

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

**Iowa Workforce Development
Iowa Division of Labor
Iowa Occupational Safety and Health Administration**



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

Initial Approval Date: July 20, 1973
State Plan Certification Date: September 14, 1976
Final Approval Date: July 2, 1985

**Prepared by:
U. S. Department of Labor
Occupational Safety and Health Administration
Region VII
Kansas City, MO**



Contents

I.	Executive Summary.....	3
II.	State Plan Background.....	4
	A. Background.....	4
	B. Major New Issues.....	5
III.	Assessment of State Plan Performance.....	5
	A. Data and Methodology.....	5
	B. Review of State Plan Performance	6
	1. Program Administration.....	6
	2. Enforcement.....	7
	3. Review Procedures.....	11
	4. Standards and Federal Program Changes (FPCs) Adoption.....	11
	5. Variances.....	13
	6. State and Local Government Worker Program.....	13
	7. Whistleblower Program.....	13
	8. Complaint About State Program Administration (CASPA).....	14
	9. Voluntary Compliance Program.....	14
	10. State and Local Government 23(g) On-Site Consultation Program.....	15
	11. Private Sector 23(g) On-Site Consultation Program.....	15

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 2016 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 Iowa Occupational Safety and Health Administration's (Iowa OSHA) performance during Fiscal Year (FY) 2017, and Iowa OSHA's progress in completing the recommendations of the FY 2016 Follow-up FAME Report. Overall, Iowa OSHA has been responsive to recommendations made in the FY 2016 Follow-up FAME Report and has maintained a high level of program performance.

Iowa OSHA continued a long-term trend in the reduction of injuries and illnesses. Specifically, The U.S. Department of Labor (USDOL) Bureau of Labor Statistics (BLS) injury and illness rates for the State of Iowa continued to drop over the past three years. The rates were as follows: 4.4 in CY 2014, 3.9 in CY 2015 and 3.8 in CY 2016. This represents a 14% decrease from CY 2014. These rates represent the number of injuries and illnesses surveyed per 100 full-time workers. The rates for general industry in Iowa dropped 9% from 5.4 in CY 2014 to 4.9 in CY's 2015 and 2016. Additionally, the rates for the construction industry in Iowa also decreased 9% from 4.5 in CY 2014 to 4.1 in CY 2016.

Iowa OSHA used the credible deterrent effect of civil penalties to influence positive safety and health behavior and obtain significant safety and health protections for workers. Two examples of this occurred through two significant enforcement actions initiated during FY 2017, resulting in civil penalties issued for \$232,000 in FY 2017 and \$306,500 in First Quarter 2018.

Secondly, Iowa OSHA continued certifying and re-certifying worksites for the Voluntary Protection Program (VPP). There were, on average, 41 active VPP participants. Iowa OSHA had two alliances that continued throughout FY 2017, with an additional alliance signed during the year. Partnerships with construction companies continued through FY 2017, with an average of six (6) active participants per quarter. Four (4) partnerships were closed out and five (5) new partnerships were established during FY 2017. There were also six (6) Safety and Health Achievement Recognition Program (SHARP) establishments in FY 2017.

Iowa OSHA made progress in addressing six (6) previous observations from the FY 2016 Follow-up FAME Report. The completion of four (4) observations were related to the following: the State Plan meeting its projected inspection numbers, improving complaint response times, increasing 90-day whistleblower completions, and improving violation assessments. These improvements were sufficient to warrant closing the observations. One (1) new finding was to enhance the organization of complaint case files. Moreover, one (1) observation was to continue to monitor further improvements in complaint response times. Lastly, one (1) observation was converted to a finding to enhance improvement in managing 90-day hazards after on-site VPP evaluations. 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

The Iowa State Plan, referred to as the Iowa Occupational Safety and Health Administration (Iowa OSHA), is part of the Iowa Workforce Development, Labor Services Division and is administered by the Commissioner of Labor who was appointed in 2011. Iowa OSHA adopts most OSHA instructions as promulgated and its enforcement program functions very similar to the federal program with no significant differences. The enforcement program was benchmarked for 16 safety compliance officers and 13 health compliance officers.

During FY 2017, Iowa OSHA conducted 891 inspections, exceeding the 685 inspections projected. Three hundred eighty-eight (388) of the inspections were in construction and 503 were in general industry. The 891 inspections represent a 56% increase over the 569 inspections conducted during FY 2016. Iowa OSHA Consultation and Education conducts public 23(g) and private 21(d) consultation activities in addition to providing training and education services. The consultation and cooperative programs compliment the enforcement effort to reduce exposure to occupational hazards.

Iowa OSHA's budget is a 50/50 match between federal and state funds and additional state appropriated funds needed beyond the 50/50 match. With the exception of 2014 and 2015, Iowa OSHA has historically overmatched the federal match in funding. Iowa OSHA's funding levels from FY 2013 through FY 2017 are shown below in Table 1.

Fiscal Year	Federal Award (\$)	State Plan Match (\$)	100% State Funds (\$)	Total Funding (\$)	% of State Plan Contribution
2017	2,000,600	2,000,600	1,402,777	5,403,977	62.9
2016	2,000,600	2,000,600	795,898	4,797,098	58.0
2015	2,000,600	2,000,600	0	4,001,200	50.0
2014	1,991,600	1,991,600	0	3,983,200	50.0
2013	1,984,550	1,984,550	659,752	4,628,852	57.1

B. Major New Issues

None.

III. Assessment of State Plan Progress and Performance

A. Data and Methodology

OSHA established a two-year cycle for the FAME process consisting of a comprehensive year and a follow up year. Comprehensive years consist of full case reviews and onsite evaluation. During follow up years, OSHA does not perform the level of case review and onsite evaluation associated with comprehensive years. This strategy allows the State Plan opportunity, during the follow up year, to focus on correcting deficiencies identified during the comprehensive year. FY 2017 is a comprehensive year and OSHA conducted an on-site evaluation and a full case file review. A three-person OSHA team, including a whistleblower investigator, conducted full case file reviews. The on-site evaluation was conducted at the Iowa State Plan office between January 9 and February 10, 2018. Management and administrative personnel responsible for the programs and staff members primarily responsible for the VPP, Partnership and Alliance Programs were interviewed in conjunction with the evaluation. OSHA reviewed 268 safety, health, whistleblower, Voluntary Protection Program (VPP), and partnership and alliance case files. The case files were chosen using random selection of safety, health, and whistleblower case files that were closed cases developed during the evaluation period Oct 1, 2016 through September 30, 2017. The population included:

- Fourteen (14) fatality case files
- Forty (40) formal complaint case files
- Eighty (80) non-formal complaint case files
- Twenty (20) employer-reported referral case files
- Twenty (20) non-employer-reported referral case files
- Twenty (20) unprogrammed-related case files
- Forty-one (41) programmed targeted case files
- Thirteen (13) whistleblower case files
- Fourteen (14) Voluntary Protection Program files
- Four (4) partnership files
- Two (2) alliance files

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 (SAMM) Report (Appendix D)
- State Information Report (SIR)
- Mandated Activities Report for Consultation (MARC)

- State OSHA Annual Report (SOAR) (Appendix E)
- State Plan Annual Performance Plan
- State Plan Grant Application
- Quarterly monitoring meetings between OSHA and the State Plan
- Full case file reviews
- OSHA Information System (OIS) reports
- Field Operations Manual (FOM)
- State Plan Application (SPA)
- Iowa Administrative Bulletin (IAB)
- Iowa Administrative Code (IAC)

Each SAMM Report 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, which also includes the FRL for each measure.

B. Review of State Plan Performance

1. PROGRAM ADMINISTRATION

a) Training

Iowa OSHA adopted Directive TED-01-00-019 2014 704, Mandatory Training Program for OSHA Compliance Personnel; and Directive TED 01-00-020, Mandatory Training Program for OSHA Whistleblower Investigators to administrate its training program. The Public Service Managers I tracked individual enforcement officer training and the Consultation and Education Bureau Chief tracked training the compliance assistance and 21(d) programs staff. Staff training during FY 2017 included:

- OSHA Training Institute Course 1230, Incident Investigations, Des Moines, IA, Nov 30 – Dec 7, 2016.
- OSHA Training Institute Course 1310, Investigative Interviewing Techniques, Des Moines, IA, Nov 30 – Dec 7, 2016.
- OSHA Training Institute Course 3030, Concrete Forms and Shoring, Des Moines, IA, June 2017.
- OSHA Training Institute Course 1000, Initial Compliance Course, (new compliance personnel).

