



# OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 02-01-062

EFFECTIVE DATE: 12/14/2020

SUBJECT: Site-Specific Targeting (SST)

## ABSTRACT

- Purpose:** This Instruction implements OSHA's *Site-Specific Targeting (SST)* inspection plan. This program does not include construction worksites.
- Scope:** OSHA-wide.
- References:** OSHA Instruction CPL 02-00-025, *Scheduling System for Programmed Inspections*, January 4, 1995.
- OSHA Instruction CPL 02-00-164, *Field Operations Manual (FOM)*, April 14, 2020.
- OSHA Instruction CSP 01-00-005, *State Plan Policies and Procedures Manual*, May 6, 2020.
- Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41(a)(1) and (a)(2)*, February 21, 2018.
- Cancellations:** This Instruction cancels 19-01(CPL 02), *Site-Specific Targeting 2016 (SST-16)*, October 16, 2019.
- Expiration Date:** Two years from the effective date, unless replaced by a new Instruction. Upon the expiration or replacement of this Instruction, inspection cycles already underway must be completed as described in paragraph XI.B.
- State Impact:** Notice of Intent and Equivalency required. State Plan documentation of targeting system required if not current. See paragraph VII, *State Plan Impact*.
- Action Offices:** National, Regional, and Area Offices.

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## **Executive Summary**

This Instruction implements OSHA's SST inspection program, using employer-submitted Form 300A data for calendar years (CY) 2017-2019. The SST is OSHA's main SST inspection plan for non-construction workplaces that have 20 or more employees, and is based on the data received from injury and illness information that employers submitted for CY 2017-2019 in accordance with 29 CFR § 1904.41.

This program helps OSHA achieve the goal of ensuring that employers provide safe and healthful workplaces by directing enforcement resources to those workplaces with the highest rates of injuries and illnesses.

This Instruction identifies key references, describes the inspection list, provides scheduling and inspection procedures, and provides information on OSHA Information System (OIS) coding.

## **Significant Changes**

Based on OSHA's enforcement experience with the SST-16, the following changes have been incorporated into the SST plan:

- A new targeting category has been added that uses a three-year data range to target sites reflecting a rate increase during that period.
- It is now permissible to change the scope of an inspection from a comprehensive to records-only inspections in limited situations.

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I. Purpose

This Instruction implements OSHA's SST inspection plan. This program does not include construction worksites.

II. Scope

This Instruction applies OSHA-wide.

III. References

- A. Occupational Safety and Health Act of 1970, 29 U.S.C. 651.
- B. 29 CFR Part § 1904, Recording and Reporting Occupational Injuries and Illnesses.
- C. 29 CFR Part § 1908, Consultation Agreements.
- D. Revisions to the Voluntary Protection Programs to Provide Safe and Healthful Working Conditions, *Federal Register*, January 9, 2009 (74 FR 927).
- E. OSHA Directives
- ADM 03-01-005, *OSHA Compliance Records*, August 3, 1998.
  - CPL 02-00-025, *Scheduling System for Programmed Inspections*, January 4, 1995.
  - CPL 02-00-051, *Enforcement and Limitations under the Appropriations Act*, May 28, 1998.
  - CPL 02-00-164, *Field Operations Manual (FOM)*, April 14, 2020.
  - CPL 02-00-149, *Severe Violator Enforcement Program (SVEP)*, June 18, 2010.
  - CSP 01-00-005, *State Plan Policies and Procedures Manual*, May 6, 2020.
  - CSP 02-00-003, *Consultation Policies and Procedures Manual*, November 19, 2015.
  - CSP 03-01-003, *Voluntary Protection Programs (VPP): Policies and Procedures Manual*, April 18, 2008.

- F. Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41(a)(1) and (a)(2), February 21, 2018.

IV. Cancellations

This Instruction cancels 19-01 (CPL-02), *SST-16*, October 16, 2019.

V. Expiration Date

This Instruction terminates two years from the effective date, unless replaced by a new Instruction. Upon the expiration or replacement of this Instruction, inspection cycles already underway must be completed as provided in paragraph XI.B.

VI. Action Information

A. Responsible Office

Directorate of Enforcement Programs (DEP).

B. Action Offices

National, Regional, and Area Offices.

C. Information Offices

State Plans, OSHA Training Institute, Consultation Project Managers, VPP Managers and Coordinators, Compliance Assistance Coordinators, and Compliance Assistance Specialists.

