



ILLINOIS OSHA NOTICE
DIVISION OF OCCUPATIONAL SAFETY AND HEALTH

DIRECTIVE NUMBER: 20-2	EFFECTIVE DATE: 12-1-2020
SUBJECT: Site Specific Targeting 2020 (SST-20)	

- Purpose:** This notice implements Illinois OSHA’s Site-Specific Targeting (SST) inspection plan, identified as the “SPPIL” (State Program Planned Inspection List).
- Scope:** Illinois OSHA-wide.
- Reference:** Illinois OSHA Field Operations Manual (IL FOM), December 1, 2020; OSHA Instruction CSP 01-00-005, *State Plan Policies and Procedures Manual*, May 6, 2020; and OSHA Rule *Improve Tracking of Workplace Injuries and Illnesses*, January 25, 2019.
- Cancellations:** Illinois OSHA Notice 14-01 (CPL 02), *Site-Specific Targeting 2014* (SST-14), 2016.
- Expiration Date:** This notice will terminate one year from the effective date, unless replaced earlier by a new Notice. Upon the expiration or replacement of this Notice, inspection lists already underway must be completed.
- Contact:** Illinois OSHA Division
900 S. Spring Street
Springfield, IL 62704
217-782-9386

Background

Illinois OSHA's Programmed Planned Inspection (PPI) Program

The State of Illinois has more units of government than any other state. The state and local government constituency covered under the Illinois Occupational Safety and Health Act includes approximately 8,529¹ public entities with an estimated 758,967² public employees in Illinois.

Enforcement inspectors could not possibly inspect every state and local government unit every year and certainly could not inspect every establishment under Illinois OSHA jurisdiction. Therefore, Illinois OSHA has developed a Site-Specific Targeting (SST) plan to direct enforcement resources on four state and local government operations. These operations: 1) incur a high percentage of reportable incidents, and 2) perform activities that can be regulated through standards adopted by and rules promulgated under the Illinois Occupational Safety and Health Act.

Illinois OSHA's Site-Specific Targeting (SST) plan has been developed for Illinois OSHA's main Programmed Planned Inspection (PPI) program for state and local government establishments. Illinois OSHA uses a high hazard inspection targeting system based on reportable incident data collected by Illinois OSHA during federal fiscal year 2015-2019. The OSHA Information System (OIS) provides this data through the "State Accident (FAT/CAT) Log" report. Periodic tracking and analysis of this data will help Illinois OSHA achieve its goal of reducing the number of injuries and illnesses that occur at state and local government establishments by directing enforcement resources to inspect where the most serious injuries are likely to occur.

Creating the SST Inspection List

The "State Accident (FAT/CAT) Log" report was generated in OIS for RID 0551701 and 0551702 for the period of 10-1-14 through 9-30-19 (FY15-FY19). This report lists the establishment and associated details for any occupational injury classified as a reportable injury to Illinois OSHA. 56 Illinois Administrative Code Part 350 Section 410 provides reportable incident criteria:

"a) Basic Requirement

Within 8 hours after the death of any employee from a work-related incident, the employer shall orally report the fatality by telephone 24/7 Notification – (800) 782-7860 or (217) 782-7860. Within 24 hours after the in-patient hospitalization of one or more employees, or an employee's amputation, or an employee's loss of an eye, as a result of a work-related incident, the employer shall report the in-patient hospitalization, amputation or loss of an eye."

844 reportable incidents (Figure 1) occurred during federal fiscal year 2015-2019. Almost 40% of all reportable incidents occurred within one of the four targeted operations. These four targeted operations will receive Illinois OSHA's attention through comprehensive, programmed planned inspections of establishments that perform these operations:

- **Local Fire Protection (NAICS 922160)**

Over 26% (223) of reportable incidents were from municipal fire departments or fire districts. Five of the reportable incidents resulted in a fatality. The National Fire Department Registry maintained by the U.S. Fire Administration lists 1,081 fire departments/districts in Illinois

¹ As reported by the Illinois Office of the Comptroller, April 2018.

² U.S. Census Bureau 2018 Annual Survey of Public Employment & Payroll.

with approximately 40,500 active firefighters. A review of data from the National Fire Incident Reporting System shows Illinois has a higher rate of injuries per firefighter than any other OSHA state-plan state.