- Internal Iowa OSHA Quarterly Training covering new standards, OIS issues, and interpretive guidance.
 - OSHA Training Institute Course 1050, Introduction to Safety Standards for Safety Officers (new compliance personnel).
- b) OSHA Information System (OIS)

Iowa OSHA uses various reports such as: Area Office Operational Reports, Audit and Data Reports, DCAT Reports, Enforcement Activity Reports, State Program Performance Measures Reports, and Trending / Statistic Reports. These reports aid in Iowa OSHA's enforcement management. Case files and various data reports indicate that since the 2014 implementation of OIS in the State Plan, staff members have become efficient with using the system and inputting necessary data.

c) State Internal Evaluation Program Report

Iowa OSHA internally evaluated its program on a quarterly basis to measure progress towards goals and incorporated the evaluated results in its State OSHA Annual Report (SOAR), which can be found in Appendix E.

d) Staffing

The enforcement program was benchmarked for 16 safety compliance officers and 13 health compliance officers with 44.75 full time staff. Staff turnover and filling vacancies for the State Plan was strenuously challenging. Two (2) senior industrial hygienists, three (3) compliance safety and health officers and the Compliance Assistance Specialist (CAS) departed the program for other employment during FY 2017. Consequently, Iowa OSHA took immediate hiring actions to fill the vacated positions. The process of filling a compliance officer position, beginning with vacancy announcements to new compliance personnel completing the OTI Initial Course and conducting their first solo inspection, can take approximately eight (8) to twelve (12) months. The State Plan staffed eleven (11) safety officers and nine (9) health officers by the end of FY 2017.

2. ENFORCEMENT

a) Complaints

The FY 2017 SAMM Report indicated the average number of workdays was 6.35 to initiate formal complaint inspections, which was outside the further review level of five (5) days (SAMM 1A). The 6.35 days represents a 23% improvement compared to 8.24 days in FY 2016. A case file review of 39 formal complaint inspections revealed the average number of days to initiate was 5.6 days. Two of the three review criteria above indicated the number of days to initiate complaint inspections were beyond the further review level.

Thirty-seven of thirty-nine formal complaint inspections (95%) reviewed had inspection result letters sent to the complainant. This represents an improvement over FY 2015 data that indicated of the 59 formal complaint inspections reviewed, 44/59 (75%) showed inspection result letters sent to the complainant. Moreover, the case file review indicated that complaint items were appropriately addressed during the inspections. The SAMM, case files, and OIS Report review did not show any issues with obtaining entry.

The FY 2017 SAMM Report indicated the average number of workdays to initiate complaint investigations was 4.39 (non-formal complaint inquiries), which was outside the further review level of one (1) day. This represents a 13% improvement compared to 5.04 days in FY 2016 (SAMM 2A). An OIS UPA Report for FY 2017 containing 440 complaint investigations shows the average number was 2.4 days to initiate. A case file review of 80 complaint investigations showed that 69 of them were valid. The 69 complaints took an average of 1.6 days to initiate.

Complaint inspection and investigation response times remain outside the further review level. However, due to improvements made in these areas during FY 2017, OSHA will continue to monitor (Observation FY 2016-OB-03) for further improvements.

Observation FY 2017-OB-01 (FY 2016-OB-03): The SAMM data shows the average number of workdays to initiate complaint inspections and complaint investigations were 6.35 and 4.39, respectively. The case file review noted the average number of days to initiate a complaint inspection was 4.29 days and the average number of workdays to initiate a complaint investigation was 0.05 for the sample set.

Federal Monitoring Plan: Complaint inspection and investigation response times will be a subject of monthly discussion for emphasis on making further improvements. Response times will remain a part of quarterly discussions and annual FAME evaluation.

Iowa OSHA policy requires complainants be notified of investigation results when a response is required and contact information is known. Forty (40) of the complaint investigations reviewed required notification of investigation results. Thirty-eight (95%) of the 40 complaints contained notification of investigation results.

Actions taken by Iowa OSHA to notify complainants of investigation results were documented in complaint documents. In 17 of the case files reviewed, Iowa OSHA sent emails to complainants notifying them of the results; however, the emails were not maintained in the case files, which deviates from Iowa OSHA's policy that inspection records be organized and maintained in inspection case files.

Finding FY 2017-01: In 17 of the case files, Iowa OSHA sent emails to complainants notifying them of results; however, the emails were not maintained in the case files.

Recommendation FY 2017-01: Iowa OSHA should ensure that emails or any records made related to non-formal complaint cases are organized and maintained in the case file to which it pertains.

b) Fatalities

The FY17 SAMM Report indicated a 95% fatality response time of one workday (SAMM 10). Thirteen of the 14 fatality case files reviewed had one-day response times. The one (1) fatality not responded to within one day was a law enforcement workplace violence case. Due to its criminal implications, Iowa OSHA elected not to immediately respond. Two (2) of the 14 fatalities were reported untimely and Iowa OSHA issued appropriate penalties. Investigation findings in all case files reviewed were appropriate. With the exception of one case, by request of the family to notify their attorney, family members received appropriate letters.

c) Targeting and Programmed Inspections

The FY 2017 Grant set forth goals of 45 National Emphasis Program (NEP), and 332 State Emphasis Program (SEP) inspections. The inspection categories included:

- Falls - 102
- Amputations - 81
- Grain - 11
- Scaffold - 49
- Trench - 19
- Hexavalent Chromium - 7
- Combustible Dust - 8
- Lead - 13
- Silica - 5
- Primary Metals - 5
- Isocyanates - 5
- Asbestos Removal - 82

OIS data from an Inspection One Liner Report for primary emphasis program inspections in these categories revealed they met or exceeded the inspection goals as set forth in the grant application.

In fact, Iowa OSHA improved its projected inspections versus actual inspections goal in FY 2017. In FY 2016, the State Plan projected 750 inspections; however, Iowa OSHA conducted 569 inspections. In FY 2017, the State Plan projected 685 inspections and Iowa OSHA conducted 891 inspections. Therefore, Observation FY 2016-OB-01 was closed.

According to SAMM Measure 9, Iowa OSHA's percent in compliance (IC) for safety inspections was 41% and 49% for health inspections, falling outside the further review level. An IC analysis shows that Inspection Scheduling for Construction (C-Target)

complaints and unprogrammed related inspections are the primary generators of Iowa OSHA's IC inspections. One hundred thirty-one (65%) of the 203 Construction ICs resulted from C-Target inspections. Iowa OSHA's policy for inspections conducted under the C-Target Program is inspections are site specific rather than employer specific. Therefore, correct application of the program is to inspect all employers on a C-Target worksite, which may generate IC inspections, but ensures fair and equitable treatment of all employers. In addition, this practice develops an accurate inspection history, which is applicable to future inspections. Furthermore, unprogrammed inspections (180) generated 47% of the ICs. In the unprogrammed inspection category, complaints (74) and unprogrammed related (62) inspections generated 36% of all ICs.

d) Citations and Penalties

The FY 2017 SAMM Report indicated that Iowa OSHA had an average of 2.15 Violations per inspection that were serious, willful, repeat, and .51 violations per Inspection that was other than serious (SAMM 5). Iowa OSHA was within the further review level for classifying serious, willful, and report violations.

The team reviewed eighty nine not in compliance case files. The review determined there were 355 violations cited with an average of 3.98 violations per inspection. Two hundred ninety-eight of the violations were serious, willful, repeat, and 57 were other than serious. An OIS Issued Violations report indicated that of the 1,734 violations issued in FY 2017, 1,447 (83%) were serious, and 287 (17%) were other than serious. All apparent cited violations in all files contained evidence to support violations. Grouping of violations were in accordance with Iowa OSHA's policy. The average serious penalty of \$1,381.81 (SAMM 8) falls outside the further review level, which is between \$1,887.60 and \$3,146.00. This was due to the State Plan not being on the same penalty structure as OSHA. The State Plan adopted OSHA's penalty structure, beginning February 11, 2018.

Violations in 78 (88%) of 89 not in compliance case files were appropriately classified as serious, willful, repeat, and other than serious. An additional review of 14 Scan Detail data files indicated that one (1) of the 14 was not appropriately assessed, indicating that 93% were appropriately assessed. Therefore, Observation FY 2016-OB-04 was closed.

e) Abatement

Eighty-five (96%) of 89 not in compliance case files reviewed had appropriate abatement periods. The four (4) percent with inadequate abatement periods was due to abatement exceeding 30 days with no justification for the longer periods documented in the case file as required by Iowa OSHA policy outlined in the FOM. Adequate verification of abatement was evident in 100% of the files.

f) Worker and Union Involvement

The FY 2017 SAMM Report indicated that 99.6% of the inspections included worker walk around representation, or worker interview. One hundred forty-four (94%) of 54 case files reviewed showed workers were interviewed. One hundred thirty-five (94%) of 144 files contained documentation of interviews in the case file.

Lastly, thirty-one of 154 case files showed union affiliation with the inspected establishment. Unions participated during all or partial phases of the inspections in 13 cases (SAMM13).