VII. State Plan Impact

- A. Notice of Intent and Equivalency required. State Plan documentation of targeting system required.
- B. This Instruction describes a federal program change which establishes policies and procedures regarding targeting of general industry inspections under the SST program. States with OSHA-approved State Plans are required to have their own inspection targeting systems (a “core inspection policy”), which must be documented in their State Plans and revised as necessary to reflect current practices. These inspection policies and procedures must be at least as effective as Federal OSHA’s and be available for review. State Plans are required to notify OSHA whether they intend to adopt policies and procedures identical to the SST program or adopt or maintain different policies and procedures for targeting of general industry inspections.

Within 60 days of the date of issuance of this directive, State Plans must submit a notice of intent indicating if the State Plan will adopt or already has in place targeting policies and procedures that are identical to or different from the federal program. State adoption, either identically or different, should be accomplished within 6 months. If adopting identically, the State Plan must provide the date of adoption to OSHA, due within 60 days of adoption. If the State Plan adopts or maintains enforcement policies that differ from this SST, the State Plan must either post its different policies on its State Plan website and provide a link to OSHA, or provide OSHA with an electronic copy and the name and contact information of an official within the State Plan who can assist the public with obtaining a copy. This action must occur within 60 days of the date of adoption. OSHA will provide summary information on the State Plan responses to this instruction on its website.

#### VIII. Significant Changes

This Instruction replaces the SST-16 program, using employer submitted data from CY 2017 through 2019. A new targeting category has been added that relies on a three-year range of data to target sites showing an increase in rates during that timeframe. Additionally, records only inspections are now permitted in limited situations.

#### IX. Background

The SST plan is OSHA's main site-specific programmed inspection initiative for non-construction workplaces that have 20 or more employees. The SST program uses objective data from injury and illness information that employers submit under 29 CFR § 1904.41. The current program helps OSHA achieve the goal of ensuring that employers provide safe and healthful workplaces by directing enforcement resources to those workplaces with the highest rates of injuries and illnesses.

By applying industry and establishment-size criteria, OSHA focuses data collection on establishments most likely to be experiencing elevated rates and increased numbers of occupational injuries and illnesses. The SST plan selects individual establishments for inspection based on their required (by 29 CFR § 1904.41) submission of Form 300A data.

In October 2018, OSHA launched the SST-16, which resulted in 705 inspections during FY 2019. OSHA experienced fewer "No Inspections" instances at these sites, as compared to other programmed inspections. The data revealed that the average number of violations identified and citations issued as a result of SST-16 inspections were comparable to those issued as a result of other emphasis programs. The SST-16 inspections were, therefore, as effectively targeted as those of other emphasis programs. Thus, OSHA found the SST program to be an effective means of using its enforcement resources.

X. Description of the SST Plan

A. Inspection List Selection Criteria

OSHA will generate inspection lists of establishments with elevated Days Away, Restricted, or Transferred (DART) rates, both for CY 2019, and sites with upward trending rates for the three-year range of CY 2017-2019. OSHA will also identify a random sample of establishments that did not provide the required 2017, 2018, and 2019 Form 300A data to OSHA. To verify data accuracy and quality control, OSHA intends to also include a random sample of low-rate establishments from the CY 2019 data.

1. High-Rate Establishments

The SST plan selects individual establishments for inspection based on CY 2019 Form 300A data.

Because average DART rates vary widely among industries, OSHA will set one DART rate for manufacturing and a different DART rate for non-manufacturing as objective selection criteria. This method will allow OSHA to equally target manufacturing and non-manufacturing establishments.

2. Upward Trending Establishments

OSHA will identify establishments with rates above their industry's national average in CY 2017 that have continued to trend upward in both CY 2018 and CY 2019 and continue to remain above their industry's national average.

3. Low-Rate Establishments

To verify the reliability of the Form 300A data reported to OSHA, the agency will generate a random sample of establishments with low DART rates using the CY 2019 data.

4. Non-Responders

OSHA will generate a random sample of establishments that failed to provide the required Form 300A data to OSHA for CY 2017-2019. Inclusion of these non-responding employers is intended to discourage employers from not complying with their obligation to report injury and illness information in an attempt to avoid inspection.



