

STATE OF UTAH STATE OPERATIONS ANNUAL REPORT (SOAR)

December 13, 2013



UTAH LABOR COMMISSION

UTAH OCCUPATIONAL SAFETY AND HEALTH DIVISION

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Introduction

This introduction is common for both the SOAR and CAPR since the Utah State Plan is a joint Compliance/Consultation effort to provide a safe and healthful working environment for the employees in the state of Utah through either the enforcement of the OSHA Standards by Compliance and/or assistance to employers through the Consultation program.

Utah OSHA developed its five year Strategic Performance Plan (FY 2009-2013) on the basis that occupational safety and health in Utah is an integrated process with Compliance, and Consultation working together to accomplish a common goal. Due to major leadership changes at Utah OSHA, the FFY 2009-2013 Strategic Performance Plan was extended for one more year past FFY 2013 to continue into the FFY 2014.

Utah operates a "state plan" occupational safety and health program under Section 18 of the federal Occupational Safety and Health Act of 1970. Funding for this program is provided in accordance with Section 23 of the Act. Establishment and enforcement of state occupational safety and health standards form the core of this program.

Utah also provides a consultation program in accordance with 29 CFR 1908. This program is designed to operate within the requirements established in Section 21 of the Act.

This report is a performance report of Utah OSHA activities accomplished for the fulfillment of requirements included in the Strategic Plan (FFY 2009-FY2013 plus 2014 extension) and identified in the F FY 2013 23(g) Grant Application and FFY 2013 21(d) Consultation Cooperative Agreement.

Utah OSHA Performance Summary

The Utah Occupational Safety and Health Program mirrors the federal program as closely as possible while still recognizing the autonomy and unique characteristics of the state.

During FY 2013, Utah OSHA performed 1357 total compliance interventions and 1030 consultation, education and training interventions. This is a total of 2387 Interventions. Total Utah OSHA interventions include inspections, investigations, visits, form 55 and form 66 activities in both programs. These interventions removed 374,996 employees from 2,865 identified and corrected hazards.

Utah OSHA, in line with its strategic and performance plans, emphasized the prevention of fatalities and the reduction of the Utah fatality rate for industries under Utah OSHA jurisdiction. Utah OSHA also made a concentrated effort to reduce the Utah Annual Recordable Case Rate in Construction and General Industry. Utah OSHA promoted a safety and health culture through increased participation in compliance interventions, consultation interventions, consultation services, VPP and SHARP.

Compliance Activity

1. Emphasis Initiatives	
Public Sector - Inspections	90
Oil & Gas Exploration/Drilling - Inspections	12
Machine Guarding & LOTO - Inspections	106
Utah Reportable Accidents	124

Primary Metal - Inspections	0
Chemical PSM - Inspections	1
Grain Elevators	2
Trenching Excavation	57
Confined Space and/or Immediate Hazards (CSI)	318
2. Fatality Cases Reported to UTAH OSHA	
Reported to Utah OSHA	12
Inspections accomplished	12
Investigations accomplished	12
3. Serious Injury Cases Reported to UTAH OSHA	
Reported to Utah OSHA	250
Inspections accomplished	124
Investigations accomplished	126
4. Safety and Health Complaints	
Safety and Health complaints received	411
Inspections accomplished	129
Investigations (Phone/Fax) accomplished	50
Invalid and/or Referred to other agencies	8
5. General Industry	
Total General Industry	528
Inspections accomplished	369
Interventions accomplished	159
6. Construction	
Total Construction	712
Inspections accomplished	585
Interventions accomplished	127
7. Public Sector	
Total Public Sector	166
Inspections accomplished	64
Public Sector Consultation Visits	29
Public Sector Interventions	73
8. Whistleblower Complaints	
Whistleblower complaints received	52
Investigations accomplished	20
Merit Cases	4
Referred to another agency	5
Administratively screened and closed	26
9. VPP applications received presentations and/or pre-audits accomplished.	
Total Participants	7
Applications received	1

