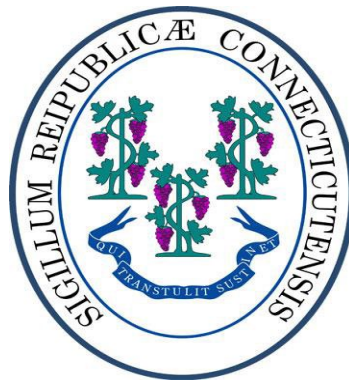


**FY 2018**  
**Follow-up Federal Annual Monitoring Evaluation (FAME) Report**

State of Connecticut  
Division of Occupational Safety and Health (CONN-OSHA)



**Evaluation Period: October 1, 2017 – September 30, 2018**

**Initial Approval Date: January 4, 1974**  
**Conversion to State and Local Government Plan: November 3, 1978**  
**Program Certification Date: August 21, 1986**  
**Final Approval Date: N/A**

**Prepared by:**  
**U. S. Department of Labor**  
**Occupational Safety and Health Administration**  
**Region I**  
**Boston, Massachusetts**



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## **I. Executive Summary**

The primary purpose of this report is to assess the State Plan's progress in Fiscal Year (FY) 2018 in resolving outstanding findings from the previous FY 2017 Comprehensive Federal Annual Monitoring Evaluation (FAME) Report.

In FY 2018, CONN-OSHA began experiencing challenges right from the start. Due to the state's ongoing budgetary issues, the staff continued to be affected by travel restrictions and other cost-cutting measures. In addition, CONN-OSHA had to operate at a reduced level of staffing during the entire fiscal year; a veteran compliance safety and health officer (CSHO) began taking extended leave in late FY 2017 and then retired in mid-FY 2018. The loss of this CSHO was the major cause of CONN-OSHA not meeting its inspection goal in FY 2018.

However, as the year progressed, CONN-OSHA was able to achieve success in key areas. First, having no findings to contend with from last year, CONN-OSHA was able to focus on resolving the handful of observations that were carried over from the FY 2017 FAME Report and did so successfully. One of these observations pertained to high lapse time and had been on the books for a couple of years. Second, no new issues came to light in FY 2018; thus, there are no new findings or observations in this report. Last but not least, there were no work-related fatalities in Connecticut's state and local government workforce for the third straight year.

This was the first year in quite some time that CONN-OSHA had to operate with less than a full complement of CSHOs. Despite this and other impediments, CONN-OSHA's performance was noteworthy on many fronts. Most importantly, neither its difficulties nor its accomplishments distracted the State Plan from focusing on its mission of protecting the state and local government workforce in Connecticut.

## **II. State Plan Background**

CONN-OSHA became operational on January 4, 1974, and covered both the private and state and local government sectors. It operated effectively in that manner until 1977, when the Connecticut State Labor Council sponsored a bill in the state legislature to restrict the enforcement of Connecticut's safety and health program to state and local government only. The bill was subsequently enacted with an effective date of June 30, 1978. Connecticut's previously existing approved 18(b) Plan, which covered both the private and state and local government sectors, was withdrawn on October 2, 1978, and was officially converted to a State and Local Government Only State Plan on November 3, 1978.

In August 1986, CONN-OSHA was officially recognized by the U.S. Department of Labor as having completed all structural and developmental aspects of its approved State and Local Government Only State Plan, giving CONN-OSHA the distinction of being the first State and Local Government Only State Plan in the nation. CONN-OSHA is administered by the State of Connecticut, Department of Labor, under the leadership of the Commissioner of Labor. The State Plan's staff operates out of the state office building located in Wethersfield, Connecticut. CONN-OSHA enforces safety and health standards in state and local government workplaces, provides

consultation services to these workplaces, adopts standards, and provides outreach services to the state and local government workforce. CONN-OSHA covers approximately 63,000 state government workers and 153,600 local government workers; OSHA conducts private sector enforcement in Connecticut.

The Connecticut Department of Labor operates a workplace retaliation program pursuant to the Connecticut Occupational Safety and Health Act of 1973 (Chapter 571, Sections 31-367 through 31-385). The attorneys who administer the workplace retaliation program are employed by the Office of Program Policy (OPP), which is a separate division within the Connecticut Department of Labor. OPP has jurisdiction over workplace retaliation cases arising from state and local government workers in the State of Connecticut.

At full staffing, CONN-OSHA has two first-line supervisors (the director and the occupational safety and health program manager), five CSHOs, and three 23(g) consultants. As stated earlier, throughout FY 2018, CONN-OSHA was hampered by the departure of a veteran safety compliance officer who began taking an extended leave of absence late in FY 2017 and eventually retired in July 2018. This position remained open for the remainder of the fiscal year. Currently, one of CONN-OSHA's two administrative positions also remains vacant.

Two compliance assistance specialists plan, develop, and implement training and education programs for the state and local government workforce. In recent years, enrollment in CONN-OSHA's training programs has not met expectations. CONN-OSHA planned its training programs back in 2014, when it created its current five-year strategic plan. From client feedback, CONN-OSHA has become aware that newer policies issued by OSHA have caused the demand for training to change over time. CONN-OSHA will make adjustments in its new strategic plan, which begins in FY 2020, to accommodate the changes in the demand for its training.

Based on financial close-out forms, CONN-OSHA's FY 2018 federal funding award was \$629,700. In addition to matching the federal funding award, the State of Connecticut also contributed \$1,276,443 to the State Plan's total funding amount of \$2,535,843. Thus, Connecticut contributed 75 percent of CONN-OSHA's total funding in FY 2018, which is comparable to the state's contribution in past years.

## **New Issues**

None

## **III. Assessment of State Plan Progress and Performance**

### **A. Data and Methodology**

OSHA has established a two-year cycle for the FAME process. This is the follow-up year, and as such, OSHA did not perform an on-site case file review associated with a Comprehensive FAME Report. This strategy allows the State Plan to focus on correcting deficiencies identified in the

most recent Comprehensive FAME Report. The analyses and conclusions described in this report are based on information obtained from a variety of monitoring sources, including:

- State Activity Mandated Measures (SAMM) Report (Appendix D)
- State OSHA Annual Report (Appendix E)
- State Plan Annual Performance Plan
- State Plan Grant Application
- OSHA Information System (OIS) Reports
- WebIMIS Reports
- Quarterly monitoring meetings between OSHA and the State Plan

## **B. Findings and Observations**

The FY 2017 Comprehensive FAME Report contained no findings and six observations. This FY 2018 Follow-up FAME Report contains no new findings or observations, and all six of the observations from the previous FAME Report have been closed. Appendix A, which describes the new and continued findings and recommendations, has been left blank. Appendix B describes observations subject to continued monitoring and the related federal monitoring plans. Appendix C describes the status of each FY 2017 finding in detail and has also been left blank.

### **OBSERVATIONS**

#### Closed FY 2017 Observations

**Observation FY 2017-OB-01:** CONN-OSHA's average lapse time of 72.76 days for health cases did not meet the further review level (FRL), or range of acceptable data, of +/- 20 % of 56.03 days.

**Status:** In FY 2018, the FRL range for the average lapse time for health cases (SAMM 11) was from 45.25 to 67.87 days. Over the past few years, CONN-OSHA's managers have been working closely with the health CSHOs to reduce lapse time, and these efforts have been successful. CONN-OSHA's average lapse time of 54.86 days for health cases was within the FRL range of 45.25 to 67.87 days in FY 2018. This observation is closed.

**Observation FY 2017-OB-02:** In 17 (38 percent) of the 45 case files that were reviewed, there was no documentation that the CSHO had either requested or reviewed the OSHA 300 Log.

**Status:** Discussions between OSHA and CONN-OSHA clarified that CSHOs do request and review the OSHA 300 Log when appropriate. When conducting programmed inspections of local governments, CONN-OSHA typically inspects multiple departments within a city or town but maintains the logs requested from each departmental inspection in the city (or town) hall inspection file. To ensure that the OSHA 300 Log has been requested and/or obtained for all inspections, whether programmed or un-programmed, the CONN-OSHA manager reviews the documentation in all case files prior to closing the inspection. Since OSHA has a better understanding of CONN-OSHA's procedures with regard to requesting the OSHA 300 Log,

another case file review is not needed to evaluate this issue. However, OSHA suggests that the CSHO note in each department's inspection file that the OSHA 300 Log is maintained in the city (or town) hall inspection file. This observation is closed.

