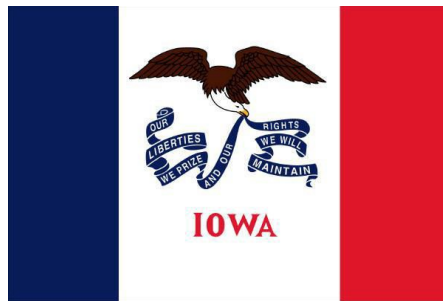


**FY 2018 Follow-up
Federal Annual Monitoring Evaluation (FAME) Report**

**Iowa Workforce Development
Iowa Division of Labor
Iowa Occupational Safety and Health Administration**



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

Initial Approval Date: July 20, 1973
State Plan Certification Date: September 14, 1976
Final Approval Date: July 2, 1985

**Prepared by:
U. S. Department of Labor
Occupational Safety and Health Administration
Region VII
Kansas City, MO**



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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. Iowa OSHA responded to recommendations made in the FY 2017 Comprehensive FAME Report and sustained high-level program performance.

Iowa OSHA continued a long-term trend in the reduction of injuries and illnesses. Specifically, The U.S. Department of Labor (USDOL), Bureau of Labor Statistics (BLS) injury and illness rates for the State of Iowa continues to decline over the past four years. These rates represent the number of injuries and illnesses surveyed per 100 full-time workers. The rates were as follows: 4.4 in CY 2014, 3.9 in CY 2015, 3.8 in CY 2016 and 3.6 in CY 2017. Therefore, there was an 18% overall decrease in worker injury and illness rates in the State of Iowa, since 2014. Specifically, the rates for general industry in Iowa decreased by 20% from 5.4 in CY 2014 to 4.9 in CY's 2015 and 2016 and 4.3 in CY 2017. The rates for the construction industry in Iowa also decreased by 18% from 4.5 in CY 2014 to 3.7 in CY 2017.

Iowa OSHA continues credible deterrence with civil penalties, influencing positive safety and health behavior to obtain significant safety and health protections for workers. For example, two significant enforcement actions initiated during FY 2018, resulted in civil penalties issued for \$306,500 in First Quarter 2018 and \$169,250 in Second Quarter 2018. Additionally, Iowa OSHA maintained 43 Voluntary Protection Program (VPP) participants, four alliances, four construction partnerships per quarter, and six Safety and Health Achievement Recognition Program (SHARP) establishments in FY 2018.

Iowa OSHA experienced significant challenges with Compliance Safety and Health Officer (CSHO) turnover during the evaluation period. Salary level was a major factor in the turnover, as it has been in recent years. Four Senior Industrial Hygienists departed during this period. Consequently, Iowa OSHA took immediate hiring actions to fill the vacated positions. Iowa OSHA hired three new Safety and Health Consultants and three Senior Industrial Hygienists; however, none of the new officers completed training during the evaluation period. In addition, Iowa OSHA experienced a lengthy eight to 12 month hiring process, from posting the vacancy announcement to new personnel completing the OSHA Training Institute (OTI) Initial Course and conducting their first solo inspection. This lag time impacts the experience gap, which further impacts the ability to accomplish the highest quality inspections. Iowa OSHA continues to work to fill positions and train its safety and health personnel as quickly as possible.

Iowa OSHA made progress in addressing the two findings and one observation from the FY 2017 Comprehensive FAME Report. Iowa OSHA was able to complete two completed findings regarding sending complaint investigation result emails and obtaining Voluntary Protection Program (VPP) 90-Day Hazard Management Letters from VPP applicants and participants. The one observation regarding complaint inspection and investigation response times remains open.

II. State Plan Background

A. Background

The Iowa State Plan, referred to as the Iowa Occupational Safety and Health Administration (Iowa OSHA), is part of the Iowa Workforce Development, Labor Services Division, which is administered by the Commissioner of Labor. Iowa OSHA adopts most OSHA instructions as promulgated and its enforcement program functions very similar to the federal program with no significant differences. Iowa's enforcement benchmark is 16 safety compliance officers and 13 health compliance officers. Of the benchmarked, five safety and four health positions were vacant at the end of FY 2018. Iowa OSHA's budget is a 50/50 match between federal and state funds and additional state appropriated funds needed beyond the 50/50 match. Except for 2014 and 2015, Iowa OSHA has historically overmatched the federal match in funding. Iowa OSHA's funding levels from FY 2014 through FY 2018 are shown below in Table 1. Iowa OSHA Consultation and Education conducts public 23(g) and private 21(d) consultation activities, in addition to providing training and education services. The consultation and cooperative programs complement the enforcement effort to reduce exposure to occupational hazards. During FY 2018, Iowa OSHA conducted a total of 838 inspections, exceeding the 775 inspections projected. Of these inspections, 390 were in construction and 448 were in general industry.

Fiscal Year	Federal Award (\$)	State Plan Match (\$)	100% State Funds (\$)	Total Funding (\$)	% of State Plan Contribution
2018	2,000,600	2,000,600	1,049,591	5,050,791	60.3
2017	2,000,600	2,000,600	1,402,777	5,403,977	62.9
2016	2,000,600	2,000,600	795,898	4,797,098	58.0
2015	2,000,600	2,000,600	0	4,001,200	50.0
2014	1,991,600	1,991,600	0	3,983,200	50.0

B. New Issues

None.

III. Assessment of State Plan Progress and Performance

A. Data and Methodology

OSHA established a two-year cycle for the FAME process consisting of a comprehensive year and a follow-up year. Comprehensive years consist of full case reviews and onsite evaluation. During follow-up years, OSHA does not perform the level of case review and onsite evaluation associated with comprehensive years. This strategy allows the State Plan opportunity, during the follow-up year, to focus on correcting deficiencies identified during the comprehensive year. FY 2018 is a follow-up year and OSHA did not conduct an on-site evaluation and a full case file review. OSHA randomly reviewed emails transmitting results to non-formal complainants, to ensure continued inclusion in the case files. OSHA also reviewed VPP 90-day Hazard Management Letters to ensure the letters continue as part of the program.

This report draws its analyses and conclusions from a variety of information and monitoring sources, including:

- State Activity Mandated Measures Report (Appendix D)
- State OSHA Annual Report (Appendix E)
- State Plan Grant Application
- State Plan Annual Performance Plan
- Quarterly monitoring meetings between OSHA and the State Plan
- OSHA Information System (OIS) reports
- Non-formal complaint case file email correspondence
- VPP 90-Day Hazard Management Letters
- State Plan Application (SPA)

B. Findings and Observations

Findings (Status of Previous and New Items)

The State Plan made progress in addressing the previous two findings from the FY 2017 Comprehensive FAME Report. This Follow-up FAME Report contains no new findings or observations. The two findings from the FY 2017 FAME Report are closed and the one observation remains open. Appendix A describes new and continued findings and recommendations. Appendix B describes observations subject to continued monitoring and the related federal monitoring plan. Appendix C describes the status of each FY 2017 recommendation in detail.