Presentations accomplished	3
Pre-audits accomplished	1
Recertification audits accomplished	4
10. Compliance Outreach	
Safety Awareness Day	460
Total Outreach Activities Accomplished	823

Federal Guidance Adopted

CPL 02-01-054 2013 545	Inspection and Citation Guidance for Roadway and Highway Construction Work Zones	Adopted identical, 10/17/12 except all references to Federal FOM, shall read "Utah FOM".
CPL 02-13-01 2013 564	Site-Specific Targeting 2012 (SST-12)	Utah OSHA did not adopt. Utah is developing its own emphasis program.
CPL-03-00-017 2013 585	National Emphasis Program Occupational Exposure to Isocyanates	Effective Date 01/20/2014
CPL 02-00-155 2013 604	Federal Program Change Memo for OSHA Instruction	Utah OSHA did not adopt. Utah is developing its own emphasis program.
CPL 02-01-055 2014 624	Maritime Cargo Gear Standards and 29 CFR part 1919 Certification	Utah OSHA did not adopt due to no Maritime in Utah.

Compliance Outreach

- Annual ICC Conference - St George, UT
- Southern Utah Builders Association - St George, UT
- On-going communication and contact with Local and State Government Building Inspectors Offices in a continuing effort to maintain and build upon a partnership of cooperation.
- State of Utah Governor's Safety Conference - Layton, UT
- Fifteen safety walks at five different construction sites. Safety walks involved training sub-contractors and assisting the general contractor. These safety walks were a part of the Arches Partnership Program.

Public Sector SHARP

During FFY 2013, five Sandy City Fire Stations, #31, #32, #33, #34 and #35, were accepted into the Safety and Health Achievement Recognition Program (SHARP). There are currently seven Public Sector SHARP entities.

Public Sector Consultation Activities

The Public Sector Consultation Program conducted 58 visits statewide. Of the 58 visits conducted, 42 were initial visits, seven were training and assistance visits and nine were follow-up visits.

As a result of the 58 initial visits conducted, 154 serious hazards were identified and abated.

The Public Sector Consultation Program conducted 67 interventions and of the 67 interventions conducted, 28 were safety related, 9 were health and 30 of the interventions conducted had both safety and health related aspects.

A number of state agencies, county departments, cities and special service districts were provided assistance this year. Many of these requests came from those visited in promotion of public sector consultation in previous years or from the outreach activities from the current and prior years.

Public Sector Consultation Activity Table

Visits	Type
42	Initial visits
7	Training classes after initial visits
9	Follow-up
58	Total Public Sector Consultation

Interventions	Type		
67	Outreach		
15	Training not associated with a visit		
52	Total Public Sector Consultation		
7/30	Intro. to OSHA - 2 Hr.	Salt Lake Community College	RMCOEH class
8/23	Intro. to Utah OSHA	Utah OSHA Training Rm.	LC new employees
9/13	Intro. to OSHA – 2 Hr.	Thanksgiving Point Conference Center	Stock Builder’s Supply Sponsored this
9/28	Introduction to OSHA, Emergency Action Plans – 2.5 Hr.	Cedar City Conference Ctr.	Utah Counties Indemnity Pool

VPP Activity and Current Status of Program Participants

Utah OSHA will continue to promote VPP through presentations with the assistance of existing VPP members and employees. Utah OSHA will increase awareness of the compliance and consultation staff to assist in identifying potential candidates. Other means available to promote VPP in Utah are the Labor Commission WEB page, the Labor Commission newsletter, Utah OSHA SafetyLine Newsletter and professional associations. Utah OSHA has signed an agreement with federal OSHA for the use of “Special Government Employees” to be used as a supplement to assist compliance staff during VPP audits.

Utah OSHA conducted one pre-audit visit.

The following VPP applications that are in the process of being reviewed and/or waiting for corrections to be made by the employee:

- a. Northrop Grumman
- b. Longview Fiber
- c. Southwire Co
- d. Nucor Steel
- e. Holly Frontier Woods Cross Refinery
- f. Nucor Building Systems

Energy Solutions has submitted a new application in FFY 2013

Current VPP sites are listed in the table below.