3. REVIEW PROCEDURES

a) Informal Conferences

The FY 2017 SAMM Report indicated 66% penalty retention, which falls within the FRL (SAMM 12). Thirty-two (36%) of 89 not in compliance case files reviewed contained requests for informal conference. Penalties were reduced in 22 (69%) of the 32 files, and violations were reclassified or vacated in 18 (56%) of 32 files. Penalty retention in the reviewed files was 72%. Additionally, eligible employers received a 50% penalty reduction offer through the Expedited Informal Settlement Agreement program. Reports for Informal Settlement Agreements (ISA) and Expedited Informal Settlement Agreements (EISA) showed that of the 510 not in compliance inspections, there were 342 informal settlements, consisting of 175 ISAs and 167 EISAs. The total ISA penalties collected equaled 67% of \$1,149,300.00 assessed, which equaled \$766,840.00. The total EISA penalties collected equaled 50% of \$524,790.00 assessed, which equaled \$262,395.00. Total penalty involved in the informal settlements was 61% of \$1,674,090.00, which equaled \$1,029,235.00. Changes made during informal conferences were appropriate and documentation was sufficient in all but one case. Iowa OSHA's procedures have been implemented and adequate.

b) Formal Review of Citations

Twenty-seven (3%) of Iowa OSHA's 891 inspections were contested. Penalty reductions in eight files representing 46% of the contested cases, showed an overall 88% penalty retention. Of the 90 violations contained in settled cases, 21 or 23% needing to be withdrawn, 52 or 58% needing to be modified and 17 or 19% had no change. All filing of contested cases were proper and timely. Similar to the Occupational Safety and Health Review Commission, Iowa's Department of Inspections and Appeals oversees litigation of Iowa OSHA's contested inspections. The public can obtain information about the process from the Department's website: <https://dia.iowa.gov/employment-appeal-board-resources>.

4. STANDARDS AND FEDERAL PROGRAM CHANGE (FPC) ADOPTION

a) Standards Adoption

Standards adoption reflects appropriate action in accordance with Iowa statutes. The

Labor Services Division publishes a notice of intended action for public information and possible public hearing. At the end of the comment or hearing period, scheduling of standard adoptions are effective on a specified date in the near future. There were no State Plan-initiated standards during FY 2017.

During FY 2017, Iowa OSHA received and responded timely to three (3) standards adoption notifications (100%). Adoption of one standard in FY 2017, upon completion of legislative action, became effective February 11, 2018. On February 6, 2017, Iowa OSHA submitted its intent to adopt OSHA’s Final Rule on implementation of the 2017 Annual Adjustment to Civil Penalties for Inflation. The legislature passed legislation amending Iowa’s law governing workplace safety and health, Iowa Code Chapter 88, to conform to federal civil penalties. The Governor signed the amendments into law April 12, 2017. Iowa OSHA promulgated the changes on October 25, 2017, which became effective February 11, 2018.

On January 9, 2017, OSHA adopted new standards addressing occupational beryllium exposure in general industry, construction, and shipyards. State Plans were required to adopt an “at least as effective as” rule within six months of promulgation, by July 9, 2017. However, on June 27, 2017, OSHA published a notice of proposed rulemaking proposing to revoke the ancillary provisions applicable to the construction and shipyard sectors, but to retain the new permissible exposure limits (PELs). OSHA will not enforce the provisions of the January 9, 2017, construction and shipyard standards that it has proposed to revoke, while the current rulemaking is underway. Given the unusual circumstances of this rulemaking, in which proposed substantive changes to a standard within six months following its initial promulgation, several State Plans, including Iowa OSHA, have delayed promulgation-pending completion of the second rulemaking.

Table 3 Standards Adoption			
Standard	Response Due Date	Responded Date	Adopted Date
Final Rule to Improve Tracking of Workplace Injuries and Illnesses	7/12/2016	6/14/2016	11/1/2016
Walking Working Surfaces and Personal Protective Equipment	1/18/2017	11/21/2016	4/5/2017
Annual Adjustment to Civil Penalties	3/18/2017	2/6/2017	2/11/2018
Occupational Exposure to Beryllium	3/9/2017	3/9/2017	Delayed

b) Federal Program Change (FPC) Adoption

The State Plan made timely adoption of One (1) Federal Program Change (FPC) in FY 2017. In addition, there was adoption of two other FPCs from previous periods: One upon completion of legislative action for civil penalties and the other upon resolution of internal state issues regarding the change. Presently, there are no past FPCs requiring adoption. See Table 4 below.

Table 4 Federal Program Changes			
Standard	Response Due Date	Responded Date	Adopted Date
Enforcement Procedures and Scheduling for Occupational Exposure to Workplace Violence	3/10/2017	2/28/2017	4/1/2017
CPL-02-00-160 Field Operations Manual	10/01/2016	11/30/2016	2/11/2018
Mandatory Training Program for OSHA Whistleblower Investigators	12/8/2015	11/30/2016	3/1/2017

5. VARIANCES

Iowa OSHA granted one temporary variance in May of 2009. Alternate protections listed in the variance approval order indicate workers have the necessary protections needed to prevent exposure to the hazard.

6. STATE AND LOCAL GOVERNMENT WORKER PROGRAM

Iowa OSHA has policies and procedures for conducting inspections involving state and local government workers. During FY 2017, Iowa OSHA conducted 21 or 2.4% of its inspections in state and local government agencies, which was below the further review level of 4.55 to 5.06. Therefore, OSHA will perform quarterly monitoring in FY 2018 to assess whether this measure continues to trend downward (SAMM 6). Six (6) of 154 case files reviewed were state and local government inspections. Three (3) or 50% of six (6) were not in-compliance and Iowa OSHA imposed monetary penalties. Iowa OSHA follows policy and procedures for informal settlements with state and local government establishments. There was a reduction of penalties in one of the three cases.

7. WHISTLEBLOWER PROGRAM

The State Plan received one-hundred whistleblower complaints during FY 2017. Of these, the State Plan docketed thirty-three complaints for anti-retaliation investigation, administratively closing 66, and one (1) pending completion. Fifteen percent of docketed 11(c) cases were meritorious (SAMM 15). Using FY 2014 as a baseline, the SAMM Report indicated the percent completed within 90 days was 34% (SAMM 13). In comparison 41% was completed within 90 days in 2015, 23% in 2016, and 26% in 2017 (SAMM 14). Iowa OSHA, on average, took 181 days to complete an 11(c) investigation (SAMM 16). All reviewed files contained proper documentation of prima facie allegations, thorough interviews of all parties and witnesses, proper pretext testing, and accurate reports of investigation.

Iowa OSHA improved its percent completed in 90 days from 23% in 2016 to 26% in 2017. Additionally, Iowa OSHA’s 181 average number of days to complete a case in FY 2017 was lower than the average number of days for all State Plans, federal, and national (federal and State Plans combined), which is historically the case. The average number of days for all State Plan were 227. The Whistleblower Activity Measures Reports show the average number of days for federal was 260. The average number of days for state and federal combined was 247. Iowa OSHA improved its percentage completed in 90 days and is still outperforming all State Plans, federal, and national in the number of days it takes to complete a case. Consequently, Observation FY 2016-OB-02 was closed. To ensure continuous improvement, Iowa OSHA should further review its internal policies and procedures to identify efficiencies and resources that would aid in increasing the percent of whistleblower investigations completed within 90 days. Table 5 below shows Iowa OSHA’s progress towards its Outcome Goal 2.

Lastly, Iowa OSHA appointed and trained a backup Whistleblower Protection Program (WPP) investigator in the event of an emergency or departure of its only investigator. Consequently, Observation FY 2016-OB-06 was closed.

Table 5 Whistleblower SAMM (14, 15, 16)						
Fiscal Year	Percent Completed within 90 Days (SAMM 14)	% Change of 90 Day Completion to Baseline (SAMM 14)	Percent Meritorious for Iowa (SAMM 15)	Percent Meritorious for All State Plans (SAMM 15)	Average # of Days to Complete for Iowa (SAMM 16)	Average # Days to Complete for All State Plans (SAMM 16)
2017	26%	-24%	15%	21%	181	227
2016	23%	-32%	14%	17%	140	214
2015	41%	+21%	31%	19%	126	139
2014 (baseline)	34%					

8. COMPLAINT ABOUT STATE PROGRAM ADMINISTRATION (CASPA)

OSHA did not receive any CASPAs pertaining to Iowa OSHA in FY 2017.

9. VOLUNTARY COMPLIANCE PROGRAM

Iowa OSHA's written policies and procedures for voluntary and cooperative programs are substantially the same as OSHA's Voluntary Protection Programs (VPP) Policies and Procedures Manual CSP 03-01-003 (VPP Manual) and are adequate to accomplish the program's goals. The State Plan adopted federal directives for the Voluntary Protection Program (VPP) and the Safety and Health Achievement Recognition Program (SHARP). Iowa OSHA published its own instruction for its partnership program, which is substantially similar to the federal partnership directive and appropriately provides non-enforcement incentives. There were no changes made to the State Plan's voluntary and cooperative programs during FY 2017.

Observation FY 2016-OB-05, related to the managing of 90-day items resulting from onsite evaluations, was converted to a finding in FY 2017. OSHA reviewed fourteen (14) or 34% of 41 active voluntary protection program cases for program management, in accordance with the VPP Manual. Twelve (12) of 14 cases reviewed should have contained a 90 day hazard management letter from the applicant or participant. Of the 12, none (100%) contained the required letter.

The applicant or participant has a maximum of 90 days to correct uncontrolled hazards, as long as interim protection is occurring, with correction occurring before the final onsite evaluation report can be processed. The VPP Manual requires applicant or participant's management to provide the onsite evaluation team leader a signed letter showing appropriate and timely corrections. Iowa OSHA did not require a letter from management stating appropriate and timely correction. Instead, Iowa OSHA relied on the applicant or participant to submit their corrections within 90-days.

Finding FY 2017-02 (FY 2016-OB-05): Twelve (86%) of the 14 VPP cases reviewed should have contained a 90 day hazard management letter from the applicant or participant. Of the 12, none (100%) contained the required letter.