**Observation FY 2017-OB-03:** For one employer that had 54 citations (14 serious and 40 other-than-serious) long overdue for abatement, CONN-OSHA did not conduct a follow-up inspection at the workplace until 11 months after the date of the opening conference and about six months after the abatement due date.

**Status:** CONN-OSHA has been mindful of the need to maintain an awareness of overdue abatement and to conduct follow-up inspections, when appropriate, to verify abatement. An OIS Abatement Tracking Report run by OSHA in January 2019 lists a total of 15 violations overdue for abatement; the length of time the abatement is overdue ranges from two to 31 days. This is a vast improvement over last year's OIS report which listed numerous violations, each of which was several months overdue for abatement. This observation is closed.

**Observation FY 2017-OB-04:** In 20 (47 percent) of the 43 cases where the CSHO indicated that worker interviews were held, there were no notes or documentation of the interviews.

**Status:** CONN-OSHA's managers have met with the CSHOs to emphasize the need to include documentation of worker interviews in the case file. In addition, the managers have reviewed randomly selected case files to determine whether the CSHOs are including this documentation. The State Plan has reported the results of these case file reviews to OSHA, which indicate that the CSHOs are performing satisfactorily in terms of including documentation of worker interviews in the case file. This observation is closed.

**Observation FY 2017-OB-05:** OPP has a workplace retaliation case that has been open for more than five years. The case has been delayed due to years of litigation and OPP's extensions.

**Status:** In FY 2018, CONN-OSHA closed the case that was mentioned in this observation, as well as some other cases that were open for lengthy periods of time. OPP is aware of the need to monitor the length of extensions. This observation is closed.

**Observation FY 2017-OB-06:** It is difficult for state and local government workers to use the CONN-OSHA website to file workplace retaliation complaints.

**Status:** The State Plan created a new website that has a link to workplace retaliation information on its homepage. The site also includes links to the online complaint form and workers' rights information. This observation is closed.

### **C. State Activity Mandated Measures (SAMM) Highlights**

Each SAMM has an agreed upon FRL, which can be either a single number or a range of numbers above and below the national average. State Plan SAMM data that falls outside the FRL triggers a closer look at the underlying performance of the mandatory activity. Appendix D presents the State Plan's FY 2018 SAMM Report and includes the FRLs for each measure. The State Plan was outside the FRL on the following SAMMs:

#### **SAMM 2a - Average number of work days to initiate complaint investigations (state formula)**

Discussion of State Plan data and FRL: The FRL for the average number of work days to initiate complaint investigations (state formula) was one work day in FY 2018. CONN-OSHA's result for SAMM 2a was zero work days. In FY 2017, the State Plan was just outside the FRL of one work day with an average of a day and a half to initiate complaint investigations.

Explanation: SAMM 2a calculates the number of work days from the date the State Plan receives the complaint to the date the State Plan initiates the investigation by notifying the employer of the complaint. This SAMM pertains only to complaints that are handled as "phone/fax investigations" and have no related inspection.<sup>1</sup> In FY 2018, CONN-OSHA did not conduct any complaint investigations, which is typical for the State Plan.

#### **SAMM 5 - Average number of violations per inspection with violations by violation type**

Discussion of State Plan data and FRL: The FRL range for serious, willful, repeat, and unclassified (SWRU) violations was from 1.46 to 2.18 in FY 2018. CONN-OSHA's average of 1.63 for SWRU violations was within the FRL range. The FRL range for other than serious (OTS) violations was from 0.78 to 1.18. In FY 2018, CONN-OSHA's average of 1.44 for OTS violations was outside (above) the acceptable range. This average was a bit lower than the State Plan's FY 2017 average of 1.76 for OTS violations, which was above the FRL range of 0.79 to 1.19.

Explanation: OSHA is not concerned that CONN-OSHA's average for OTS was above the FRL range. If the average for SWRU were below the acceptable range, then having a high average for OTS would indicate that the State Plan was not targeting high-hazard employers and/or was classifying some serious violations as OTS. However, the average for SWRU was squarely within the acceptable range. Therefore, it appears that CONN-OSHA targets the most hazardous workplaces and that the CSHOs cite a fair number of both SWRU and OTS violations when conducting inspections.

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<sup>1</sup> For low priority hazards, with permission of a complainant, CONN-OSHA may telephone the employer to describe safety and health concerns, following up with a fax providing details on alleged safety and health hazards. The employer must respond in writing within five working days, identifying any problems found and noting corrective actions taken or planned. If the response is adequate and the complainant is satisfied with the response, CONN-OSHA generally will not conduct an on-site inspection.

## **SAMM 7 – Inspections**

Discussion of State Plan data and FRL: The FRL range for safety inspections was from 166.25 to 183.75 in FY 2018. CONN-OSHA’s total of 119 safety inspections was substantially below the acceptable range. For health inspections, the FRL range was from 76 to 84. CONN-OSHA’s total of 68 health inspections was also below the FRL range. In FY 2017, the FRL range for safety inspections was from 166.25 inspections to 183.75 inspections, and FRL range for health inspections was from 76 to 84; the State Plan was only slightly outside the FRL for safety inspections with 159 but met the FRL range for health inspections with 77.

Explanation: As noted earlier, CONN-OSHA operated with only two safety CSHOs in FY 2018, as opposed to the usual three, and this was the main cause of CONN-OSHA not meeting the goal for safety inspections. With regard to health inspections, CONN-OSHA conducted a relatively high number of unprogrammed inspections in FY 2018, and these inspections tended to be more complex and time-consuming than programmed inspections.<sup>2</sup> Thus, CONN-OSHA was unable to meet the goal for health inspections in FY 2018. OIS Inspection Summary Reports confirm that CONN-OSHA has experienced an increase in the number of unprogrammed inspections over the past few years; in FY 2018, CONN-OSHA conducted 42 unprogrammed inspections, compared to 38 in FY 2017 and 34 in FY 2016. Since CONN-OSHA has identified the obstacles that prevented it from meeting the goals for safety and health inspections in FY 2018, OSHA does not believe that the State Plan’s results for SAMM 7 are cause for concern.

## **SAMM 14 - Percent of 11(c) investigations completed within 90 days**

Discussion of State Plan data and FRL: The FRL of 100 percent is fixed for all State Plans. In FY 2018, CONN-OSHA’s percent was zero. In FY 2017, CONN-OSHA’s percent was also zero.

Explanation: CONN-OSHA considers all cases to be meritorious and proceeds with mediation. OSHA is not concerned with CONN-OSHA’s performance on this SAMM; mediation is often a slow process, which has resulted in the State Plan not completing any cases within 90 days.

## **SAMM 15 - Percent of 11(c) complaints that are meritorious**

Discussion of State Plan data and FRL: The FRL range for SAMM 15 was from 19.20 percent to 28.80 percent in FY 2018. CONN-OSHA’s percent of 11(c) complaints that were meritorious was 60, which was well above the FRL range. In FY 2017, the FRL range was from 20 percent to 30 percent, and no complaints were found to have merit. However, this result was not a good indicator of CONN-OSHA’s overall performance because the sample size consisted of only one completed case that resulted in a dismissal.

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<sup>2</sup> Inspections scheduled in response to alleged hazardous working conditions identified at a specific worksite are classified as unprogrammed. This type of inspection responds to imminent dangers, fatalities/catastrophes, complaints; and referrals. It also includes follow-up and monitoring inspections scheduled by the State Plan. (Source: CONN-OSHA FOM, p. 2-6)



Explanation: CONN-OSHA had a relatively high percent of 11(c) complaints that were meritorious because it considers all complaints to be meritorious, except those that are untimely or are outside the State Plan's jurisdiction.