If, upon arrival, compliance officers learn that a listed establishment is only an administrative office, refer to paragraph XI.D.2, Office-Only Sites.

## XI. Scheduling

The Office of Statistical Analysis will provide each Area Office (AO) with access to software and databases that include the establishments on the Inspection List. Only OSHA and State Plan States will have access to this information.

### A. Maintaining Inspection List/Cycles and Documentation

The AO is responsible for maintaining the documentation necessary to demonstrate that it has instituted the SST inspection list and cycles in accordance with the requirements of this Instruction, including documenting all deletions, deferrals, or other modifications (such as rationale for expanding inspections to cover health hazards based on (a) prior inspection history of the establishment, or (b) knowledge of an establishment's industry classification). The AO must maintain all such inspection lists, cycles, and documentation for a period of three years after all inspections conducted under this SST plan have been closed. See paragraph B.1.b.(1)(c)3 in CPL 02-00-025, *Scheduling System for Programmed Inspections* (1/4/1995) and Appendix D, *Compliance Records Disposition Schedule*, in ADM 03-01-005, *OSHA Compliance Records* (8/3/1998).

### B. Cycle Size

AOs must generate inspection cycles using the SST software that randomly selects the establishments and shall determine inspection cycle size (i.e., 5 to 50 establishments) based on available resources and the geographic range of the office. Larger generated cycles will allow greater flexibility and efficiency of scheduling. Once initiated, however, the entire cycle must be completed. If a cycle larger than 50 establishments would provide the AOs with more efficient use of staff, the office must first request Regional Office approval.

Within a cycle, the AO may schedule and inspect the selected establishments in any order that makes efficient use of available resources.

After opening an inspection, AOs should use the "Update" function of the SST application to enter the inspection number in the activity ID field.

After completing a cycle, the AO may generate a subsequent new cycle using the SST software.

AOs must inspect all establishments in an existing cycle before inspecting any establishments in a newly generated cycle. However, OSHA Instruction CPL 02-00-025, *Scheduling System for Programmed Inspections* (1/4/1995), paragraph B.1.b.(1)(e)1, lists criteria for permissible carryovers from one cycle to another cycle. In addition, at the expiration of this Instruction, the AO must first complete any cycle initiated, but not yet completed, even if any inspections for the remaining establishments are opened after the expiration date.

C. Use of SST Software

Each AO must use the “Create” function of the SST web-based application to create cycles from the SST inspection lists, and use the application to update the inspection lists to enter deletions and inspections conducted. AOs shall not create cycles manually.

After initiation of an inspection, the AO shall update the application to connect the inspection number with the particular establishment.

D. Worksite Clarification

As part of the pre-inspection process, the AO shall verify that all procedures for accurate targeting have been followed. If the worksite is not subject to the data submittal criteria, an inspection shall not be initiated.

Contact the Office of Statistical Analysis to correct any data discrepancies. Report any discrepancies directly through the SST application.

1. Industries without Permanent Workplaces

For industries such as NAICS Code 561730, Landscaping Services that do not have permanent worksites, the establishment list will normally identify only the employer’s central office. The AO will, so far as possible (e.g., by visiting the central office), determine the location of active worksites based on the type of work scheduled and the length of time remaining to complete the project.

2. Office-Only Sites

The SST is not intended to include establishments that are office-only facilities. If a Compliance Safety and Health Officer (CSHO) arrives at an establishment and discovers that there is only an office at the site, the CSHO should determine what site or sites are associated with the OSHA Form 300A data.

If the Form 300A data includes information for a site (or sites) in addition to an office, then an inspection of the site (or one of the sites) with the highest DART rates shall be conducted if within the AO's jurisdiction.

NOTE: Recordkeeping rule § 1904.30 requires an employer to keep a separate OSHA 300 Log for each establishment that the employer expects to be in operation for one year or longer.

3. Records Only Inspections

When a CSHO determines that a worksite was included on the inspection list because of incorrect data submitted by the employer, a "records only" inspection may be conducted.

For "records only" inspections, the CSHO **must** conduct a partial walkthrough of the workplace and interview employees to verify the establishment's injury and illness experience. Any serious violations that are observed in plain view or brought to the attention of the CSHO must be investigated pursuant to Field Operations Manual (FOM) procedures.

