARGET</th> <th data-bbox="1023 1335 1179 1396">FY 2017 RESULTS</th> <th data-bbox="1179 1335 1386 1396">% CHANGE</th> </tr> </thead> <tbody> <tr> <td data-bbox="532 1396 867 1690"> Illinois OSHA will use FY 2015 as a baseline and will increase compliance assistance activities by a minimum of one each year for a total of 12 by FY 2020. FY 2015 = 7 FY 2016 = 8 FY 2017 = 9 </td> <td data-bbox="867 1396 1023 1690" style="text-align: center;"> 9 compliance assistance activities </td> <td data-bbox="1023 1396 1179 1690" style="text-align: center;"> 12 compliance assistance activities </td> <td data-bbox="1179 1396 1386 1690" style="text-align: center;"> 133% </td> </tr> </tbody> </table>	BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE	Illinois OSHA will use FY 2015 as a baseline and will increase compliance assistance activities by a minimum of one each year for a total of 12 by FY 2020. FY 2015 = 7 FY 2016 = 8 FY 2017 = 9	9 compliance assistance activities	12 compliance assistance activities	133%
BASELINE	FY 2017 TARGET	FY 2017 RESULTS	% CHANGE						
Illinois OSHA will use FY 2015 as a baseline and will increase compliance assistance activities by a minimum of one each year for a total of 12 by FY 2020. FY 2015 = 7 FY 2016 = 8 FY 2017 = 9	9 compliance assistance activities	12 compliance assistance activities	133%						

PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENTS

The strategic plan identifies three fundamental goals to reduce workplace injuries, illnesses and fatalities in Illinois public sector worksites.

- Improve workplace safety and health for all public employees as evidenced by fewer hazards, reduced exposures and fewer injuries, illnesses and deaths.
- Promote safety and health values in Illinois public sector workplaces.
- Generate public confidence through excellence in the development and delivery of
- Illinois OSHA programs and services.

The FY 2017 activities that were conducted toward meeting our strategic plan goals are described below.

Strategic Efforts to Achieve Goal #1:

Improve workplace safety and health for all public employees as evidenced by fewer hazards, reduced exposures and fewer injuries, illnesses and deaths.

- Illinois OSHA's strategy for improving workplace safety and health for all public employees as evidenced by fewer hazards, reduced exposures and fewer injuries, illnesses and deaths is based on addressing specific areas that have the greatest impact on the overall rates. The areas of emphasis in the current Site-Specific Targeting (SST) plan include:
 - State Support Activities for Transportation (NAICS 488)
 - State Nursing and Residential Care Facilities (NAICS 623)
 - Local Fire Protection (NAICS 92216)
 - Departments of Public Works (NAICS 926120)
 - Water and Sewage Treatment Facilities (NAICS 2213)

Illinois OSHA uses a high hazard inspection targeting system based on OSHA Instruction CPL 02-00-025, *Scheduling System for Programmed Inspections* (January 4, 1995), which is based on Bureau of Labor Statistics (BLS) injury/illness rate data. The BLS data and the SST plan helped Illinois OSHA meet activity measures and achieve its goal of reducing the number of injuries and illnesses that occur at public employer establishments by directing enforcement resources to those establishments where the highest rate of injury and illness has occurred.

- Illinois OSHA maintained a strong enforcement presence as an effective deterrent for employers who fail to meet their safety and health responsibilities by conducting comprehensive inspections at locations identified through a Programmed Planned Inspection (PPI) list, based off the SST plan.
- Inspectors encouraged public sector employers to use consultation services to ensure they are performing these tasks in a safe and compliant manner.
- Outreach materials were distributed and compliance assistance conducted to assist with abatement and to raise awareness levels of hazardous conditions in the workplace.
- Averaged 2015 and 2016 BLS data revealed IL OSHA is on track to decrease injury and illness rates (total recordable cases) in state, county and/or local agencies in the specific NAICS segments by 2% by FY 2020.