Completed Findings

Finding FY 2017-01: In 17 of the case files, Iowa OSHA sent emails to complainants notifying them of results; however, the emails were not maintained in the case files.

Status: Iowa OSHA now maintains notification emails in the case files. Twenty-five (25) of 121 randomly selected files requiring email placement showed all 25 (100%) of the files contained the emails. This item is completed.

Finding FY 2017-02: Twelve (86%) of the 14 VPP cases reviewed should have contained a 90-Day Hazard Management Letter from the applicant or participant. Of the 12, none (100%) contained the required letter.

Status: Iowa OSHA implemented requiring 90-Day Hazard Management Letters from applicants and participants in February 2018. Of the six VPP cases reviewed for 90-Day Hazard Management Letters, all (100%) contained letters. This item is completed.

OBSERVATIONS

Continued Observations

Observation FY 2017-OB-01: The SAMM data shows average number of workdays to initiate complaint inspections and complaint investigations to be 8.93 and 4.21 respectively. The case file review noted the average number of days to initiate a complaint inspection was 4.29 days and the average number of workdays to initiate a complaint investigation was 0.05 for the sample set.

Status: The State Plan's negotiated goal was five days for initiating complaint inspections and one day for initiating complaint investigations. The Iowa OSHA SAMM for initiating complaint inspections trended down from 8.24 in FY 2016 to 7.59 in FY 2018, and the SAMM for initiating complaint investigations trended down from 5.04 in FY 2016 to 3.20 in FY 2018. The State Plan is making progress; however, they are still outside the goal for both inspections and investigations. This observation will remain open for a closer look during the FY 2019 Comprehensive FAME.

C. State Activity Mandated Measures (SAMM) Highlights

Each SAMM has an agreed upon Further Review Level (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 State Activity Mandated Measures (SAMM) Report and includes the FRLs for each measure. The State Plan was outside the FRL on the following SAMMs:

SAMM 1a - Average Number of Workdays to Initiate Complaint Inspections.

Discussion of State Plan data and FRL: The FY 2018 SAMM Report indicated the average number of workdays was 7.59 to initiate formal complaint inspections, which was outside the FRL of five (5) days.

Explanation: Overall, this measure saw a reduction from 8.24 days (FY16) to 7.59 days (FY18) to initiate a complaint inspection. This represents a year-over-year downward trend. A review of 174 formal complaint inspections from an OIS unprogrammed activity report (UPA) revealed that the average number of days to initiate formal complaint inspections was 3.74 days. This is a

downward trend from FY 2016 of 5.04 days.

SAMM 2a – Average Number of Workdays to Initiate Complaint Investigations.

Discussion of State Plan data: The FY 2018 SAMM Report indicated the average number of workdays was 3.20 to initiate non-formal complaint investigations, which was outside the FRL of one (1) day.

Explanation: This measure represents a year-over-year downward trend from 5.04 in FY 2016 to 3.20 in FY 2018. The OIS UPA report for FY 2018 containing 419 complaint investigations shows the average number was 0.62 days to initiate. This downward trend from FY 2016 of 3.27 days to 0.62 days in FY 2018 indicates a major improvement in the average number of workdays over previous years.

SAMM 5 — Average Number of Violations per Inspection

Discussion of State Plan data: According to FY 2018 SAMM Measure 5, the average number of serious, willful, repeat, unclassified (SWRU) violations per inspection was 1.89 and fell within the acceptable range of the FRL (1.46 - 2.18). The average number of OTS violations per inspection was 0.56 and achieved an average more stringent than the FRL (0.78 - 1.18).

Explanation: Iowa OSHA performed within the FRL for SWRU and exceeded FRL for OTS.

SAMM 6 – Percentage of Total Inspections in State and Local Government Workplaces

Discussion of State Plan data and FRL: The FY 2018 SAMM report indicated 3.23% of total inspections in state and local government workplaces (SAMM 6), achieving an average more stringent than the FRL (2.45% - 2.71%).

Explanation: Iowa OSHA exceeded the FRL for this SAMM.

SAMM 8a - Average Current Serious Penalty in Private Sector-Total (1 - 25 Workers); SAMM 8c - Average Current Serious Penalty in Private Sector (101 - 250 workers).

Discussion of State Plan data and FRL: The FY 2018 SAMM report indicated the \$1,011.28 average current serious penalty in the private sector, 1-25 workers, was outside the FRL of \$1,323.89 (SAMM 8A). The \$2,923.53 average current serious penalty in the private sector, 101-250 workers, was outside the FRL of \$3,152.55 (SAMM 8C).

Explanation: Penalty differences resulted from Informal Settlement Agreement (ISA) penalty reductions, Expedited Informal Settlement Agreement (EISA) penalty reductions, and employer contests. An OIS report shows an ISA penalty reduction of 29.5%, where the overall total penalty was reduced from \$1,687,959.00 to \$1,189,707.88 (186 inspections). Based on an OIS report, an analysis by establishment size shows a range of average reductions (see Table 2 below): 38.1% (1-10 workers); 25.0% (11 - 25 workers); 42.7% (26 - 100 workers); 28% (101 - 250 workers); and 26.2% (251+ workers).

Eligible employers received a 50% penalty reduction offer through the EISA program (see Table 2

below). An OIS report showed an overall total reduction from \$581,616.00 to \$290,808.00 (127 inspections).

Contested penalty reductions lowered the penalty (see Table 2 below): 62% (1 - 10 workers); 41% (11 - 25 workers); 37% (26 - 100 workers); 29% (101 - 250 workers); and 16% (251+ workers). The \$969,883.00 contested penalty reduction to \$660,212.75 indicates a 31.9% reduction (39 inspections).

Table 2 Percent Penalty Reductions — ISA/EISA & Contested

Number of Employees Controlled by Establishment:	1-10	11-25	26-100	101-250	251+
ISA – Avg. % Penalty Reduction (number of inspections)	38.1% (28)	25.0% (21)	42.7% (38)	28.0% (27)	26.2% (72)
EISA – Avg. % Penalty Reduction (number of inspections)	50% (21)	50% (25)	50% (41)	50% (13)	50% (27)
Contested – Avg. % Penalty Reduction (number of inspections)	62% (1)	41% (4)	37% (5)	29% (4)	16% (25)

SAMM 9 – Percent in Compliance

Discussion of State Plan data and FRL: According to SAMM Measure 9, Iowa OSHA’s percent in-compliance (IC) was 43.63% for safety inspections, falling outside the further review levels (23.92% - 35.88% for safety). Health inspection percent in-compliance, 42.35%, was within the further review level range (28.88% - 43.32% for health).

Explanation: An IC analysis shows that the primary generators of Iowa OSHA’s IC safety inspections are inspection scheduling for construction (C-Target), unprogrammed related, fall, and scaffold inspections.

