



# OSHA REGIONAL NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

**DIRECTIVE NUMBER:** CPL 2-16-03D

**EFFECTIVE DATE:** October 1, 2018

**SUBJECT:** Region-wide Local Emphasis Program (REP) High Hazard Safety and Health Workplace Inspections

**REGIONAL IDENTIFIER:** Region VII

## ABSTRACT

**Purpose:** This Regional Notice continues a Region-wide Local Emphasis Program (REP) for programmed safety and health inspections of general industry establishments in high hazard industries.

**Scope:** Region VII Federal Enforcement Offices.

**References:** OSHA Instructions: CPL 02-00-160, Field Operations Manual; CPL 04-00-001 Procedures for Approval of Emphasis Programs; CPL 02-00-025, Scheduling System for Programmed Inspections; CPL 02-00-051, Exemptions and Limitations Under the Current Appropriations Act; CPL 03-00-014, PSM Covered Chemical Facilities National Emphasis Program.

**Cancellation:** CPL 2-16-03C

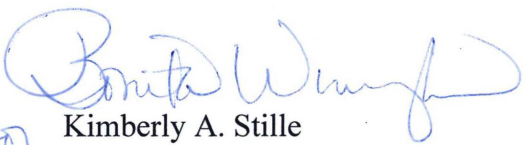
**State Impact:** State Consultation Program outreach efforts encouraged

**Action Offices:** Region VII Federal Enforcement Area Offices

**Originating Office:** Kansas City Regional Office – Enforcement Programs

**Contact:** Assistant Regional Administrator for Enforcement Programs  
(816) 283-8745

By and Under the Authority of:

  
Kimberly A. Stille  
Regional Administrator

### **Executive Summary**

This Regional Notice continues a Region-wide Local Emphasis Program (REP) for programmed safety and health inspections of general industry establishments located in Region VII in high hazard industries as identified by injury and illness rates. This program affects all establishments in high hazard industries with more than 3,000 workers per state and establishments with more than ten (10) employees within the jurisdictional boundaries of Region VII.

### **Significant Changes**

OSHA Regional Notice CPL 2-16-03C, Region-wide Local Emphasis Program (REP) High Hazard Safety and Health Workplace Inspections, January 19, 2018, canceled.

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I. Purpose.

This Regional Notice continues a Region-wide Local Emphasis Program (REP) for programmed safety and health inspections of general industry establishments located in Region VII in high hazard industries as identified by injury and illness rates. This program affects all establishments in high hazard industries with more than 3,000 workers per state and establishments with more than ten (10) employees within the jurisdictional boundaries of Region VII.

II. Scope.

This Notice applies to general industry establishments within the jurisdictional boundaries of all Region VII Federal Enforcement Area Offices.

III. Cancellation.

This Notice cancels OSHA Regional Notice CPL 2-16-03C, Region-wide Local Emphasis Program (REP) High Hazard Safety and Health Workplace Inspections, January 19, 2018.

IV. References.

- A. The Occupational Safety and Health Act of 1970.
- B. OSHA Instruction CPL 02-00-160, Field Operations Manual (FOM), August 2, 2016 (or current version).
- C. OSHA Instruction CPL 04-00-001, Procedures for Approval of Emphasis Programs (LEPs), November 10, 1999.
- D. OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections, dated January 4, 1995.
- E. OSHA Instruction CPL 02-00-051, Exemptions and Limitations Under the Current Appropriations Act, dated May 28, 1998, Appendix A, change effective April 25, 2018 (or most current version).
- F. OSHA Instruction CPL 02-02-045 (REVISED), Process Safety Management of Highly Hazardous Chemicals--Compliance Guidelines and Enforcement Procedures, September 13, 1994.
- G. OSHA Instruction CPL 03-00-014, PSM Covered Chemical Facilities National Emphasis Program, November 29, 2011.
- H. Environmental Protection Agency, Enforcement and Compliance History Online (ECHO) <http://echo.epa.gov>.
- I. OSHA Technical Links Web Page, Ergonomics Enforcement Policy, <https://www.osha.gov/SLTC/ergonomics/faqs.html>.
- J. Furniture and Related Products, <https://www.osha.gov/SLTC/woodproducts/index.html>.
- K. Computer and Electronic Products, <https://www.osha.gov/SLTC/semiconductors/index.html>.