Recommendation FY 2017-02: Iowa OSHA should ensure that applicants and participants submit 90-day hazard management letters when required.

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

The State Plan accomplished twenty-two state and local government consultation visits during FY 2017. Seventeen of the visits were late in the 4th quarter of FY 2017 and the State Plan proposed hazards identified during those 17 visits during the 1st quarter of FY 2018. In keeping with preceding years, most requests for assistance stemmed from indoor air quality issues most often related to mold or inadequate ventilation. Unlike previous years, most visits were to city and county governments during FY 2017.

11. PRIVATE SECTOR 23(g) ON-SITE CONSULTATION PROGRAM

Iowa OSHA's employers benefited from the consultation program's education staff through training on the use of safety and health management programs to help reduce injury and illness rates. In fact, the program affected 5,363 outreach participants through consultation provided training during FY 2017. This was a 24% increase over its 2014 baseline of 4324 participants impacted through training. Additionally, youth engagement in safety and health continued through general industry and construction training venues for youth workers. Venues included community colleges and the State Training School. The total number of training sessions for young workers in FY 2017 was eight.

Consultation program staff coordinated eight (8) events during the National Stand Down for Falls During the 3rd quarter of FY 2017. Event activities included fall protection training and fall protection equipment demonstrations, affecting the 590 workers who participated. All of Iowa OSHA's partnership sites participated in the Stand Down.

The State Plan regularly scheduled monthly visits with each partnership site during FY 2017. The State Plan accomplished walk-arounds, identification and correction of all hazards during regularly scheduled visits. There were eight to nine partnerships, on average, each quarter during the year. There were five (5) new partnerships during the year and six (6) closed out with final evaluations accomplished.

No injuries occurred falling under OSHA's mandatory reporting requirements and there were no partnership site fatalities during FY 2017. Partnership jobsite total recordable incident (TRC) and days away/restricted or job transfers (DART) rates were below the State Plan and national average for general contractors.

Construction partnerships during FY 2017 had approximately 8,423 workers participate in OSHA outreach programs.

Iowa OSHA had forty-one (41) companies in VPP Star status during FY 2017. One (1) company achieved VPP Star status in FY 2017 and two companies did not renew, due to a change in ownership and corporate direction. There were six (6) Safety and Health Achievement Recognition Program (SHARP) participants and three (3) alliance participants active during the year. The State Plan visited 125 jobsites, which resulted in uncovering and correcting 350 serious and 16 other-than-serious hazards that exposed approximately 2,865 workers.

The compliance assistance staff continued working with the Employer's Councils of Iowa to provide employers and workers training throughout the state. The Employer's Council members include representatives from Iowa Workforce Development, community colleges, local business development groups, and other government organizations.

Appendix A – New and Continued Findings and Recommendations

FY 2017 Iowa OSHA Comprehensive FAME Report

FY 2017-#	Finding	Recommendation	FY 2016-# or FY 2016-OB-#
FY 2017-01	In 17 of the case files, Iowa OSHA sent emails to complainants notifying them of results; however, the emails were not maintained in the case files.	Iowa OSHA should ensure that emails or any records made related to non-formal complaint cases are organized and maintained in the case file to which it pertains.	
FY 2017-02	Twelve (86%) of the 14 VPP cases reviewed should have contained a 90 day hazard management letter from the applicant or participant. Of the 12, none (100%) contained the required letter.	Iowa OSHA should ensure that applicants and participants submit 90-day hazard management letters when required.	FY 2016-OB-05

Appendix B – Observations Subject to New and Continued Monitoring

FY 2017 Iowa OSHA Comprehensive FAME Report

Observation # FY 2017-OB-#	Observation# FY 2016-OB-# or FY 2016-#	Observation	Federal Monitoring Plan	Current Status
FY 2017-OB-01	FY 2016-OB-03	The SAMM data shows average number of workdays to initiate complaint inspections and complaint investigations to be 8.93 and 4.21 respectively. The case file review noted the average number of days to initiate a complaint inspection was 4.29 days and the average number of workdays to initiate a complaint investigation was 0.05 for the sample set.	Complaint inspection and investigation response times will be a subject of monthly discussion for emphasis on making further improvements. Response times will remain a part of quarterly discussions and annual FAME evaluation.	Continued
	FY 2016-OB-01	Iowa OSHA projected accomplishment of 750 inspections in FY 2016. The actual versus projected inspections conducted were 569.	Monitoring completed. Inspection projection exceeded.	Closed
	FY 2016-OB-02	The SAMM Report shows the percent of whistleblower complaints completed within 90 days was 34% in FY 2014, increased to 41% in FY 2015, and decreased to 23% in FY 2016.	Monitoring completed. Progress in 90-day completions is sufficient to close observation.	Closed
	FY 2016-OB-04	While Iowa OSHA's penalty assessment system is equivalent to OSHA, it did not follow it in all cases. It appeared that in 13 of the 78 not in-compliance case files, the severity assessment and violation classification was not applied in accordance with the Iowa FOM Chapter 6.	Monitoring completed. Progress made in penalty assessment is sufficient to close observation.	Closed
	FY 2016-OB-05	A VPP applicant or participant has a maximum of 90 days to correct uncontrolled hazards, providing the use of interim protection that needs correction prior to processing the final onsite evaluation report. Iowa OSHA does not require a letter from management stating the appropriate and timely interim protection methodology. Instead, Iowa OSHA relies on the applicant or participant to submit the corrections within 90 days. (See discussion under Section III.)		Converted to Finding
	FY 2016-OB-06	The Iowa OSHA Whistleblower Protection Program (WPP) does not have any personnel available to investigate whistleblower complaints in the event of any emergency or departure.	Monitoring completed. Iowa appointed and trained a backup WPP investigator.	Closed

Appendix C - Status of FY 2016 Findings and Recommendations

FY 2017 Iowa OSHA Comprehensive FAME Report

FY 2016-#	Finding	Recommendation	State Plan Corrective Action	Completion Date (if Applicable)	Current Status (and Date if Item is Not Completed)
	None.				

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

FY 2017 Iowa OSHA State Plan Comprehensive FAME Report

U.S. Department of Labor				
Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)				
State Plan: Iowa – IOWA 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)	6.35	5	OSHA and the State Plan negotiate the further review level.
1b	Average number of work days to initiate complaint inspections (federal formula)	4.63	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)	4.39	1	OSHA and the State Plan negotiate the further review level.
2b	Average number of work days to initiate complaint investigations (federal formula)	2.59	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)	N/A	100%	There is a fixed level for further review for all State Plans. N/A – The State Plan did not receive any imminent danger complaints or referrals in FY 2017.
4	Number of denials where entry not obtained	0	0	There is a fixed level for further review for all State Plans.

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

FY 2017 Iowa OSHA State Plan Comprehensive FAME Report

5	Average number of violations per inspection with violations by violation type	SWRU: 2.15	+/- 20% of SWRU: 1.83	A two-year national average is the further review level. 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.
		Other: 0.51	+/- 20% of Other: 0.99	
6	Percent of total inspections in state and local government workplaces	2.36%	+/- 5% of 4.82%	The basis for a further review level is a number negotiated by OSHA and the State Plan through the grant application. The range of acceptable data not requiring further review is from 4.58% to 5.06%.
7	Planned v. actual inspections – safety/health	S: 660	+/- 5% of S: 418	The basis for a further review level is a number negotiated by OSHA and the State Plan through the grant application. The range of acceptable data not requiring further review is from 397.10 to 438.90 for safety and from 253.65 to 280.35 for health.
		H: 231	+/- 5% of H: 267	
8	Average current serious penalty in private sector - total (1 to greater than 250 workers)	\$1,381.81	+/- 25% of \$2,516.80	The basis for a further review level is a two-year national average. The range of acceptable data not requiring further review is from \$1,887.60 to \$3,146.00.
	a. Average current serious penalty in private sector (1-25 workers)	\$736.13	+/- 25% of \$1,706.10	The basis for a further review level is a two-year national average. The range of acceptable data not requiring further review is from \$1,279.58 to \$2,132.63.
	b. Average current serious penalty in private sector (26-100 workers)	\$1,042.99	+/- 25% of \$2,867.94	The basis for a further review level is a two-year national average. The range of acceptable data not requiring further review is from \$2,150.96 to \$3,584.93.
	c. Average current serious penalty in private sector (101-250 workers)	\$1,503.97	+/- 25% of \$3,952.26	The basis for a further review level is a two-year national average. The range of acceptable data not requiring further review is from \$2,964.20 to \$4,940.33.
	d. Average current serious penalty in private sector (greater than 250 workers)	\$2,817.81	+/- 25% of \$5,063.48	The basis for a further review level is a two-year national average. The range of acceptable data not requiring further review is from \$3,797.61 to \$6,329.35.