Reference: USFA, NFIRS Firefighter Casualty Module for Illinois, calendar year 2015-2018, injuries coded as severity code 2 (first aid) through code 7 (death).

- **County/Local Road (e.g. highway, street, alley) Maintenance and Construction (NAICS 237310)**
Over 7% (62) of reportable incidents were from county or municipal road maintenance departments. Seven of the reportable incidents resulted in a fatality.
- **Water Supply and Distribution (NAICS 221310) & Sewage Treatment (e.g. wastewater, sewer) (NAICS 221320)**
6% (51) of reportable incidents were from municipal or district water supply or wastewater treatment operations. Two of the reportable incidents resulted in a fatality.

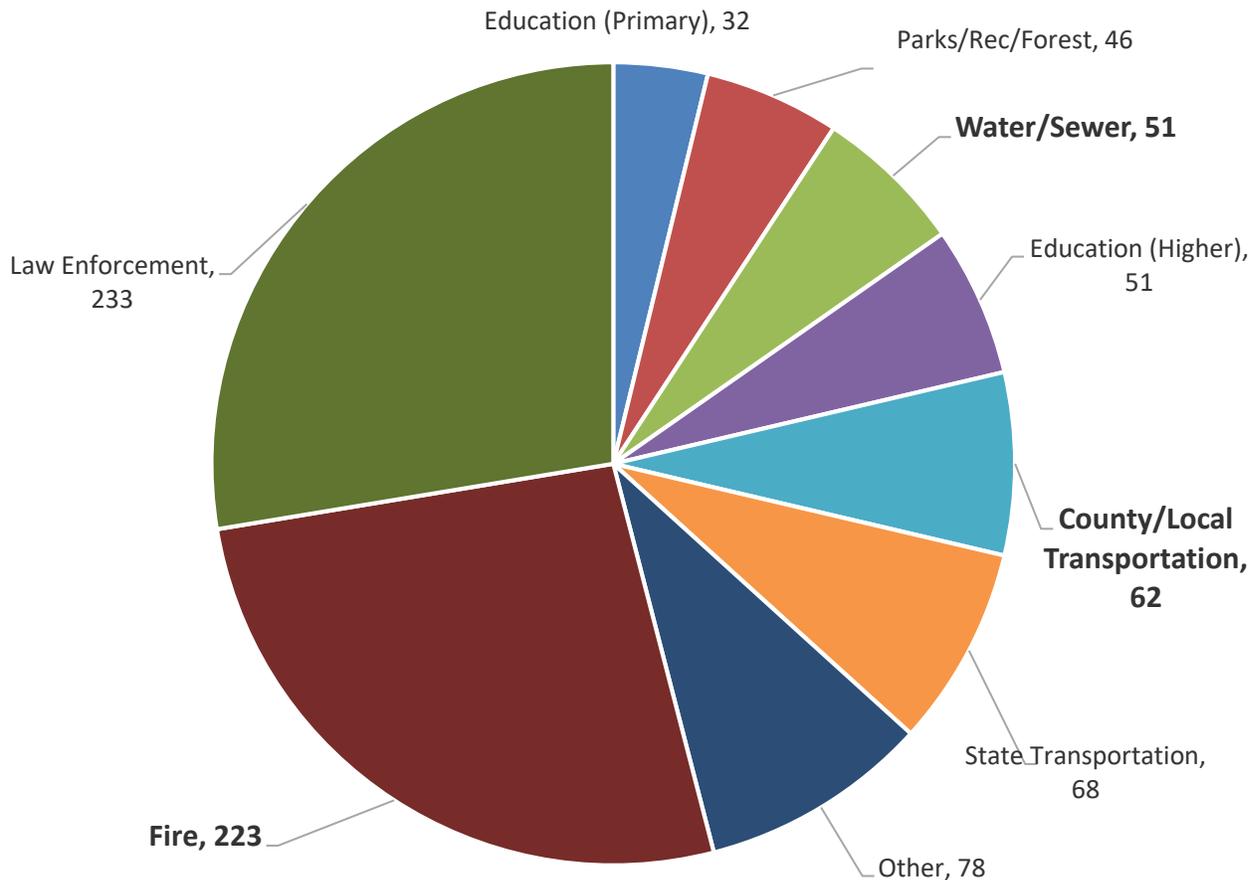


Figure 1 Reportable injury incidents by sector, federal FY15-FY19

Definitions

Comprehensive Inspection

A comprehensive inspection is a substantially complete and thorough inspection of all potentially hazardous areas of the establishment. An inspection may be deemed comprehensive even though, as a result of the exercise of professional judgment, not all potentially hazardous conditions or practices within those areas are inspected. All programmed planned inspections will be comprehensive in scope.