- L. Meat Packing, <https://www.osha.gov/SLTC/meatpacking/index.html>.
  - M. Poultry Processing, <https://www.osha.gov/SLTC/poultryprocessing/index.html>.
  - N. Silica, <https://www.osha.gov/dsg/topics/silicacrystalline/index.html>.
  - O. Concrete and Concrete Products, <https://www.osha.gov/SLTC/concreteproducts/index.html>.
  - P. Toxic Metals, <https://www.osha.gov/SLTC/metalsheavy/index.html>.
  - Q. Synthetic Mineral Fibers (Fiberglass), <https://www.osha.gov/SLTC/syntheticmineralfibers/index.html>.
  - R. Metalworking Fluids, <https://www.osha.gov/SLTC/metalworkingfluids/index.html>.
  - S. Welding, Cutting, and Brazing, <https://www.osha.gov/SLTC/weldingcuttingbrazing/index.html>.
  - T. Memorandum from Thomas Galassi to Regional Administrators, Procedures for Local and Regional Emphasis Programs, December 3, 2014.
  - U. Memorandum from Francis Yebesi to Regional Administrators, Establishment-Targeting Lists for Emphasis Programs, November 12, 2014.
- V. Expiration Date.
- This notice will expire on September 30, 2019.
- VI. Action.
- The Regional Administrator and Area Directors shall ensure that Area Offices adhere to the procedures established in this Notice in the scheduling of programmed inspections.
- The Area Director (AD) for the Des Moines Area Office will apprise Iowa OSHA of the contents of this Local Emphasis Program (LEP). The Assistant Regional Administrator (ARA) for Compliance Assistance Programs (CAP) shall ensure that the Federal Program offices apprise State Consultation Program Managers in the region of the contents of this LEP.
- VII. Background.
- Under currently used targeting directives to select high hazard establishments for programmed inspections, some establishments have received comprehensive inspections every three years while other establishments have never received a comprehensive OSHA inspection. This region wide emphasis program bases the priority for General Industry safety inspections on the CY 2016 U. S. Bureau of Labor Statistics (BLS) Days Away, Restricted or Transferred (DART) rates in addition to Days Away From Work Injury, and Illnesses (DAFWII) rates. General Industry health inspections priority uses three (3) fiscal years of OSHA inspection data (FY 2016 – FY 2018) from the OSHA Information System (OIS) and calculating the Serious Violation Rate per Inspection (SVPI).

**Number and rate of nonfatal occupational injuries and illnesses by selected industry, All U.S., private industry, 2016 (Numbers in thousands)**

Characteristic	Private industry		Wood product manufacturing	
	Number	Rate	Number	Rate
<b>Injuries and Illnesses</b>				
<b>Total cases</b>	2,857.4	2.9	25.4	6.4
<b>Cases with days away from work, job transfer, or restriction</b>	1,547.8	1.6	14.2	3.6
<b>Cases with days away from work</b>	892.3	0.9	7.2	1.8
<b>Cases with job transfer or restriction</b>	655.6	0.7	6.9	1.8
<b>Other recordable cases</b>	1,309.5	1.3	11.3	2.9
<b>Injuries</b>				
<b>Total cases</b>	2,719.8	2.8	24.2	6.1
<b>Illnesses</b>				
<b>Total cases</b>	137.5	14.1	1.3	32.3
<b>Illness categories</b>				
<b>Skin disorders</b>	21.8	2.2	0.1	2.4
<b>Respiratory conditions</b>	11.0	1.1	0.0	0.4
<b>Poisoning</b>	2.0	0.2	0.0	-
<b>Hearing loss</b>	16.5	1.7	0.9	22.6
<b>All other illness cases</b>	86.2	8.9	0.3	6.9