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

FY 2017 Iowa OSHA State Plan Comprehensive FAME Report

9	Percent in compliance	S: 40.57%	+/- 20% of S: 29.53%	The basis for a further review level is 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: 48.89%	+/- 20% of H: 35.78%	
10	Percent of work-related fatalities responded to in one workday	94.74%	100%	There is a fixed level for further review for all State Plans.
11	Average lapse time	S: 30.69	+/- 20% of S: 45.29	The basis for further review level is 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: 36.09	+/- 20% of H: 56.03	
12	Percent penalty retained	65.67%	+/- 15% of 67.44%	The basis for further review level is 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	99.66%	100%	There is a fixed level for further review for all State Plans.
14	Percent of 11(c) investigations completed within 90 days	26%	100%	There is a fixed level for further review for all State Plans.
15	Percent of 11(c) complaints that are meritorious	15%	+/- 20% of 25%	The basis for further review level is 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	181	90	There is a fixed level for further review for all State Plans.
17	Percent of enforcement presence	1.36%	+/- 25% of 1.26%	The basis for further review level is a two-year national average. The range of acceptable data not requiring further review is from 0.95% to 1.58%.

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

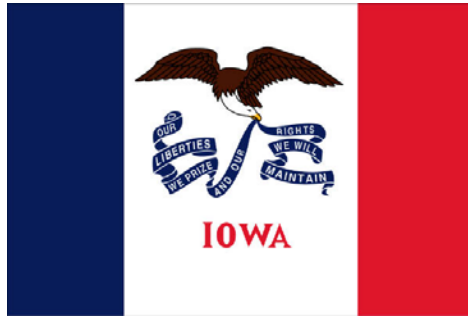
FY 2017 Iowa OSHA State Plan Comprehensive FAME Report

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)

**FFY 2017 State OSHA Annual Report (SOAR)
Iowa**

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



Prepared by: Jens Nissen

Submitted:

December 15, 2017

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

I. Executive Summary

The Iowa Occupational Safety and Health Administration (IOSHA) completed the third year of its strategic plan cycle that began in FFY 2015.

Iowa OSHA remains committed to providing workplace environments that are safe, healthy, and productive and allows businesses to grow and flourish as the State of Iowa supports statewide economic growth. We are committed to our strategic performance plan to assure that workplaces maintain safe and healthful working conditions for all employees that are free of recognizable hazards and free of retaliation.

Iowa OSHA submitted separate 23(g) grant and 21(d) cooperative agreement applications for FFY 2017. Therefore, only a discussion of the portions of the 21(d) Consultation Activity Projection Plan (CAPP) that support 23(g) activities are incorporated in this 23(g) SOAR. A submission of a separate Consultation Annual Progress Report (CAPR) to the Regional and National Office will occur. The Division of Labor Services' organization chart is included in Appendix A on page 18.

Iowa OSHA requested and received a \$668,877 increase in appropriation funding from the State of Iowa only for state fiscal years (SFY) 2016 and 2017. Unfortunately, due to a 2017 mid-year budget cut and those funds did not become available from the Iowa Division of Labor's state appropriation. These additional funds would have allowed Iowa OSHA to continue to fill vacancies and provide for general expenditures throughout the year.

The total number of Iowa OSHA enforcement inspections versus its projected inspections was up during FFY 2017. This was primarily due to a shift in inspection resources to construction activities. The addition of three Compliance Safety and Health Officers provided additional personnel resources to address inspection needs. The newer inspection staff completed OSHA Training Institute training and was able to perform inspection activity as opposed to the previous fiscal year where the filling of positions occurred during the year and new personnel had not yet attended mandatory OTI training. Over this past year two (2) Sr. Industrial Hygienists, three Compliance Safety and Health Officers and the Compliance Assistance Specialist (CAS) left employment with the Iowa Division of Labor. IOSHA is in the process of filling those vacancies. Enforcement inspection staff and Consultants regularly attended staff development meetings where discussion of various Iowa OSHA Enforcement topics, such as standard changes, interpretive guidance, directives and the OSHA Information System.

Managerial and supervisory staff at Iowa OSHA has remained relatively constant during this review period. In fact, there was only one administrative change that resulted in a new Deputy Labor Commissioner. Iowa's Labor Commissioner was appointed in 2011 and remains in this position. The Iowa OSHA Administrator, Iowa OSHA Consultation and Education Bureau Chief and two Public Service Manager 1 Enforcement supervisors remain unchanged. These two Public Service Manager 1 positions are responsible for the direct daily supervision of enforcement field staff, which includes safety inspectors and industrial hygienists. Duties include daily work assignments for field staff inspections; training new staff through accompanied visits and assisting with complicated inspections; evaluation of each inspector's

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

work performance for annual evaluations; evaluation of additional training needs and requirements; providing technical

assistance and answering questions from the public and coworkers; conducting informal settlement conferences and reviewing documentation for violation abatement and corrective means; and providing assistance to the Iowa OSHA Administrator and the Labor Commissioner.

The enforcement supervisors also take an active role in outreach and encouraging partnerships and alliances. They provide training sessions to our enforcement staff and public presentations when called upon by employers and interest groups.

Iowa OSHA continued to foster a solid working relationship with the Federal Area OSHA office and the Regional Administrator. The Labor Commissioner, Iowa OSHA Administrator, Iowa OSHA Consultation and Education Bureau Chief, and the enforcement Public Service Managers participate in all Monday morning Region VII conference calls. IOSHA also continued to meet quarterly with the Area and Regional office staff to discuss Iowa OSHA's performance and goals.

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

Workers Memorial Day once again witnessed too many families, friends and loved ones paying tribute to those lost on the job. A well-received ceremony honoring thirty- four (34) workers including those that died in events outside Iowa OSHA's jurisdiction. There were twenty-two (22) Iowa OSHA fatality inspections in FFY 2017. This represents an 8.3% decrease in the number of fatalities from the previous year's number of 24 fatality inspections.

II. Summary of Annual Performance Plan Results

There were 891 enforcement inspections during FFY 2017. There were 388 construction and 503 general industry inspections. There were 1,388 violations (1,015 safety and 373 for health). There was a 56% increase in the number of inspections compared to the previous fiscal year's 569 inspections. The number of violations cited increased by 26%. There was a single Iowa OSHA significant enforcement inspection issued in FFY 2017. The total penalty for this inspection as issued was \$232,000. The case has a good outcome with the employer paying \$200,000 after contesting the citations as well as upholding the majority of the citations. An additional inspection conducted, for the most part, in FFY 2017, had citations issued in the first quarter of FFY 2018. The penalty as issued was \$306,500.

The US Department of Labor (USDOL) Bureau of Labor Statistics (BLS) injury and illness rates for the State of Iowa continued to drop over the past three years. The rates were as follows: 4.8 in the baseline calendar year (CY) 2013, 4.4 in CY 2014, 3.9 in CY 2015 and 3.8 in CY 2016. This represents a 14% decrease from CY 2014. These rates represent the number of injuries and illnesses surveyed per 100 full-time workers. The rates for general industry in Iowa dropped 9%

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

from 5.4 in CY 2014 to 4.9 in CY's 2015 and 2016. The rates for the construction industry in Iowa also decreased 9% from 4.5 in CY 2014 to 4.1 in CY 2016. BLS collected and published

The measured data rate for the non-fatal injury and illness rates is by calendar year so this performance goal must look at rate changes for a calendar year rather than by fiscal year.

Iowa OSHA conducted 22 occupational fatality inspections in FFY 2017. This represented a decrease of 8.3% from the previous year. There were 15 fatality inspections in general industry, matching FFY 2016's fatalities. There were seven fatality inspections in the construction industry. This represented a 22% decrease from the nine construction fatalities in FFY 2016.

Unprogrammed inspections again comprised the greatest number of inspections conducted by Iowa OSHA. There were 509 unprogrammed inspections out of 891 total inspections. This increase from 481 in FFY 2016 represents a 6% increase in unprogrammed inspections. However, the total number of programmed inspections rose from 89 in FFY 2016 to 382 in FFY 2017. This shows the number of unprogrammed activities, e.g. employer reported referrals and complaints have remained relatively constant. However, with the inclusion of new enforcement staff IOSHA was able to refocus on programmed activities. Programmed inspection lists remain based primarily on emphasis programs. Local emphasis programs (LEPs) were used for targeting purposes for: Construction by Zip Codes, Amputations, Asbestos in Construction, Falls in Construction, Scaffolding, Temp Workers and Grain Handling. National emphasis programs (NEPs) for Combustible Dust, Primary Metals, Amputations, Lead, Silica, Chemical Plants, Trenching and Construction Targeting.

There were one hundred (100) Whistleblower complaints received for FFY 2017. Of those one hundred (100) complaints received, the state was able to docket thirty-three (33) discrimination complaints. There was a recommendation of dismissal for thirty-eight (38) complaints. A withdrawal of one (1) case, settlement of five (5) cases, and ten (10) cases are still pending. Among those complaints received; nine (9) untimely complaint filings; administrative closing of five (5) complaints due to lack of participation; and thirteen (13) chose not to proceed. Additionally, the state made referrals of thirty-three (33) complaints to other regulatory agencies, such as the Iowa Civil Rights Commission, or other organizations. The state made referrals of Nine (9) complaints to Region VII under Surface Transportation Assistance Act (STAA). Referrals of seven additional complaints to Region VII of various regulations, such as the Food Safety Modernization Act and Federal Railroad Safety Act.

