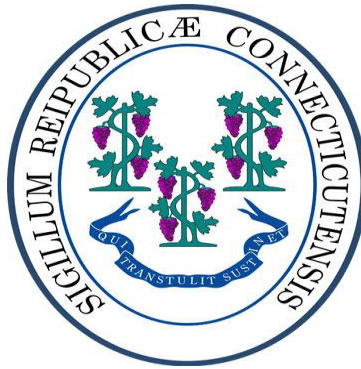


FY 2020
Follow-up Federal Annual Monitoring Evaluation (FAME) Report

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



Evaluation Period: October 1, 2019 – September 30, 2020

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
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I. Executive Summary

The primary purpose of this report is to assess the Connecticut State Plan's (CONN-OSHA's) progress in Fiscal Year (FY) 2020 in resolving outstanding findings from the previous FY 2019 Comprehensive Federal Annual Monitoring Evaluation (FAME) Report.

COVID-19 disrupted CONN-OSHA's normal course of business. Most of Connecticut's state and local government workforce began working remotely in March 2020, which limited the number of inspections, on-site consultation visits, and outreach activities the State Plan could conduct. Thus, CONN-OSHA was unable to meet some of its FY 2020 goals. The State Plan also had other challenges: the long-standing program manager retired in September 2019, and the position remained vacant for the first half of FY 2020. Additionally, two compliance officers were on non-work-related medical leave for a few months.

Despite these challenges, CONN-OSHA made great strides. For example, the State Plan developed new and innovative performance indicators for use in its current five-year strategic plan. Although CONN-OSHA was initially affected by the retirement of the program manager, the State Plan filled this position with the former consultation manager who drafted key components of the strategic plan. CONN-OSHA also filled two vacant consultant positions and wasted no time getting the new hires up to speed.

On-site activities were scaled back for most of the year, but CONN-OSHA adjusted. While working remotely, staff developed an online complaint form, as well as written programs to help workers and employers comply with the Occupational Safety and Health Administration's (OSHA's) standards. The State Plan also became adept at using online platforms to deliver training that is traditionally presented in a classroom.

In the FY 2019 Comprehensive FAME Report, CONN-OSHA did not have any findings or observations. There are no new findings or observations in this report, a sign that CONN-OSHA's tradition of high-level performance remains intact.

II. State Plan Background

CONN-OSHA became operational on January 4, 1974, and covered the private sector and state and local government. It operated effectively in that manner until 1977, when the Connecticut State Labor Council sponsored a bill in the state legislature to restrict enforcement of Connecticut's safety and health program to state and local government only. The bill was enacted with an effective date of June 30, 1978. Connecticut's previously approved 18(b) Plan was withdrawn on October 2, 1978, and 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 a state office building located in Wethersfield, Connecticut. CONN-OSHA adopts and enforces safety and health standards and provides consultation and outreach services to the state and local government workforce. CONN-OSHA covers approximately 68,400 state government workers and 132,500 local government workers, as well as 10,000 volunteer firefighters.¹

The Connecticut Department of Labor operates a workplace retaliation program covering state and local government workers pursuant to the Connecticut Occupational Safety and Health Act of 1973 (Chapter 571, Sections 31-367 through 31-385). Attorneys who administer the workplace retaliation program are employed by the Legal Division, a separate division within the Connecticut Department of Labor.

At full staffing, CONN-OSHA has two first-line supervisors, the director and the occupational safety and health program manager; five compliance safety and health officers; and three 23(g) consultants. Two compliance assistance specialists plan, develop, and implement training and education programs for the state and local government workforce.

Based on FY 2020 financial close-out forms, the State Plan's initial federal funding award was \$642,100. However, CONN-OSHA's federal funding award increased to \$809,113 as a result of \$167,013 in additional funds awarded by OSHA during the course of the fiscal year. In addition to the State Plan matching the federal funding award, the state contributed \$722,819. In FY 2020, CONN-OSHA's total funding amount was \$2,341,045, which was in keeping with previous years' totals.

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. This strategy allows the State Plan to focus on correcting deficiencies identified in the most recent comprehensive FAME. In the FY 2019 Comprehensive FAME Report, CONN-OSHA did not have any findings or observations; however, OSHA monitored CONN-OSHA's performance in FY 2020. The analyses and conclusions described in this report are based on information obtained from a variety of monitoring sources, including:

¹ Source for state and local government workers: Bureau of Labor Statistics' Current Employment Statistics as of September 30, 2020. The estimate for volunteer firefighters was provided by CONN-OSHA.