Voluntary Protection Participants Table

Voluntary Protection Participants						
No	Company Name	Since	Status	Latest Recertification	Expiration	Employees
1	GE Medical	04/14/2003	Star	7/15/2013	08/18/2018	671
2	Morton Salt	06/29/2004	Star	06/21/2010	06/01/2015	144
3	Frito Lay	07/20/2004	Star	1/12/2013	5/01/2018	275
4	Pacific States Cast Iron Pipe Co.	10/21/2009	Star	09/26/2012	09/01/2015	293
5	Firestone Building Products	10/20/2009	Star	10/23/2012	4/25/2018	19
6	Simmons Manufacturing Co LLC	08/09/2012	Merit	N/A	08/01/2015	34
7	Conoco Philips	12/10/2012	Merit	N/A	12/12/2017	10

Utah OSHA Staff Changes

In FFY 2013 three new CSHOs were hired. These three CSHOs were trained and released for field duties in April of 2013. One of these CSHO's left Utah OSHA for other employment opportunities. Utah OSHA experienced one retirement: (Eldon Tryon Compliance Manager) in January and Louis Silva the Division Administrator resigned July 2013. The Financial Analyst position was eliminated.

Public Sector Emphasis Initiative

Utah OSHA continued the 2011 Public Sector Safety Inspection Emphasis Initiative for public sector agencies, departments, city, county, municipalities and school districts in the state of Utah. This initiative for public sector safety is designed to help identify and

eliminate hazards, such as falls, confined space entry, trenching, materials handling, equipment and electricity, associated with the major causes of fatalities, accidents, and injuries in this group of Utah workplaces.

Oil and Gas (Exploration and Drilling) Emphasis Initiative

Utah OSHA continued this fiscal year with the emphasis inspections in this industry. Compliance in conjunction with Consultation attended seminars for the STEPS program. In addition, consultation continued to conduct outreach activities for this industry in the Eastern and Central Utah areas.

Machine Guarding & LOTO Emphasis Initiative

Utah OSHA continued this emphasis program during this fiscal year for machine guarding and lockout. Serious injuries reported started increasing in 2010, including amputations from unguarded machinery. The NAICS were selected and inspections conducted according to size and Industrial Accident database information. Machine guarding and LOTO was also emphasized during compliance inspections where the hazards observed during inspections would warrant expanding the inspection to include this emphasis.

Chemical PSM Emphasis Initiative

Utah OSHA accomplished one Process Safety Management (PSM) inspection at a major city's Waste and Water Reclamation Plant. This inspection was conducted following PSM guidelines.

Safety Awareness Day

Wednesday June 26, 2013 Utah OSHA sent out all consultation and compliance officers in "consultation mode." As part of Safety Awareness Day, no citations or penalties were issued to workplaces visited that day. Utah OSHA prepared packets that explained the reason behind the visits, and provided the companies visited with information on how to develop a Safety and Health Management System (SHMS). The staff visited 460 employers in high hazard areas of industry and construction throughout the state. In just one day, the message of safety and awareness was delivered to this significant number of employers. Employers were appreciative of the visit and CSHO's were very well received.

Staff Training Activity

The following training was provided to all CHSO's
OSHA Webinar #0050 – Practical Noise Control Engineering
OSHA Webinar #0069 – Recognizing Failures in Machine Safeguarding Systems
OSHA Webinar #0067 – Safeguarding Robotics
MSDS pro Webinar – GHS and the US Manufacturer-Labeling and Safety Data Sheet Revisions
OSHA Webinar #0066 - Standards and Citation Policy for Roadway and Work Zone Inspections

OSHA Webinar #0065 – CSHO Safety in Roadway and Highway Construction Work Zone
OSHA Webinar #0068 – Documenting Heat Stress Violations
OSHA Webinar #0062 – Lead Removal in Bridge Demolition
HAZCOMM 2012 – The Revised Standard and What Changes You Can Expect in the Workplace
CPR and Auto-Defibrillator training
What is new in window washer safety equipment – taught by local vendor
Hearing Conservation – taught by 3M corp.
Phone Duty training – Proper answering, message transfer, customer service training (in-house)
Proof-reading – Tips for better proof-reading (in-house)

Occupational Medicine Cooperation with University of Utah

During FFY 2013 two physicians from the Occupational Medicine Program of the University of Utah Department of Family and Preventive Medicine Division of Public Health served residency training with Utah OSHA staff.