Iowa OSHA 23(g) training and education staff members continued participating in the Voluntary Protection Program (VPP) teams auditing VPP worksites for re-certifications, renewals, and new sites. Currently Iowa has forty-one (41) active VPP participants. The program did see an increase in one new participant but also lost two due to change of ownership and corporate direction. Although we encouraged companies to strive for VPP in 2017, they wanted to defer until FFY 2018. We do anticipate the evaluation of additional companies who submit applications in FY 2018.

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

There were two alliances that continued to be active through FFY 2017: Master Builders of Iowa and the Iowa Renewable Fuels Association. Additionally, the State has a signing of a third alliance with the IBEW 55, Transmission and Distribution Union, USDOL Des Moines Area Office, and Iowa OSHA.

Partnerships with construction companies continued through FFY 2017 with an average of six (6) each quarter. Four (4) were completed and five (5) new were added. The performance goal of adding one (1) new partnership to the baseline is not conducive to available resources and the vacancy of the CAS in the 3rd quarter. As Partnerships end, the State will pursue new partnerships that may benefit from our services

There were six Safety and Health Achievement Recognition Program (SHARP) establishments that continued into FFY 2017. The continuation adding one additional location to a level of seven into FFY 2018 through our continued effort and promotion of the SHARP program is still a goal.

Iowa OSHA has reviewed and taken the following action for the SOAR period FFY 2017 on Federal program changes (directives may have been modified to reflect procedures relevant to the Iowa OSHA Program):

1. Federal Program Change Memo for OSHA Instruction CPL-02-00-160 Field Operations Manual Directive dated 08/02/2016 – Iowa OSHA intends to adopt on 02/11/2018. This change required legislative action, which took place during the third quarter.
2. Federal Program Change Memo for OSHA Instruction TED-01-00-020 Mandatory Training Program for OSHA Whistleblower Investigators dated 10/08/2015 – Iowa OSHA adopted this directive on 03/01/2017.
3. Federal Program Change Memo for OSHA Instruction for CPL-02-01-058 Enforcement Procedures and Scheduling for Occupational Exposure to Workplace Violence dated 01/10/2017 – Iowa OSHA adopted this directive on 04/01/2017.

III. Progress Toward Strategic Plan Accomplishments

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

Iowa OSHA planned to reach this main performance goal by breaking it down into three performance goals, further subdivided into outcome, strategic, and performance goals. The three performance goals were Building Awareness, Broadening Support, and Building Commitment/Buy In. Improved targeting was used to direct resources for maximum effect. Strengthening infrastructure by improving training and targeting enabled Iowa OSHA to create effective and meaningful change to unsafe workplaces.

Strategic Goal 1 Reduce Exposure to Occupational Hazards

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

The main goal was to reduce Iowa's incident rate of occupational injuries and illnesses to at least the national average. Continuation of many of the activities in this goal from previous strategic plans exists. Iowa OSHA capitalized on this experience to provide a higher standard of service to Iowa's workplaces.

Progress in Achieving Iowa OSHA Performance Goal 1 was assessed by tracking outreach program development and participation:

5-Year Outcome Goal 1: Continually decrease incidences of fatalities, injuries, illnesses and amputations to meet or exceed the national average by the year 2019.
IOSHA Strategic Objective 1.1: Secure safe and healthy workplaces, particularly in high risk industries.
Performance Goal 1.1: Improve workplace safety and health through compliance assistance and the enforcement of safety and health regulations and standards. Reduce occupational injury and illness rates and the number of fatalities by three percent (3%) as listed below.
Strategy: Focus IOSHA resources by coordinating both enforcement and consultation and education interventions to maximize effectiveness for each workplace and employee impacted. Also utilize enforcement inspections, consultation surveys, and outreach interventions synergistically to reduce injuries and illnesses throughout the state.
Performance Indicators: Percent difference in Total Recordable Case Rate (TRC) and change in number of fatalities.
Baseline: Number of occupational fatality inspections noted in the FFY 2014 Federal Annual Monitoring and Evaluation (FAME) report for Iowa OSHA. US Department of Labor, Bureau of Labor Statistics - Table 6. Incident rates of nonfatal occupational injuries and illnesses by industry and case types, 2013. These nonfatal incident rates are published annually in the fourth quarter for the previous calendar year.

Progress in Achieving IOSHA Performance Goal 1.1a.1 was assessed by tracking the outcome of the number of fatalities:

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

FFY 2017 Iowa OSHA Performance Goal 1.1a.1		Assess progress by tracking the outcome of the number of fatalities:						
<i>Fatality Outcome Measures</i>	FFY 2014 Baseline	FFY 2015 Total	FFY 2016 Total	FFY 2017 Total	FFY 2017 1st Qtr	FFY 2017 2nd Qtr	FFY 2017 3rd Qtr	FFY 2017 4th Qtr
Total number of fatalities	27	18	24	22	6	5	8	3
Number of General Industry fatalities	12	13	15	15	5	2	5	3
Number of Construction fatalities	15	5	9	7	1	3	3	0

Progress in Achieving IOSHA Performance Goal 1.1a.2 was assessed by tracking the outcome of the non-fatal injury and illness rate changes published by the BLS in October for each previous calendar year:

FFY 2017 Iowa OSHA Performance Goal 1.1a.2		Assess progress by tracking the outcome of the non-fatal injury and illness rate changes by calendar year (CY):				
<i>Non-Fatal Outcome Measures</i>	CY 2013 Baseline	CY 2014	CY 2015	CY 2016	CY 2017	CY 2018
Percent change in the injury and illness Total Recordable Case rates for Iowa	4.8	4.4	3.9	3.8		
Percent change in the injury and illness Total Recordable Case rates for General Industry in Iowa	5.5	5.4	4.9	4.9		
Percent change in the injury and illness Total Recordable Case rates for Construction in Iowa	3.8	4.5	4.2	4.1		

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

Progress in Achieving IOSHA Performance Goal 1.1b was assessed by tracking the number of enforcement interventions:

Enforcement FFY 2017 Iowa OSHA Performance Goal 1.1b	Assess progress by tracking number of inspections:					
<i>Performance Measure</i>	Baseline FFY 2016	FFY 2017 Total	FFY 2017 1st Qtr.	FFY 2017 2nd Qtr.	FFY 2017 3rd Qtr.	FFY 2017 4th Qtr.
Private Sector - Number of inspections associated with fall hazards in construction	95	262	22	42	105	93
Private Sector - Number of inspections associated with fall hazards in general industry	13	73	14	23	13	23
Number of Safety Emphasis Program Related Codes						
Falls	91	222	22	48	87	65
Amputations	136	199	39	51	60	49
Grain	9	20	2	2	3	13
Scaffold	46	147	4	15	64	64
Trench	15	17	2	4	5	6
Construction/Zip Code	67	297	26	55	108	108
Temp Workers	5	14	5	4	3	2
Total all safety emphasis programs	369	916	100	179	330	307

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

Number of Health Emphasis Program Related Codes						
Asbestos	115	140	24	38	39	39
Hexavalent Chromium	4	2	2	0	0	0
Combustible Dust	4	6	2	2	0	2
Lead	14	13	6	1	4	2
Silica	5	9	1	0	5	3
Primary Metals	3	5	2	1	0	2
Isocyanates	6	2	1	1	0	0
Chemical Plant	5	16	2	3	7	4
Total all health emphasis programs	156	193	40	46	55	52
Percent of inspections that are LEP / NEP coded	63%	75%	70%	70%	81%	76 %
Public Sector - Number of Safety Inspections (<i>state & local government</i>)	13	14	1	5	5	3
Public Sector - Number of Health Inspections (<i>state & local government</i>)	15	7	1	3	1	2
Total Number of Inspections	569	891	141	207	270	273
Total Number of Severe Incidents Reported and Inspected	172	205	41	46	56	62
Fatalities	24	22	6	5	8	3
catastrophes	0	1	0	0	1	0
Amputations	53	52	9	13	12	18
Hospitalizations	94	129	26	28	34	41
Enucleations	1	1	0	0	1	0
Total Number of Incidents Reported and RRI or Not Inspected	312	228	67	64	53	44
Fatalities	48	37	6	14	9	8
Amputations	90	35	11	10	8	6
Hospitalizations	173	155	50	40	36	29

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

Enucleations	1	1	0	0	0	1
--------------	---	---	---	---	---	---

*Progress in Achieving **IOSHA Performance Goal 1.2.1** was assessed by tracking the outcome of Consultation Program support assistance:*

Compliance Assistance FFY 2017 Iowa OSHA Performance Goal 1.2.1	Assess progress by tracking number of interventions:					
<i>Performance Measure</i>	Baseline FFY 2014	FFY 2017 Total	FFY 2017 1st Qtr.	FFY 2017 2nd Qtr.	FFY 2017 3rd Qtr.	FFY 2017 4th Qtr.
Private Sector - Number of visits associated with falls in construction	45	158	32	36	44	46
Private Sector - Number of visits associated with falls in general industry	5	26	1	7	7	11
Private Sector - Total Number of consultation Safety visits	149	269	49	68	74	78
Trench	4	16	2	0	1	13
Amputations	16	56	11	12	14	19
Combustible Dust	4	16	0	4	1	11
Grain	2	5	1	0	0	4
Nursing Homes	9	7	0	1	4	2
Residential Building Construction	0	16	2	4	8	2