### **SAMM 16 – Average number of calendar days to complete an 11(c) investigation**

Discussion of State Plan data and FRL: The FRL of 90 calendar days is fixed for all State Plans. In FY 2018, CONN-OSHA's average of 982 days was well above the FRL. This average is an improvement over CONN-OSHA's FY 2017 average of 1,788 calendar days.

Explanation: OPP's average of 982 calendar days was the result of the State Plan closing several older cases in FY 2018. Currently, OPP's average age of open cases is 396 calendar days, which indicates a downward trend in the average number of calendar days that workplace retaliation investigations remain open. Since OPP's average has decreased, and the State Plan continues to focus on closing old cases, OSHA is not concerned that the State Plan's average is above the FRL for SAMM 16.

## Appendix A – New and Continued Findings and Recommendations

FY 2018 CONN-OSHA Follow-up FAME Report

| FY 2018-# | Finding | Recommendation | FY 2017-# or<br>FY 2017-OB-# |
|-----------|---------|----------------|------------------------------|
|           | None    |                |                              |
|           |         |                |                              |
|           |         |                |                              |

## Appendix B – Observations and Federal Monitoring Plans

### FY 2018 CONN-OSHA Follow-up FAME Report

| Observation #<br>FY 2018-OB-# | Observation#<br>FY 2017-OB-# or<br>FY 2017-# | Observation   | Federal Monitoring Plan | Current<br>Status |
|-------------------------------|--|---|-------------------------|-------------------|
|                               | FY 2017-OB-01                                | CONN-OSHA’s average lapse time of 72.76 days for health cases did not meet the FRL of +/- 20 % of 56.03 days.   |                         | Closed            |
|                               | FY 2017-OB-02                                | In 17 (38 percent) of the 45 case files that were reviewed, there was no documentation that the CSHO had either requested or reviewed the OSHA 300 Log.   |                         | Closed            |
|                               | FY 2017-OB-03                                | For one employer that had 54 citations (14 serious and 40 other-than-serious) long overdue for abatement, CONN-OSHA did not conduct a follow-up inspection at the workplace until 11 months after the date of the opening conference and about six months after the abatement due date. |                         | Closed            |
|                               | FY 2017-OB-04                                | In 20 (47 percent) of the 43 cases where the CSHO indicated that worker interviews were held, there were no notes or documentation of the interviews.   |                         | Closed            |
|                               | FY 2017-OB-05                                | OPP has a workplace retaliation case that has been open for more than five years. The case has been delayed due to years of litigation and OPP’s extensions.  |                         | Closed            |
|                               | FY 2017-OB-06                                | It is difficult for state and local government workers to use the CONN-OSHA website to file workplace retaliation complaints.   |                         | Closed            |

## Appendix C - Status of FY 2017 Findings and Recommendations

FY 2018 CONN-OSHA Follow-up FAME Report

| FY 2018-# | Finding | Recommendation | State Plan Corrective Action | Completion Date | Current Status and Date |
|-----------|---------|----------------|------------------------------|-----------------|-------------------------|
|           | None    |                |                              |                 |                         |

**Appendix D – FY 2018 State Activity Mandated Measures (SAMM) Report**  
 FY 2018 CONN-OSHA Follow-up FAME Report

| <b>U.S. Department of Labor</b>   |   |                        |                             |  |
|---|---|------------------------|-----------------------------|--|
| Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs) |   |                        |                             |  |
| State Plan: Connecticut - CONN-OSHA   |   |                        | FY 2018                     |  |
| <b>SAMM Number</b>  | <b>SAMM Name</b>  | <b>State Plan Data</b> | <b>Further Review Level</b> | <b>Notes</b>   |
| <b>1a</b>   | Average number of work days to initiate complaint inspections (state formula)         | 3.48                   | 5                           | The further review level is negotiated by OSHA and the State Plan.   |
| <b>1b</b>   | Average number of work days to initiate complaint inspections (federal formula)       | 2.75                   | N/A                         | This measure is for informational purposes only and is not a mandated measure.   |
| <b>2a</b>   | Average number of work days to initiate complaint investigations (state formula)      | 0.00                   | 1                           | The further review level is negotiated by OSHA and the State Plan.   |
| <b>2b</b>   | Average number of work days to initiate complaint investigations (federal formula)    | 0.00                   | N/A                         | This measure is for informational purposes only and is not a mandated measure.   |
| <b>3</b>  | Percent of complaints and referrals responded to within one workday (imminent danger) | 100%                   | 100%                        | The further review level is fixed for all State Plans.   |
| <b>4</b>  | Number of denials where entry not obtained  | 0                      | 0                           | The further review level is fixed for all State Plans.   |
| <b>5</b>  | Average number of violations per inspection   | SWRU: 1.63             | +/- 20% of SWRU: 1.82       | The further review level is based on a three-year national average. The range of acceptable data not requiring further |

## Appendix D – FY 2018 State Activity Mandated Measures (SAMM) Report

### FY 2018 CONN-OSHA Follow-up FAME Report

|          |   |             |                        |  |
|----------|---|-------------|------------------------|--|
|          | with violations by violation type   | Other: 1.44 | +/- 20% of Other: 0.98 | review is from 1.46 to 2.18 for SWRU and from 0.78 to 1.18 for OTS.  |
| <b>6</b> | Percent of total inspections in state and local government workplaces                     | 100%        | 100%                   | Since this is a State and Local Government State Plan, all inspections are in state and local government workplaces.   |
| <b>7</b> | Planned v. actual inspections – safety/health   | S: 119      | +/- 5% of S: 175       | The further review level is based on a number negotiated by OSHA and the State Plan through the grant application. The range of acceptable data not requiring further review is from 166.25 to 183.75 for safety and from 76 to 84 for health. |
|          |   | H: 68       | +/- 5% of H: 80        |  |
| <b>8</b> | Average current serious penalty in private sector - total (1 to greater than 250 workers) | N/A         | +/- 25% of \$2,603.32  | N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.   |
|          | a. Average current serious penalty in private sector (1-25 workers)                       | N/A         | +/- 25% of \$1,765.19  | N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.   |
|          | b. Average current serious penalty in private sector (26-100 workers)                     | N/A         | +/- 25% of \$3,005.17  | N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.   |
|          | c. Average current serious penalty in private sector (101-250 workers)                    | N/A         | +/- 25% of \$4,203.40  | N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.   |
|          | d. Average current serious penalty in private sector (greater than 250 workers)           | N/A         | +/- 25% of \$5,272.40  | N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.   |
| <b>9</b> | Percent in compliance   | S: 26.42%   | +/- 20% of S: 29.90%   | The further review level is based on a three-year national average. The range of acceptable data not requiring further   |

## Appendix D – FY 2018 State Activity Mandated Measures (SAMM) Report

### FY 2018 CONN-OSHA Follow-up FAME Report

|           |   |           |                         |   |
|-----------|---|-----------|-------------------------|---|
|           |   | H: 32.69% | +/- 20% of<br>H: 36.10% | review is from 23.92% to 35.88% for safety and from 28.88% to 43.32% for health.  |
| <b>10</b> | Percent of work-related fatalities responded to in one workday                            | N/A       | 100%                    | N/A – The State Plan did not have any work-related fatalities in FY 2018.<br><br>The further review level is fixed for all State Plans.   |
| <b>11</b> | Average lapse time  | S: 40.71  | +/- 20% of<br>S: 46.20  | The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 36.96 to 55.44 for safety and from 45.25 to 67.87 for health. |
|           |   | H: 54.86  | +/- 20% of<br>H: 56.56  |   |
| <b>12</b> | Percent penalty retained  | 64.36%    | +/- 15% of<br>66.81%    | The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 56.79% to 76.83%.   |
| <b>13</b> | Percent of initial inspections with worker walk around representation or worker interview | 100%      | 100%                    | The further review level is fixed for all State Plans.  |
| <b>14</b> | Percent of 11(c) investigations completed within 90 days                                  | 0%        | 100%                    | The further review level is fixed for all State Plans.  |
| <b>15</b> | Percent of 11(c) complaints that are meritorious  | 60%       | +/- 20% of<br>24%       | The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 19.20% to 28.80%.   |
| <b>16</b> | Average number of calendar days to complete an 11(c) investigation                        | 982       | 90                      | The further review level is fixed for all State Plans.  |
| <b>17</b> | Percent of enforcement presence   | N/A       | +/- 25% of<br>1.24%     | N/A – This is a State and Local Government State Plan and is not held to this SAMM.<br><br>The further review level is based on a three-year national average.                                      |

**STATE OF CONNECTICUT**

**STATE OSHA ANNUAL REPORT**  
**(SOAR)**

**October 1, 2017 through September 30, 2018**



**Prepared By:**

**State of Connecticut**  
**Department of Labor**  
**Division of Occupational Safety and Health**

**Submitted:**  
**June 20, 2019**



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## I. Executive Summary

The State of Connecticut Department of Labor, Division of Occupational Safety and Health State and Local Government Only State Plan (CONN-OSHA), submits this State OSHA Annual Report (SOAR) to the Federal Occupational Safety and Health Administration (OSHA) for evaluation of the State Plan program.