Utah OSHA provides this training as part of a cooperative effort with the University of Utah. This training provided allows the residents to gain exposure to the administrative and regulatory aspects of Utah OSHA with respect to health and safety in the workplace. Also it increases their knowledge and familiarity regarding worker's compensation and employment law in the state of Utah.

Staff Training Cost Saving

Due to the size of our staff and their training needs, training is a significant expense for the agency. Utah OSHA has implemented efforts to obtain training courses on site, instead of having to travel out of state. In addition to webinars, training has been provided to the Utah OSHA staff at the local level at no cost. Considering average attendance of 18 CSHOs to each course, with an estimated cost factor of \$1,000 per CSHO per course that would be \$18,000 per course, for eight courses translates into total cost savings of \$144,000 by taking advantage of other training opportunities offered locally and using internet resources. Utah OSHA also utilizes the expertise of our own most experienced CSHOs to provide training to new staff members, in addition to local courses offered by the University of Utah. The Utah Labor Commission also provides regular training sessions in other general areas important to the achievement of our mission.

Telecommuting Program

Utah OSHA continues to use the telecommuting program, with four compliance officers and three consultants. This initiative has proven effective to assist us in confronting our operational cost increases and funding challenges due to the economy and the limitation of office space. The telecommuting program has been especially valuable to ensure a compliance field presence. The availability of state vehicles under reduced funding conditions is a significant challenge to the program.

State Internal Evaluation Program (SIEP)

Utah OSHA’s State Internal Evaluation Program (SIEP) included an internal evaluation of its internal operations. This is a critical component of the monitoring system and provides that mandates are met, remembering that states have the flexibility to design and implement programs that will fit each individual State’s needs and personnel resources.

Areas of Emphasis SIEP program

Inspection Scheduling	Utah Adjudication Process
Accident Referral Investigations	Contested Cases
Fatality/Catastrophe Investigations	Informal Conference
Complaint Investigations	Data Entry for Contested Cases
Case File Documentation	Data Entry for Informal Conference
Case File Data Entry	Settlement of Cases
Case File Review and Approval	Data Entry of Settlement Cases
Citation Processing	Data Quality – SAMM Report
Assurance of Abatement	Data Quality – CRR Report
Petition for Abatement Modification	CSHO Training
Denial of Entry Warrant	Industrial Hygiene Process
Review of Form 55	

In FFY 2013 Utah OSHA reviewed and improved the efficiency of the citation process. The Lean Six Sigma process was used.

In FFY 2014 Utah OSHA will perform quarterly reviews of a random sample of compliance safety and health cases to ensure the quality and efficiency of the process, utilizing the federal checklist.

Compensation Level and Recruitment Challenges

Limited personnel compensation levels continue to be a tremendous challenge to Utah OSHA for the type of professional level, technical knowledge, education, experience and expertise needed to perform complex occupational safety and health inspections, this continues to be a critical challenge for Utah OSHA, limiting our ability to recruit the expertise and talent needed to accomplish our mission. This is evident by the difficulty in recruiting individuals with experience and backgrounds in engineering, chemistry and industrial hygiene.

Infrequent and limited pay increases, due to unstable/limited funding results in experienced employees leaving state jobs and going into the private sector for better pay and benefits, after the state has invested an estimated \$50,000 in training for those individuals. Based on current economic forecasts, we do not expect this situation to improve in the near future.

Annual Performance Goals and Results

Utah’s performance plan includes a goal directed towards the reduction of fatalities, injuries, and illnesses. The change in the State’s injury/illness/fatality rates will be included in Utah OSHA’s assessment of the achievement of the national goal(s).