Strategic Efforts to Achieve Goal #2:

To promote safety and health values in Illinois public sector workplaces.

- 100% of the time there was participation of an employee representative at all inspections and consultation visits conducted.
- Public sector SHARP was promoted at all public-sector consultation visits performed.
- 100% of public sector employers participating in an initial Illinois OSHA On-Site Consultation visit were provided with site-specific recommendations to improve their safety and health program management system.
- In FY 2017, Illinois OSHA performed 12 compliance assistance activities.
 - October 20, 2016 staff presented Illinois OSHA 101 to the Southern Illinois Water Operators Association.
 - October 27, 2016 Southern Illinois Occupational Safety and Health (SIOSH) Day: Illinois OSHA participated as a vendor and presented “Safety Leadership” to more than 50 attendees. IDOL presented WRB Refining, LP with the 2nd Annual Governor’s Safety and Health Award for an Illinois employer.
 - November 3, 2016 staff presented “Snow Plow Operator Safety” to Tazewell County Health Department.
 - January 17, 2017 staff presented “Snow Plow Operator Safety” to the City of Bloomington, Public Works, Streets & Sewers Division.
 - February 7, 2017 Troy Fire Department SHARP Ceremony.
 - March 1, 2017 Downstate Illinois Occupational Safety and Health (DIOSH) Day: Illinois OSHA participated as a vendor. IDOL presented Kevin Gorshe, from CORE Construction, with the 6th Annual Governor’s Safety and Health Award for an individual. More than 600 safety and health professionals attended.
 - March 3, 2017 Illinois OSHA FactSheet for Public Works Departments distributed to more than 100 members of the Illinois Public Service Institute (IPSI).
 - April 25, 2017 Illinois OSHA Fire Department FactSheet distributed to more than 1,500 members of the Illinois Fire Chiefs Association (IFCA).
 - April 25, 2017 Illinois OSHA Fire Department FactSheet distributed to the Illinois Association of Fire Protection Districts (IAFDP) which has approximately 3,000 members.

- May 9, 2017 Mailed consultation brochure and called 44 public nursing home and residential care facilities.
- May 22, 2017 Illinois OSHA FactSheet for Public Works Departments distributed to more than 2,500 members of the Illinois American Water Works Association (IAWWA).
- September 20, 2017 Illinois OSHA had a booth at the Chicagoland Safety Conference with more than 250 attendees.

Strategic Efforts to Achieve Goal #3

Generate public confidence through excellence in the development and delivery of Illinois OSHA programs and services.

- Through a partnership with the Illinois Emergency Management Agency (IEMA), Illinois OSHA offers a 24-hour, seven days per week answering service which affords Illinois OSHA the ability to respond to fatal events or catastrophes expeditiously at any time.
- Using the OSHA Information System (OIS), Illinois OSHA tracks all complaints and referrals to ensure timely assignment and prioritization of imminent danger situations.
- Illinois OSHA public sector consultation surveys track customer satisfaction and ensure that 90% of the services are rated four or higher on a scale of one to five with five being the most effective.
- Developed and distributed outreach materials, Illinois OSHA FactSheets for Fire Departments and FactSheets for Public Works Departments to the following associations:
 - Illinois Public Service Institute (IPSI)
 - Illinois Fire Chiefs Association (IFCA)
 - Illinois Association of Fire Protection Districts (IAFDP)
 - Illinois American Water Works Association (IAWWA).

MANDATED ACTIVITIES

Activities mandated under the OSHA state plan program are considered core elements of Illinois OSHA’s occupational safety and health program. The core elements outlined in the OSH Act (29 CFR 1902) and 29 CFR 1956 for public sector only plans are as follows:

- Prohibition against advanced notice.
- Employee access to hazard and exposure information.
- Safeguards to protect employer trade secrets.
- Employer recordkeeping.
- Legal procedures for compulsory process and right of entry.
- Posting of employee protections and rights.
- Right of employee representative to participate in walk-around.
- Right of an employee to review decision not to inspect (following a complaint).