Twenty-five (25) percent (69 of 272) of safety inspection ICs resulted from C-Target inspections. Iowa OSHA’s policy for inspections conducted under the C-Target program is inspections are site-specific rather than employer specific. Therefore, the correct application of the program is to inspect all employers on a C-Target worksite, which generates IC inspections, but ensures fair and equitable treatment of all employers. In addition, this practice develops an accurate inspection history, which is applicable to future inspections.

Twenty-four (24) percent (64 of 272) of safety inspection ICs resulted from unprogrammed-related inspections. Fourteen (14) percent (38 of 272) of unprogrammed-related inspections resulted from multi-employer construction site inspections, six (6) percent (15 of 272) from temporary staffing agency inspections, and four (4) percent (11 of 272) from other inspections.

Eighteen (18) percent (49 of 272) of safety inspection ICs resulted from construction fall inspections. Thirteen (13) percent (36 of 272) of safety inspection ICs resulted from scaffold

inspections. Nine (9) percent (25 of 272) of safety inspection ICs resulted from inspections related to employer reported referral inspections. Seven (7) percent (20 of 272) of safety inspections ICs resulted from complaint inspections. Two (2) percent (5 of 272) of safety inspections ICs resulted from Construction Zip Code inspections. One (1) percent (3 of 272) of safety inspections ICs resulted from referrals. Less than one percent resulted from trench inspections.

Further IC analysis shows the primary generators of Iowa OSHA's IC health inspections were 46% (41 of 90) and 32% percent asbestos (29 of 90) inspections resulting in 78% of health inspection ICs. Fourteen (14) percent (13 of 90) of health inspection ICs resulted from unprogrammed-related inspections. Eight (8) percent (7 of 90) of health inspection ICs resulted from referral inspections. Iowa OSHA should review its asbestos targeting, C-Target, and unprogrammed-related inspection engagement policies to aid in maximum human capital use for inspections. Iowa OSHA should further consider applying OSHA's Focused Inspection Policy to C-Target inspections, as applied in its IA/LEP 4 construction inspections, to better focus human capital on serious hazards during C-Target inspections.

Appendix A – New and Continued Findings and Recommendations

FY 2018 Iowa OSHA Follow-up FAME Report

FY 20XX-#	Finding	Recommendation	FY 20XX-# or FY 20XX-OB-#
	None.		

Appendix B – Observations and Federal Monitoring Plans

FY 2018 Iowa OSHA Follow-up FAME Report

Observation # FY 2018-OB-#	Observation# FY 2017-OB-# <i>or</i> FY 20XX-#	Observation	Federal Monitoring Plan	Current Status
FY 2018-OB-01	FY 2017-OB-01	The SAMM data shows average number of workdays to initiate complaint inspections and complaint investigations to be 8.93 and 4.21 respectively. The case file review noted the average number of days to initiate a complaint inspection was 4.29 days and the average number of workdays to initiate a complaint investigation was 0.05 for the sample set.	Complaint inspection and investigation response times will be a subject of monthly discussions for emphasis on making further improvements. Response times will remain a part of quarterly discussions and the annual FAME evaluation.	Open

Appendix C - Status of FY 2017 Findings and Recommendations

FY 2018 Iowa OSHA Follow-up FAME Report

FY 2018-#	Finding	Recommendation	State Plan Corrective Action	Completion Date	Current Status and Date
FY 2017-01	In 17 of the case files, Iowa OSHA sent emails to complainants notifying them of results; however, the emails were not maintained in the case files.	Iowa OSHA should ensure that emails or any records made related to non-formal complaint cases are organized and maintained in the case file to which it pertains.	Iowa OSHA is now placing the actual email correspondence in the file.	6/1/2018	Completed
FY 2017-02	Twelve (86%) of the 14 VPP cases reviewed should have contained a 90-day hazard management letter from the applicant or participant. Of the 12, none (100%) contained the required letter.	Iowa OSHA should ensure that applicants and participants submit 90-day hazard management letters when required.	Applicants and participants are now submitting 90-day hazard management letters when required.	2/1/2018	Completed

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

FY 2018 Iowa OSHA Follow-up FAME Report

U.S. Department of Labor				
Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)				
State Plan: Iowa - IOWA OSHA			FY 2018	
SAMM Number	SAMM Name	State Plan Data	Further Review Level	Notes
1a	Average number of work days to initiate complaint inspections (state formula)	7.59	5	The further review level is negotiated by OSHA and the State Plan.
1b	Average number of work days to initiate complaint inspections (federal formula)	6.19	N/A	This measure is for informational purposes only and is not a mandated measure.
2a	Average number of work days to initiate complaint investigations (state formula)	3.20	1	The further review level is negotiated by OSHA and the State Plan.
2b	Average number of work days to initiate complaint investigations (federal formula)	0.86	N/A	This measure is for informational purposes only and is not a mandated measure.
3	Percent of complaints and referrals responded to within one workday (imminent danger)	N/A	100%	N/A – The State Plan did not receive any imminent danger complaints or referrals in FY 2018. The further review level is fixed for all State Plans.
4	Number of denials where entry not obtained	0	0	The further review level is fixed for all State Plans.

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

FY 2018 Iowa OSHA Follow-up FAME Report

5	Average number of violations per inspection with violations by violation type	SWRU: 1.89	+/- 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 review is from 1.46 to 2.18 for SWRU and from 0.78 to 1.18 for OTS.
		Other: 0.56	+/- 20% of Other: 0.98	
6	Percent of total inspections in state and local government workplaces	3.23%	+/- 5% of 2.58%	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 2.45% to 2.71%.
7	Planned v. actual inspections – safety/health	S: 628	+/- 5% of S: 559	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 531.05 to 586.95 for safety and from 205.20 to 226.80 for health.
		H: 208	+/- 5% of H: 216	
8	Average current serious penalty in private sector - total (1 to greater than 250 workers)	\$2,641.52	+/- 25% of \$2,603.32	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from \$1,952.49 to \$3,254.15.
	a. Average current serious penalty in private sector (1-25 workers)	\$1,011.28	+/- 25% of \$1,765.19	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from \$1,323.89 to \$2,206.49.
	b. Average current serious penalty in private sector (26-100 workers)	\$2,430.08	+/- 25% of \$3,005.17	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from \$2,253.88 to \$3,756.46.
	c. Average current serious penalty in private sector (101-250 workers)	\$2,923.53	+/- 25% of \$4,203.40	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from \$3,152.55 to \$5,254.25.
	d. Average current serious penalty in the private sector (greater than 250 workers)	\$4,713.97	+/- 25% of \$5,272.40	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from \$3,954.30 to \$6,590.50.

