



OSHA COMPLIANCE BULLETIN

HIGHLIGHTS

- + OSHA implemented a program that targets establishments for inspection based on their 2016 Form 300A data.
- + Establishments that had elevated injury and illnesses rates in 2016 are the program's main targets.
- + Other establishments that were subject to OSHA's 2016 Form 300A requirements may be targeted for inspection as well.

IMPORTANT DATES

- + **October 16, 2018**
OSHA implemented its site-specific targeted inspection program based on 2016 target data from Form 300A.

OSHA'S SST-16 INSPECTION PLAN TARGETS WORKSITES BASED ON 2016 REPORTS

OVERVIEW

On Oct. 16, 2018, the Occupational Safety and Health Administration (OSHA) launched a "site-specific targeting" (SST) plan that uses employer-submitted data from 2016 to select non-construction worksites for inspections. The plan, known as [SST-16](#), is one of several OSHA initiatives that direct the agency's enforcement resources to workplaces with high injury or illness rates in order to help ensure employers observe health and safety rules.

Under the SST-16, any non-construction establishment that was subject to OSHA's electronic reporting requirements for 2016 may be selected for inspection. However, establishments that either reported high injury rates or failed to report in 2016 are particularly likely to be chosen.

ACTION STEPS

Establishments that were subject to OSHA's electronic reporting requirements for 2016—especially those that either failed to comply or reported high injury rates—should begin preparing for a comprehensive OSHA inspection.



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BACKGROUND

Starting in 1995, OSHA conducted an annual SST plan that selected establishments for inspection based on data collected through a prior initiative. After that initiative expired in 2014, OSHA implemented a new data-collection mechanism through a [final rule](#). Issued in May 2016, the final rule requires certain establishments to use OSHA's [Injury Tracking Application](#) (ITA) to report workplace injury and illness information every year. For 2016 data, the initial submissions were due by Dec. 15, 2017.

OSHA's SST-16, launched on Oct. 16, 2018, now uses that first set of electronic submissions to determine which establishments will be subject to comprehensive health or safety inspections under the program.

SST-16 INSPECTION LISTS

The SST-16 uses software to generate inspection lists for each of OSHA's area offices. These lists include random samples of the establishments described in the table below.

SST-16 INSPECTION LIST SELECTION CRITERIA		
Inclusion	Description	Additional information
High-rate establishments	Establishments that had elevated days away, restricted or transferred (DART) rates* on their 2016 Forms 300A	Different DART rates for manufacturing and nonmanufacturing are set as selection criteria to achieve 50/50 representation
Low-rate establishments	Establishments that had low DART rates* on their 2016 Forms 300A	Included to verify reliability of Form 300A data for quality control purposes
Non-responders	Establishments that failed to provide the required 2016 Form 300A data to OSHA	Included to discourage employers from trying to avoid inspections by not reporting injury and illness information

**OSHA does not define what constitutes "elevated" or "low" DART rates.*

In general, each OSHA area office must inspect every establishment that appears on its SST inspection lists. However, an establishment is **not** subject to inspection under the program and will, therefore, be deleted from any SST-16 list, if it:

- + Has received a comprehensive OSHA safety or health inspection within 36 months of the SST-16 inspection list's creation date;
- + Is a public sector employer (such as a federal, state or local government); or
- + Is an approved participant in OSHA's Voluntary Protection Programs ([VPP](#)) or Safety and Health Achievement Recognition Program ([SHARP](#)).

MORE INFORMATION

For more information on OSHA inspections, please contact MJ Insurance, Inc. or visit OSHA's [website](#).