<b>Number and rate of nonfatal occupational injuries and illnesses by selected industry, All U.S., private industry, 2016 (Numbers in thousands)</b>				
<b>Characteristic</b>	<b>Private industry</b>		<b>Food manufacturing</b>	
	<b>Number</b>	<b>Rate</b>	<b>Number</b>	<b>Rate</b>
<b>Injuries and Illnesses</b>				
<b>Total cases</b>	2,857.4	2.9	72.6	4.7
<b>Cases with days away from work, job transfer, or restriction</b>	1,547.8	1.6	49.2	3.2
<b>Cases with days away from work</b>	892.3	0.9	19.7	1.3
<b>Cases with job transfer or restriction</b>	655.6	0.7	29.5	1.9
<b>Other recordable cases</b>	1,309.5	1.3	23.4	1.5
<b>Injuries</b>				
<b>Total cases</b>	2,719.8	2.8	62.9	4.0
<b>Illnesses</b>				
<b>Total cases</b>	137.5	14.1	9.8	62.5
<b>Illness categories</b>				
<b>Skin disorders</b>	21.8	2.2	0.5	2.9
<b>Respiratory conditions</b>	11.0	1.1	0.2	1.4
<b>Poisoning</b>	2.0	0.2	0.0	0.1
<b>Hearing loss</b>	16.5	1.7	2.4	15.4
<b>All other illness cases</b>	86.2	8.9	6.7	42.7

**Number and rate of nonfatal occupational injuries and illnesses by selected industry, All U.S., private industry, 2016 (Numbers in thousands)**

Characteristic	Private industry		Beverage and tobacco product manufacturing	
	Number	Rate	Number	Rate
<b>Injuries and Illnesses</b>				
<b>Total cases</b>	2,857.4	2.9	10.2	4.7
<b>Cases with days away from work, job transfer, or restriction</b>	1,547.8	1.6	7.0	3.2
<b>Cases with days away from work</b>	892.3	0.9	2.7	1.2
<b>Cases with job transfer or restriction</b>	655.6	0.7	4.3	2.0
<b>Other recordable cases</b>	1,309.5	1.3	3.3	1.5
<b>Injuries</b>				
<b>Total cases</b>	2,719.8	2.8	9.8	4.5
<b>Illnesses</b>				
<b>Total cases</b>	137.5	14.1	0.4	20.2
<b>Illness categories</b>				
<b>Skin disorders</b>	21.8	2.2	0.0	1.1
<b>Respiratory conditions</b>	11.0	1.1	0.0	1.1
<b>Poisoning</b>	2.0	0.2	-	-
<b>Hearing loss</b>	16.5	1.7	0.2	7.5
<b>All other illness cases</b>	86.2	8.9	0.2	8.6

<b>Number and rate of nonfatal occupational injuries and illnesses by selected industry, All U.S., private industry, 2016 (Numbers in thousands)</b>				
<b>Characteristic</b>	<b>Private industry</b>		<b>Furniture and related product manufacturing</b>	
	<b>Number</b>	<b>Rate</b>	<b>Number</b>	<b>Rate</b>
<b>Injuries and Illnesses</b>				
<b>Total cases</b>	2,857.4	2.9	18.0	4.6
<b>Cases with days away from work, job transfer, or restriction</b>	1,547.8	1.6	10.6	2.7
<b>Cases with days away from work</b>	892.3	0.9	4.6	1.2
<b>Cases with job transfer or restriction</b>	655.6	0.7	6.0	1.5
<b>Other recordable cases</b>	1,309.5	1.3	7.4	1.9
<b>Injuries</b>				
<b>Total cases</b>	2,719.8	2.8	16.9	4.4
<b>Illnesses</b>				
<b>Total cases</b>	137.5	14.1	1.1	27.7
<b>Illness categories</b>				
<b>Skin disorders</b>	21.8	2.2	0.1	3.1
<b>Respiratory conditions</b>	11.0	1.1	0.0	0.5
<b>Poisoning</b>	2.0	0.2	-	-
<b>Hearing loss</b>	16.5	1.7	0.4	9.3
<b>All other illness cases</b>	86.2	8.9	0.6	14.7

<b>Number and rate of nonfatal occupational injuries and illnesses by selected industry, All U.S., private industry, 2016 (Numbers in thousands)</b>				
Characteristic	Private industry		Primary metal manufacturing	
	Number	Rate	Number	Rate
<b>Injuries and Illnesses</b>				
Total cases	2,857.4	2.9	17.9	4.5
Cases with days away from work, job transfer, or restriction	1,547.8	1.6	10.4	2.6
Cases with days away from work	892.3	0.9	4.5	1.1
Cases with job transfer or restriction	655.6	0.7	5.9	1.5
Other recordable cases	1,309.5	1.3	7.5	1.9
<b>Injuries</b>				
Total cases	2,719.8	2.8	16.4	4.1
<b>Illnesses</b>				
Total cases	137.5	14.1	1.5	37.1
<b>Illness categories</b>				
Skin disorders	21.8	2.2	0.2	5.9
Respiratory conditions	11.0	1.1	0.1	1.3
Poisoning	2.0	0.2	0.0	-
Hearing loss	16.5	1.7	0.8	20.0
All other illness cases	86.2	8.9	0.4	9.7

This REP increases the probability of inspecting establishments in high hazard industries, within the jurisdiction of Region VII, that have more than ten employees and have not received a comprehensive OSHA inspection since 2015. Thereby, in accordance with the Department of Labor's Strategic Plan, this REP addresses OSHA Performance Objective 2.1: "Secure safe and healthful working conditions for America's workers."