Establishment

56 Illinois Administrative Code Part 350 Section 250 provides the definition of an establishment as:

“c) Establishment – a single physical location where business is conducted or where services or industrial operations are performed. For activities in which employees do not work at a single physical location, such as construction, transportation, and electric, gas and sanitary services, and similar operations, the establishment is represented by main or branch offices, terminals, stations, etc., that either supervise those activities or are the base from which personnel carry out those activities.”

North American Industry Classification System (NAICS) Codes

The North American Industry Classification System (NAICS) is the standard used by federal statistical agencies in classifying business establishments for the purpose of collecting, analyzing, and publishing statistical data related to the U.S. business economy.

Selection of Target Areas

Illinois OSHA has created three establishment master lists for programmed planned inspections:

- Fire Departments/Districts
- County/Local Road Maintenance and Construction
- Water/Sewer Operations

Each master list contains every identified state and local government establishment within the targeted operation. The lists were compiled from a variety of resources and databases. Each list also assigns the establishments into four categories based on a reference date of 10-1-20:

- No record of comprehensive inspection
- Comprehensive inspection performed since 10-1-17
- Comprehensive inspection performed 3-5 years ago
- Comprehensive inspection performed over 6 years ago

Scheduling and Assignment

Prior to October 1st of each year, establishments will be randomly drawn from Illinois OSHA’s three targeted establishment master lists using the “RANDBETWEEN” function in Microsoft Excel. Until exhausted, establishments will be selected from the “no record of comprehensive inspection” sheet. The Division Manager will provide each Regional Enforcement Manager (REM) a programmed planned inspection list for their respective region (Figure 2) for the full federal fiscal year. Each regional list will have an approximate distribution of 50% fire department/district inspections, 25%

county/local road maintenance and construction inspections, and 25% water/sewer operations inspections.

Each Regional Enforcement Manager will then divide their lists and assign inspections to enforcement team members (public safety inspectors and industrial services hygienists).

Regional Enforcement Managers will be responsible for providing inspectors with the most accurate PPI list possible. Each assigned inspection must be verified for inspection history, appropriate jurisdiction (private/public), and operations matched to the associated NAICS code.

Example: The PPI list provided to the REM has a water entity, Mahomet Valley Water Authority, that is not clearly public or private. The REM must investigate the entity and attempt to determine appropriate jurisdiction.

Example: The PPI list provided to the REM has a water entity, Village of Tremont Water. A search of the Village of Tremont website shows that the Village only does billing and receives water from a water district. The REM would delete this entity from the PPI list and replace with another entity.



Figure 2 Illinois OSHA enforcement regions

If the REM receives an entity that just includes water or sewer (e.g. Village of Maryville Water Department) the REM will also look to add an inspection to the PPI list for Village of Maryville Sewer/Wastewater Department if a search finds that the Village 1) has a sewer/wastewater department, 2) it is public sector, and 3) it has not had a comprehensive safety inspection within three years. The REM can also add a sewer/wastewater inspection if that municipality is served by a district or other public sector provider and that provider has not had a comprehensive safety inspection within three years.

For fire departments/districts, the Regional Enforcement Manager will note category 2 departments on inspector’s PPI lists (see section on Establishment Determinations).

Enforcement team members will conduct assigned programmed planned inspections in accordance with the IL-OSHA Field Operations Manual.

Maintaining Inspection Lists and Documentation

Illinois OSHA's Division Manager, or designee, is responsible for maintaining documentation necessary to demonstrate that the PPI lists have been properly utilized in accordance with the requirements of this Notice, including adequate documentation on all deletions, deferrals or other modifications. All such inspection lists and documentation must be maintained by Illinois OSHA for a period of three years after all the inspections conducted under this SST plan are closed. See paragraph B.1.b.(1)(c).3 in CPL 02-00-025, *Scheduling System for Programmed Inspections* (January 4, 1995) for additional information.