Mandated activities are tracked on a quarterly basis using the State Activities Measures (SAMM) Report in OIS which compares state activity data to an established reference point. (See FY 2017 SAMM Report)

23(g) State Plans Projected Program Activities

	FY 2017 Projections*		FY 2017 Actuals	
	Safety	Health	Safety	Health
Public Sector Inspections	500	200	251	16
Public Sector Consultations	20	10	13	15

**This assumes a fully staffed and fully trained staff, with 40 available work weeks in the year, and an average of 1.25 inspections per week per Safety/Health Inspector, and is based on previous work experience and past history. Goals are adjusted throughout the year based on staffing levels and training.*

23(g) Compliance Assistance

	FY 2017 Projections		FY 2017 Actuals	
	New	Total	New	Total
SHARP participants- Public-Sector	*0	*0	1	1
Outreach Participants		**3500		6400

**The five-year plan states IL OSHA will award 5 new public sector SHARP worksites by 2020. Due to vacancies in the Consultation program and the time necessary to fully conduct a SHARP consultation, IL OSHA will not focus FY 2017 efforts toward finding a new public sector SHARP worksite. In FY 2017, priority will be given to private sector consultation goals.*

***Outreach participants are the total number of trainees/participants anticipated to be affected by state outreach activities during the period, such as formal training, workshops, seminars, speeches, conferences, and informal worksite training.*

Illinois OSHA met 41.85% of the fully staffed and fully trained year to date projection of 700. During FY 2017, staffing levels fluctuated throughout the year, but mostly consisted of 10 Safety/Health Inspectors, four short of Illinois’ mandated benchmark. Of the 10, seven were fully trained, but during FY 2017, one retired, one was hired and terminated, two spent most of their time on whistleblower cases and three resigned. Due to a considerable number of vacancies and the inability to fill vacant positions, we adjusted the numbers to show year to date projections based on staffing levels. (See Adjustment/Mandated Activities section for a detailed staffing breakdown.) Even with the considerable number of vacancies, Illinois OSHA was 6.5% over the adjusted goal, based on staffing levels, by performing 293 enforcement and whistleblower inspections.

The Illinois On-Site Consultation Project met 93% of the fully staffed year to date projections of 30 public sector consultations. Based on adjusted staffing goals however the program exceeded its goal by performing 28 public sector consultations. (See Adjustment/Mandated Activities section for a detailed staffing breakdown.)

Illinois OSHA's outreach activities in FY 2017 such as formal training, workshops, seminars, speeches, conferences and informal worksite training resulted in 6,400 trainee/participants.

FY 2017 SAMM REPORT
 ILLINOIS OSHA MANDATED ACTIVITIES
 OCTOBER 1, 2016 – SEPTEMBER 30, 2017

SAMM #	Measure	RIDs Selected	All State Plan RIDs	All Federal RIDs	National	
1A	Time to Initiate Complaint Inspections STATE formula (Average Number of Work Days to Initiate Complaint Inspections)	205	70,066	39,036	109,102	
		4.88	7.39	4.67	6.12	
		42	9,480	8,353	17,829	
1B	Time to Initiate Complaint Inspections FEDERAL formula (Average Number of Work Days to Initiate Complaint Inspections)	85	46,788	25,419	72,207	
		2.02	4.94	3.04	4.05	
		42	9,480	8,353	17,829	
2A	Time to Initiate Complaint Investigations STATE formula (Average Number of Work Days to Initiate Complaint Investigations)	156	97,995	18,928	116,923	
		1.84	6.22	0.90	3.18	
		85	15,750	21,064	36,814	
2B	Time to Initiate Complaint Investigations FEDERAL formula (Average Number of Work Days to Initiate Complaint Investigations)	13	41,733	4,650	46,383	
		0.15	2.65	0.22	1.26	
		85	15,750	21,064	36,814	
3	Timely Response to Imminent Danger Complaints and Referrals (Percent of Complaints and Referrals of Imminent Danger Responded to within 1 Day)	2	612	639	1,251	
		100.00%	99.35%	95.52%	97.35%	
		2	616	669	1,285	
4	Number of Denials where entry not obtained	0	5	10	15	
5	Average Number of Violations per Inspection with Violations by Violation Type	SWRU	384	46,950	42,750	89,700
			2.12	1.68	1.93	1.78731544
			181	28,008	22,179	50,187
		OTS	115	41,324	8,486	49,810
			0.64	1.48	0.38	0.992488095
			181	28,008	22,179	50,187
6	Percent of Total Inspections in Public Sector	267	5,730	25	5,755	
		100.00%	13.25%	0.08%	7.61%	
		267	43,238	32,396	75,634	
7	Inspections	Safety	251	33,278	26,617	59,895
		Health	16	9,960	5,779	15,739