The SOAR covers the time period October 1, 2017 through September 30, 2018. This submission is in accordance with the State Plan Policies and Procedures Manual (Directive Number: CSP 01-00-004, effective September 22, 2015).

1. CONN-OSHA's five-year strategic plan began in fiscal year 2015 (FY 2015). This report covers the Annual Performance Plan from October 1, 2017 through September 30, 2018 (FY 2018), the fourth year of that plan.
- 2.
3. CONN-OSHA fell short of its goal for number of inspections and exceeded its goal for number of consultations.

There were no fatality/catastrophe events that occurred during FY 2018. This is the third consecutive fiscal year with no work-related fatalities. CONN-OSHA was successful in meeting its performance goals for inspections, consultations and outreach in the identified high hazard workplaces. Implementing and prioritizing CONN-OSHA's efforts into the high hazard workplaces appears to be successful in striving for zero fatalities.

CONN-OSHA did not issue any willful violations during FY 2018. However, CONN-OSHA issued one repeat serious violation to a volunteer fire company for failing to ensure that all equipment was inspected annually. Willful, repeat and failure to abate citations are typically low in number for this program.

One local government contested a citation, ending a seven year period of no contests for this program.

CONN-OSHA did not sign any new Alliances during FY 2018, but two were renewed; seven Alliances remain active.

CONN-OSHA conducted 25 training classes that 281 state employees attended and 23 training classes that 321 local government employees attended

## II. Summary of Annual Performance Plan Results

| <b>Strategic Goal #1: Improve workplace safety and health for all workers, as evidenced by reducing hazards, exposures to hazards, injuries, illnesses, and fatalities.</b> |  |                |                                 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
|---|--|----------------|---------------------------------|--|----------------|----------------|---------------------------------|-----------------|-----|-----|----|---|------|------|-----|---|------|-----|-----|
| Performance Goal #1.1   | Reduce the number of worker injuries, illnesses and fatalities by focusing CONN-OSHA's resources on the most hazardous workplaces.   |                |                                 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| Annual Performance Goal #1.1a   | Reduce the 2013 baseline Bureau of Labor Statistics' (BLS) days away from work, job transfer or restriction (DART) rate by 4% in the following state government industries: state hospitals, state residential development disability homes and state highway maintenance & repair operations.   |                |                                 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| Strategy  | Conduct inspections and consultations in the identified high hazard industries.  |                |                                 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures)  | Conduct at least 10 inspections and 10 consultations in the identified high hazard industries.<br>Reduce the 2013 baseline DART rates by 4% in identified high hazard industries.<br>By the end of the five-year strategic plan, reduce the 2013 baseline DART rates by 5% in identified high hazardous industries.  |                |                                 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| FY 2018 Results   | CONN-OSHA conducted 12 inspections and 10 consultations in the identified high hazard state government industries.<br>2017 DART rates: state hospitals – 5.4; state nursing & residential care facilities – 13.2; and state highway maintenance & repair operations – 3.8.   |                |                                 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| Conclusion  | <table border="1"> <thead> <tr> <th></th> <th>2013 DART rate</th> <th>2017 DART rate</th> <th>Percent change from 2013 - 2017</th> </tr> </thead> <tbody> <tr> <td>State hospitals</td> <td>5.7</td> <td>5.4</td> <td>-5</td> </tr> <tr> <td>State nursing &amp; residential care facilities</td> <td>16.0</td> <td>13.2</td> <td>-18</td> </tr> <tr> <td>State highway maintenance &amp; repair operations</td> <td>11.1</td> <td>3.8</td> <td>-66</td> </tr> </tbody> </table> <p>CONN-OSHA met the goal of providing inspections and consultations in identified high hazard industries.<br/>The DART rates for state hospitals, state nursing &amp; residential care facilities and highway maintenance &amp; repair operations decreased from the baseline.</p> |                |                                 |  | 2013 DART rate | 2017 DART rate | Percent change from 2013 - 2017 | State hospitals | 5.7 | 5.4 | -5 | State nursing & residential care facilities | 16.0 | 13.2 | -18 | State highway maintenance & repair operations | 11.1 | 3.8 | -66 |
|   | 2013 DART rate   | 2017 DART rate | Percent change from 2013 - 2017 |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| State hospitals   | 5.7  | 5.4            | -5                              |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| State nursing & residential care facilities   | 16.0   | 13.2           | -18                             |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |
| State highway maintenance & repair operations   | 11.1   | 3.8            | -66                             |  |                |                |                                 |                 |     |     |    |   |      |      |     |   |      |     |     |

| Annual Performance Goal #1.1b  | Reduce the 2013 baseline DART rates by 4% in the following municipal operations: municipal public works - street & highway, municipal utilities and municipal waste management & remediation services.   |                |                                 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
|--|--|----------------|---------------------------------|--|--|----------------|----------------|---------------------------------|---|------|-----|-----|---|-----|-----|-----|---|-----|-----|------|--|
| Strategy   | Conduct inspections and consultations in the identified high hazard industries.  |                |                                 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures) | Conduct at least 50 inspections and 10 consultations in the identified high hazard industries.<br>Reduce the 2013 baseline DART rates by 4% in identified high hazard industries.<br>By the end of the five-year strategic plan, reduce the 2013 baseline DART rates by 5% in identified high hazardous industries.  |                |                                 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| FY 2018 Results  | CONN-OSHA conducted 47 inspections and 40 consultations in the identified high hazard municipal operations.<br>2017 DART rates: municipal public works - street & highway – 4.9; municipal water, sewage & other systems – 4.4; and municipal waste management & remediation services – 9.0.   |                |                                 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Conclusion   | <table border="1"> <thead> <tr> <th data-bbox="527 898 836 993"></th> <th data-bbox="836 898 1003 993">2013 DART rate</th> <th data-bbox="1003 898 1182 993">2017 DART rate</th> <th data-bbox="1182 898 1360 993">Percent change from 2013 - 2017</th> </tr> </thead> <tbody> <tr> <td data-bbox="527 993 836 1056">Municipal public works – street &amp; highway</td> <td data-bbox="836 993 1003 1056">11.1</td> <td data-bbox="1003 993 1182 1056">4.9</td> <td data-bbox="1182 993 1360 1056">-56</td> </tr> <tr> <td data-bbox="527 1056 836 1119">Municipal water, sewage &amp; other systems</td> <td data-bbox="836 1056 1003 1119">8.5</td> <td data-bbox="1003 1056 1182 1119">4.4</td> <td data-bbox="1182 1056 1360 1119">-48</td> </tr> <tr> <td data-bbox="527 1119 836 1209">Municipal waste management &amp; remediation services</td> <td data-bbox="836 1119 1003 1209">2.3</td> <td data-bbox="1003 1119 1182 1209">9.0</td> <td data-bbox="1182 1119 1360 1209">+291</td> </tr> </tbody> </table> |                |                                 |  |  | 2013 DART rate | 2017 DART rate | Percent change from 2013 - 2017 | Municipal public works – street & highway | 11.1 | 4.9 | -56 | Municipal water, sewage & other systems | 8.5 | 4.4 | -48 | Municipal waste management & remediation services | 2.3 | 9.0 | +291 | <p>CONN-OSHA exceeded the goal of conducting consultations in identified high hazard industries but fell short of meeting the goal for inspections in high hazard industries by 3.</p> <p>The DART rates for municipal water, sewage &amp; other systems and for municipal public works - street &amp; highway decreased from the baseline. The DART rate for municipal waste management &amp; remediation services increased significantly. CONN-OSHA hopes to reverse this trend in FY 2019.</p> |
|  | 2013 DART rate   | 2017 DART rate | Percent change from 2013 - 2017 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Municipal public works – street & highway  | 11.1   | 4.9            | -56                             |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Municipal water, sewage & other systems  | 8.5  | 4.4            | -48                             |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Municipal waste management & remediation services  | 2.3  | 9.0            | +291                            |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Annual Performance Goal #1.1c  | Prevent fatalities in the public sector by focusing resources on the most hazardous industries.  |                |                                 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |
| Strategy   | Focus enforcement and compliance assistance efforts on work places within the six identified high hazard industries that are most prone to fatalities. Discuss fatality prevention in each issue of the <i>CONN-OSHA Quarterly</i> .   |                |                                 |  |  |                |                |                                 |   |      |     |     |   |     |     |     |   |     |     |      |  |