- State Activity Mandated Measures (SAMMM) Report (Appendix D)
- State OSHA Annual Report (Appendix E)
- State Plan Annual Performance Plan
- State Plan Grant Application
- OSHA IT Support System (OITSS) Reports (Case Summary, Activity Measures, Investigation Data and Length of Investigation)
- Quarterly monitoring meetings between OSHA and the State Plan

B. Findings and Observations

FINDINGS (STATUS OF PREVIOUS AND NEW ITEMS)

Appendix A describes new and continued findings and recommendations; Appendix B describes observations subject to continued monitoring and the related federal monitoring plans; and Appendix C describes the status of each FY 2019 recommendation in detail. CONN-OSHA did not have any findings or observations from the FY 2019 Comprehensive FAME Report, and OSHA did not make any findings or observations in this report. Thus, the tables in Appendices A through C are blank.

C. State Activity Mandated Measures Highlights

Each SAMMM 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 SAMMM 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 2020 SAMMM Report and includes the FRL for each measure. CONN-OSHA was outside the FRL on the following SAMMMs:

SAMMM 2a – Average number of work days to initiate complaint investigations (state formula)

Discussion of State Plan Data and FRL: The negotiated FRL is one day. CONN-OSHA’s average in FY 2020 was 1.25 days, which was outside (above) the FRL.

Explanation: SAMMM 2a (state formula) calculates the number of work days from the date the State Plan receives the complaint to the date the investigation is initiated by notifying the employer of the complaint. This SAMMM pertains only to complaints that have no related inspection. OSHA is not concerned that CONN-OSHA’s average of 1.25 work days was a bit higher than the FRL of one work day for SAMMM 2a.

SAMM 5 – Average number of violations per inspection with violations by violation type

Discussion of State Plan Data and FRL: The FRL is based on a three-year national average. CONN-OSHA's FY 2020 average of 1.96 met the FRL range of 1.43 to 2.15 for serious, willful, repeat, and unclassified (SWRU) violations. For other-than-serious (OTS) violations, the State Plan's average of 1.68 was outside (above) the FRL range of 0.76 to 1.14.

Explanation: Although CONN-OSHA's average for OTS violations was higher than the FRL range, it was acceptable. OSHA would be concerned if the State Plan had a high average for OTS violations and a correspondingly low average for SWRU violations. This outcome could indicate that the State Plan had a tendency to classify some serious violations as OTS violations, but this was not the case; CONN-OSHA's average for SWRU violations was well within the FRL range.

SAMM 7 – Planned v. actual inspections – safety/health

Discussion of State Plan Data and FRL: The FRL is based on a number negotiated by OSHA and the State Plan through the grant application. In FY 2020, CONN-OSHA planned to conduct 165 safety inspections and 80 health inspections. The FRL range was from 156.75 to 173.25 for safety and from 76 to 84 for health. The State Plan's results of 83 safety inspections and 56 health inspections were outside (below) the FRL ranges.

Explanation: In FY 2020, CONN-OSHA was unable to achieve its goals for safety and health inspections for a couple of reasons. First, two compliance officers were away on medical leave for several months in FY 2020. Secondly, the State Plan discontinued programmed inspections after March 2020 because most state and local government agencies shifted to remote work during the pandemic. Therefore, OSHA is not concerned with CONN-OSHA's result for SAMM 7.

SAMM 11 - Average lapse time

Discussion of State Plan Data and FRL: Lapse time is the number of work days from the opening conference date to the earliest issuance date. The FRL is based on a three-year national average. In FY 2020, the FRL range was from 40.46 to 60.70 work days for safety inspections and from 48.31 to 72.47 work days for health inspections. CONN-OSHA's average of 67.29 work days for safety inspections was outside (above) the FRL range; for health inspections, the State Plan's average of 65.28 work days met the FRL.

Explanation: In FY 2020, CONN-OSHA's lapse time for safety increased because the State Plan operated without a program manager for the first six months of FY 2020; thus, it took longer to issue citations because the director had to devote time to reviewing inspection case files in addition to performing his regular duties. Also, some employers closed down during the pandemic, which caused delays in conducting closing conferences. Because the State Plan has a strong track record of meeting the FRLs for both safety and health over the past few years, OSHA is not concerned with CONN-OSHA's high lapse time for safety inspections in FY 2020.

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 2020, CONN-OSHA's result for this SAMM was zero percent.

Explanation: In FY 2020, CONN-OSHA closed one docketed investigation that had been open for 825 calendar days. According to the hearing officer's logs and interviews with the Legal Division, progress on this case was stymied by the parties' inability to reach a settlement agreement. OSHA is not concerned with CONN-OSHA's result for SAMM 14 because the Legal Division attempted to mediate this dispute and was not responsible for the lengthy settlement process.