List Size

Illinois OSHA will base determinations of list size (i.e., 5 to 50 establishments) on consideration of available resources and geographic range of the office.

Exhausting Assigned List

All of the establishments in a list must be inspected before any establishments in a new list may be inspected.

Deferrals

Illinois OSHA On-Site Consultation Visit in Progress

If an Illinois OSHA On-Site Consultation visit is in progress, it will take priority over programmed planned inspections. A consultation visit will be considered "in progress" in relation to the working conditions, hazards, or situations covered by the visit from the beginning of the opening conference through the end of the correction due dates and any extensions thereof. If a consultation visit is already in progress it will terminate when the following kind of Illinois OSHA compliance inspection is about to take place:

- Imminent danger inspection;
- Fatality/catastrophe inspection;
- Complaint inspections; and/or
- Other critical inspections, as determined by the Illinois OSHA Division Manager and in accordance with the Illinois OSHA Field Operations Manual.

Full-Service Illinois OSHA On-Site Consultation Visits

While an establishment is undergoing a full-service consultation visit for safety **and/or** health; programmed enforcement activity may not occur until after the end of the establishment's visit "In Progress" status.

Limited Service On-Site Consultation Visits

If an establishment is undergoing a limited service consultation visit, whether focused on a particular type of work process or a hazard; programmed enforcement activity may not proceed while the consultant is at the establishment. The re-scheduled enforcement activity must be limited only to those areas that were not addressed by the scope of the consultative visit (posted List of Hazards).

Enforcement Follow-Up and Monitoring Inspections

If an enforcement follow-up or monitoring inspection is scheduled while an establishment is undergoing a consultation visit, the inspection shall not be deferred; however, its scope shall be limited only to those areas required to be covered by the follow-up or monitoring inspection. In such instances, the consultant must halt the consultation visit until the enforcement inspection is

completed. In the event Illinois OSHA issues a citation(s) as a result of the follow-up or monitoring inspection, a consultation visit may not proceed until the citation(s) becomes final.

Illinois OSHA On-Site Consultation and 90-Day Deferral

If an establishment has requested an initial full-service comprehensive consultation visit for safety and health from the Illinois OSHA On-Site Consultation Program, and that visit has been scheduled, the PPI may be deferred for 90 calendar days from the date of the notification by the Illinois OSHA On-Site Consultation Program to the Illinois OSHA Division Manager. No extension of the deferral beyond 90 calendar days is possible, unless the consultation visit is “In Progress.” Illinois OSHA may, however, in exercising its authority to schedule inspections, assign a lower priority to establishments where consultation visits are scheduled. See CSP 02-00-003, *Consultation Policies and Procedures Manual, Chapter 7: Relationship to Enforcement* (November 19, 2015) for additional information.

Safety and Health Achievement Recognition Program (SHARP).

SHARP is designed to provide support and incentives to those public employers that implement and continuously improve effective safety and health management system(s) at their establishment. SHARP participants are exempted from programmed planned inspections. [29 CFR 1908.7(b)(4)]. All initial approvals of SHARP status will be for a period of up to two years, commencing with the date the Regional Office approves an employer’s SHARP application. After the initial approval, all SHARP renewals will be for a period of up to three years.

Deletions

Illinois OSHA will be responsible for making appropriate deletions from the programmed planned inspection (PPI) list:

- **No Longer in Business or No Jurisdiction:** Establishments no longer in business or not under the jurisdiction of Illinois OSHA will be removed from any PPI list prior to assignment to an inspector.
- **Previous Inspection:** Establishments that have had a comprehensive inspection within the last 36 months from the beginning of the current fiscal year (October 1st) will be removed from any PPI list prior to assignment to an inspector. The inspection reference date will be the inspection opening conference date. A three-layer method will be used to prevent an inspector from arriving on-site at an establishment that has received a comprehensive inspection within the last 36 months:
 1. Each establishment master list (Fire, Water/Sewer, Street) will be categorized by inspection date history based on months since the beginning of the federal fiscal year.
 2. After the Division Manager sends the Regional Enforcement Manager the raw PPI assignments, the REM will verify inspection history prior to sending individual PPI lists to inspectors.
 3. The inspector will verify inspection history for an establishment as part of their pre-inspection preparation prior to traveling to the establishment.
- **SHARP Establishments:** Establishments that have active SHARP status will be removed from any PPI list prior to assignment to an inspector. NOTE: certain events or incidents (e.g.

imminent danger, fatality/catastrophe, formal complaint) can trigger an Illinois OSHA enforcement inspection at SHARP sites.