FY 2017 SAMM REPORT
 ILLINOIS OSHA MANDATED ACTIVITIES
 OCTOBER 1, 2016 – SEPTEMBER 30, 2017

8	Average Current Penalty per Serious Violation (Private Sector)	Total (1 to greater than 250 Employees)	\$0.00	\$77,605,831.44	\$134,025,675.39	\$211,631,506.83
			\$0.00	\$2,267.92	\$3,717.15	\$3,011.48
			0	34,219	36,056	70,275
		a. 1-25 Employees	\$0.00	\$28,366,996.45	\$55,842,213.12	\$84,209,209.57
			\$0.00	\$1,421.69	\$2,466.31	\$1,976.97
			0	19,953	22,642	42,595
		b. 26-100 Employees	\$0.00	\$18,236,565.87	\$28,990,568.33	\$47,227,134.20
			\$0.00	\$2,571.07	\$4,516.37	\$3,495.20
			0	7,093	6,419	13,512
		c. 101-250 Employees	\$0.00	\$10,221,716.27	\$14,675,390.47	\$24,897,106.74
			\$0.00	\$3,778.82	\$6,024.38	\$4,842.85
			0	2,705	2,436	5,141
d. Greater than 250 Employees	\$0.00	\$20,780,552.85	\$34,517,503.47	\$55,298,056.32		
	\$0.00	\$4,650.97	\$7,571.29	\$6,125.85		
	0	4,468	4,559	9,027		
9	Percent In Compliance	Safety	66	9,113	5,712	14,825
			28.57%	32.35%	25.66%	29.40%
			231	28,170	22,262	50,432
		Health	5	3,053	1,416	4,469
			35.71%	37.25%	31.69%	35.29%
			14	8,195	4,468	12,663
10	Percent of Work Related Fatalities Responded to in 1 Work Day	4	501	753	1,254	
		100.00%	94.89%	97.16%	96.24%	
		4	528	775	1,303	

FY 2017 SAMM REPORT
 ILLINOIS OSHA MANDATED ACTIVITIES
 OCTOBER 1, 2016 – SEPTEMBER 30, 2017

11	Average Lapse Time	Safety	7,359	1,023,734	843,133	1,866,867
			42.54	46.00	44.62	45.36515844
			173	22,257	18,895	41,152
		Health	541	313,099	234,571	547,670
			60.11	50.68	61.57	54.83279936
			9	6,178	3,810	9,988
12	Penalty Retention Percent Penalty Retained	\$1,250.00	\$78,444,071.95	\$143,176,836.63	\$221,620,908.58	
		55.56%	77.06%	65.14%	68.91%	
		\$2,250.00	\$101,792,226.50	\$219,796,879.15	\$321,589,105.65	
13	Percent of Initial Inspections with Employee Walk around Representation or Employee Interview	267	42,724	31,632	74,356	
		100.00%	98.81%	97.64%	98.31%	
		267	43,238	32,396	75,634	

*On 10/19/17 Illinois OSHA received the Q4 cumulative report from the Regional Office. The goal was to correct any discrepancies before the National Office ran the final report on 11/13/17. All discrepancies were quickly corrected and the above SAMM report was generated on 10/25/17. The final report from National Office was the same as the 10/19/17 report. The highlighted sections above show the areas with discrepancies. Illinois OSHA used the 10/25/17 as their final FY 2017 numbers (listed above) and will work with the Regional and National offices to resolve the discrepancies.