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

Discussion of State Plan Data and FRL: In FY 2020, the FRL range for SAMM 15 was from 14.40 percent to 21.60 percent and was based on a three-year national average. The Legal Division's percent of 11(c) complaints that were meritorious was 100, which is outside (above) the FRL range. This was a positive outcome.

Explanation: In FY 2020, CONN-OSHA closed one case, which was settled. Thus, CONN-OSHA's result for SAMM 15 was 100 percent because settled cases are considered meritorious.

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 2020, the Legal Division's average of 825 days was outside (above) the FRL. The average for SAMM 16 is 825 calendar days, rather than 1,078 calendar days, which is shown in the SAMM Report in Appendix D. This is due to a data entry error in OITSS which was identified by OSHA and acknowledged by the Legal Division.

Explanation: As discussed under SAMM 14, CONN-OSHA had one docketed investigation in FY 2020 that took 825 calendar days to complete. The Legal Division was not responsible for the delays in settling this case. Thus, OSHA is not concerned with CONN-OSHA's result for SAMM 16.

Appendix A – New and Continued Findings and Recommendations

FY 2020 CONN-OSHA Follow-up FAME Report

FY 2020-#	Finding	Recommendation	FY 2019-# or FY 2019-OB-#
	None.		

Appendix B – Observations and Federal Monitoring Plans

FY 2020 CONN-OSHA Follow-up FAME Report

Observation # FY 2020-OB-#	Observation# FY 2019-OB-# or FY 2019-#	Observation	Federal Monitoring Plan	Current Status
		None.		

Appendix C - Status of FY 2019 Findings and Recommendations

FY 2020 CONN-OSHA Follow-up FAME Report

FY 2019-#	Finding	Recommendation	State Plan Corrective Action	Completion Date	Current Status and Date
	None.				

Appendix D – FY 2020 State Activity Mandated Measures (SAMM) Report

FY 2020 CONN-OSHA Follow-up FAME Report

U.S. Department of Labor				
Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)				
State Plan: Connecticut - CONN-OSHA			FY 2020	
SAMM Number	SAMM Name	State Plan Data	Further Review Level	Notes
1a	Average number of work days to initiate complaint inspections (state formula)	3.27	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)	2.43	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)	1.25	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)	1.25	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)	100%	100%	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.
5	Average number of violations per inspection with violations by violation type	SWRU: 1.96	+/- 20% of SWRU: 1.79	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 1.43 to 2.15 for SWRU and from 0.76 to 1.14 for OTS.
		Other: 1.68	+/- 20% of Other: 0.95	
6	Percent of total inspections in state and local government	100%	100%	Since this is a State and Local Government State Plan, all inspections are in

Appendix D – FY 2020 State Activity Mandated Measures (SAMM) Report

FY 2020 CONN-OSHA Follow-up FAME Report

U.S. Department of Labor				
	workplaces			state and local government workplaces.
7	Planned v. actual inspections – safety/health	S: 83	+/- 5% of S: 165	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 156.75 to 173.25 for safety and from 76 to 84 for health.
		H: 56	+/- 5% of H: 80	
8	Average current serious penalty in private sector - total (1 to greater than 250 workers)	N/A	+/- 25% of \$2,964.86	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 \$1,967.64	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 \$3,513.45	N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.

Appendix D – FY 2020 State Activity Mandated Measures (SAMM) Report

FY 2020 CONN-OSHA Follow-up FAME Report

U.S. Department of Labor				
	c. Average current serious penalty in private sector (101-250 workers)	N/A	+/- 25% of \$5,027.02	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 \$6,190.91	N/A – This is a State and Local Government State Plan. The further review level is based on a three-year national average.
9	Percent in compliance	S: 33.73%	+/- 20% of S: 31.03%	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 24.82% to 37.24% for safety and from 29.72% to 44.58% for health.
		H: 32.08%	+/- 20% of H: 37.15%	
10	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 2020. The further review level is fixed for all State Plans.
11	Average lapse time	S: 67.29	+/- 20% of S: 50.58	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 40.46 to 60.70 for
		H: 65.28	+/- 20% of H: 60.39	

Appendix D – FY 2020 State Activity Mandated Measures (SAMM) Report

FY 2020 CONN-OSHA Follow-up FAME Report

U.S. Department of Labor				
				safety and from 48.31 to 72.47 for health.
12	Percent penalty retained	N/A	+/- 15% of 67.51%	NA – This is a State and Local Government State Plan and is not held to this SAMM. The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 57.38% to 77.64%.
13	Percent of initial inspections with worker walk around representation or worker interview	100%	100%	The further review level is fixed for all State Plans.
14	Percent of 11(c) investigations completed within 90 days	0%	100%	The further review level is fixed for all State Plans.
15	Percent of 11(c) complaints that are meritorious	100%	+/- 20% of 18%	The further review level is based on a three-year national average. The range of acceptable data not requiring further review is from 14.40% to 21.60%.
16	Average number of calendar days to complete an 11(c) investigation	1,078	90	The further review level is fixed for all State Plans.
17	Percent of enforcement presence	N/A	+/- 25% of 1.09%	N/A – This is a State and Local Government State Plan and is not held to this SAMM.