#### VIII. Outreach.

The Regional and Area Offices conducted outreach activities intended to reach as many employers and stakeholders as is practicable. Area Offices conducted outreach activities to raise awareness of the hazards associated with the targeted high hazard industries identified in this REP to inform stakeholders and employers of the elements of the REP.

In FY 2016, Area Offices conducted outreach three months prior to the initiation of inspections. OSHA provided to employers and workers information of potential hazards and how to prevent them through educational resources such as those listed below:

- OSHA's safety and health topics webpage, [\*Furniture and Related Products\*](#).
- OSHA's safety and health topics webpage, [\*Computer and Electronic Products\*](#).
- OSHA's safety and health topics webpage, [\*Silica\*](#).
- OSHA's safety and health topics webpage, [\*Toxic Metals\*](#).
- OSHA's safety and health topics webpage, [\*Synthetic Mineral Fibers \(Fiberglass\)\*](#).
- OSHA's safety and health topics webpage, [\*Metalworking Fluids\*](#).
- OSHA's safety and health topics webpage, [\*Welding, Cutting, and Brazing\*](#).
- OSHA's safety and health topics webpage, [\*Machine Guarding\*](#).
- OSHA's safety and health topics webpage, [\*Woodworking\*](#).

Outreach activity discussions for this LEP will include OSHA speeches, training sessions, and Area Office newsletters. State Consultation Programs will be encouraged to participate in local outreach efforts performed by Area Offices.

#### IX. Inspection Targeting.

Using the 2016 BLS data, Area Offices will develop lists of high hazard industries.

##### A. Safety Inspections

1. Safety High Hazard Industry List. The high hazard safety list contains manufacturing industries classified by their NAICS codes, and is based on the industries with the highest DART rates for calendar year 2016 as reported by BLS for the industries in Region VII. The list limits evaluation to the three-digit NAICS code in order to identify a broader establishment base. Removed from the list are any three-digit NAICS code for related industries with less than 3,000 workers per state, and establishments with less than ten (10) employees. This REP will cover the industries ranked one through five on the safety high hazard list (see Appendix A).

Without interfering with the completion of a currently active list and based on the available site locations on this previously generated list and on available OSHA resources, OSHA may generate a new high hazard list (as described above) at any time within the effective dates of this program. In addition, any cycle OSHA began (See paragraph IX. below) but has not completed before the generation of a new high hazard list, OSHA must complete within the effective dates of this program.

2. Establishments in Safety High Hazard Industries.

- a. The Directorate of Technical Support and Emergency Management's (DTSEM), Office of Statistical Analysis (OSA) will use the most recent

Dun & Bradstreet employer list to prepare a primary list of establishments. This list will include appropriate deletion criteria based on those NAICS codes ranked 1 through 5 (Appendix A) on the safety high hazard list for related industries with more than 3,000 workers per state and establishments with more than ten (10) employees. OSA will assign random numbers to establishments in accordance with Agency policy. This list of establishments will make up the inspection list. OSHA will inspect all establishments on the primary list before initiating inspections on any secondary list in accordance with OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections.

- b. Whenever an Area Office becomes aware of a previously unknown establishment within any of the identified NAICS codes, the Area Office shall add establishment to the secondary list. The Area Office will place any establishment remaining on the secondary list in alphabetical order. The Area Office will assign a random number using the most current version of Microsoft Excel's Random Sample Function, i.e., RANDBETWEEN function in Microsoft Excel. To prevent duplicate random numbers generation for multiple records each time the file opens, the user will highlight, copy, and past the entire worksheet into a blank worksheet as "Values (V)". The new worksheet will have each random number saved as a value not a formula, which will allow the user to open the worksheet without the possibility of changing the already assigned random numbers.
- c. Additional information sources that allow an office to become aware of a previously unknown establishment within any of the identified NAICS codes include a revised Dun & Bradstreet employer list and the EPA Enforcement and Compliance History Online (ECHO), <http://echo.epa.gov>.
- d. Once an Area Office has selected establishments, it will apply deletions pursuant to the deletions policy set forth in this Instruction, paragraph VIII.C.