ADJUSTMENTS

In FY 2017, Illinois OSHA adjusted mandated activities, inspection procedures and fiscal processes to accomplish current and future performance goals.

Mandated Activities

Illinois OSHA's goal this year was to conduct 700 public sector inspections with a fully trained and staffed program. Illinois OSHA adjusted this goal based on actual fully trained and available staff members in the program. If a position was vacant, or an inspector was not fully trained for part of the year, we considered this in determining our adjusted goal. We used inspectors' monthly goals to calculate weekly goals, and adjusted our annual fully-staffed divisional goals based on the actual number of full-time equivalents (FTEs) on hand and the weeks they were available and fit for duty, in terms of necessary training, to conduct inspections.

Due to a considerable number of resignations/retirements, two inspectors focusing most of their time on whistleblower cases and the inability to fill vacant positions, we created the table below to show year to date (YTD) projections based on staffing levels.

	Fully Staffed YTD Projected	YTD Projected	YTD Totals	Whistleblower	Comments
Jason Funk/Vacant	50	46	43	0	resigned 9/5/17
Melissa Jackson	50	28	26	8	
Jerry Klaric/Vacant	50	30	20	0	retired 4/28/17
Tony LaMaster	50	50	47	0	
Sam Laxman	50	0	3	0	started 6/16/17
Thomas Lu/Vacant	50	0	0	0	started 11/16/16 terminated 3/3/17
Jasmine Mallory/Vacant	50	38	29	13	maternity 12/21/16 - 3/3/17 resigned 9/30/17
Dave Martin/Vacant	50	0	9	0	on contract 11/2016 - 6/1/2017
Mark Morris	50	32	29	0	resigned 6/2/17
Tim Rienstra	0	0	5	1	resigned 7/28/17
Charlie Smith	50	50	51	0	
Zoya Sotirova	0	0	5	0	
Wanda Andrews	0	0	0	3	6/1/17 MOU with Con/Med
Wesley James	0	0	0	1	6/1/17 MOU with Con/Med
Vacant - Safety	50	0	0	0	
Vacant - Safety	50	0	0	0	
Vacant - Safety	50	0	0	0	
Vacant - IH	50	0	0	0	
PROJECTED GOAL	700	274	267	26	293

Illinois OSHA’s goal this year was to conduct 30 public sector consultations with a fully trained and staffed program. We adjusted this goal to reflect actual fully trained and available staff members in the program. If a position was vacant, or a consultant was not fully trained for part of the year, we considered this in determining our adjusted goal. We used consultants’ monthly goals to obtain weekly goals, and adjusted our annual fully staffed divisional goals based on the actual number of FTEs on hand and the weeks they were available and fit for duty, in terms of necessary training, to conduct Consultations. The Division Manager prioritized the Illinois On-Site Consultation Project’s private sector consultations. This accounts for the 6.6% shortfall in meeting public sector consultation goals.

Due to the inability to fill vacant positions, we created the table below to show year to date projections based on staffing levels.

	Public YTD Projections	Public YTD Projections Based on Staffing	Public YTD Totals	Comments
Buhrmester, Rex	7.5	12	13	
Curran, John	0	0	1	Not listed in the grant to perform public sector consultations but assisted with one due to vacancies.
Tisckos, Jeff	7.5	12	12	
Chunes, Mica	0	0	2	
Vacant, IH Cook	7.5	0	0	
Vacant, Safety Cook	7.5	0	0	
PROJECTED GOAL	30	24	28	

Deobligation

The program deobligated \$636,100 during the FY 2017 grant due to vacancies and the inability to fill vacant positions. The deobligation was timely and there were no lapsed funds.