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

FY 2018 Iowa OSHA Follow-up FAME Report

9	Percent in compliance	S: 43.63%	+/- 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 review is from 23.92% to 35.88% for safety and from 28.88% to 43.32% for health.
		H: 42.35%	+/- 20% of H: 36.10%	
10	Percent of work-related fatalities responded to in one workday	100%	100%	The further review level is fixed for all State Plans.
11	Average lapse time	S: 26.79	+/- 20% of 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: 24.61	+/- 20% of H: 56.56	
12	Percent penalty retained	65.71%	+/- 15% of 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%.
13	Percent of initial inspections with worker walk around representation or worker interview	99.40%	100%	The further review level is fixed for all State Plans.
14	Percent of 11(c) investigations completed within 90 days	50%	100%	The further review level is fixed for all State Plans.
15	Percent of 11(c) complaints that are meritorious	21%	+/- 20% of 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%.
16	Average number of calendar days to complete an 11(c) investigation	97	90	The further review level is fixed for all State Plans.
17	Percent of enforcement presence	1.26%	+/- 25% of 1.24%	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 0.93% to 1.55%.

NOTE: Fiscal Year 2018 is the third year since the transition from the NCR (OSHA's legacy data system) to OSHA's Information System (OIS). At this time, all three-year State Plan enforcement data has been captured in OIS. Therefore, the national averages in

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

FY 2018 Iowa OSHA Follow-up FAME Report

this report are three-year rolling averages. Unless otherwise noted, the data contained in this Appendix D is pulled from the State Activity Mandated Measures (SAMM) Report in OIS and the State Plan WebIMIS report run on November 13, 2018, as part of OSHA's official end-of-year data run.

Appendix E – FY 2018 State OSHA Annual Report (SOAR)
FY 208 Iowa OSHA Follow-up FAME Report

FFY 2018 State OSHA Annual Report (SOAR)
Iowa

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



Prepared by: Joseph L. Mullen and Luther Don Peddy

Submitted:

December 15, 2018

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

FY 208 Iowa OSHA Follow-up FAME Report

I. Executive Summary

The Iowa Occupational Safety and Health Administration (IOSHA) completed the fourth year of its strategic plan cycle that began in FFY 2015.

Iowa OSHA remains committed to providing workplace environments that are safe, healthy, and productive and also allows businesses to grow and flourish as the State of Iowa supports state wide economic growth. We are committed to our strategic performance plan to assure that workplaces maintain safe and healthful working conditions for all employees that are free of recognizable hazards and free of retaliation.

Iowa OSHA submitted separate 23(g) grant and 21(d) cooperative agreement applications for FFY 2018. Therefore, only a discussion of the portions of the 21(d) Consultation Activity Projection Plan (CAPP) that support 23(g) activities are incorporated in this 23(g) SOAR. A separate Consultation Annual Progress Report (CAPR) will also be submitted to the Regional and National Office. The Division of Labor Services' organization chart is included in Appendix A on page 18.

The actual number of Iowa OSHA enforcement inspections versus its projected inspections were slightly up during FFY 2018. The actual was 837 versus the projected of 775. Over this past year four (4) Sr. Industrial Hygienists, four Compliance Safety and Health Officers and one administrative staff left employment with the Iowa Division of Labor. IOSHA has filled three of the Sr. Industrial Hygienists positions and the four Compliance Safety and Health Officer positions. IOSHA is diligently working to enroll new staff in required OSHA training Institute (OTI) courses. Enforcement and Consultation staff regularly attended development meetings where various Iowa OSHA Enforcement topics are discussed, such as standard changes, interpretive guidance, directives and the OSHA Information System.

Managerial and supervisory staff at Iowa OSHA remained constant during this review period. Iowa's Labor Commissioner was appointed in 2011. The Iowa OSHA Administrator, Iowa OSHA Consultation and Education Bureau Chief and two Public Service Manager 1 Enforcement supervisors remained unchanged. These two Public Service Manager 1 positions are responsible for the direct daily supervision of enforcement field staff, which includes safety inspectors and industrial hygienists. Duties include daily work assignments for field staff inspections; training new staff through accompanied visits and assisting with complicated inspections; evaluation of each inspectors' work performance for annual evaluations; evaluation of additional training needs and requirements; providing technical assistance and answering questions from the public and coworkers; conducting informal settlement conferences and reviewing documentation for violation abatement and corrective means; and providing assistance to the Iowa OSHA Administrator and the Labor Commissioner.

The enforcement supervisors also take an active role in outreach and encouraging partnerships and alliances. They provide training sessions to our enforcement staff and public presentations when called upon by employers and interest groups.

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

FY 208 Iowa OSHA Follow-up FAME Report

Iowa OSHA continued to foster a solid working relationship with the Federal Area OSHA office and the Regional Administrator. The Labor Commissioner, Iowa OSHA Administrator, Iowa OSHA Consultation and Education Bureau Chief, and the enforcement Public Service Managers participate in all Monday morning Region VII conference calls. The Labor Commissioner, Iowa OSHA Administrator, Iowa OSHA Consultation and Education Bureau Chief, and the enforcement Public Service Managers also continued to meet quarterly with the Area and Regional office staff to discuss Iowa OSHA's performance and goals. The Iowa OSHA leadership team participated in a Region VII wide strategic planning meeting in Kansas City, Missouri.

The Labor Commissioner has worked with the National Association of Government Labor Officials (NAGLO), the Occupational Safety and Health State Plan Association (OSHSPA), the Area and Regional OSHA offices and Iowa OSHA leadership to evaluate and ensure Iowa OSHA is meeting its long-term goals.

Workers Memorial Day once again witnessed too many families, friends and loved ones paying tribute to those lost on the job. Thirty two (32) workers were honored in this ceremony including those that died in events outside Iowa OSHA's jurisdiction. There were twenty four (24) Iowa OSHA fatality inspections in FFY 2018. This represents a 9.0 % increase in the number of fatalities from the previous year's number of 22 fatality inspections.

II. Summary of Annual Performance Plan Results

During FFY18 there were 837 enforcement inspections (393 construction and 444 general industry) with 1,163 violations (820 safety and 343 health). There was a 7% decrease in the number of inspections compared to the previous fiscal year's 891 inspections. The number of violations cited decreased by 16%.

The US Department of Labor (USDOL) Bureau of Labor Statistics (BLS) injury and illness rates for the State of Iowa continued to drop over the past four years. The rates were as follows: 4.4 in CY 2014, 3.9 in CY 2015, 3.8 in CY 2016 and 3.6 in CY 2017. This represents an 18% decrease from CY 2014. These rates represent the number of injuries and illnesses surveyed per 100 full-time workers. The rates for general industry in Iowa dropped 20% from 5.4 in CY 2014 to 4.9 in CY's 2015 and 2016 to 4.3 in CY 2017. The rates for the construction industry in Iowa dropped 18% from 4.5 in CY 2014 to 3.7 in CY 2017. BLS collected and published the data for the non-fatal injury and illness rates by calendar year so this performance goal must also be measured as rate changes for a calendar year rather than by fiscal year.

