



OSHA's Site Specific Targeting Plans are Back and Based on E-reporting!

Insights

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OSHA issued a new Site Specific Targeting (SST) Plan effective October 16, 2018. Unlike prior versions, this new SST Plan utilizes the 2016 300A data that many employers electronically submitted in December 2017. The new SST Plan is, therefore, dubbed the SST-16.

https://www.osha.gov/sites/default/files/enforcement/directives/18-01_CPL-02.pdf

The SST is Federal OSHA's main method of scheduling programmed comprehensive ("wall-to-wall") inspections. The SST will be used to select and schedule programmed inspections for non-construction employers with 20 or more employees. OSHA, however, also schedules programmed inspections based on its nine (9) National Emphasis Programs (NEP) and approximately 100 Regional and Local Emphasis Programs (REP/LEP). These programmed inspections are in addition to unprogrammed inspections triggered by reports of fatalities, hospitalizations, reports of certain serious injuries and employee complaints.

State OSHA Plans are required to have their own "core inspection procedure" and must submit notice within 60 days of their intention to either adopt the SST or that they already have in place a targeting plan.

Establishments will be selected for the SST list if they have an undefined "elevated" DART Rate. DART stands for Days Away, Restricted or Transferred. OSHA will include a sampling of "High Rate" establishments, divided 50/50 between manufacturing and non-manufacturing. The list will also include a random sample of "non-responders" or establishments that did not electronically submit their 300A. And, for quality assurance purposes, the list will also include a random sample of "Low -Rate" establishments.

OSHA Area Offices must utilize the SST software to create inspection "cycles" or short term inspection lists supposedly customized to that Area Office. Some establishments will be exempted, deferred or deleted from the cycle list. For example, office only establishments will be deleted from the list.

Deferrals may be granted for establishments that are current participants in the SHARP, VPP or On-site Consultation programs. The deferrals can range from 75 to 90 days. If, however, the establishment is an approved SHARP or VPP site, it will be deleted from the list. An establishments may also be deleted from the list if it has received a comprehensive inspection within the last 36

months or is a public sector employer. Establishments in the SVEP (Severe Violators Enforcement Program) will not be deferred or deleted from the list.

OSHA will still give priority to unprogrammed inspections (fatalities, hospitalizations and employee complaints). If , however, an establishment is selected for an unprogrammed inspection or emphasis program inspection, and is also on the SST list, then OSHA can conduct both, either concurrently or separately.

Finally, those establishments that did not electronically submit their 300A reports, dubbed by OSHA to be "non-responders," will receive additional attention regarding recordkeeping, likely including citations for failing to electronically submit.

So, another reason to reduce those DART injuries, as they can come back to haunt you years later in the form of an SST programmed inspection.

Related People



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