Appendix D – FY 2020 State Activity Mandated Measures (SAMM) Report
FY 2020 CONN-OSHA Follow-up FAME Report

U.S. Department of Labor				
				The further review level is based on a three-year national average.

NOTE: The national averages in 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 9, 2020, as part of OSHA’s official end-of-year data run.

STATE OF CONNECTICUT
STATE OSHA ANNUAL REPORT
(SOAR)
October 1, 2019 through September 30, 2020

Appendix E – FY 2020 State OSHA Annual Report (SOAR)
FY 2020 CONN-OSHA Follow-up FAME Report



Prepared By:

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

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I. Executive Summary

The Connecticut State Plan (CONN-OSHA) fiscal year (FY) 2020 State OSHA Annual Report (SOAR) covers the period of October 1, 2019 through September 30, 2020. This submission is in accordance with the State Plan Policies and Procedures Manual (Directive Number: CSP 01-00-0054, effective 5-06-2020).

FY 2020 was the sixth and final year of the strategic plan that began in FY 2015 and was originally scheduled to end in FY 2019. As the five-year period was coming to an end, CONN-OSHA requested a one-year extension, citing the need for more time to develop a new strategic plan. OSHA agreed to the State Plan's request, and during FY 2020, CONN-OSHA developed a new strategic plan that began in FY 2021 and contains significant improvements, as discussed in Section V of this report.

The COVID-19 pandemic presented many challenges for CONN-OSHA in FY 2020. Most of Connecticut's state and local government workforce worked remotely for approximately three months, which limited the number of inspections, consultation visits and training sessions that the State Plan could conduct. The program manager retired in September 2019; thus, the State Plan operated with one vacant management position until April 2020, when the 21(d) consultation program manager was hired as the replacement. The new State Plan program manager has 27 years of experience as an industrial hygienist in both consultation and enforcement. Additionally, two compliance officers missed significant time due to non-work-related injuries. These factors caused CONN-OSHA to fall short of meeting its FY 2020 annual performance goals for inspections, consultation visits and training.

CONN-OSHA maintained seven active Alliances in FY 2020, although one of the Alliances was not renewed because the parties were unable to meet to re-sign the Alliance agreement. None of the other six Alliances were due to be renewed and no new Alliances were signed in FY 2020.

CONN-OSHA began working remotely in March 2020 as the pandemic spread and continued to do so for the remainder of FY 2020. During this time, staff updated written programs pertaining to respiratory protection, silica exposure control and personal protective equipment hazard assessments for specific state and local government employers. They also developed PowerPoint presentations to help employers comply with OSHA's standards pertaining to machine guarding and electrical hazards. The State Plan's training section developed training sessions for use on online platforms, and staff completed online training seminars provided by the OSHA Training Institute (OTI).

CONN-OSHA hired two new employees to fill vacant industrial hygienist positions in the 23(g) state and local government consultation program. With these new hires, the State Plan was fully staffed as of September 2020.

II. Summary of Annual Performance Plan Results

Strategic Goal #1: Improve workplace safety and health for all workers, as evidenced by reducing hazards, exposures to hazards, injuries, illnesses, and fatalities.				
Performance Goal #1.1	Reduce the number of worker injuries, illnesses and fatalities 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) (including activity, intermediate outcome, and primary outcome measures)	Conduct at least 10 inspections and 10 consultations in the identified high hazard industries. By the end of FY 2020, reduce the 2013 baseline DART rate by 5% in identified high hazard industries. (Note: The performance indicators of fatality prevention in each issue of the <i>CONN-OSHA Quarterly</i> and DART rate reduction in identified high hazard industries are common to all performance goals but will not be repeated.)			
Results	CONN-OSHA conducted four inspections and two consultations in the identified high hazard state government industries. 2019 DART rates: state hospitals – N/A; state nursing & residential care facilities – 6.5; and state highway maintenance & repair operations – 8.5.			
Conclusion		2013 DART rate	2019 DART rate	Percent change from 2013 - 2019
	State hospitals	5.7	N/A	N/A
	State nursing & residential care facilities	16.0	6.5	-59.375
	State highway maintenance & repair operations	11.1	8.5	-23.423
	The goal for number of inspections and consultations was not met for the following reasons. First, the State Plan had two compliance officers who were out on medical leave for lengthy periods of time in FY 2020. Second, programed inspections were not conducted after March because state and local government workplaces were working remotely during the pandemic.			

