OSHA Site-Specific Targeting (SST) Inspection Program Overview

To protect the health and safety of workers nationwide, OSHA created the Site-Specific Targeting (SST) Inspection Program to proactively examine employers with the highest rates of occupational injuries and illnesses.

The Basics of SST

Each year, employers must report their injuries and illnesses on the “OSHA Work-related Injury and Illness Data Collection Form.” Approximately 80,000 non-construction employers respond to this survey.

Using data collected from the surveys, OSHA creates an annual “hit list” of employers targeted for a programmed inspection. The “hit list” consists of 10,000 to 15,000 employers that have the highest rates of injuries and illnesses as compared to the average rate for their industry.

The SST inspection plan is based on data received from the previous year’s survey. Inspections conducted in 2013 are based on data from 2011 that OSHA collected from surveys submitted to employers in 2012.

The DART Rate

OSHA uses the DART rate to determine which employers will be targeted for inspection. DART—Days Away, Restricted or Transferred—includes injuries resulting in days away from work, injuries resulting in restrictions from normal job duties or injuries resulting in both.

Use the following equation to calculate your DART rate:

\[ \text{DART rate} = \left( \frac{N}{EH} \right) \times 200,000 \]

- \( N \) = the number of cases involving days away from work, restricted work activity or job transfers
- \( EH \) = the total number of hours worked by all employees in the calendar year
- \( 200,000 \) = the base number of hours worked for 100 full-time equivalent employees

The more injuries and illnesses your company has, the higher your DART rate. The average DART rate is around 1.8. The employers on OSHA’s hit list usually have DART rates exceeding 2.5, though the number can be higher or lower depending on the specific type of industry.

Each year, OSHA targets thousands of the country’s most dangerous worksites for a thorough inspection. Are you on this year’s “hit list?”

Programmed vs. Unprogrammed Inspections

SST inspections are programmed inspections—meaning they are periodic, routine and based on objective criteria (the DART rate). These inspections are comprehensive, including a complete inspection of all high-hazard areas. They differ from unprogrammed inspections, which are a direct response to a specific complaint, fatality or other catastrophic incident at the company.
In any given year, OSHA can conduct both a programmed and unprogrammed inspection at a single site, with the inspections occurring concurrently or separately.

Is My Company on the Hit List?
You can find OSHA’s annual hit list at www.osha.gov or by contacting your representative at Clark-Mortenson Insurance. The list is generally published in late March or early April.

If your company is on the hit list, it means your injury and illness rate is higher than average; although in some cases, employers may have accidentally over-reported their injuries and illnesses.

OSHA sends a letter encouraging high-hazard employers to hire an outside safety consultant or to discuss risk management with its insurance carrier, to help correct issues before OSHA comes in for the inspection. Addressing safety risks before the inspector arrives can help employers avoid OSHA citations and costly fines.

Prepare for an SST inspection
When OSHA comes in for the inspection, they will examine safety hazards and occupational hazards, and will inspect the employer’s records to make sure they are up to date and accurate. SST inspections are typically unannounced, so it’s important to be prepared.

Programmed OSHA inspections consist of three steps:

1. A full company inspection. A designated company representative should be with the inspector at all times and should take detailed notes throughout the inspection process.
2. Document review. OSHA will review the company’s documents, including OSHA forms and employee medical records with the employee’s permission.
3. Employee interviews. OSHA will interview both management and non-management employees.

To prepare for an SST inspection:

- Communicate to management and employees that OSHA is targeting your company for a potential inspection this year.
- Understand what is being recorded on your OSHA 300 Logs, and make sure the information is detailed and accurate. Verify all of your OSHA forms are completed correctly and are organized and accessible.
- Establish an “inspection team” to prepare and manage the OSHA visit.
- Conduct your own health and safety audits or inspections throughout the year to identify and correct problems before OSHA finds them.

If OSHA finds violations during your SST inspection and issues you a citation, you must post the citation in your facility promptly. OSHA usually conducts a follow-up inspection to ensure violations were corrected. Keep in mind that failing to correct any violations identified during the initial inspection will result in a “willful violation” citation, which carries a heftier fine.

National and Local Emphasis Programs
The SST program shouldn’t be confused with OSHA’s National and Local Emphasis Programs. The SST program targets specific individual employers; while the National and Local Emphasis Programs focus on inspections for specific hazards or industries.

OSHA’s 13 National Emphasis Programs target specific hazards such as lead and silica, or industries such as nursing and residential care facilities. OSHA also has 140 Regional or Local Emphasis Programs, which address risks to workers in a certain office’s jurisdiction. For example, some regions have a specific program to address risks to those employed at marinas, which does not apply to all OSHA regions.

For more information about the SST program and OSHA compliance, contact Clark-Mortenson Insurance today.