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

Commercial and Institutional Building Construction	0	170	34	41	47	48
Highway and Street Construction	0	3	0	0	1	2
Site Preparation / Demolition	0	1	1	0	1	0
Power and Communication Lines	0	1	0	0	1	0
Lead	1	3	2	0	0	1
Silica	6	24	1	4	8	11
Isocyanates	0	0	0	0	0	0
Primary Metals	1	4	2	0	2	0
PSM Covered Chemical Facilities	0	0	0	0	0	0
Other - scrap, waste, refuse, etc.	0	286	54	68	80	84
Total all safety visit emphasis programs	85	608	110	134	168	197
Private Sector - Total Number of consultation Health visits	65	99	13	25	34	27
Hexavalent Chromium	8	8	1	5	1	1
Amputations	19	32	2	11	8	11
Combustible Dust	2	6	0	2	1	3
Lead	3	5	0	0	3	2
Silica	7	17	3	4	4	6
Primary Metals	0	6	1	2	2	1
Isocyanates	5	3	1	2	0	0
Nursing Homes	12	7	0	1	4	2
Trenching	0	2	0	0	1	1
Noise - Hearing Conservation / Respirators	3	31	4	8	7	12
Other - scrap, waste, refuse, etc.	0	100	6	31	28	35
Total all health visit emphasis programs	59	217	18	66	59	74
Private Sector - Percent of visits that are LEP / NEP	67.3%	81.2%	77.1%	78.3%	83.9%	57.2%

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

Public Sector - Number of consultation visits	20	22	3	1	1	17
Public Sector - Number of hazards corrected	54	1	0	1	0	0*

* The hazards for the public sector consultations were written in FFY 2018.

Progress in Achieving IOSHA Performance Goal 1.2.2 was assessed by tracking the outcome of the number of Compliance Assistance Program interventions:

Cooperative Programs and Training FFY 2017 Iowa OSHA Performance Goal 1.2.2	Assess progress by tracking number of interventions:						
	Baseline FFY 2014	FFY 2017 Goal	FFY 2017 TOTAL	FFY 2017 1st Qtr.	FFY 2017 2nd Qtr.	FFY 2017 3rd Qtr.	FFY 2017 4th Qtr.
Number of training sessions	73	Increase by 10%	154	34	55	40	25
Number of employees	4,323	Increase by 100 employees	5,363	1,261	2,258	1,401	443
Number of Partnerships	14	Increase by 1	8	8	7	4	5
Number of employees	25,394	Increase by 100 employees	8,423	4,609	1,490	1,034	1,290
Number of SHARP	6	Increase by 1	6	6	6	6	6
Number of VPP	46	Increase by 1	41	42	40	40	41

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

*Progress in Achieving **IOSHA Performance Goal 1.2.3** was assessed by tracking the outcome of the participation in Compliance Assistance Program interventions:*

Training FFY 2017 Iowa OSHA Performance Goal 1.2.3	Assess progress by tracking number of interventions:					
<i>Performance Measure</i>	Baseline FFY 2014	FFY 2017 Total	FFY 2017 1st Qtr.	FFY 2017 2nd Qtr.	FFY 2017 3rd Qtr.	FFY 2017 4th Qtr.
1. Increase in training programs:						
a. Fall hazards in general industry	4	51	7	18	17	9
b. Fall hazards in construction	14	89	19	36	16	18
c. Youth	6	8	0	3	5	0
2. Increase in outreach activities to establishments covered by NEP and LEP	116	114	30	28	24	32
3. Increase in outreach activities to establishments in agriculture	5	3	0	2	1	0

23 (g) Enforcement Program Activities:

Iowa OSHA continued providing traditional direct interventions through mandated enforcement activities, consultation activities and compliance assistance and outreach activities.

Iowa OSHA worked to reduce hazards by intervening at targeted work sites by focusing on inspections at work sites that experienced fatalities, severe injury incidents, employee

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

complaints, and by participation of high-hazard work sites in recognition programs. Iowa OSHA used the USDOL BLS rates for the previous data collection year published annually in October as an indicator to determine if Iowa OSHA had a positive impact on fatality, injury and illness rates.

Iowa OSHA continued to focus on amputations and hospitalizations as well as construction activities. The emphasis and other targeting programs developed for Iowa is on the web page <http://www.iowaosha.gov/iowa-osha-guidance>. There were 669 coded inspections for Iowa OSHA, with one or more safety and health LEPs. The changes in Iowa OSHA enforcement targeting programs in the past several years have improved Iowa OSHA inspection performance.

In addition to the direct intervention inspections, Iowa OSHA continued to dedicate one Sr. Industrial Hygienist as a duty officer who addressed 504 non-formal complaints in FFY 2017. Dedicating one staff member to act as duty officer has allowed Iowa OSHA to handle these informal complaints more consistently with better hazard correction and verification.

Utilizing one-person to process complaints, trends, and repeat offenders allows for easier detection. In addition, the duty officer answered numerous questions, from other entities forwarding inquiries to Iowa OSHA as well as through the e-correspondence system and responsiveness to numerous phone calls.

Iowa OSHA adopted the revised OSHA incident reporting recordkeeping rule on January 14, 2015. The Sr. Industrial Hygienist duty officer and Iowa OSHA Administrator took most of the 433 Severe Incident reports received during FFY 2017. 205 incidents resulted in an inspection including 22 work related fatalities. In addition, there were 228 incidents reported that resulted in an RRI or “no action” because the incident was out of the scope for an Iowa OSHA intervention, for example, reports of workers that died of natural causes in the work place.

Iowa OSHA enforcement completed 891 inspections; nearly 57% more inspections than the 569 inspections conducted in FFY 2016. The direct relationship of increased number of inspections related to the ability of IOSHA to shift resources back to construction activities. In the previous year due to staffing issues (open positions) and the necessity to address, severe incident reports IOSHA had to shift resources away from construction in order to address the incident reports. The number of construction enforcement inspections increased from 176 in FFY 2016 to 388 inspections in FFY 2017. IOSHA also attempted to conduct an additional 87 inspections during this federal fiscal year. The “no inspections” were primarily related to programmed construction activities where the “process was not active”.

Iowa Education staff continued to promote and educate employers on the use of safety and health management programs through direct contact as well as through training programs. The outreach to improve safety and health programs is an important effort to reduce injury and illness rates in this state.

Iowa OSHA provided training to 4323 outreach participants in FFY 2014 and increased the number of outreach participants by 24% in FFY 2017 with 5363 outreach participants.

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

The Compliance Assistance Specialist continued to identify methods to educate and engage youths in safety. Training venues for youthful workers included community colleges and the State Training School. Topics included both general industry and construction. The total number of training sessions for young workers in FFY 2017 was eight.

Iowa OSHA again participated in the National Stand Down for Falls held during the 3rd Quarter of FFY 2017. There were eight (8) activities and 590 employees participated. These activities included fall protection training, demonstrations of fall protection equipment and fall hazards. All of the Iowa partnership sites participated, including those participating in the alliance with Master Builders of Iowa and Kirkwood Community College Outreach Center.

The Training and Education Section maintains an inventory of 19 Spanish-speaking safety videos that are available for lending to those employers seeking assistance in training their

employees. The State is maintaining a supply of quick cards and other OSHA publications printed in Spanish is for distribution as needed.

The Compliance Assistance Specialist was the primary contact for partnerships in the State of Iowa and visited with each partnership on a regularly scheduled monthly basis. The designated representatives accompanied him from the general contractor and the subcontractors on a walkthrough of the jobsite. The parties identified hazards and other issues on the walk-around and the identified hazards became the basis for focused training for the employees. On the average, there were eight to nine partnerships each quarter during FFY 2017. There were five (5) new partnerships during the year and six (6) closed out with final evaluations done.

The compliance assistance staff was onsite at each partnership jobsite at least once a month in addition to staying in contact through email and cell phone. There were no serious injuries that met the mandatory reporting criteria or fatalities that occurred on partnership sites during FFY 2017. The jobsite TRC/DART rates were below the state and national average for general contractors. Construction partnerships during FFY 2017 had approximately 8423 employees participate in all the outreach programs. The decrease was in part due to the focus towards smaller projects.

There were three (3) alliances active through FFY 2017: Iowa Renewable Fuels Association, Master Builders of Iowa and International Brotherhood of Electrical Workers, Local 55. The Iowa OSHA formal Alliance with the Iowa Renewable Fuels Association (IRFA) continued through FFY 2017 and was renewed for another two years. The focus of this alliance is to share information on hazard recognition, control and best management practices among association members and Iowa OSHA personnel, through quarterly meetings. The IRFA covers Iowa's renewable ethanol and bio-fuels industries. In October 2016, the signing of an additional alliance with International Brotherhood of Electrical Workers, Local 55, Federal OSHA Des Moines Area Office, and Iowa OSHA ..

The Iowa OSHA formal Alliance with Master Builders of Iowa (MBI) continued through FFY 2017 and was renewed for another two years. The focus of this alliance is to share information

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

on hazard recognition, control and best management practices in the construction industry. Iowa OSHA Consultation worked cooperatively with MBI to reach construction companies who are normally not accessible. These include contractors who work exclusively with MBI and do not generally use our services, as well as subcontractors of those contractors and contractors new to the State of Iowa. During FFY 2017, there were 125 visits with 350 serious and 16 other-than-serious hazards identified at these sites covering 2865 workers.