Establishment Determinations

In accordance with 56 Illinois Administrative Code Part 350 Section 250(c), there are factors that determine if an establishment can include more than one physical location. Alternatively, other factors can determine if one physical location contains two or more establishments. The following methods will be used to make establishment determinations for each targeted inspected entity.

These establishment determinations also determine the proper level (establishment level) the employer should be using to maintain injury and illness records. This is critical to improving data quality submitted electronically via the federal OSHA Injury Tracking Application.

Local Fire Protection (NAICS 922160)

Fire departments and fire districts have been divided into three categories based on number of fire stations.

Category 1: Chicago Fire Department

For programmed planned inspections, the Chicago Fire Department will be inspected at the battalion level. A battalion is an organizational structure within larger fire departments that usually represents a geographical area covered by multiple stations under a battalion chief. Chicago Fire Department has 100 stations and 25 battalions. When an inspector is assigned a PPI for Chicago Fire Department it will be presented as one of the 25 battalions: Chicago Fire Department 15th Battalion, 1618 W. 33rd Pl. The address provided is the fire station where Battalion Chief 15 is located. Inspectors will inspect the stations, personnel, equipment, etc. of the 15th battalion as one inspection/establishment.

Category 2: Departments with six or more fire stations

For programmed planned inspections, these larger departments may have a geographical organizational structure like a battalion or division. When assigned a PPI for one of these departments, the inspector will determine the organizational structure of the department during the opening conference. The inspector will ask if fire stations are divided into geographical areas under a battalion, division, deputy, assistant chief, etc. If yes, the inspector will inspect the department under multiple inspections/establishments that match the fire department geographical divisions. If there are not geographical divisions, the department will be inspected under one inspection/establishment.

Example: Aurora Fire Department has nine stations. An inspector determines that Aurora Fire Department operates three battalions (Battalion 1, 2, 3) with three stations per battalion. The inspector performs three inspections, Aurora Fire Department Battalion 1, Aurora Fire Department Battalion 2, and Aurora Fire Department Battalion 3.

Example: Champaign Fire Department has six stations. An inspector determines that Champaign Fire Department operates all six stations under a single command chief. The inspector performs one inspection, Champaign Fire Department.

Category 3: All other departments

All other departments shall be inspected as one department. In unusual cases, an inspector can contact their Regional Enforcement Manager if they believe a department should be divided into two or more inspections.

NOTE: If a fire department or fire station is located within a multi-use public safety building this would be considered a physical location with two establishments: 922160 Fire Protection and 922120 Police Protection.

County/Local Road Maintenance and Construction (NAICS 237310)

The 237310 NAICS code is the proper cross reference for the 926120 NAICS code for government establishments engaged in street/highway construction and/or maintenance. The 926120 and 488XXX NAICS codes will no longer be used for PPIs. Instead, the 237310 NAICS code will be used when inspecting assigned highway/street operations. These operations may be a city, village, or township street (or streets and alleys) department, a county highway department, or road district. The following determination method will apply:

- Inspect only the highway/street maintenance and construction operations and facilities of the assigned entity. These operations may be performed under a variety of department names and the department may perform a variety of functions.

Example: An inspector is assigned to the City of Elgin Street Department. During the opening conference the inspector determines that street maintenance is under the Department of Public Works. The inspector will limit the inspection to the operations and facilities for street maintenance.

- An inspector is assigned a large department with multiple facilities. During the opening conference the inspector determines if the facilities have separate managers. If yes, the inspector opens additional inspections. If no, the inspector inspects as one inspection. If the department has more than four separate facilities, contact the Regional Enforcement Manager for further guidance.

Example: An inspector is assigned to DuPage County Highway Department. At the opening conference the inspector determines there are four operations yards. Each yard has a manager. The inspector would open an inspection for each yard.

Example: An inspector is assigned to DuPage County Highway Department. At the opening conference the inspector determines there are four operations yards. All yards are managed by a single manager. The inspector would open a single inspection for the department.