Performance Goal #1.2	Reduce the number of worker injuries, illnesses and fatalities in the following local government industries: local government public works - street & highway, local government utilities and local government waste management & remediation services.			
Strategy	Conduct inspections and consultations in the identified high hazard industries.			
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Conduct at least 50 inspections and 10 consultations in the identified high hazard industries. By the end of FY 2020, reduce the 2013 baseline DART rate by 5% in identified high hazard industries.			
FY 2020 Results	CONN-OSHA conducted 34 inspections and 29 consultations in the identified high hazard municipal operations. 2019 DART rates: municipal public works - street & highway – 8.5; municipal water, sewage & other systems – 5.3; and municipal waste management & remediation services – N/A.			
Conclusion		2013 DART rate	2019 DART rate	Percent change from 2013 - 2019
	Municipal public works – street & highway	11.1	8.5	-23.423
	Municipal water, sewage & other systems	8.5	5.3	-37.65
	Municipal waste management & remediation services	2.3	N/A	N/A
The goal for consultations was met because the State Plan had received a high number of requests at the beginning of the fiscal year due to employers understanding that these areas were a focus for inspections.				

Strategic Goal #2: Promote a safety and health culture through compliance assistance, cooperative programs and strong leadership.	
Performance Goal #2.1	Increase safety and health awareness among workers and employers in state government agencies.
Strategy	Train state workers and employers 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) (including activity, intermediate outcome, and primary outcome measures)	Conduct a minimum of seven training classes for state employees in the topics listed above.
FY 2020 Results	The State Plan conducted one training session on workplace violence and one on material handling and ergonomics for state employees.
Conclusion	Training was conducted on two of the seven topics; the goal was not met due to training being suspended due to the pandemic.
Performance Goal #2.2	Increase safety and health awareness among workers and employers in local government agencies.
Strategy	Train local government workers and employers 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) (including activity, intermediate outcome, and primary outcome measures)	Conduct a minimum of seven training classes for local government employees in the topics listed above.
FY 2020 Results	The State Plan conducted on training session on workplace violence for municipal employees.
Conclusion	Training was conducted on only one of the seven topics; the goal was not met due to training being suspended due to the pandemic.

Performance Goal #2.3	Increase safety and health awareness among workers and employers in state and local government agencies.
Strategy	Maintain all current Alliances
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Maintain seven current Alliances
FY 2020 Results	The only Alliance that was due to be renewed during FY 2020 was the State Department Energy and Environmental Protection. It was not renewed due to the COVID pandemic. No new Alliances were signed in FY 2020.
Conclusion	Six of the seven Alliances are currently active; the goal was partially met.
Strategy	CONN-OSHA will ensure that workers are interviewed and participate in all inspections and consultation visits.
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	All onsite activities will involve workers.
FY 2020 Results	100% of onsite activities included involvement with workers.
Conclusion	The goal of involving workers in all onsite activities has been met.

Strategic Goal #3: Maximize CONN-OSHA effectiveness and efficiency by strengthening its capabilities and infrastructure.	
Performance Goal #3.1	Strengthen the technical and professional skills and education of all CONN-OSHA field staff.
Strategy	Management will meet with field staff to discuss their training needs and the training options available to fulfill those needs. Enroll field staff in technical courses.
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Each field staff member will complete at least one technical course that is required by the Mandatory Training Program for OSHA Compliance Personnel (Directive Number TED 01-00-019).
FY 2020 Results	CSHO 1, CSHO 4 – 3010 Excavation & Trenching CSHO 2 - 0157 Confined Spaces in GI; 0158 COVID-19 Interim Enforcement Response Plan; 0161 CSHO Safety Inspections During the Pandemic CSHO 5 – 1310 Investigative interviewing techniques CSHO 3 – 2340 Biohazards; 0157 Confined Spaces in GI; 0158 COVID-19 Interim Enforcement Response Plan; 0161 CSHO Safety Inspections During the Pandemic Consultant 1 – 2010 Hazardous materials (Cancelled) Consultant 2 – 1501 Intro to Consultation
Conclusion	The goal of all staff completing technical training was met.
Strategy	Management will meet with field staff to discuss their professional development needs and options available to fulfill those needs. Enroll field staff in courses related to professional development.
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	Each field staff member will complete at least one professional development course/seminar.
FY 2020 Results	All staff completed: IS-00700.b An Introduction to the National Incident Management System IS-00800.c National Response Framework, An Introduction
Conclusion	The goal of all staff completing professional development was met.

