



ILA-USMX JOINT SAFETY COMMITTEE

OSH ALERT 2018-06 [23 October 2018]

OSHA Announces Statistics Driven Inspection Targeting Program

On 17 October, OSHA issued a press release announcing the agency’s intention to implement a program designed to prioritize the scheduling of OSHA’s workplace enforcement activities. The agency refers to this initiative as **SST-16** (Site-Specific Targeting - 2016). For your convenience, we attach a copy of that press release to this OSH Alert. An OSHA Directive to Field Offices accompanied the press release: [The Directive](#)

In sum, OSHA’s more recently issued regulations requiring most employers to electronically submit their previous year’s injury/illness data provide the agency with a frame of reference that ostensibly reveals which workplaces have a greater than average incidence of injuries/illnesses and the lost work time (severity) repercussions that evolve from those injuries/illnesses.

The first prong of the program appears to target employers whom the agency believes should have electronically filed such data, but did not.

The second prong will target employers whose injury and illness rates are more elevated than the average employer operating both within and outside of that particular industrial sector.

With such data coming to it every year, OSHA is, theoretically at least, in a position to prioritize its efforts and marshal its enforcement resources in a more effective manner.

For 2016*, the marine cargo handling industry’s (NAICS Code 48832) OSH statistics include the performance of union and non-union employers and had an comparatively high set of numbers (see table below) when compared to the balance of the private sector. Accordingly, we can expect a heightened level of attention coming from the agency in the near term.

TABLE 1. Incidence rates of nonfatal occupational injuries and illnesses by industry and case types, 2016

Industry ²	NAICS code ¹	Total recordable cases	Cases with days away from work, job transfer, or restriction			Other recordable cases
			Total	Cases with days away from work ⁴	Cases with job transfer or restriction	
Marine cargo handling	48832	6.1	3.7	3.3	0.4	2.3
All industries including private, state and local government ³		3.2	1.7	1.0	0.7	1.5
Private industry ⁵		2.9	1.6	0.9	0.7	1.3

[Source: Bureau of Labor Statistics]

[*In the current FY, OSHA will utilize CY 2016 data and advance progressively each year thereafter]

Should any questions arise about any aspect of this OSHA program, the JSC stands ready to assist all ILA and USMX Members and Local Labor Unions.

Got an OSH-related question? Write to the JSC at: blueoceana@optonline.net

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OSHA Trade Release

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Occupational Safety and Health Administration
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OSHA Launches Program to Target High Injury and Illness Rates

WASHINGTON, DC – The U.S. Department of Labor’s Occupational Safety and Health Administration (OSHA) is initiating the **Site-Specific Targeting 2016 (SST-16)** Program using injury and illness information electronically submitted by employers for calendar year (CY) 2016. The program will target high injury rate establishments in both the manufacturing and non-manufacturing sectors for inspection. Under this program, the agency will perform inspections of employers the agency believes should have provided 300A data, but did not for the CY 2016 injury and illness data collection. For CY 2016, OSHA required employers to electronically submit Form 300A data by December 15, 2017. The CY 2017 deadline was July 1, 2018; however, employers may still provide this information to the database.

Going forward, establishments with 250 or more employees that are currently required to keep OSHA injury and illness records, and establishments with 20-249 employees that are classified in **specific industries** with historically high rates of occupational injuries and illnesses will be required to provide this information each year by March 2.

OSHA’s **On-site Consultation Program** offers employers with up to 250 workers with free, confidential safety and health advice on complying with OSHA standards, and establishing and improving safety and health programs.

Under the Occupational Safety and Health Act of 1970, employers are responsible for providing safe and healthful workplaces for their employees. OSHA’s role is to ensure these conditions for America’s working men and women by setting and enforcing standards, and providing training, education and assistance. For more information, visit www.osha.gov.

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