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| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures)                                     | Conduct 60 inspections and 20 consultations in the most hazardous workplaces. Include an article emphasizing fatality prevention in each <i>Quarterly</i> . Achieve zero increase in the number of fatalities from FY2017.  |
| FY 2018 Results  | The February issue of the <i>CONN-OSHA Quarterly</i> discussed slings and rigging safety. The November issue of the <i>CONN-OSHA Quarterly</i> discussed carbon monoxide poisoning. The May issue of the <i>CONN-OSHA Quarterly</i> discussed mobile equipment operations such as asphalt rollers. The August issue of the <i>CONN-OSHA Quarterly</i> discussed trench and excavation safety. There were no work-related fatalities that occurred in FY 2018.   |
| Conclusion   | CONN-OSHA exceeded the goal of providing inspections and consultations in identified high hazard industries. Each issue of the <i>Quarterly</i> included an article emphasizing fatality prevention. There were no work-related fatalities in FY 2018.  |
| <b>Strategic Goal #2: Promote a safety and health culture through compliance assistance, cooperative programs and strong leadership.</b> |   |
| Performance Goal #2.1  | Increase safety and health awareness among workers and employers in state and municipal agencies to help promote effective safety and health awareness.   |
| Annual Performance Goal #2.1a  | Reduce the 2013 baseline DART rates by 4% in the following state government industries: state hospitals, state residential development disability homes and state highway maintenance & repair operations.  |
| Strategy   | Conduct training classes on one or more of the following topics: confined space; lockout/tagout; material handling and ergonomics; safe driving; trenching and excavation; work zone safety; and workplace violence.  |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures)                                     | Conduct a minimum of seven training classes for state employees in the topics listed above.<br>Reduce the 2013 baseline DART rates by 4% in identified high hazard industries. By the end of the five-year strategic plan, reduce the 2013 baseline DART rates by 5% in identified high hazardous industries.   |
| FY 2018 Results  | CONN-OSHA conducted one lockout/tagout, one material handling, two safe driving and one confined space training that state employees attended. The State Plan conducted 25 total trainings that state employees attended. Training classes not covered on the topics listed above included recordkeeping with the new electronic submission requirements that were held locally and regionally in the state and OSHA 10 hour classes for short term incarcerated men and women as part of a second chance initiative. |

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| Conclusion   | See conclusion for Annual Performance Goal #1.1a.  |
| Annual Performance Goal #2.1b  | Reduce the 2013 baseline DART rate by 4% in the following municipal operations: municipal public works - street & highway, municipal utilities and municipal waste management & remediation services.  |
| Strategy   | Conduct training classes that will cover one or more of the following topics: confined space; lockout/tagout; material handling and ergonomics; safe driving; trenching and excavation; work zone safety; and workplace violence.  |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures) | Conduct a minimum of seven training classes for municipal employees in the topics listed above.<br>Reduce the 2013 baseline DART rates by 4% in identified high hazard industries.<br>By the end of the five-year strategic plan, reduce the 2013 baseline DART rates by 5% in identified high hazardous industries. |
| FY 2018 Results  | CONN-OSHA conducted three lockout/tagout trainings and two trenching and excavation trainings that local government employees attended. The State Plan conducted 23 total trainings that local government employees attended.  |
| Conclusion   | See conclusion for Annual Performance Goal #1.1b.  |
| Annual Performance Goal #2.1c  | Maintain or renew current Alliances that share and promote CONN-OSHA's goal of reducing injuries and illnesses. Participate in training and outreach with Alliance partners to improve their safety and health awareness.  |
| Strategy   | Maintain all current alliances.  |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures) | Maintain seven current alliances.  |
| FY 2018 Results  | Two of the seven Alliances were renewed by CONN-OSHA in FY2018 and two others have been renewed since FY 2018 ended. Another is initiated by federal OSHA and was renewed by all parties in FY 2018. Two more Alliances are in progress of being renewed and will be completed in FY 2019.                           |
| Conclusion   | Seven Alliances maintained.  |

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| Performance Goal #2.2   | Increase safety and health awareness among workers and employers in state and municipal agencies to help promote effective safety and health management systems. |
| Annual Performance Goal #2.2a   | CONN-OSHA will include workers in all onsite activities.   |
| Strategy  | CONN-OSHA will ensure that workers are interviewed and participate in all inspections and consultation visits.   |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures)                            | 100% of all onsite activities will involve workers.  |
| FY 2018 Results   | 100% of all onsite activities included workers in FY 2018.   |
| Conclusion  | Goal 2.2a met.   |
| <b>Strategic Goal #3: Maximize CONN-OSHA effectiveness and efficiency by strengthening its capabilities and infrastructure.</b> |  |
| Performance Goal #3.1   | Strengthen the technical and professional skills and education of all CONN-OSHA field staff.   |
| Annual Performance Goal #3.1a   | CONN-OSHA field staff members will complete safety and/or health training annually.  |
| Strategy  | Management will meet with field staff members to discuss their training needs and training options available to fulfill those needs.                             |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures)                            | Each field staff member will complete at least one safety and/or health training course. All courses listed are from the OSHA Training Institute (OTI).          |
| FY 2018 Results   | CSHO 1 – 3090 Electrical Standards<br>CSHO 2 – 2200 Industrial Noise   |

|   |  |
|---|--|
|   | <p>CSHO 3 – 3220 Applied Welding Principles<br/> CSHO 4 – 2340 Biohazards<br/> Consultant 1 – 3220 Applied Welding Principles<br/> Consultant 2 – 2070 Fire Protection &amp; Life Safety (CANCELLED)<br/> Consultant 3 – 1250 Introduction to Health Standards</p> |
| Conclusion  | Goal 3.1a met.   |
| Annual Performance Goal #3.1b   | CONN-OSHA field staff members will complete professional development course/seminar annually.  |
| Strategy  | Management will meet with field staff members to discuss their professional development needs and options available to fulfill those needs.  |
| Performance Indicator(s)<br>(including activity, intermediate outcome, and primary outcome measures)                            | Each field staff member will complete at least one professional development course/seminar.  |
| FY 2018 Results   | American Industrial Hygiene Association annual meeting – Consultant 1<br>Hazard awareness during tunneling operations – CSHO 2, CSHO 3, Consultant 3   |
| Conclusion  | Goal 3.1b partially met. The state sponsored professional development classes were not available this year due to budgetary restrictions. Staff previously took advantage of these offerings to satisfy the goal.  |
| <b>Strategic Goal #3: Maximize CONN-OSHA effectiveness and efficiency by strengthening its capabilities and infrastructure.</b> |  |
| Performance Goal #3.2   | Maintain a Local Emergency Management plan that defines CONN-OSHA’s role and responsibilities as part of the Connecticut Emergency Management System.  |
| Annual Performance Goal #3.2a   | Strengthen the effectiveness of the Emergency Management Plan.   |