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.
Strategy	To strengthen the Emergency Management Plan, CONN-OSHA will: <ul style="list-style-type: none"> • Participate as team members of the Connecticut Emergency Management System • Schedule training sessions when needed • Coordinate the development and implementation of plan changes with state and local agencies • Monitor the development and implementation of the plan; and • Ensure that all CONN-OSHA staff has thorough knowledge of the plan
Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)	CONN-OSHA will participate in at least 85 % of Connecticut Emergency Management System meetings.
FY 2020 Results	State Emergency Response Commission Meeting (2 held, 1 attended) Connecticut Eastern Region Response Integrated Team meeting (2 held, 2 attended) COVID conference calls (411 held, 411 attended) CONN-OSHA staff participated in 99% of Connecticut Emergency Management System meetings during the first three quarters.
Conclusion	The goal of participating in at least 85% of Connecticut Emergency Management System meetings was met.

III. Progress Toward Strategic Plan Accomplishments

In FY 2020, CONN-OSHA achieved 56.73% percent of the goal for inspections. The table below provides a comparison of the projected number of inspections to the actual number of inspections conducted in FY 2020.

FY 2020 Inspections
Projected v. Actual

1.	2. Projected	3. Actual	4. Percent of Annual Performance Goal Achieved
5. Safety	6. 165	7. 83	8. 49.70
9. Health	10. 80	11. 56	12. 70.00
13. Total	14. 245	15. 139	16. 56.73

CONN-OSHA conducted 67 of the 130 consultation visits that were projected for the year, or 51.54% 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 2020.

FY 2020 Consultation Visits
Projected v. Actual

	Projected	Actual	Percent of Annual Performance Goal Achieved
Safety	50	39	78.00
Health	80	28	35.00
Total	130	67	51.54

CONN-OSHA's training specialists provide OSHA 10-hour construction training classes to short-term incarcerated men and women as part of an initiative which began in FY 2017. However, due to the pandemic, only one class was provided that trained 35 individuals.

CONN-OSHA conducted nine classes for 173 state workers and 12 classes for 165 local government workers. The number of classes held was 34% less than the previous fiscal year and the number of employees trained was 28% less. This reduction was due to outreach being limited and/or discontinued due to the pandemic.

IV. Mandated Activities

In FY 2020, CONN-OSHA performed satisfactorily on most metrics that measure State Plan performance as referenced on the State Activity Mandated Measures (SAMM) report and on the Mandated Activities for Consultation (MARC). However, the number of hazards corrected within the original time or onsite (MARC 4D) was well below the standard of 65%. Consultants found it difficult to obtain written confirmation that hazards were corrected because many state and local government workplaces suspended operations for an indefinite period or worked remotely. Therefore, consultants granted many extensions until operations resumed, at which time they were able to confirm that the hazards had been abated.

See the FY 2020 End-of-Year SAMM and MARC Reports below.

SAMM

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SAMM #	Measure	RIDs Selected	All State Plan RIDs	All Federal RIDs	National
01A	Time to Initiate Complaint Inspections STATE formula (Average Number of Work Days to Initiate Complaint Inspections)	121	73,681	29,288	102,969
		3.27	10.11	6.08	8.50
		37	7,290	4,820	12,110
01B	Time to Initiate Complaint Inspections FEDERAL formula (Average Number of Work Days to Initiate Complaint Inspections)	90	43,292	12,535	55,827
		2.43	5.94	2.60	4.61
		37	7,290	4,820	12,110
02A	Time to Initiate Complaint Investigations STATE formula (Average Number of Work Days to Initiate Complaint Investigations)	5	232,821	21,516	254,337
		1.25	5.70	0.87	3.88
		4	40,826	24,645	65,471
02B	Time to Initiate Complaint Investigations FEDERAL formula (Average Number of Work Days to Initiate Complaint Investigations)	5	116,022	6,365	122,387
		1.25	2.84	0.26	1.87
		4	40,826	24,645	65,471
03	Timely Response to Imminent Danger Complaints and Referrals (Percent of Complaints and Referrals of Imminent Danger Responded to within 1 Day)	1	526	394	920
		100.00%	99.06%	94.48%	97.05%
		1	531	417	948
04	Number of Denials where entry not obtained	0	2	1	3
05	Average Number of Violations per Inspection with Violations by Violation Type - SWRU	218	36,047	33,549	69,596
		1.96	1.67	1.92	1.78
		111	21,576	17,451	39,027
	Average Number of Violations per Inspection with Violations by Violation Type - OTS	187	29,707	6,702	36,409
		1.68	1.38	0.38	0.93
06	Percent of Total Inspections in Public Sector	139	3,738	21	3,759
		100.00%	11.71%	0.10%	7.01%
		139	31,925	21,677	53,602
07	Inspections - Safety	83	23,818	17,559	41,377
	Inspections - Health	56	8,107	4,118	12,225
08	Average Current Penalty per Serious Violation (Private Sector) - Total (1 to greater than 250 Employees)	\$0.00	\$64,573,743.47	\$112,376,787.21	\$176,950,530.68
		\$0.00	\$2,495.12	\$3,990.65	\$3,274.44
		0	25880	28160	54040
	Average Current Penalty per Serious Violation (Private Sector) - 1-25 Employees	\$0.00	\$23,944,773.32	\$48,467,190.52	\$72,411,963.84
		\$0.00	\$1,534.00	\$2,695.32	\$2,155.44
		0	15613	17982	33595
	Average Current Penalty per Serious Violation (Private Sector) - 26-100 Employees	\$0.00	\$14,034,358.00	\$23,208,219.03	\$37,242,577.03
		\$0.00	\$2,792.91	\$4,963.26	\$3,839.05
		0	5025	4676	9701
	Average Current Penalty per Serious Violation (Private Sector) - 101-250 Employees	\$0.00	\$8,814,491.75	\$13,085,847.82	\$21,900,339.57
		\$0.00	\$4,416.08	\$6,487.78	\$5,457.35
		0	1996	2017	4013
Average Current Penalty per Serious Violation (Private Sector) - Greater than 250 Employees	\$0.00	\$17,780,120.40	\$27,615,529.84	\$45,395,650.24	
	\$0.00	\$5,477.55	\$7,924.11	\$6,744.27	
	0	3246	3485	6731	
09	Percent In Compliance - Safety	28	7,118	4,242	11,360
		33.73%	34.37%	27.60%	31.49%
		83	20,709	15,369	36,078