Water Supply (NAICS 221310) and Sewage Treatment (NAICS 221320)

Inspectors have the potential to receive a variety of assignments under these NAICS codes. Regional Enforcement Managers will do their best to provide inspectors with the most accurate inspection establishment name and address. Water and sewer operations fall under various levels of government. Some operations are under a city government, while others operate under a district.

Some water/sewer operations fall under one manager and some are under different management structures. The following determination method will apply:

- If assigned to inspect a “clean” system (water supply, drinking water, distribution) it will be coded as 221310.
- If assigned to inspect a “dirty” system (wastewater, sewer) it will be coded as 221320.
- If assigned a small village or district that has a combined water/sewer department (e.g. same manager and same employees), select the dominant operation and code it as one inspection with the appropriate NAICS code.
- If assigned a large district with multiple facilities, determine if the facilities have separate managers during the opening conference. If yes, open additional inspections. If no, inspect as one inspection. If the district has more than four separate facilities, contact the Regional Enforcement Manager for further guidance.

Example: An inspector is assigned Urbana & Champaign Sanitary District. At the opening conference the inspector determines that they have a Northeast Plant and a Southwest Plant. Each plant has a manager. The inspector opens a 221320 inspection for each plant.

Example: An inspector is assigned Urbana & Champaign Sanitary District. At the opening conference the inspector determines that they have a Northeast Plant and a Southwest Plant. Both plants are managed by a single manager. The inspector opens a single 221320 inspection for both sites.

NOTE: There is an increasing trend in Illinois to privatize water and sewer systems. Private systems have been filtered out (to the best ability) of the PPI list. If an inspector determines before or during an inspection that the operation has been privatized, they must contact their Regional Enforcement Manager to confirm jurisdiction.

Inspection Procedures

Programmed Planned Inspections

Inspections conducted under this plan will be comprehensive safety and/or health inspections.

Both Safety and Health Inspection Conducted

If both a safety and health inspection are conducted, such inspections may be conducted as one combined safety and health inspection by a cross-trained inspector (as established through specific training or demonstrated ability), or as separate safety and health inspections, or as joint safety and health inspections.

When a programmed planned inspection is assigned to a cross-trained industrial hygienist, the inspection will be a combined safety and health inspection and can be marked in the OSHA information System (OIS) as “safety and health.”

Citations

Violations will be cited and penalties will be proposed in accordance with the Illinois OSHA Field Operations Manual and other applicable documents.

Recordkeeping Violations

Whenever injury and illness recordkeeping violations are identified, appropriate citations and penalties will be proposed. Supporting documentation will be provided in accordance with the Illinois OSHA Field Operations Manual.

Relationship to Other Programs

Un-Programmed Inspections

Un-programmed planned inspections will be conducted according to the Illinois OSHA Field Operations Manual and other applicable documents. If the occasion for an un-programmed (e.g., complaint, fatality) inspection arises with respect to an establishment that is also in the current inspection list to receive a programmed planned inspection, the two inspections may be conducted concurrently or separately at the discretion of the Regional Enforcement Manager.

Recording and Tracking

PPI-Only Inspections

In the OSHA Information System (OIS) under the investigation type tab the “initiating type” must be marked as “programmed planned.” In addition, the “State Emphasis Program” box must be marked as “**SPPIL (State Program Planned Inspection List)**.”

PPI Combined with Un-programmed Inspections.

For all un-programmed inspections conducted in conjunction with a programmed planned inspection, the OIS investigation type tab must be marked as “un-programmed” and the un-programmed activity identified. In addition, the “State Emphasis Program” box must be marked as “**SPPIL (State Program Planned Inspection List)**.”

PPI Combined with Emphasis Program Inspections.

For all emphasis program inspections such as National and Local Emphasis Programs conducted in conjunction with a programmed planned inspection, the OIS investigation type tab must be marked as “programmed planned.” In addition, the “State Emphasis Program” box must be marked as “**SPPIL (State Program Planned Inspection List)**” along with all NEP and LEP OSHA codes applicable to the inspection.

PPI Combined with Un-programmed and Other Programmed Inspections.

If a programmed planned inspection is combined with an un-programmed (e.g., complaint, catastrophe, or fatality) inspection and a programmed inspection, such as a NEP or LEP, the OIS investigation type tab must be marked “un-programmed.”