The compliance assistance staff continued to work with the Employer's Councils of Iowa to provide training to employers and employees throughout the state. The Employer's Council members include representatives from Iowa Workforce Development, community colleges, local business development groups and other government organizations. In addition to the construction and general industry 10-hour classes, he has expanded the presentations to include four-hour workshops on specific topics such as falls, electrical, lockout/tagout, recordkeeping, machine guarding, and ergonomics.

Iowa has forty-one (41) companies in VPP Star status and is working with additional companies to achieve the designation. There was one (1) company to achieve VPP Star status in FFY 2017 and two companies did not renew due to a change in ownership and corporate direction. We do anticipate the application and evaluation of additional companies in FFY 2018. An industrial hygienist continues to serve as the VPP team leader and works with companies already in the program while assisting those who are striving to achieve the designation. Two (2) Safety and Health Consultants and three (3) Industrial Hygienists assist him with VPP audits as needed. The state maintains a list of the current VPP companies on file in the Iowa OSHA Consultation and Education Section.

21(d) Consultation Program Activities:

Iowa Consultation and Education continued to support the Local and National Emphasis Programs of Iowa OSHA Enforcement. There was positive response to requests to Iowa OSHA Consultants to give talks and training on nursing homes, trenching, silica, grain, asbestos and falls in construction.

Iowa Consultation and Education staff also provided presentations and staffed booths at the annual Governor's Safety Conference, the Iowa-Illinois Safety Conference, the Master Builders of Iowa Conference, and the Hawkeye on Safety Conference.

During FFY 2017, three (3) separate mailings were made to Iowa companies covered in emphasis programs. Ninety-one employers in the North American Industrial Classification System, NAICS, 327xxx, Nonmetallic Mineral Product Manufacturing; 300 employers in NAICS 332xxx, Fabricated Metal Product Manufacturing; and 234 employers in NAICS 333xxx, Machinery Manufacturing Metalworking; where an increased level of injuries and illness rates were identified in comparison to the national TRC and DART rates or included as part of a National or Local Emphasis Program. The letters explained the method for choosing establishments to receive the letter and offered several avenues for assistance including

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

Consultation and Education. Of these employers, four (4) in NAICS 327xxx, Nonmetallic Mineral Product Manufacturing; forty-two in NAICS 332xxx, Fabricated Metal Product Manufacturing; and sixteen in NAICS 333xxx, Machinery Manufacturing Metalworking accepted Consultation services.

Iowa Consultation and Education continued to promote SHARP to employers with the goal of improving their safety and health management programs. Unfortunately, there were no new companies who achieved SHARP status during FFY 2017 even though we promoted and encouraged companies' participation.

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

A proposal of one serious hazard in 22 public sector consultation visits during FFY 2017. However seventeen (17) of the twenty-two (22) public sector visits were conducted in the last part of the 4th quarter. The proposal of this hazard identified in the last quarter of FFY 2017 was in FFY 2018. As in previous years, several of the requests several were for indoor air issues most often related to mold or inadequate ventilation. However, in FFY 2017, the majority of the visits were to city and county governments.

The state held the Iowa Governor's Safety Conference in November in the Des Moines area. Iowa OSHA Consultation and Education Bureau Chief for the Iowa Consultation and Education Program are the Vice-Chair for the board that selects speakers and topics for the annual conference. Iowa OSHA Consultation and Education personnel to answer questions and promote consultation services staffed a booth at the conference.

Iowa Consultation and Education supports the NEPs and the LEPs adopted by Iowa OSHA through outreach, education and consultation visits. You can find a detailed discussion of these activities in the "Discussion of Results in Achieving Annual Plan (AP) Performance Goals" section of the FFY 2017 Iowa Consultation Annual Project Report (CAPR.) Consultants stressed the importance of safety and health program management during all consultation activities.

Strategic Goal 2 Protect Worker's Rights

As required by Iowa Code 88.9(3) of the Iowa Occupational Safety and Health Act Iowa OSHA strove to ensure that no person discharged or in any manner discriminated against any employee because the employee exercised their rights under the Act.

<p>5-Year Outcome Goal 2: In using the FFY 2014 measures as a baseline, Iowa OSHA plans to increase the timeliness in handling whistleblower investigations by increasing the % completed within 90 days.</p>
<p>IOSHA Strategic Objective 2.1: Strengthening the enforcement of the whistleblower protection statutes.</p>
<p>Performance Goal 2.1: Protect employees' rights to file health and safety complaints and prevent discrimination against workers who report hazards.</p>

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

PERFORMANCE MEASURES	Baseline for FFY 2007	Targeted Employer Participation	Actual Activities
Strategy: Coordinate Iowa OSHA resources to maximize efficiency of discrimination claim processing.			
Performance Indicators: Percent improvement in processing rates each year.			
Baseline: Percent of discrimination complaint investigations completed within 90 days in FFY 2014.			

Progress in Achieving IOSHA Performance Goal 2.1 was assessed by tracking the outcome of Whistle Blower investigations:

Discrimination FFY 2017 Iowa OSHA Performance Goal 2.1	Assess progress by tracking number of whistle blower investigations:					
<i>Performance Measure</i>	Baseline FFY 2014 Average	FFY 2017 Average	FFY 2017 1st Qtr.	FFY 2017 2nd Qtr.	FFY 2017 3rd Qtr.	FFY 2017 4th Qtr.
Average age in days for pending whistle blower investigations / percent completed in 90 days	196 / 33%	113 / 26%	181 / 22%	108 / 14%	94 / 50%	68 / 10%
Average days to complete new complaint screening process	11.1	9.4	9.3	9.3	8.1	10.5

Iowa OSHA’s discrimination officer position has remained constant this FFY 2017. Training of an additional compliance officer is in process for the whistleblower investigation section. This will allow IOSHA to continue to address whistleblower complaints in the absence of the main investigator. The discrimination officer received several complaints (100) during this period. The discrimination officer has made a tremendous effort in attempting to complete 100% of discrimination investigations within 90 days and to screen complaints as efficiently as possible.

IV. Mandated Activities

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

The requirement for reporting amputations, hospitalizations, and loss of eye continues to directly affect Iowa OSHA's complaint inspection and investigation response time. The requirement directly generated 433 reports, of which 205 required inspections beyond the normal complaint and fatality inspections. An additional inspector and administrative assistant assisted the complaint officer with processing the severe incident reports, phone & fax complaints, answering e-correspondence and taking over 1,756 (due to an office move, 3 weeks of calls were not logged) phone calls during the year. These individuals perform this function, part time, to better handle the influx of severe incidents and non-formal complaints. Iowa OSHA's percentage for employee participation in inspections, i.e. employees on the walk around and interviewed continues to trend with such inspections for all other states. Iowa OSHA's percentage of Serious/Willful/Repeat/Unclassified violations per inspection also continues to exceed all other states and federal jurisdictions, as well as its percentage of Other Than Serious violations being lower than all other states. Iowa OSHA's in-compliance rate was above that of

other state plans and federal jurisdictions. This appears largely due to inspections initiated on construction worksites scheduled through the construction-targeting program (C-Target). General industry in-compliance inspections were primarily associated with complaints. Iowa OSHA remained committed to its mandated measures and overall accomplished them.

Impact Factors

Iowa OSHA's State of Iowa appropriation continues to be a volatile situation. The increased appropriation for SFY 2017 was removed from the budget mid-year. The state budget forecast does not look promising. Therefore, IOSH must rely heavily upon the federal grant. Over the past few years, Iowa has over-matched the federal grant by approximately 35%. An increase in Federal funding is imperative for Iowa to continue to fulfill our mandated OSHA activities and strategic goals.

The average statewide unemployment rate for Iowa was 3.2% at the end of the fourth quarter of FFY 2017. Iowa OSHA continues to serve in a challenging economic environment in regards to the availability of workers. The tables above show that Iowa OSHA is responding to economic changes by providing services that positively affect safety and health working conditions for both employees and employers in Iowa.

Conclusion

Iowa OSHA has been actively engaged in promoting Partnerships and Alliances to proactively assist employers to create and sustain safe and healthy employment and workplaces for their employees. Local Emphasis Programs (LEPs) for Amputations, Grain Handling, Hexavalent Chromium and statewide emphasis on fall protection and trenching have continued to be premiere interests to both Enforcement and Consultation and Education outreach and inspection scheduling.

Enforcement has been also utilizing our Random Zip Code LEP to schedule statewide construction inspections. These inspections have also initiated activities with the Iowa Division

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

of Labor's Contractor Registration, Child Labor and Wage sections. These sections have in turn made referrals to Iowa OSHA for inspection activities.

Once again, Iowa OSHA is committed to maximizing our resources to the areas that we hope will provide the most significant impact for our performance goals. Iowa OSHA will continue to find better ways to target resources to ensure that its performance outcome measures are affecting its strategic and performance goals.

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

2017 Iowa OSHA SOAR P. 18 – Appendix A

3/22/2018