Iowa OSHA conducted 24 occupational fatality inspections in FFY 2018. This represented an increase of 9.0% from the 22 conducted during the previous year. There were 13 fatality inspections in general industry. This represents a 13% decrease from the 15 General Industry fatalities in FFY 2017. There were 11 fatality inspections in the construction industry. This represented a 22% increase from the 9 construction fatalities in FFY 2017.

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

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Unprogrammed inspections again comprised the greatest number of inspections conducted. There were 539 unprogrammed inspections out of 837 inspections total performed. This increase from 509 in FFY 2017 represents a 6% increase in unprogrammed inspections. However, the total number of total programmed inspections decreased from 382 in FFY 2017 to 298 in FFY 2018. This shows the number of unprogrammed activities, e.g., employer reported referrals and complaints have remained relatively constant. The number of inspections decreased in FFY 2018 from FFY 2017. This was mainly due to the necessary hiring of eight new enforcement inspectors, which represented approximately 33% of all IOSHA enforcement staff. Local emphasis programs (LEPs) were used for targeting purposes for: Construction by Zip Codes, Amputations, Asbestos in Construction, Falls in Construction, Scaffolding, Temp Workers and Grain Handling. National emphasis programs (NEPs) for Combustible Dust, Primary Metals, Amputations, Lead, PSM Covered Chemical Facilities, Trenching and Construction Targeting were also used.

Of the 46 whistleblower complaints that were docketed in FFY18, 27 cases were recommended for dismissal after an investigation, 6 cases were withdrawn, 8 cases were settled, and 14 cases were pending at the end of the fiscal year. An additional 79 cases were administratively closed. Eight cases were administratively closed because they were filed late; 47 cases were administratively closed because they were referred to other organizations; 16 cases were administratively closed because the complainant chose not to proceed; 4 cases were administratively closed because adverse action was not alleged; and, 4 cases were administratively closed because of lack of participation by the complainant. An additional 12 whistleblower complaints were referred to Region VII without being entered into IMIS. Of this last group, 2 were related to the Affordable Care Act, 1 was related to the U.S. Postal Service, and 9 were related to the Surface Transportation Assistance Act.

Voluntary Protection Program (VPP) teams of OSHA 23(g) staff participated in VPP audits. Currently Iowa has 43 active VPP participants. The program saw 2 new participants. Although we encouraged other companies to strive for VPP in 2018, they wanted to defer until FFY19. We anticipate additional companies to submit applications and to be evaluated in FFY19.

There were 4 alliances that continued to be active through FFY18: Master Builders of Iowa (MBI), the Iowa Renewable Fuels Association, and the IBEW 55, Transmission and Distribution Union, USDOL Des Moines Area Office, and Iowa OSHA. A fourth alliance was signed with the Associated Builders and Contractors.

Partnerships with construction companies continued through FFY18 with an average of 4 each quarter. Two were completed and 3 continued through the year. The performance goal of adding 1 new partnership to the baseline is not compatible with available resources and the continued vacancy of the CAS in the 3rd quarter of FFY17; the CAS position was filled during the 3rd quarter of FFY18. The 23(g) Training and Education staff have been sharing the Partnership responsibilities the past year and will continue sharing responsibilities moving forward. Unfortunately, the source of Partnerships has decreased in the past year due to pending building projects on hold.

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There were 6 Safety and Health Achievement Recognition Program (SHARP) establishments that continued into FFY18. Four of the current SHARP establishments were recertified during FFY18. Our goal of adding one additional location to a level of seven will be continued into FFY19 through our continued effort and promotion of the SHARP program.

III. Progress Toward Strategic Plan Accomplishments

Iowa OSHA dedicated its efforts this fiscal year toward reducing exposure to occupational hazards. The main goal was to reduce Iowa's incident rate of occupational injuries and illnesses to at least the national average.

Iowa OSHA planned to reach this main performance goal by breaking it down into three performance goals, further subdivided into outcome, strategic, and performance goals. The three performance goals were Building Awareness, Broadening Support, and Building Commitment/Buy In. Improved targeting was used to direct resources for maximum effect. Strengthening infrastructure by improving training and targeting enabled Iowa OSHA to create effective and meaningful change to unsafe workplaces.

Strategic Goal 1 Reduce Exposure to Occupational Hazards

The main goal was to reduce Iowa's incident rate of occupational injuries and illnesses to at least the national average. Many of the activities in this goal were continued from previous strategic plans. Iowa OSHA capitalized on this experience to provide a higher standard of service to Iowa's workplaces.

Progress in Achieving Iowa OSHA Performance Goal 1 was assessed by tracking outreach program development and participation:

5-Year Outcome Goal 1: Continually decrease incidences of fatalities, injuries, illnesses and amputations to meet or exceed the national average by the year 2019.

IOSHA Strategic Objective 1.1: Secure safe and healthy workplaces, particularly in high risk industries.

Performance Goal 1.1: Improve workplace safety and health through compliance assistance and the enforcement of safety and health regulations and standards. Reduce occupational injury and illness rates and the number of fatalities by three percent (3%) as listed below.

Strategy: Focus IOSHA resources by coordinating both enforcement and consultation and education interventions to maximize effectiveness for each workplace and employee impacted. Also utilize enforcement inspections, consultation surveys, and outreach interventions synergistically to reduce injuries and illnesses throughout the state.
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<p>Performance Indicators: Percent difference in Total Recordable Case Rate (TRC) and change in number of fatalities.</p>
<p>Baseline: Number of occupational fatality inspections noted in the FFY 2014 Federal Annual Monitoring and Evaluation (FAME) report for Iowa OSHA. US Department of Labor, Bureau of Labor Statistics - Table 6. Incident rates of nonfatal occupational injuries and illnesses by industry and case types, 2013. These nonfatal incident rates are published annually in the fourth quarter for the previous calendar year.</p>

Progress in Achieving IOSHA Performance Goal 1.1a.1 was assessed by tracking the outcome of the number of fatalities:

FFY 2018 Iowa OSHA Performance Goal 1.1a.1	Assess progress by tracking the outcome of the number of fatalities				
Fatality Outcome Measures	FFY 2014 Baseline	FFY 2015 Total	FFY 2016 Total	FFY 2017 Total	FFY 2018 Total
Total number of fatalities	27	18	24	22	24
Number of General Industry Fatalities	12	13	15	15	13
Number of Construction Fatalities	15	5	9	7	11

Progress in Achieving IOSHA Performance Goal 1.1a.2 was assessed by tracking the outcome of the non-fatal injury and illness rate changes published by the BLS in October for each previous calendar year:

FFY 2017 Iowa OSHA Performance Goal 1.1a.2	Assess progress by tracking the outcome of the non-fatal injury and illness rate changes by calendar year (CY):					
<i>Non-Fatal Outcome Measures</i>	CY 2013 Baseline	CY 2014	CY 2015	CY 2016	CY 2017	CY 2018
Percent change in the injury and illness Total Recordable Case rates for Iowa	4.8	4.4	3.9	3.8	3.6	Pending Publication