4. Non-Responders

If, upon initiating an inspection of a non-responder establishment, the establishment provides documentation that they in fact submitted CY 2019 data or provides evidence that they are not subject to the requirements of 29 CFR § 1904.41 due to size or industry, the CSHO should stop the inspection and code the event as a "No Inspection."

E. Deferrals

1. OSHA On-Site Consultation Program

If an establishment is an approved participant in the Pre-Safety and Health Achievement Recognition Program (SHARP), it may be granted a deferral from OSHA programmed inspections.

If an On-Site Consultation visit is "in progress" at an establishment, it will take priority over OSHA programmed inspections. An On-Site Consultation visit will be considered "in progress" in relation to the working conditions, hazards, or reasons generated by the visit from the beginning of the opening conference through the end of the correction dates and any extensions thereof (29 CFR § 1908.7(b)(1)).

If an establishment has requested an initial full-service comprehensive consultation visit for safety and health from an On-Site Consultation program and that visit has been scheduled by the program, a programmed inspection may be deferred for up to 90 calendar days from the date of the notification by the On-Site Consultation program to the Regional Office. No extension of the deferral beyond 90 calendar days shall be granted unless the consultation visit continues to be “in progress.” As an exercise of its authority to schedule inspections, the agency may assign a lower priority to worksites where consultation visits are scheduled (Field Operations Manual, CPL-02-00-164, Chapter 2, Section VI.H.2.c).

2. VPP Applicants

When the AO receives notification from the VPP Manager that a VPP on-site review has been scheduled, the AO will remove the applicant from any programmed inspection list for a period of up to 75 days prior to the scheduled on-site review. The AO will also remove the applicant workplace from any programmed inspection list for the duration of VPP participation, unless the site chooses otherwise (see paragraph XII.C., Deletions – VPP or SHARP). See also Revisions to the Voluntary Protection Programs to Provide Safe and Healthful Working Conditions, *Federal Register*, January 9, 2009 (74 FR 927).

F. Inspection Priority

While unprogrammed inspections are normally prioritized, this Instruction adds the following procedures:

1. AOs that have started but not completed a cycle of inspections from the SST-16 plan must normally complete that cycle before moving to inspections under a subsequent SST plan. See CPL 02-00-025, *Scheduling System for Programmed Inspections*, at paragraph B.1.b.(1)(e)1 for permissible carryovers from one cycle to another cycle.
2. An AO must inspect all establishments on the SST inspection list unless, in consideration of available resources, like agency emphasis programs, the Regional Administrator authorizes the AO to conduct a smaller number of inspections from the list. Such authorization will normally require the AO to complete all inspections in the current cycle. The Regional Administrators will submit their yearly targets in the annual performance plan stating how many SST inspections the Region shall conduct.

3. All Federal OSHA offices having coverage over sites in State Plan states are expected to inspect all establishments on their inspection lists (i.e., U.S. Post Offices, ship and boat building and repairing sites) where there is Federal OSHA coverage. For establishments in NAICS 3366, Ship and Boat Building, Federal OSHA and the State Plan must coordinate to determine whether the State Plan, Federal OSHA, or both have coverage over the establishment.
4. AOs will continue to conduct other programmed inspections under national, regional, or local emphasis programs, or other initiatives as the AO and Regional Office goals dictate.

## XII. Deletions

AOs will be responsible for making appropriate deletions, as stated below, from the inspection cycle. Deletions will also include establishments no longer in business, in accordance with CPL 02-00-025, *Scheduling System for Programmed Inspections*, at B.1.b.(1)(b)6.d.

Deletion criteria for previous inspections, public sector employers, VPP, or SHARP establishments shall be applied either before or after creating a cycle.

### A. Previous Inspections

The AO will delete an establishment from the inspection list if the establishment has received a comprehensive safety or health inspection within 36 months of the creation of the current inspection cycle. For deletion purposes, an establishment's comprehensive inspection date is the *opening conference date* of that inspection. If the opening conference date occurred within the previous 36 months of the current SST inspection cycle, delete the establishment from the SST inspection list.

NOTE: When updating an establishment list, do not use the deletion codes H# (Health inspection) and S# (Safety inspection) described in B.1.b.(1)(b)6.d. of CPL 02-00-025, *Scheduling System for Programmed Inspections*.

The SST software tracks the opening conference date entered for establishments deleted for the above listed reason (previous comprehensive inspection). Once the 36-month period passes, the software makes that establishment available again for selection.

