

**North Carolina Department of Labor
Occupational Safety and Health Division**

Raleigh, NC

Field Information System

CPL 02-01-064

Subject: Site-Specific Targeting (SST)

A. Scope.

This notice implements OSHA's Site-Specific Targeting inspection plan. This program does not include construction worksites or North Carolina public sector sites.

B. Discussion.

The North Carolina Occupational Safety and Health (OSH) Division has elected to adopt the inspection targeting plan established by federal OSHA for non-construction workplaces that have 20 or more employees and is based on data received from injury and illness information that employers submitted in accordance with 29 CFR 1904.41 - *Electronic submission of Employer Identification Number (EIN) and injury and illness records to OSHA*. This targeting program uses the submitted data from federal OSHA and parallels the federal OSHA SST program set forth in OSHA's Directive CPL 02-01-064 Site-Specific Targeting (SST), February 7, 2023. This assignment schedule will also exclude any North Carolina public sector sites, which will otherwise be assigned through the North Carolina OSH Public Sector Targeting Schedule.

C. Action.

Compliance Safety and Health Officers (CSHO) will conduct inspections in accordance with the procedures described within this compliance directive (CPL) and in other guidance documents. Inspections conducted under this plan will be either comprehensive programmed safety or comprehensive programmed health inspections as defined by the NC Field Operations Manual (FOM). Targeted inspections under this inspection program will receive the highest inspection priority among all other general industry programmed inspections (see FOM Chapter II - Compliance Programming, paragraph E.1. - Order of Priority). Programmed inspections under other NC OSH Division Special Emphasis initiatives including Health Hazards; Long Term Care; Logging and Arboriculture Fatality Reduction; Food Manufacturing; Grocery and Related Product Wholesalers; Construction Fatality Reduction; and Amputations, carry inspection priority equal to SST inspections.

The Targeting System Administrator in the Planning, Statistics, and Information Management (PSIM) Bureau will supply the assignments to the East and West Compliance Bureaus via the NC OSH Targeting System webpage (SST Assignments) on the OSH One Stop Shop. Sections in the OSHA Directive relating to scheduling for federal jurisdiction, Area Offices, Cycle Size (paragraph XI.B.), Use of SST Software (paragraph XI.C.), and Deletions (paragraph XII), will not be used by the NC OSH Division. Other provisions of CPL 02-01-064, effective February 7, 2023, include clarifying procedures when an establishment becomes a Records Only Inspections (paragraph XI.D.3.) and Non-Responders (paragraph XI.D.4.), which are to be followed by OSH.

D. Effective Date.

This CPL is effective on the date of signature. It will remain in effect until revised or canceled by the director.

Signed on original

Anne Weaver
Bureau Chief

____ Signed on original _____

Jennifer Haigwood
Director

08/06/2023

Date of Signature



OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: CPL 02-01-064

SUBJECT: Site-Specific Targeting (SST)

SIGNATURE DATE: January 17, 2023

EFFECTIVE DATE: February 7, 2023

ABSTRACT

- Purpose:** This Instruction updates 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.
- [Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41\(a\)\(1\) and \(a\)\(2\), May 6, 2021.](#)
- Cancellations:** This Instruction cancels CPL 02-01-062, *Site-Specific Targeting (SST)*, December 14, 2020.
- 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.
- Originating Office:** Directorate of Enforcement Programs

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By and Under the Authority of

DOUGLAS L. PARKER
Assistant Secretary

Executive Summary

This Instruction updates OSHA's Site-Specific Targeting (SST) inspection program, which uses employer-submitted Form 300A data for calendar years (CY) 2019, 2020 and 2021. 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 pursuant to 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 target list, provides scheduling and inspection procedures, and information on OSHA Information System (OIS) coding.

Significant Changes

Based on OSHA's past enforcement experience, the following changes have been incorporated into this current SST plan:

- For high-rate establishments, the SST plan selects individual establishments for inspection based on CY 2021 Form 300A data. The previous SST used CY 2019 data.
- For upward trending establishments, the SST plan selects individual establishments for inspection based on CY 2019 through 2021 Form 300A data. The previous SST used CY 2017 through 2019 data.
- The low-rate establishments list is generated using CY 2021 Form 300 A data. The previous SST used CY 2019 data.
- The non-responders list is generated using CY 2021 data, when compared to CY 2019 data used for the previous SST.