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Percent change in the injury and illness Total Recordable Case rates for General Industry in Iowa	5.5	5.4	4.9	4.9	4.3	Pending Publication
Percent change in the injury and illness Total Recordable Case rates for Construction in Iowa	3.8	4.5	4.2	4.1	3.7	Pending Publication

Progress in Achieving IOSHA Performance Goal 1.1b was assessed by tracking the number of enforcement interventions:

FFY18 Enforcement Iowa OSHA Performance Goal 1.1b	Assess progress by tracking number of inspections:					
<i>Performance Measure</i>	FFY17 Baseline	FFY18 Total	FFY18 1st Qtr.	FFY18 2nd Qtr.	FFY18 3rd Qtr.	FFY1 8 4th Qtr.
Private Sector - Number of inspections associated with fall hazards in construction	262	272	38	74	70	84
Private Sector - Number of inspections associated with fall hazards in GI	73	33	7	10	9	7
Number of Safety Emphasis Program Related Codes						
Falls	222	239	36	64	55	84
Amputations	199	130	37	32	18	43
Grain	20	12	6	2	1	3
Scaffold	147	171	16	45	43	67
Trench	17	9	3	1	2	3
Construction/Zip Code	297	246	42	75	49	80
Temp Workers	14	12	4	2	0	6
Total all safety emphasis programs	916	819	144	221	168	286
Number of Health Emphasis Program Related Codes						
Asbestos	140	86	16	24	26	20
Hexavalent Chromium	2	6	2	2	1	1
Combustible Dust	6	6	2	2	1	1
Lead	13	13	2	8	1	2
Silica	9	6	1	0	5	0
Primary Metals	5	6	3	3	0	0
Isocyanates	2	1	1	0	0	0
Chemical Plant	16	16	4	2	6	4
Total all health emphasis programs	193	140	31	41	40	????
Percent of inspections that are LEP / NEP coded	75%	69%	63%	66%	66%	77%
Public Sector - Number of Safety Inspections (<i>state & local government</i>)	14	20	6	3	5	6
Public Sector - Number of Health Inspections (<i>state & local government</i>)	7	7	1	0	3	3
Total Number of Inspections	891	837	184	220	185	248

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Total Number of Severe Incidents Reported and Inspected	205	246	61	51	57	77
Fatalities	22	24	4	3	6	11
Catastrophes	1	0	0	0	0	0
Amputations	52	82	18	23	20	21
Hospitalizations	129	140	39	25	31	45
Enucleations	1	0	0	0	0	0
Total Number of Incidents Reported and RRI or Not Inspected	228	250	52	78	54	66
Fatalities	37	42	11	11	10	10
Amputations	35	43	9	9	8	17
Hospitalizations	155	165	32	58	36	39
Enucleations	1	0	0	0	0	0

Progress in Achieving IOSHA Performance Goal 1.2.1 was assessed by tracking the outcome of Consultation Program support assistance:

FFY 2018 Iowa OSHA Compliance Assistance Performance Goal 1.2.1	Assess progress by tracking number of interventions:					
Performance Measure	FFY14 Baseline	FFY18 Total	FFY18 1st Qtr.	FFY18 2nd Qtr.	FFY18 3rd Qtr.	FFY18 4th Qtr.
Private Sector - Visits associated with falls in construction	45	131	35	41	23	32
Private Sector - Visits associated with falls in GI	5	52	12	20	9	11
Private Sector - Total number of consultation safety visits	149	218	53	62	51	52
Trench	4	21	5	3	7	6
Amputations	16	44	11	12	10	11
Combustible Dust	4	8	0	5	1	2
Grain	2	8	0	6	0	2
Nursing Homes	9	2	1	0	1	0
Residential Building Construction	0	2	1	1	0	0
Commercial and Institutional Building Construction	0	159	35	46	40	38
Highway and Street Construction	0	4	0	0	3	1
Site Preparation / Demolition	0	8	2	4	1	1
Power and Communication Lines	0	1	0	1	0	0
Lead	1	0	0	0	0	0
Silica	6	13	3	6	1	3
Isocyanates	0	1	1	0	0	0
Primary Metals	1	7	1	3	1	2
PSM Covered Chemical Facilities	0	0	0	0	0	0
Other - scrap, waste, refuse, etc.	0	176	48	54	30	44
Total all safety visit emphasis programs	85	454	108	141	95	110
Private Sector - Total Number of consultation Health visits	65	103	28	32	24	19
Hexavalent Chromium	8	5	0	3	1	1
Amputations	19	49	11	18	15	5
Combustible Dust	2	11	1	8	1	1
Lead	3	2	0	2	0	0
Silica	7	27	10	5	7	5
Primary Metals	0	12	1	6	3	2

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Isocyanates	5	2	2	0	0	0
Nursing Homes	12	4	1	0	3	0
Trenching	0	2	0	2	0	0
Noise - Hearing Conservation / Respirators	3	24	9	5	6	4
Other - scrap, waste, refuse, etc.	0	73	15	35	16	7
Total all health visit emphasis programs	59	314	78	116	76	44
Private Sector - Percent of visits that are LEP / NEP	67.3%	75.7%	80.2%	84.0%	65.3%	70.4%
Public Sector - Number of consultation visits	20	9	5	0	4	0
Public Sector - Number of hazards corrected	54	43	7	5	18	13

Progress in Achieving IOSHA Performance Goal 1.2.2 was assessed by tracking the outcome of the number of Compliance Assistance Program interventions:

FFY18 Cooperative Programs and Training Performance Goal 1.2.2	Assess progress by tracking number of interventions:						
	Baseline FFY 2016	FFY 2018 Goal	FFY 2018 TOTAL	FFY 2018 1st Qtr.	FFY 2018 2nd Qtr.	FFY 2018 3rd Qtr.	FFY 2018 4th Qtr.
Performance Measure							
Number of training sessions	194	Increase by 10%	151	31	57	38	25
Number of employees	4,621	Increase by 100 employees	4,587	1,146	1,779	1,004	658
Number of Partnerships	8	Increase by 1	5	5	4	3	3
Number of employees	25,394	Increase by 100 employees	12,745	4,220	1,850	4,765	1,910
Number of SHARP	6	Increase by 1	6	6	6	6	6
Number of VPP	43	Increase by 1	40	40	41	41	40

Progress in Achieving IOSHA Performance Goal 1.2.3 was assessed by tracking the outcome of the participation in Compliance Assistance Program interventions:

Training FFY18 Iowa OSHA Performance Goal 1.2.3	Assess progress by tracking number of interventions:						
	FFY14 Baseline	FFY18 Goal	FFY18 Total	FFY18 1 st Qtr.	FFY18 2 nd Qtr.	FFY18 3 rd Qtr.	FFY18 4 th Qtr.
1. Increase in training programs:							
a. Fall hazards in GI	4	Increase by 3	14	5	5	3	
b. Fall hazards in construction	14	Increase by 3	59	18	16	16	
c. Youth	6	Increase by 3	10	6	4	0	
2. Increase in outreach activities to establishments covered by NEP and LEP	116	Increase by 5	314	116	84	46	
3. Increase in outreach activities to establishments in agriculture	5	1 new outreach activity	2	0	1	0	

23(g) Enforcement Program Activities:

Iowa OSHA continued providing traditional direct interventions through mandated enforcement activities, consultation activities, compliance assistance and outreach.