|  |   |
|--|---|
| <p>Strategy</p>  | <p>In an effort to strengthen the Emergency Management Plan, CONN-OSHA will:</p> <ul style="list-style-type: none"> <li>• Participate as team members of the Connecticut Emergency Management System.</li> <li>• Schedule training sessions when needed.</li> <li>• Coordinate development and implementation of plan changes with state and local agencies.</li> <li>• Monitor development and implementation of the plan.</li> <li>• Ensure that all CONN-OSHA staff has thorough knowledge of the plan.</li> </ul>                                       |
| <p>Performance Indicator(s)<br/>(including activity, intermediate outcome, and primary outcome measures)</p> | <p>CONN-OSHA staff will participate in at least 85 % of Connecticut Emergency Management System meetings.</p>   |
| <p>FY 2018 Results</p>   | <p>SERC Meeting (5 held, 4 attended)<br/> CERRIT meeting (5 held, 5 attended)<br/> Interagency Debris Management Conference Call (1 held, 1 attended)<br/> EPP (2 held, 2 attended)<br/> Tri-Town LEPC meeting (1 held, 1 attended)<br/> State Emergency &amp; Preparedness Response (1 held, 1 attended)<br/> Ammonia Safety Day (1 held, 1 attended)<br/> Unified Command conference call (3 held, 3 attended)<br/> Statewide Continuity of Operations Plan Exercise (1 held, 1 attended)<br/> Webinar “OSHA’s role in Emergency Response” (attended)</p> |
| <p>Conclusion</p>  | <p>CONN-OSHA staff participated in 95% of CT Emergency Management System meetings.<br/> Goal 3.2a met.</p>  |

4.

**III. Progress Toward Strategic Plan Accomplishments**

5.

6. In FY 2018, CONN-OSHA achieved 73% percent of the goal for inspections (see table below). CONN-OSHA was unable to meet the goal for safety inspections due to the absence of a safety compliance officer; this person began taking medical leave in early FY 2018 and then retired in July. To date this position has not been filled. It appears that the state’s current fiscal outlook will prevent CONN-OSHA from refilling this position any time soon. CONN-OSHA also did not meet the goal for health inspections. This was primarily due to the increase in unprogrammed inspections, which typically takes more time to complete than programmed inspections.

7.

| 8. FY 2018 Inspections<br>9. Projected v. Actual |               |            |   |
|--|---------------|------------|---|
| 10.  | 11. Projected | 12. Actual | 13. Percent of Annual Performance Goal Achieved |
| 14. Safety                                       | 15. 175       | 16. 119    | 17. 68  |
| 18. Health                                       | 19. 80        | 20. 68     | 21. 85  |
| 22. Total  | 23. 255       | 24. 187    | 25. 73  |

In terms of consultation visits, CONN-OSHA conducted 138 of the 130 visits that were projected for the year, or 106% of the year-end goal. The table below provides a comparison of the projected number of consultation visits to the actual number of visits conducted in FY 2018.

| FY 2018 Consultation Visits<br>Projected v. Actual |           |        |   |
|--|-----------|--------|---|
|  | Projected | Actual | Percent of Annual Performance Goal Achieved |
| Safety   | 50        | 54     | 108   |
| Health   | 80        | 84     | 105   |
| Total  | 130       | 138    | 106   |

CONN-OSHA's outreach to local governments has shifted in response to new and revised standards. Recordkeeping training requests are still being received by this office. Silica exposure in both general industry and construction has also generated requests for training. Although CONN-OSHA did not meet the goal for specific training subjects, the local government outreach totals were comparable to previous years. CONN-OSHA will continue to provide training to local governments to assist them with OSHA's new requirements for electronic recordkeeping, which took effect January 1, 2017. This office will host training activities regionally as well as centrally as part of our outreach.

CONN-OSHA's training specialists continue to provide OSHA 10-hour construction training classes to short term incarcerated men and women as part of a second chance initiative which was co-sponsored by the State of Connecticut Department of Corrections and began in FY 2017. Four 10-hour construction training classes were provided that trained 126 individuals.

FY 2018 was also punctuated by the State of Connecticut responding to continuing budget deficits. The unionized state employees accepted a concession package by vote in lieu of layoffs. The concessions that were voted on in FY 2017 and accepted by the union still impacted the State Plan in FY 2018. Within the concession package were healthcare concessions, furlough days, and other cost cutting measures to help stem the state deficit. Concessions agreed to in FY 2017 were still impacting the State Plan in FY 2018. State employees were required to take three furlough days during the state fiscal year (July 1, 2017 to June 30, 2018). To minimize the effect of these unpaid days, the unionized employees had their biweekly pay reduced over the same period. Also, management employees have not received a salary increase in five years. During that same time, both union and management had to increase contributions to healthcare and retirement funds. As a result, both union and management have been negatively affected by those fiscal austerity measures.

Since January 2017 when CONN-OSHA's administrative assistant left the State Plan, that person's duties have fallen on other staff. For example, when traveling to an OTI class, each consultant or compliance officer must now make his or her own hotel reservations. The CONN-OSHA Director currently completes the necessary travel authorization forms, works on flight reservations and completes cash advance forms for each staff member who travels. The state has notified the managerial staff that travel will continue to be impacted for the near future due to the budget deficit. As discussed previously in this summary, CONN-OSHA has been impacted negatively in its ability to meet strategic planning goals due to staffing shortages. Due to fiscal constraints, only one of the two CONN-OSHA managers was able to attend each of the OSHSPA conferences in FY 2018.

Overall, CONN-OSHA noticed an increase in unprogrammed inspections primarily from activity required by 29CFR 1904.39, the rule that requires reporting fatalities, hospitalizations, amputations, and losses of an eye as a result of work-related incidents to OSHA.

| Programmed vs. Unprogrammed Inspections |        |         |        |         |       |         |                                  |
|---|--------|---------|--------|---------|-------|---------|----------------------------------|
|   | Health |         | Safety |         | Total |         |                                  |
|   | Prog.  | Unprog. | Prog.  | Unprog. | Prog. | Unprog. | Total Percentage of Unprogrammed |
| FY 2016                                 | 47     | 34      | 195    | 22      | 242   | 56      | 19%                              |
| FY 2017                                 | 39     | 38      | 123    | 36      | 162   | 74      | 31%                              |
| FY 2018                                 | 26     | 42      | 84     | 35      | 110   | 77      | 41%                              |

This table shows that unprogrammed inspections increased by about 10% per year from FY 2016 to FY 2018, resulting in unprogrammed inspection activity almost doubling. Consequently, CONN-OSHA conducted fewer safety and health programmed inspections. The largest decrease in programmed inspections was on the safety side, which also coincides with the retirement of a safety compliance inspector. The loss of this inspector will continue to result in fewer safety inspections (both programmed and unprogrammed). CONN-OSHA will continue to request a replacement to fill this position in order to return to past levels of activity. However total state employment has been decreasing for the last few years and as employees have left state service there has been no back-filling of positions. Information originating from the State Comptroller's Office indicates that Connecticut's current fiscal status is running over budget and is unwilling to consider hiring for vacant positions.

