



# OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

<b>DIRECTIVE NUMBER: CPL-02-03-002</b>	<b>EFFECTIVE DATE: February 10, 2016</b>
<b>SUBJECT: Streamlined Uniform ROI Pilot (S.L.U.R.P.)</b>	
<b>REGIONAL IDENTIFIER: Region I</b>	

## ABSTRACT

**Purpose:** The purpose of this notice is to establish a Region I pilot program to utilize abbreviated Reports of Investigation (ROIs) on a certain population of cases in order to streamline operations and address the current backlog of cases and national performance goals.

**Scope:** This Notice applies to the Boston Regional Office, Whistleblower Protection Program.

**References:** OSHA Instruction: CPL 02-03-007, January 28, 2016 – Whistleblower Investigations Manual; Memo “Revised Whistleblower Disposition Procedures” dated April 18, 2012; and other applicable National and Regional Whistleblower Protection Program Regulations and Directives.

**Cancellation:** None

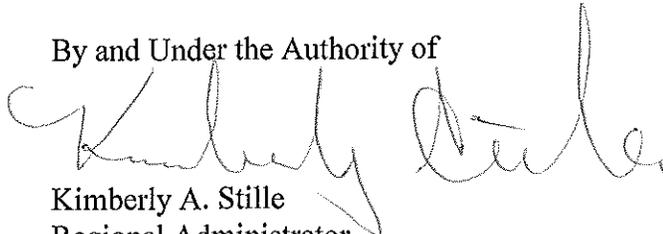
**State Impact:** None

**Action Offices:** Boston Regional Office, Office of Whistleblower Protection

**Originating Office:** Boston Regional Office

Contact: Michael Mabee, ARA – Whistleblower Protection  
J.F.K. Federal Building, Room E-340  
Boston, MA 02203  
Tel.: (617) 565-9857  
Fax: (617) 565-9827

By and Under the Authority of



Kimberly A. Stille  
Regional Administrator

### Executive Summary

In order to increase our efficiency and to enable the Region to meet the national performance measures, we are piloting streamlined Reports of Investigation (ROIs) on a certain population of cases. There has long been talk of further streamlining the reporting requirements on cases where there will likely be no further activity. In order to be able to devote resources to merit cases and cases under appeal, Region I is adopting this pilot for a period of 1 year. At that time, we will evaluate the effectiveness of the pilot.

Because the present full ROI and the Secretary's Findings contain duplicative information, most of the streamlining can be accomplished by removing duplicative information. Between the two documents, all relevant case related information will still be captured. An example is the "jurisdiction" information which is presently contained in both documents. This pilot seeks to eliminate much of this duplicative work without sacrificing the quality and integrity of the investigation.

### Pilot Population Cases

Abbreviated ROIs may be used in all dismissals if the RSI believes this would be in the interests of efficiency. Attached is a sample abbreviated ROI.

In §11(c), ISCA and AHERA cases, if Complainant files a timely appeal, then a full ROI will be immediately completed and included in the case file transmitted to DWPP.

All Merit cases will continue to require a full ROI.

### Measurement Metrics

Before and after the pilot begins, the Region will be able to track and compare the average number of cases closed per week and average age of open cases. The pilot should have a measurable effect on these metrics. The number of cases closed per week should increase and an average age of open cases should decrease. The baseline measurements will be included in the first pilot report and compared to the results as the pilot progresses. Additionally, a periodic poll of investigators' opinions and comments will be obtained to provide further qualitative assessment of this pilot.

### Reporting

The Region I whistleblower program will submit a monthly progress report to the Regional Administrator. A final report submitted one year from the effective date will contain recommendations to continue, modify or discontinue the developed procedures.



Sample Abbreviated Report of Investigation (ROI)

CONTENTS OF CASE FILE  
Respondent / Complainant / Docket #

Exhibit A	Notification to Complainant
Exhibit B	Notification to Respondent
Exhibit C	Misc. Correspondence
Exhibit D	Government Correspondence
Exhibit E	Secretary's Findings
Exhibit F	IMIS Case Summary Report
Exhibit 1	Complaint / Intake Form (OSHA-87)
Exhibit 2	Interviews of Complainant
Exhibit 3	
Exhibit 4	
Exhibit 5	
Exhibit 6	
Exhibit 7	
Exhibit 8	
Exhibit 9	
Exhibit #	Investigator's Notes
Exhibit #	Phone/Activity Log
Exhibit #	Final Investigative Report

### Report of Investigation

DATE: Date Report is submitted to RSI

MEMORANDUM FOR: [NAME]  
Regional Supervisory Investigator

FROM: [NAME]  
Investigator

SUBJECT: Respondent Name/Complainant Name/Case Number

STATUTE: NAME OF STATUTE(S)

COMPLAINANT:	[NAME] [FULL CONTACT INFO]	<u>Represented By:</u>
RESPONDENT:	[NAME] [FULL CONTACT INFO]	<u>Represented By:</u>

Date/Time	Event	Exhibit #(s)	Fact (F) Assertion (A)

**Case Narrative:**  
[Optional.]

**Recommendation:**

Respectfully Submitted,

[NAME]  
Investigator

Approved by:

[NAME]  
Supervisory Investigator