As a performance measure, Utah OSHA has had an effective impact in the reduction of the fatality rate for industries that are under Utah OSHA’s jurisdiction with a rate of 1.05 a 30% reduction from the BLS 2004-2006 baseline of 1.50.

In addition, Utah OSHA has substantially increased the number of interventions conducted in both construction and general industry. This and other activities conducted by Utah OSHA have contributed to the reduction of the total recordable injury and illness case rate from 5.5, which is the average of the 2004 - 2006 BLS data, to the currently published 2012 rate of 3.4, a 38 percent decrease.

Utah OSHA works to promote a safety and health culture through participation in consultation services, VPP, SHARP and other compliance assistance. Budget cuts and other economic effects have influenced our programs, but in most areas we exceeded our goals. Budget and staffing cuts affected our VPP program’s success.

Annual Performance Goal USG 1 Results Table

Annual Performance Goal USG1 – Reduce Fatalities (Mandatory Goal)					
5-Year Goal	Achieve an effective impact in the reduction of Utah fatality rate for industries that are under Utah OSHA jurisdiction by 2014, measured by the most current BLS fatality data available for the state.				
Outcome	By 2014, reduce the rate of workplace fatalities.				
Annual Performance	Achieve a rate of fatalities lower than the baseline.				
	<i>USG1 Strategy</i>	<i>Industry</i>	<i>Baseline</i>	<i>2013 Goal</i>	<i>2013 Results</i>
	<i>Change in Utah Fatality Rate (Baseline BLS 3 year average fatality rate FY 2004-2006)</i>	<i>All Combined</i>	<i>1.5</i>	<i>1.5</i>	<i>1.05</i>

Strategy	<ol style="list-style-type: none"> 1. Focus Utah OSHA interventions and outreach activities on industry sectors with the highest injury incident rates related to the leading causes of fatalities in Utah, which are falls, struck-by, crushed-by, electrocutions. 2. Review YTD fatalities reported to Utah OSHA to identify special areas of emphasis.
Outcome Indicator(s)	Percent change in fatality rates based on BLS annual data.
Results (2013)	<p>Number of Fatalities: 12 Number of employees under Utah OSHA Jurisdiction: 1,162,163 2013 Fatality Rate: 1.05 Change from baseline: -30% Special Areas of Emphasis: 4 Fatalities in General Industry 6 Fatalities in Construction 2 Fatalities in Oil and Gas</p> <p>Primary cause of fatalities was: Struck-by (6 cases), Fall (3 cases), Caught in between (2 cases), Explosion (1 case).</p> <p>Fatality Rate of 1.05 is a reduction of 0.3 from the baseline of 1.5</p>
Data Source(s)	BLS most current available fatality rate for the state.
Baseline	Rate of 1.5 from the average of 2004 - 2006 BLS data.

Annual Performance Goal USG 2 Results Table

Annual Performance Goal USG2 – Reduce Injuries and Illnesses (Mandatory)					
5-Year Goal	Achieve an effective impact in the reduction of injuries and illnesses, in industries that are under Utah OSHA jurisdiction, measured by the most current average of BLS total recordable cases rate (TRC) from 2009 to 2014.				
Outcome	Annual reduction of 0.1 of the BLS total recordable cases rate .				
Annual Performance	Annual reduction in total workplace injuries and illnesses rate for all industries.				
	<i>USG2 Strategy</i>	<i>Industry</i>	<i>Baseline</i>	<i>2013 Goal</i>	<i>2013 Results</i>
	<i>Change in Utah Total Annual Recordable Case Rate (Baseline BLS 3 year average TRC for FY 2004-2006)</i>	<i>All Combined</i>	5.5	5.4	3.4
Strategy	<ol style="list-style-type: none"> 1. Develop a focused inspection list in general industry of employers with the highest total injury rates in the state. 2. Track all compliance interventions (inspections and assistance form 55) in general industry and construction. 3. Track all consultation interventions (visits and assistance form 66) in general industry and construction. 				