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Iowa OSHA worked to reduce hazards by intervening at targeted work sites by focusing on employees that experienced fatalities, severe injury incidents and employee complaints. Iowa OSHA used the USDOL BLS rates for the previous data collection year as an indicator to determine if Iowa OSHA had a positive impact on fatality, injury and illness rates.

Iowa OSHA continued to focus on amputations and hospitalizations as well as construction activities. The emphasis and other targeting programs developed for Iowa may be found on the web page <http://www.iowaosha.gov/iowa-osha-guidance>. There were 574 inspections for Iowa OSHA which were coded with one or more safety and health LEPs. The changes in Iowa OSHA enforcement targeting programs in the past several years have improved Iowa OSHA inspection performance.

In addition to the direct intervention inspections, Iowa OSHA continued to dedicate one Sr. Industrial Hygienist as a duty officer who addressed 434 non-formal complaints in FFY18. Dedicating one staff member to act as duty officer has allowed Iowa OSHA to handle these informal complaints more consistently with better hazard correction and verification. By having one person process complaints, trends and repeat offenders are more easily detected. Also, the duty officer answered numerous questions which were forwarded to Iowa OSHA through the e-correspondence system and responded to numerous phone calls.

Iowa OSHA adopted the revised OSHA incident reporting recordkeeping rule on January 14, 2015. The Sr. Industrial Hygienist duty officer and Iowa OSHA Administrator took most of the 467 Severe Incident reports received during FFY18. Two hundred and fifty one incidents resulted in an inspection including 22 work related fatalities. In addition, there were 216 incidents reported that resulted in an RRI or “no action” because the incident was out of the scope for an Iowa OSHA intervention.

Iowa OSHA enforcement completed 837 inspections; approximately 6% fewer inspections than the 891 inspections conducted in FFY17. The decreased number of inspections was directly related to the turnover in enforcement staff. The number of construction enforcement inspections increased from 176 in FFY16 to 388 inspections in FFY17. IOSHA also attempted to conduct an additional 87 inspections during this federal fiscal year. The “no inspections” were primarily related to programmed construction activities where the “process was not active”.

The education staff continued to promote and educate employers on the use of safety and health management programs through direct contact as well as through training programs. The outreach to improve safety and health programs is an important effort to reduce injury and illness rates in this state. For the second year, Iowa OSHA participated in the Safe and Sound campaign with a proclamation by the governor.

Iowa OSHA provided training to 4,323 outreach participants in FFY14 and increased the number of outreach participants by 6% in FFY18 with a total of 4,587 outreach participants. The 23(g) staff continued to identify methods to educate and engage youths in safety. Training venues for youthful workers included the Associated Builders and Contractors Annual Conference and Apprenticeship Competition, presentations at both community and private colleges, and conferences. Topics included both GI and construction. Training sessions for young workers in FFY18 was 10.

Iowa OSHA again participated in the National Stand Down for Falls held during the 3rd Quarter of FFY18. Activities included fall protection training and demonstrations of fall protection equipment and fall hazards. All of the Iowa partnership sites participated, including those participating in the alliance with MBI, Associated Builders and Contractors, and Kirkwood Community College Outreach Center.

The Training and Education Section maintains an inventory of 19 Spanish-speaking safety videos that are

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available for lending to those employers seeking assistance in training their employees. A supply of quick cards and other OSHA publications printed in Spanish is maintained for distribution as needed.

Due to the CAS vacancy, a Safety and Health Consultant was the primary contact for partnerships in Iowa and visited with each partnership monthly. He was accompanied by the designated representatives from the general contractor and the subcontractors on a walkthrough of the jobsite. The parties identified hazards and other issues on the walk-around and the identified hazards became the basis for focused training for the employees. On the average there were 4 partnerships each quarter during FFY18. We did have other interest for additional establishments to enter into a Partnership in FFY18 but due to financial and building logistics, the projects are on hold.

Rates for the partnerships were low. No fatalities and no serious injuries meeting the mandatory reporting criteria occurred on partnership sites in FFY18. Construction partnerships during FFY18 had approximately 12,745 employees participate in all the outreach programs.

There were 3 alliances active through FFY18 with a fourth added during FY18: Iowa Renewable Fuels Association, MBI and International Brotherhood of Electrical Workers, Local 55. The Iowa OSHA formal Alliance with the Iowa Renewable Fuels Association (IRFA) which covers Iowa's renewable ethanol and bio-fuels industries, continued through FFY18. The focus of this alliance is to share information on hazard recognition, control and best management practices among association members and Iowa OSHA personnel, through quarterly meetings. An additional alliance was signed with Associated Builders and Contractor ABC in the second quarter of FFY18. The focus of this alliance is to share information and resources to the association and its members.

The Iowa OSHA formal Alliance with MBI continued through FFY18. The focus of this alliance is to share information on hazard recognition, control and best management practices in the construction industry. Iowa OSHA Consultation worked cooperatively with MBI to reach construction companies who are normally not accessible. These include contractors who work exclusively with MBI and do not generally use our services, as well as subcontractors of those contractors and contractors new to the State of Iowa. During FFY18, there were 110 visits with 316 serious, 17 other-than-serious, and 17 regulatory hazards identified. The 100 visits protected 2,174 workers.

The compliance assistance staff continued to work with the Employer's Council of Iowa to provide training to employers and employees throughout the state. The Employer's Council members include representatives from Iowa Workforce Development, community colleges, local business development groups and other government organizations. In addition to the construction and GI 10-hour classes, we have expanded the presentations to include workshops on specific topics such as falls, electrical, lockout/tagout, recordkeeping, machine guarding, and ergonomics.

Iowa has 40 companies in VPP Star status and is working with additional companies to achieve the designation. In FFY18 one company achieved VPP Star status and one VPP company closed. We anticipate additional 4 companies to apply and be evaluated in FFY19. An industrial hygienist continues to serve as the VPP team leader and works with companies already in the program while assisting those who are striving to achieve the designation. Three Safety and Health Consultants and 3 Industrial Hygienists assist the team leader with VPP audits. A list of the current VPP companies is maintained on file in the Iowa OSHA Consultation and Education Section.

21(d) Consultation Program Activities:

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Iowa Consultation and Education continued to support the Local and National Emphasis Programs of Iowa OSHA Enforcement. Iowa OSHA Consultants were requested to give talks and training on nursing homes, trenching, silica, grain, asbestos and falls in construction.