B. Health Inspections

1. Health High Hazard Industry List.

The high health hazard list contains industries classified by their NAICS code. High hazard health industries are determined using three (3) fiscal years of OSHA inspection data (FY 2016 – FY 2018) from the OSHA Information System (OIS) and calculating the Serious Violation Rate per Inspection (SVPI). OIS will rank the industries (based on OSHA's inspection history) for workplaces with the highest average number of serious violations per inspection (SVPI) in Region VII. The list limits evaluation to the three-digit NAICS code in order to identify a broader establishment base. Removed from the list are any three-digit NAICS code for related industries with less than 3,000 workers per state and establishments with less than ten (10) employees. This REP will cover the industries ranked one through five on the health high hazard list (see Appendix B).

2. Without interfering with the completion of a currently active list and based on the available site locations on this previously generated list and available OSHA resources, a new health high hazard list (as described above) may be generated at

any time within the effective dates of this program. In addition, the Area Office must complete any cycle (See paragraph IX below) begun before the generation of a new health high hazard list within the effective dates of this program.

3. Establishments in Health High Hazard Industries.

- a. The Directorate of Technical Support and Emergency Management's (DTSEM) Office of Statistical Analysis (OSA), using the most recent Dun & Bradstreet employer list, will prepare a master list of establishments based on those NAICS codes ranked 1 through 5 (Appendix B) on the health high hazard list. The master list will cover related industries with more 3,000 workers per state and establishments with more than ten (10) employees. OSA will assign random number to establishments in accordance with Agency policy. This list of establishments makes up the inspection list. The Area Office will inspect all establishments on the Master List before initiating inspections on a new OSA-generated list in accordance with OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections.
- b. Whenever an office becomes aware of a previously unknown establishment within any of the identified NAICS codes, the office shall add the establishment to the Master List. The Area Office will place any establishment remaining on the Master list in alphabetical order. The office will assign a random number using the most current version of Microsoft Excel's Random Sample Function, i.e., RANDBETWEEN function in Microsoft Excel. To prevent duplicate random number generation in multiple records each time the file is opened, the user will highlight, copy, and past the entire worksheet into a blank worksheet as "Values (V)". The new worksheet will have each random number saved as a value not a formula, which will allow the user to open the worksheet without the possibility of changing the already assigned random numbers.
- c. Additional information sources that allow an office to become aware of a previously unknown establishment within any of the identified NAICS codes include a revised Dun & Bradstreet employer list and the EPA Enforcement and Compliance History Online (ECHO), <http://echo.epa.gov>.
- d. Once the office selects establishments, the office will make deletions pursuant to the deletions policy set forth in this directive, paragraph VIII.C.

C. Deletions.

In accordance with OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections, establishments that have had a comprehensive safety and health inspection within the previous three (3) calendar years will be removed from the list prior to initiating inspections in the inspection cycles. Deletion criteria in OSHA Instruction CPL 02-00-025, Paragraph B.1.b.(1)(b)6.d., will be applied to the list of establishments with the exception of deletion criteria S# and I#.

X. Inspection Scheduling.

Schedule the inspections in accordance with CPL 02-00-160, Field Operations Manual (FOM).

A. Inspection Cycles.

Area Offices will generate inspection cycles from the inspection list. Each cycle will consist of ten (10) to twenty-five (25) establishments sorted by the assigned random number from lowest to highest. The office must complete each inspection cycle before generating another cycle from that list. An establishment may be carried over to another cycle for any of the reasons set forth in CPL 02-00-025, paragraph B.1.b.(1)(e).1. Prior to initiating each inspection in a cycle, the office will make deletions pursuant to the deletions policy set forth in CPL 02-00-025, as noted above. Subsequent cycle generations shall be in the same manner using cycles of ten (10) establishments each.

- B. Each establishment scheduled for inspection shall receive a comprehensive safety and/or health inspection as defined by CPL 02-00-160, FOM. Establishments with Process Safety Management hazards shall receive an evaluation of hazards in accordance with CPL 03-00-014. Offices will assess and address ergonomic hazards during every inspection occurring under this program in accordance with OSHA's Ergonomics Enforcement Policy, <https://www.osha.gov/SLTC/ergonomics/faqs.html>.