	<p>4. Review YTD accidents reported to Utah OSHA to identify special areas of emphasis.</p> <p>5. This goal will be reviewed yearly to address changing conditions.</p>																																											
Outcome Indicator(s)	<p>Reduction in total annual recordable case rates in industries under UTAH OSHA jurisdiction.</p> <p>Number of compliance interventions conducted in general industry.</p> <p>Number of compliance interventions conducted in construction.</p> <p>Number of consultation interventions conducted in general industry.</p> <p>Number of consultation interventions conducted in construction.</p> <p>Number of consultation outreach activities.</p>																																											
Results (2013)	<p>Most Recent Utah Total Annual Recordable Rate (Change from Baseline)</p> <table border="1"> <thead> <tr> <th>Compliance</th> <th>Inspections</th> <th>Form 55s</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>General Industry</td> <td>369</td> <td>159</td> <td>528</td> </tr> <tr> <td>Construction</td> <td>585</td> <td>127</td> <td>712</td> </tr> <tr> <td>Total</td> <td>954</td> <td>286</td> <td>1240</td> </tr> <tr> <th>Consultation</th> <th>Surveys</th> <th>Form 66s</th> <th>Total</th> </tr> <tr> <td>General Industry</td> <td>269</td> <td>371</td> <td>640</td> </tr> <tr> <td>Construction</td> <td>123</td> <td>179</td> <td>302</td> </tr> <tr> <td>Total</td> <td>392</td> <td>550</td> <td>942</td> </tr> <tr> <th>Total Utah OSHA</th> <th>Inspections/Surveys</th> <th>Forms 55/66</th> <th>Total</th> </tr> <tr> <td></td> <td>1346</td> <td>836</td> <td>2182</td> </tr> </tbody> </table>				Compliance	Inspections	Form 55s	Total	General Industry	369	159	528	Construction	585	127	712	Total	954	286	1240	Consultation	Surveys	Form 66s	Total	General Industry	269	371	640	Construction	123	179	302	Total	392	550	942	Total Utah OSHA	Inspections/Surveys	Forms 55/66	Total		1346	836	2182
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Data Source(s)	<p>BLS most current available TRC rate for the state. There is delay of one year.</p> <p>IMIS for intervention data.</p>																																											
Baseline	<p>Rate of 5.5 from the average of 2004 - 2006 BLS data.</p>																																											

Annual Performance Goal USG 3 Results Table

Annual Performance Goal USG3 – Safety and Health Culture (Non-mandatory)				
5-Year Goal	<p>Promote a safety and health culture through increased participation in Consultation Services, VPP, SHARP and Compliance Assistance.</p>			
Outcome	<p>By 2013, increase by 5% (1% per year) the number of consultation services, workshop, presentations, VPP applications, SHARP applications and participants in Compliance Assistance activities.</p>			
Annual Activity Goal	Interventions	Baseline	2013 Goal (2%)	2013 Results
	21(d) Consultation Visits	272	286	392
	Form 66s	226	227	550
	Form 55s	426	469	305
	VPP Presentations	5	17	2
	VPP Applications	1	5	3
	SHARP Presentations	11	11	12
	SHARP Applications	2	12	2
	Public Sector Consultation	15	17	58

Strategy	<ol style="list-style-type: none"> Promote consultation services to increase number of requests form employers in private and public sectors. Promote Utah OSHA VPP and SHARP programs, to increase the number of applications for both programs. 				
Outcome Indicator(s)	<ol style="list-style-type: none"> Number of 21(d) consultation visits Number of interventions form 55s/66s Number of VPP and SHARP presentations. Number of VPP and SHARP new applications Number of public sector consultation visits 				
Results (2013)	Interventions	Baseline	2013 Goal (2%)	2013 Results	% Change from "Baseline"
	21(d) Consultation Visits	292	286	392	34%
	Form 66s	217	239	550	153%
	Form 55s	426	469	305	-28%
	VPP Presentations	5	17	2	-60%
	VPP Applications	1	5	3	200%
	SHARP Presentations	10	12	12	20%
	SHARP Applications	2	2	2	100%
	P Sector Consultation	15	17	58	278%
Data Source(s)	IMIS Reports				
Baseline	Average number of activities from FY 2004 – FY 2006				