SAMM #	Measure	RIDs Selected	All State Plan RIDs	All Federal RIDs	National
09	Percent In Compliance - Health	17	2,582	1,098	3,680
		32.08%	41.75%	35.79%	39.77%
		53	6,185	3,068	9,253
10	Percent of Work Related Fatalities Responded to in 1 Work Day	0	773	1,247	2,020
		0.00%	86.85%	88.69%	87.98%
		0	890	1,406	2,296
11	Average Lapse Time - Safety	4,576	944,127	837,013	1,781,140
		67.29	55.23	55.26	55.24
	Average Lapse Time - Health	68	17,096	15,146	32,242
		2,807	300,525	184,438	484,963
		65.28	63.31	67.96	65.00
12	Penalty Retention Percent Penalty Retained	43	4,747	2,714	7,461
		\$0.00	\$48,573,101.70	\$127,417,587.35	\$175,990,689.05
		0.00%	76.84%	65.81%	68.52%
		\$0.00	\$63,212,745.50	\$193,620,923.00	\$256,833,668.50
13	Percent of Initial Inspections with Employee Walk around Representation or Employee Interview	139	31,429	21,024	52,453
		100.00%	98.45%	96.99%	97.86%
		139	31,925	21,677	53,602

MARC

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Reference		CT	
		QTR	FYTD
	# Visits	12	67
<i>Not Less than 90%</i>	1. % Initial Visits in High Hazard Establishments		
	# High Hazard Visits	8	54
	%	100.00%	91.53%
	# Initial Visits	8	59
<i>Not Less than 90%</i>	2. % Initial Visits to Smaller Businesses		
	# Initial Visits	8	59
	2A. # Visits with <=250 Emp in Estab	8	58
	%	100.00%	98.31%
	2B. # Visits with <=500 Emp Cntrld	7	53
	%	87.50%	89.83%
100%	3.% Visits where Consultant Conferred with Emp		
	3A. Initial		
	# Visits with Emp Conferences	8	59
	%	100.00%	100.00%
	# Initial Visits	8	59
	3B. Follow-Up		
	# Visits with Emp Conferences	0	4
	%		100.00%
	# Follow-Up Visits	0	4
	3C. T&E Visits with Compliance Assistance		
	# Visits with Emp Conferences	4	4
	%	100.00%	100.00%
	# T&E Visits	4	4
	4A Thru 4D based on Closed Cases		
100%	4A. % Serious Hazards Corrected Timely (<=14 Days of Latest Correction Due Date)		
	# Corrected Timely	54	204
	%	100.00%	100.00%
	# Serious Hazards	54	204
	# Serious Hazards Corrected		
	Onsite	0	14
	Within Original Time Frame	11	81
	Within Extension Time Frame	39	98