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I. Purpose

This Instruction implements OSHA's SST inspection plan and 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)*, September, 15, 2022.
 - [CSP 01-00-005](#), *State Plan Policies and Procedures Manual*, May 6, 2020.
 - [CSP 02-00-004](#), *Consultation Policies and Procedures Manual*, March 19, 2021
 - [CSP 03-01-005](#), *Voluntary Protection Programs (VPP): Policies and Procedures Manual*, January 30, 2020.

- F. [Interim Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR § 1904.41\(a\)\(1\) and \(a\)\(2\)](#), May 6, 2021.

IV. Cancellations

This Instruction cancels CPL 02-01-062, Site-Specific Targeting (SST), December 14, 2020.

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 Program 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 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 program detailed in CPL 02-01-062, December 14, 2020. The SST plan uses employer submitted data from CY 2019 - 2021, as compared to the previous SST, which used CY 2017-2019 data, when selecting establishments for inspections.

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.

The Site-Specific Targeting Program was reinstated in 2018; it was renewed on October 16, 2019, and then updated on December 14, 2020. From October 1, 2019 – April 1, 2022, SST resulted in 515 inspections. OSHA experienced fewer "No Inspections" at SST selected establishments, compared to other non-construction programmed inspections. SST sites also had a higher rate of violations per inspection and a higher not-in-compliance rate than non-construction programmed inspections during this period; the rate of serious violations per inspection were comparable between sites. Recent data is consistent with earlier results from the SST program. Thus, OSHA found that the SST program continues 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: (1) establishments with elevated Days Away, Restricted, or Transferred (DART) rates for CY 2021; (2) establishments with upward trending rates for the range of CY 2019-2021; (3) establishments that did not provide the required 2021 Form 300A data to OSHA; and (4) establishments with low DART rates in CY 2021 to verify data accuracy and quality control.

1. High-Rate Establishments

The SST plan selects individual establishments for inspection based on CY 2021 Form 300A data.

Because average DART rates vary widely among industries, OSHA will set one DART rate for manufacturing, (NAICS 31-33) and a different DART rate for non-manufacturing (all other NAICS, except construction) 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 at or above twice the private sector national average in CY 2019, that have continued to trend upward through CY 2021.

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 2021 data.

4. Non-Responders

OSHA will generate a random sample of establishments that failed to provide the required Form 300A data to OSHA CY 2021. Inclusion of these non-responding employers is intended to discourage employers from not complying with their obligation to report injury and illness information 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 have opened an inspection of 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 practicable (e.g., by visiting the central office), determine the location of any active worksites based on the type of work scheduled and the length of time remaining to complete the project. At the Area Director’s discretion an inspection should be conducted if possible.

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 2021 data or provides evidence that they are not subject to the requirements of 29 CFR § 1904.41 due to size or industry, inspection shall be terminated, and the event coded as a “No Inspection.”

E. Deferrals

1. OSHA On-Site Consultation Program

Establishments that have achieved SHARP status are deferred from OSHA or State Plan programmed inspection schedule for up to two (2) years upon initial approval or three (3) years for subsequent renewal periods (see 29 CFR 1908.7(b)(4)(i)(B)). Pre-SHARP establishments are deferred from OSHA or State Plan programmed enforcement inspection schedule for up to 18 months (see 29 CFR 1908.7(b)(4)(i)(A)).

If a consultation visit is “in progress” at an establishment, it will take priority over OSHA programmed inspections, including an SST. A consultation visit will be considered “in progress” regarding the working conditions, hazards, or situations covered by the consultation visit from the beginning of the opening conference through the end of the hazard correction due dates and any extensions (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 (including an SST 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 previous SST 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, such as implementing ongoing 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 should 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 and resources permit

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. The AO must fully explain and document in the file the reason for the deletion.

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. During the course of an inspection the scope may be expanded in accordance with the FOM. In addition, if the site has been inspected previously, the AO may expand the inspection to cover both health and safety hazards based on violations from that prior inspection. 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), May 6, 2021, 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 three prior calendar years, which will include CY 2019, 2020, and 2021. Refer to the FOM, Chapter 3, Section VI, *Review of Records* for further guidance on review of injury and illness data. CSHOs should verify that the CY 2022 data was submitted if the inspection is conducted after March 2, 2023, and that CY 2023 data was submitted for inspections conducted after March 2, 2024.

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 under one or more other OSHA enforcement 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 **SSTARG21** 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 **SSTARG21** in the National Emphasis Program section along with all other applicable NEP and LEP codes. Record the value **SSTARG21** 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 **SSTARG21** in the National Emphasis Program section.