Iowa Consultation and Education staff also provided presentations and staffed booths at the annual Governor’s Safety Conference, the Iowa-Illinois Safety Conference, MBI’s Conference, and the Hawkeye on Safety Conference.

During FFY18, we selected industries for promotional mailings based on high TRC and DART rates and inclusion in a national emphasis program. Each mailing explained why the business was chosen and offered several avenues for assistance. We were able to provide services to about 5.2% of the employers who received these mailings.

- A mailing about combustible dust hazards went to 346 employers in the Food Manufacturing (NAICS 311) industry and to 126 employers in the Plastics and Rubber Products Manufacturing (NAICS 336) industry. Nine and ten employers, respectively, received consultation services due to this mailing.
- A mailing about concrete and silica went to 211 employers in the Nonmetallic Mineral Product Manufacturing (NAICS 327) industry resulting in 21 employers receiving consultation services.
- A mailing about primary metals went to 409 employers in the Fabricated Metal Products (NAICS 332) industry resulting in 21 employers receiving consultation services.

Iowa Consultation and Education continued to promote SHARP to employers with the goal of improving their safety and health management programs. Unfortunately, there were no new companies who achieved SHARP status during FFY18 even though we promoted and encouraged companies’ participation.

Iowa Consultation reviewed injury and illness rates for those industries where we had concentrated efforts in past fiscal years as well as worked with those companies individually to assess outreach efforts.

There were 9 public sector consultation visits with 43 serious hazards proposed during FFY18. However, 17 of the 22 public sector visits were conducted in the last part of the 4th quarter. The hazards identified in the last quarter of FFY17 were proposed in FFY18. Unlike other years, several of the requests were from county public works. GI hazards relating to machine guarding, falls and electrical were identified.

The Iowa Governor’s Safety Conference was held in November in the Des Moines area. Iowa OSHA Consultation and Education Bureau Chief for the Iowa Consultation and Education Program is the Vice-Chair for the board that selects speakers and topics for the annual conference. A booth at the conference was staffed by Iowa OSHA Consultation and Education personnel to answer questions and promote consultation services.

Iowa Consultation and Education supports the NEPs and the LEPs adopted by Iowa OSHA through outreach, education and consultation visits. A detailed discussion of these activities may be found in the “Discussion of Results in Achieving Annual Plan (AP) Performance Goals” section of the FFY18 Iowa Consultation Annual Project Report (CAPR.) Consultants stressed the importance of safety and health program management during all consultation activities.

Strategic Goal 2 Protect Worker’s Rights

As required by Iowa Code 88.9(3) of the Iowa Occupational Safety and Health Act Iowa OSHA

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strove to ensure that no person discharged or in any manner discriminated against any employee because the employee exercised their rights under the Act.

5-Year Outcome Goal 2: In using the FFY14 measures as a baseline, Iowa OSHA plans to increase the timeliness in handling whistleblower investigations by increasing the % completed within 90 days.
IOSHA Strategic Objective 2.1: Strengthening the enforcement of the whistleblower protection statutes.
Performance Goal 2.1: Protect employees’ rights to file health and safety complaints and prevent discrimination against workers who report hazards.
Strategy: Coordinate Iowa OSHA resources to maximize efficiency of discrimination claim processing.
Performance Indicators: Percent improvement in processing rates each year.
Baseline: Percent of discrimination complaint investigations completed within 90 days in FFY14.

Progress in Achieving IOSHA Performance Goal 2.1 was assessed by tracking the outcome of Whistle Blower investigations:

Discrimination FFY 2017 Iowa OSHA Performance Goal 2.1	Assess progress by tracking number of whistle blower investigations:					
	Baseline FFY 2014 Average	FFY 2018 Average	FFY 2018 1st Qtr.	FFY 2018 2nd Qtr.	FFY 2018 3rd Qtr.	FFY 2018 4th Qtr.
<i>Performance Measure</i>						
Average age in days for pending whistle blower investigations / percent completed in 90 days	196 / 33%	97 / 50%	94/ 82%	77 / 50%	118 / 27%	80 / 50%
Average days to complete new complaint screening process	11.1	10	9	7	9	9

Iowa OSHA’s discrimination officer position has remained constant this FFY18. An additional compliance officer has been trained as a whistleblower investigator. This will allow IOSHA to continue to address whistleblower complaints in the absence of the main investigator. Several complaints were received by the discrimination officer during this period. The discrimination officer has made a tremendous effort in attempting to complete 100% of discrimination investigations within 90 days and to screen complaints as efficiently as possible.

IV. Mandated Activities

The requirement for reporting amputations, hospitalizations, and loss of eye continues to directly impact Iowa OSHA’s complaint inspection and investigation response time. The requirement directly generated 467 reports, of which 251 required inspections above and beyond the normal complaint and fatality inspections. An additional inspector and administrative assistant assisted the complaint officer with processing the severe incident reports, phone & fax complaints, e-

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correspondence, and over 2,200 phone calls during the year. These individuals perform this function part time to better handle the influx of severe incident reports and non-formal complaints.

Iowa OSHA's percentage for employee participation in inspections, i.e. employees on the walkaround and interviewed continues to trend with such inspections for all other states. Iowa OSHA's average number of Serious/Willful/Repeat/Unclassified violations per inspection also continues to exceed the average for all other state OSHA programs. Iowa OSHA's average number of Serious/Willful/Repeat/Unclassified violations per inspection was 1.89 versus 1.90 for federal jurisdictions. Iowa OSHA's average number of Other-Than-Serious violations was lower than the average for all other state OSHA programs. Iowa OSHA's in-compliance rate was above that of other state plans and federal jurisdictions. This appears largely due to inspections initiated on construction worksites scheduled through the construction targeting program (C-Target). GI in-compliance inspections were primarily associated with complaints. Iowa OSHA remained committed to its mandated measures and overall accomplished them.

Impact Factors

Iowa OSHA continues to serve an active economic environment that is challenged by the availability of workers. The tables above show that Iowa OSHA is responding to economic changes by providing services that positively impact safety and health working conditions for both employees and employers in Iowa.

Conclusion

Iowa OSHA has been actively engaged in promoting Partnerships and Alliances to proactively help employers to create and sustain safe and healthy employment and workplaces for their employees. Local Emphasis Programs (LEPs) for Amputations, Grain Handling, Hexavalent Chromium and statewide emphasis on fall protection and trenching have continued to be a primary focus of the Iowa OSHA programs.

Enforcement has been also utilizing our Random Zip Code LEP to schedule state-wide construction inspections. These inspections have also initiated activities with the Iowa Division of Labor's Contractor Registration, Child Labor and Wage sections. These sections have in turn made referrals to Iowa OSHA for inspection activities.

Once again Iowa OSHA is committed to maximizing our resources in the areas that we hope will provide the most significant impact for our performance goals. Iowa OSHA will continue to find better ways to target resources to ensure that its performance outcome measures are impacting its strategic and performance goals.

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