Reference		CT	
		QTR	FYTD
	Within 14 Days of Latest Correction Due Date	4	11
	4B. % Serious Hazards NOT Corrected Timely (>14 Days Latest Correction Due Date)		
	# NOT Corrected Timely	0	0
	%	0.00%	0.00%
	# Serious Hazards	54	204
	4C. % Serious Hazards referred to Enforcement		
	# Hazards Referred to Enforcement	0	0
	%	0.00%	0.00%
	# Serious Hazards	54	204
65%	4D. # of Serious Hazards Corrected (In Original Time Or Onsite)		
	# Corrected	11	95
	%	20.37%	46.57%
	# Serious Hazards	54	204
	5. # Serious Hazards Uncorrected with Correction Date >90 Days Past Due (Open Cases for last 3 Years, excluding Current Quarter)		
	5A. Open Cases		0

Appendix E – FY 2020 State OSHA Annual Report (SOAR)

FY 2020 CONN-OSHA Follow-up FAME Report

V. Special Measures of Effectiveness/ Special Accomplishments

As stated earlier, CONN-OSHA developed a new five-year strategic plan that will run from October 1, 2020 through September 30, 2025.

The previous plan used DART rates to measure performance in targeted industries. However, CONN-OSHA found that state and local government rates fluctuated widely from year to year due to the Bureau of Labor Statistics' relatively small sampling of state and local government workplaces.

Thus, CONN-OSHA decided to focus on alternate measures of effectiveness for its new five-year plan. Management decided that number of hazards and violations abated in high-hazard workplaces was a much more reliable measure. The focus is similar to the initiative provided by the National Office in establishing the Agency Priority Goal for Trenching.

The State Plan identified high-hazard workplaces in state and local government by evaluating data from OSHA's Injury Tracking Application (ITA). The baseline for the strategic plan was calculated by using the past five years of compliance, consultation and training/education data from OIS. The methodology was discussed on a conference call with the Region and the Directorate of Cooperative and State Programs and was received favorably by both the national office and other State Plans.

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FY 2020 CONN-OSHA Follow-up FAME Report

VI. 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) 2020, which covers the period October 1, 2019 through September 30, 2020. The issues evaluated during this time period have been:

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

The primary tools used for this monitoring procedure were the SAMM Report for compliance and the MARC for consultation. OIS Reports, on-the-job evaluations, and staff interviews supplement the SAMM Report and the MARC on a weekly and/or monthly basis.

Citation processing

Average lapse time (SAMM 11) 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.

The SAMM Reports from FY 2016 through FY 2020 show the following data for SAMM 11. The National Data for the same time frame is shown for comparison.

Table 1

Discipline	Total FY 2016	Total FY 2017	Total FY 2018	Total FY 2019	Total FY 2020	National Data (FY 2020)
Safety	51.32 Days	50.18 Days	40.71 Days	38.55 Days	67.29 Days	55.24 Days
Health	72.00 Days	72.76 Days	54.86 Days	46.91 Days	65.28 Days	65.03 Days

Source: SAMM Report (SAMM 11)

CONN-OSHA was making steady progress in reducing citation processing time as evidenced in the trends shown in Table 1. However, in FY 2020, lapse time significantly increased for the following reasons. First, the State Plan operated without a program manager for the first six months of FY 2020; thus, it took longer to issue citations because the CONN-OSHA Director had to devote time to reviewing inspections in addition to performing his regular duties. Second, CSHOs could not conduct closing conferences with employers because workplaces were closed due to the pandemic. Repeated attempts to contact employers to schedule conferences were unsuccessful.

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FY 2020 CONN-OSHA Follow-up FAME Report

Average number of workdays to initiate complaint inspections

The number of workdays to initiate complaint inspections has also been a long-standing concern at CONN-OSHA. The SAMM Report is CONN-OSHA’s main tool for evaluating performance on this metric.

The SAMM Reports from FY 2016 through FY 2020 show the following data for SAMM 1a. Since 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 program manager will continue to prioritize timely complaint response time.

Table 2

Total FY 2016	Total FY 2017	Total FY 2018	Total FY 2019	Total FY 2020	National average (FY 2020)
2.51 Days	2.79 Days	2.75 Days	3.03 Days	3.27 Days	8.50 Days

Source: SAMM Report (SAMM 1a)

Average lapsed days between closing conference and written report

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

The OIS Visit – Metrics and Lapsed Days is the primary evaluation tool for this measure.

The OIS reports from FY 2015 through FY 2020 show the following data for average lapsed days between closing conference and written report.

Table 3

Discipline	Total FY 2016	Total FY 2017	Total FY 2018	Total FY 2019	Total FY 2020
Safety	13 Days	12 Days	12 Days	14 Days	17 Days
Health	13 Days	8 Days	8 Days	8 Days	11 Days

Source: OIS Visit – Metrics and Lapsed Days Report

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