#### **IV. Mandated Activities**

In FY 2018, CONN-OSHA performed satisfactorily on all measures (see SAMM and MARC below)

**OSHA Information System  
State Activity Mandated Measures(SAMM)**

*Date Range 10/01/2017 to 09/30/2018*

| SAMM # | Measure  | RIDs Selected | All State Plan RIDs | All Federal RIDs | National         |        |
|--------|--|---------------|---------------------|------------------|------------------|--------|
| 1A     | Time to Initiate Complaint Inspections STATE formula<br>(Average Number of Work Days to Initiate Complaint Inspections)                        | 167           | 68299               | 51964            | 120,263          |        |
|        |  | 3.48          | 7.42                | 6.67             | 7.08             |        |
|        |  | 48            | 9207                | 7789             | 16,993           |        |
| 1B     | Time to Initiate Complaint Inspections FEDERAL formula<br>(Average Number of Work Days to Initiate Complaint Inspections)                      | 132           | 44,071              | 21,536           | 65,607           |        |
|        |  | 2.75          | 4.79                | 2.76             | 3.86             |        |
|        |  | 48            | 9,207               | 7,789            | 16,993           |        |
| 2A     | Time to Initiate Complaint Investigations STATE formula<br>(Average Number of Work Days to Initiate Complaint Investigations)                  | 0             | 119467              | 16367            | 135,834          |        |
|        |  | 0.00          | 7.18                | 0.86             | 3.80             |        |
|        |  | 0             | 16631               | 19138            | 35,769           |        |
| 2B     | Time to Initiate Complaint Investigations FEDERAL formula<br>(Average Number of Work Days to Initiate Complaint Investigations)                | 0             | 65,818              | 5,268            | 71,086           |        |
|        |  | 0.00          | 3.96                | 0.28             | 1.99             |        |
|        |  | 0             | 16,631              | 19,138           | 35,769           |        |
| 3      | Timely Response to Imminent Danger Complaints and Referrals (Percent of Complaints and Referrals of Imminent Danger Responded to within 1 Day) | 1             | 703                 | 576              | 1,279            |        |
|        |  | 100.00%       | 99.29%              | 95.05%           | 97.34%           |        |
|        |  | 1             | 708                 | 606              | 1,314            |        |
| 4      | Number of Denials where entry not obtained   | 0             | 1                   | 3                | 4                |        |
| 5      | Average Number of Violations per Inspection with Violations by Violation Type  | SWRU          | 173                 | 45,960           | 42,284           | 88,244 |
|        |  |               | 1.63                | 1.73             | 1.90             | 1.81   |
|        |  | OTS           | 106                 | 26,507           | 22,256           | 48,763 |
|        |  |               | 1.53                | 38,274           | 8,485            | 46,759 |
|        |  |               | 1.44                | 1.44             | 0.38             | 0.96   |
|        |  |               | 106                 | 26,507           | 22,256           | 48,763 |
| 6      | Percent of Total Inspections in Public Sector  | 187           | 5,393               | 20               | 5,413            |        |
|        |  | 100.00%       | 13.16%              | 0.06%            | 7.41%            |        |
|        |  | 187           | 40,993              | 32,020           | 73,013           |        |
| 7      | Inspections  | Safety        | 119                 | 31,648           | 26,453           | 58,101 |
|        |  | Health        | 68                  | 9,345            | 5,567            | 14,912 |
|        | Total (1 to greater than 250 Employees)  | \$0.00        | \$78,201,811.46     | \$132,192,128.90 | \$210,393,940.36 |        |
|        |  | \$0.00        | \$2,393.47          | \$3,678.34       | \$3,066.48       |        |

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OSHA Proprietary and Confidential

**OSHA Information System  
State Activity Mandated Measures(SAMM)**

*Date Range 10/01/2017 to 09/30/2018*

|    |  |                               |                 |                  |                  |                 |
|----|--|-------------------------------|-----------------|------------------|------------------|-----------------|
| 8  | Average Current Penalty per Serious Violation (Private Sector) |                               | 0               | 32,673           | 35,938           | 68,611          |
|    |  |                               | \$0.00          | \$26,676,234.28  | \$57,515,812.21  | \$84,192,046.49 |
|    |  | a. 1-25 Employees             | \$0.00          | \$1,378.47       | \$2,496.02       | \$1,985.90      |
|    |  |                               | 0               | 19,352           | 23,043           | 42,395          |
|    |  | b. 26-100 Employees           | \$0.00          | \$17,818,260.63  | \$29,495,347.95  | \$47,313,608.58 |
|    |  |                               | \$0.00          | \$2,737.06       | \$4,600.02       | \$3,661.48      |
|    |  |                               | 0               | 6,510            | 6,412            | 12,922          |
|    |  | c. 101-250 Employees          | \$0.00          | \$11,794,054.35  | \$15,329,056.27  | \$27,123,110.62 |
|    |  |                               | \$0.00          | \$4,530.95       | \$6,075.73       | \$5,291.28      |
|    |  |                               | 0               | 2,603            | 2,523            | 5,126           |
|    |  | d. Greater than 250 Employees | \$0.00          | \$21,913,262.20  | \$29,851,912.47  | \$51,765,174.67 |
|    |  |                               | \$0.00          | \$5,207.52       | \$7,538.36       | \$6,337.56      |
|    | 0  | 4,208                         | 3,960           | 8,168            |                  |                 |
| 9  | Percent In Compliance  | Safety                        | 28              | 8,652            | 6,113            | 14,765          |
|    |  |                               | 26.42%          | 31.61%           | 27.07%           | 29.56%          |
|    |  |                               | 106             | 27,372           | 22,583           | 49,955          |
|    |  | Health                        | 17              | 2,880            | 1,419            | 4,299           |
|    |  |                               | 32.69%          | 37.49%           | 32.19%           | 35.56%          |
|    |  |                               | 52              | 7,682            | 4,408            | 12,090          |
| 10 | Percent of Work Related Fatalities Responded to in 1 Work Day  | 0                             | 603             | 822              | 1,424            |                 |
|    |  | 0.00%                         | 97.57%          | 96.71%           | 97.07%           |                 |
|    |  | 0                             | 618             | 850              | 1,467            |                 |
| 11 | Average Lapse Time   | Safety                        | 2,565           | 1,044,757        | 893,045          | 1,937,802       |
|    |  |                               | 40.71           | 49.05            | 46.88            | 48.03           |
|    |  |                               | 63              | 21,301           | 19,048           | 40,349          |
|    |  | Health                        | 2,414           | 302,833          | 235,686          | 538,519         |
|    |  |                               | 54.86           | 54.08            | 62.93            | 57.63           |
|    |  |                               | 44              | 5,600            | 3,745            | 9,345           |
| 12 | Penalty Retention Percent Penalty Retained                     | \$44,956.00                   | \$72,471,194.91 | \$144,340,281.99 | \$216,811,476.90 |                 |
|    |  | 64.36%                        | 74.12%          | 64.97%           | 67.77%           |                 |
|    |  | \$69,850.00                   | \$97,769,331.00 | \$222,171,162.55 | \$319,940,493.55 |                 |

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OSHA Proprietary and Confidential

**OSHA Information System  
State Activity Mandated Measures(SAMM)**

*Date Range 10/01/2017 to 09/30/2018*

|    |   |         |        |        |        |
|----|---|---------|--------|--------|--------|
| 13 | Percent of Initial Inspections with Employee Walk around Representation or Employee Interview | 187     | 40,517 | 31,186 | 71,703 |
|    |   | 100.00% | 98.84% | 97.40% | 98.21% |
|    |   | 187     | 40,993 | 32,020 | 73,013 |



REPORT ENDING DATE: September 2018  
 FY: 2018 QUARTER: 4  
 RID: 0190901  
 Ownership: Local Government;State Government  
 Service Scope Name:

**U. S. DEPARTMENT OF LABOR  
 OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
 MANDATED ACTIVITES REPORT FOR CONSULTATION(MARC)**

|   | QUARTER | FY-TO-DATE | REFERENCE/STANDARD |
|---|---------|------------|--------------------|
| <b>TOTAL VISITS</b>   | 22      | 138        |                    |
| <b>1. Percent of Initial Visits in High Hazard Establishments</b> |         |            | Not Less than 90%  |
| Number High Hazard Visits   | 6       | 76         |                    |
| Percent   | 37.5    | 64.41      |                    |
| Number of Initial Visits  | 16      | 118        |                    |
| <b>2. Percent of Initial Visits to Smaller Businesses</b>         |         |            | Not Less than 90%  |
| Number of Initial Visits  | 16      | 118        |                    |
| 2A. Visits <=250 Employees in Estab                               | 15      | 115        |                    |
| Percent   | 93.75   | 97.46      |                    |
| 2B. Visits <=500 Employees CB by Empr                             | 12      | 85         |                    |
| Percent   | 75      | 72.03      |                    |

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OSHA Proprietary and Confidential

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**U. S. DEPARTMENT OF LABOR  
 OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
 MANDATED ACTIVITIES REPORT FOR CONSULTATION(MARC)**

| QUARTER | FY-TO-DATE | REFERENCE/STANDARD |
|---------|------------|--------------------|
|---------|------------|--------------------|