Inspections conducted under this initiative will address process safety management where 29 CFR 1910.119 applies to the establishment inspected. Such inspections must be part of a comprehensive inspection. However, they will not normally be Program-Quality-Verification (PQV) inspections as defined by OSHA Instruction CPL 02-02-045, Process Safety Management of Highly Hazardous Chemicals – Compliance Guidelines and Enforcement Procedures. If the facility has not already been inspected using the OSHA Instruction, CPL 03-00-014, PSM-Covered Chemical Facilities National Emphasis Program, a concurrent inspection using that NEP may be conducted at the Area Director's discretion.

- C. Other Programmed Inspections.

Area Offices may select establishments for inspection under this initiative and under one or more other OSHA initiatives [National Emphasis (NEP) or Local Emphasis (LEP) Programs]]. Offices can run any emphasis programs based on specific hazards (such as ergonomics, silica, amputations, or lead) or specific industries (healthcare or primary metal industries.) concurrently with this initiative.

Whenever an Area Office schedules an establishment for inspection on this initiative and on the current cycle of an NEP/LEP plan, the office will schedule the inspection at the same time. Compliance Safety and Health Officials (CSHOs) will apply all applicable OIS codes to the inspection.

- D. The CSHO will expand any unprogrammed inspection or investigation such as a complaint, referral, fatality, etc., to a comprehensive inspection for any establishment that is already included in a generated (but not completed) inspection cycle.

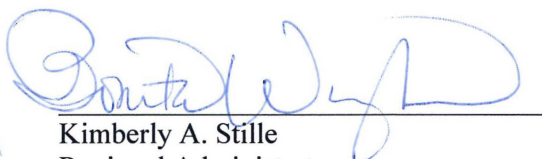
## XI. Recording in OIS.

- A. The CSHO shall apply current instructions for completing the appropriate inspection classification boxes on the OSHA Inspection Report as found in the OIS manual when recording inspections conducted under the REP, as follows:
1. Programmed inspections conducted under this REP shall be marked "Planned", "Local Emphasis Program", and "ERGHH".
  2. When it is discovered upon arrival at a worksite scheduled for an REP inspection that the establishment should have been deleted from the list (e.g., ten or fewer employees, establishment is out of business, etc.), "No Inspection" shall be recorded.

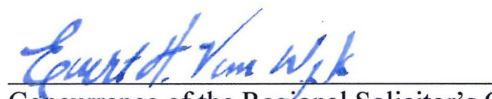
3. CSHOs will code unprogrammed inspections related to complaints or referrals requiring inspection, imminent danger, and fatality/catastrophe investigations as normally required under CPL 02-00-160. In addition, CSHOs will record the code "ERGHH" in the REP space.
4. All consultation activities (requests, visits and compliance assistance) conducted at sites in the SIC/NAICS codes included in this LEP will be coded with "ERGHH" in the Local Emphasis Program field on the appropriate forms.

XI. Evaluation.

No later than October 30 of each year that this program remains in effect, each Region VII Area Office will prepare a formal written evaluation of this REP in the format specified by OSHA Instruction CPL 04-00-001, Appendix A.

  
Kimberly A. Stille  
Regional Administrator

11/6/2018  
(Date)

  
Concurrence of the Regional Solicitor's Office

11/06/2018  
(Date)

Distribution:

Regional Solicitor  
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Area Directors  
Supervisory Investigator  
Field Review Program Coordinator

### Appendix A - Safety Rankings for 2016

Rank	Industry	NAICS
1	Wood Product Manufacturing	321
2	Food Manufacturing	311
3	Beverage and Tobacco Products Manufacturing	312
4	Furniture and Related Products Manufacturing	337
5	Primary Metal Manufacturing	331

**Appendix B - Health Rankings for 2015-2017\***

<b>Rank</b>	<b>Industry</b>	<b>NAICS</b>
1	Primary Metal Manufacturing	331
2	Industrial Machinery Manufacturing	333
3	Nonmetallic Mineral Product Manufacturing	327
4	Wood Product manufacturing	321
5	Furniture and Related Products Manufacturing	337

\*Health rankings were determined using 2015- 2017 OIS Data.