*NOTE: Do not delete Severe Violator Enforcement Program (SVEP) establishments or establishments related to a SVEP case. These establishments are not entitled to an inspection deferral.*

B. Public Sector Employers

The AO will delete any public sector employers (i.e., federal, state, or local government) on the inspection lists.

NOTE: The OSH Act was amended in 1998 to deem the U.S. Postal Service a private sector employer.

C. VPP and SHARP

1. If an establishment is an approved participant in OSHA's VPP, delete it from the inspection lists.
2. If an establishment is an approved participant in SHARP, the AO will delete it from the inspection lists (29 CFR § 1908.7(b)(4)(i)(B)).

XIII. Inspection Procedures

A. Scope

SST inspections shall be comprehensive in scope. An AO may open an inspection conducted under this program as either a comprehensive safety or health inspection, based on the AO's knowledge of the workplace's potential hazards. In addition, if the site has been inspected previously, the AO may expand the inspection to cover both health and safety hazards based on that prior inspection history. The AO must fully explain and document in the file the rationale for the expanded inspection.

B. Verify NAICS

At the opening conference, the CSHO will verify the establishment's NAICS code. As needed, establish activities occurring at the workplace before determining the appropriate NAICS code.

C. Citations

Citations for violations and corresponding proposed penalties shall be made in accordance with the FOM (OSHA Instruction CPL 02-00-164) and other relevant policy and procedures.

D. Recordkeeping Violations

When conducting an inspection of non-responder employers, CSHOs must follow the guidance listed in OSHA's *Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41(a)(1) and (a)(2)*, February 21, 2018, or subsequent guidance, for citing failure to submit violations.

E. Collection and Review of Illness and Injury Data

During inspections under this Instruction, CSHOs will review the OSHA 300 logs, 300A summaries, and 301 incident reports for five prior calendar years, which will include CY 2017, 2018, and 2019. Refer to the FOM, Chapter 3, Section VI, *Review of Records* for further guidance on review of injury and illness data. CSHOs should also verify that the CY 2019 data was submitted if the inspection is conducted after March 2, 2020. If the inspection is conducted after March 2, 2021, CSHOs should verify that the CY2020 data was submitted.

XIV. Relationship to Other Programs

A. Unprogrammed Inspections

AOs shall conduct unprogrammed inspections according to OSHA's FOM or other relevant policy and procedures. If an unprogrammed event (e.g., complaint, fatality, or referral) occurs at an establishment that is also slated for inspection under this SST program, the two inspections may be conducted either concurrently or separately, but should be conducted concurrently whenever possible. See paragraph XV.B.

B. Emphasis Programs

Some establishments may be selected for inspection under the SST program and also under one or more other OSHA initiatives (emphasis programs). Inspection programs based on specific hazards (such as combustible dust or lead) or specific industries (such as logging, scrapyards, shipbreaking, or petroleum refineries) may run concurrently with the SST program.

Whenever an establishment is scheduled for inspection based on the current cycles of the SST and another emphasis program, both inspections may be scheduled at the same time. CSHOs will designate all applicable OIS codes to the inspection. See paragraph XV.C.

XV. Recording and Tracking

OSHA inspections conducted in response to this directive shall be coded in OIS as described in this section. All consultation activities (Request, Visit, and Compliance Assistance) conducted by On-Site Consultation programs in relation to this directive shall also be coded in OIS.

A. SST-Only Inspections

The inspection shall be coded as an Initiating Type of Programmed Planned in OIS. Record the value **SSTARG171819** in the National Emphasis Program section AND the Primary Emphasis Program section.

B. SST Combined with Other Emphasis Program Inspections

For all emphasis program inspections such as NEPs, REPs, and LEPs conducted in conjunction with an SST inspection, the CSHO shall mark the inspection with an initiating type of “Programmed Planned” in OIS. Record the value **SSTARG171819** in the National Emphasis Program section along with all other applicable NEP and LEP codes. Record the value **SSTARG171819** in the Primary Emphasis Program section.

C. SST Combined with Unprogrammed Inspections

For all unprogrammed inspections conducted in conjunction with an SST inspection, the CSHO shall code the inspection Initiating Type with the appropriate type of unprogrammed inspection in OIS (e.g., Complaint, Referral). Record the value **SSTARG171819** in the National Emphasis Program section.