**3. Percent of Visits where Consultant Conferred with Employees** 100%

**3A Initial**

|                              |     |     |
|------------------------------|-----|-----|
| Number with Empe conferences | 14  | 116 |
| Percent                      | 100 | 100 |
| Number of Initial Visits     | 14  | 116 |

**3B Follow-up**

|                              |     |     |
|------------------------------|-----|-----|
| Number with Empe Conferences | 3   | 9   |
| Percent                      | 100 | 100 |
| Number of Follow-Up Visits   | 3   | 9   |

**3C Training & Education Visits with Compliance Assistance ONLY**

|                              |     |     |
|------------------------------|-----|-----|
| Number with Empe conferences | 3   | 11  |
| Percent                      | 100 | 100 |
| Number of T&E Visits         | 3   | 11  |

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| QUARTER | FY-TO-DATE | REFERENCE/STANDARD |
|---------|------------|--------------------|
|---------|------------|--------------------|

4A Thru 4D based on Closed Cases ONLY

**4A. Percent of Serious Hazards Corrected in a Timely Manner(<=14 Days of Latest Correction Due Date)**

100%

|                         |    |       |
|-------------------------|----|-------|
| Number Corrected Timely | 48 | 145   |
| Percent                 | 96 | 98.64 |
| Total Serious Hazards   | 50 | 147   |

**Number of Serious Hazards Corrected:**

|  |    |     |
|--|----|-----|
| On-Site                                      | 0  | 4   |
| Within Original Time Frame                   | 25 | 106 |
| Within Extension Time Frame                  | 22 | 31  |
| Within 14 Days of Latest Correction Due Date | 1  | 4   |

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 OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION  
 MANDATED ACTIVITES REPORT FOR CONSULTATION(MARC)**

| QUARTER | FY-TO-DATE | REFERENCE/STANDARD |
|---------|------------|--------------------|
|---------|------------|--------------------|

**4B. Percent of Serious Hazards NOT Corrected in a Timely Manner (> 14 days Latest Correction Due Date)**

|                             |    |      |
|-----------------------------|----|------|
| Number NOT Corrected Timely | 2  | 2    |
| Percent                     | 4  | 1.36 |
| Total Serious Hazards       | 50 | 147  |

**4C. Percent of Serious Hazards Referred to Enforcement**

|                                |    |     |
|--------------------------------|----|-----|
| Number Referred to Enforcement | 0  | 0   |
| Percent                        | 0  | 0   |
| Total Serious Hazards          | 50 | 147 |

**4D. Percent of Serious Hazards Corrected(In Original Time Or Onsite)**

|                       |    |       |
|-----------------------|----|-------|
| Number Corrected      | 25 | 110   |
| Percent               | 50 | 74.83 |
| Total Serious Hazards | 50 | 147   |

65%

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MANDATED ACTIVITIES REPORT FOR CONSULTATION(MARC)

QUARTER      FY-TO-DATE      REFERENCE/STANDARD

5. Number of Uncorrected Serious Hazards with Correction Date > 90 Days Past Due (Open Cases for last 3 Years, excluding Current Quarter)

5A. Open Cases

This metric counts the number of uncorrected serious hazards (open cases) more than 90 days overdue within the past three years.

0

**Appendix E – FY 2018 State OSHA Annual Report (SOAR)**  
FY 2018 CONN-OSHA Follow-up FAME Report

**V. Special Measures of Effectiveness/ Special Accomplishments**

Special measures of effectiveness are covered in the SIEP. As noted earlier, FY 2018 was the third consecutive year in which there were no work-related fatalities in Connecticut's state and local government workplaces.

## **Appendix E – FY 2018 State OSHA Annual Report (SOAR)**

### **FY 2018 CONN-OSHA Follow-up FAME Report**

#### **VI. Adjustments or Other Issues**

As discussed in earlier, state and local government workers' training preferences have changed since CONN-OSHA developed its current strategic plan. Thus, the demand for CONN-OSHA's outreach has diminished somewhat over the past few years. As a result, CONN-OSHA is adjusting its outreach strategies for its next strategic plan, which begins in FY 2020.

## Appendix E – FY 2018 State OSHA Annual Report (SOAR)

### FY 2018 CONN-OSHA Follow-up FAME Report

#### VII. State Internal Evaluation Program (SIEP) Report

The State of Connecticut State and Local Government 23(g) compliance and consultation programs submit this Evaluation Report of the State Internal Evaluation Plan (SIEP) for Fiscal Year (FY) 2018, which covers the period October 1, 2017 through September 30, 2018. The issues evaluated during this time period have been:

- Citation processing
- Average number of work days to initiate complaint inspections
- Average lapsed days between closing conference and written report

The primary tools used for this monitoring procedure were the State Activity Mandated Measures (SAMM) report for compliance and the Mandated Activities Report for Consultation (MARC) for consultation. The OSHA Information System (OIS) Reports, on-the-job evaluations, and staff interviews supplement these on a weekly and/or monthly basis.

#### Citation processing

Lapse days from inspection to citation issued has been a long-standing concern at CONN-OSHA. For many years, CONN-OSHA has monitored its performance in this area on at least a weekly basis, and continues to do so using the SAMM Report.

The SAMM Reports from FY 2015 through FY 2018 showed the following data for SAMM 11 (average lapse time). The National Data for the same time frame is shown for comparison.

**Table 1**

| Discipline | Total FY 2015 | Total FY 2016 | Total FY 2017 | Total FY 2018 | National Data (FY 2018) |
|------------|---------------|---------------|---------------|---------------|-------------------------|
| Safety     | 85.79 Days    | 51.32 Days    | 50.18 Days    | 40.71 Days    | 48.03 Days              |
| Health     | 74.12 Days    | 72.00 Days    | 72.76 Days    | 54.86 Days    | 57.63 Days              |

*Source: State Activity Mandated Measures (SAMM) Report*

CONN-OSHA is making steady progress in reducing the processing time as evidenced in the trends shown in Table 1. Factors that negatively impact the citation processing time include complex health inspections, fatality investigations, and repeat violations within an investigation. CONN-OSHA will continue to make reducing the time it takes to issue citations a top priority.



## Appendix E – FY 2018 State OSHA Annual Report (SOAR)

### FY 2018 CONN-OSHA Follow-up FAME Report

#### Average number of work days to initiate complaint inspections

Lapse days from complaint to inspection issued has also been a long-standing concern at CONN-OSHA. Similar to lapse time for citation issuance, the SAMM Report is CONN-OSHA’s main tool for evaluating performance on this metric.

The SAMM reports from FY 2015 through FY 2018 showed the following data for SAMM 1 (average number of work days to initiate complaint inspections). Beginning in FY 2016, CONN-OSHA has met the negotiated further review level (FRL) of five days for this measure. However, in order to ensure that CONN-OSHA continues to meet the FRL, the State Plan’s managers will continue to prioritize timely complaint response time.

**Table 2**

| Total<br>FY 2015 | Total<br>FY 2016 | Total<br>FY 2017 | Total<br>FY 2018 | National<br>average |
|------------------|------------------|------------------|------------------|---------------------|
| 6.05 Days        | 2.51 Days        | 2.79 Days        | 2.75 Days        | 3.86 Days           |

*Source: State Activity Mandated Measures (SAMM) Report*

#### Average lapsed days between closing conference and written report

Lapse days from consultation closing conference to issuance of the written report have been another area of concern.

The OIS Consultation Customer Service Report is the primary evaluation tool for this measure.

The OIS reports from FY 2015 through FY 2018 showed the following data for average lapsed days between closing conference and written report.

**Table 3**

| Discipline | Total<br>FY 2015 | Total<br>FY 2016 | Total<br>FY 2017 | Total<br>FY 2018 |
|------------|------------------|------------------|------------------|------------------|
| Safety     | 15 Days          | 13 Days          | 12 Days          | 12 Days          |
| Health     | 14 Days          | 13 Days          | 8 Days           | 8 Days           |

*Source: OIS Consultation Customer Service Report*

CONN-OSHA will continue to ensure that the turnaround time is no more than 20 days.