

# **STATE OF UTAH STATE OPERATIONS ANNUAL REPORT (SOAR)**

**December 19, 2014**



**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 Utah OSHA standards by Compliance and/or assistance to employers through the Consultation program.

The (federal fiscal year) FFY 2009-2013 Strategic Plan was extended for one year to continue into FFY 2014. The Utah Occupational Safety and Health Division (Utah OSHA) has developed a new 5-year Strategic Performance Plan that will be in effect from FFY 2015 – 2019. This five-year Strategic Performance Plan was developed on the basis that occupational safety and health in Utah is an integrated process with the Compliance and Consultation and Education Services Sections, working together to accomplish a common goal.

Utah operates a "state plan" occupational safety and health program under Section 18 of the federal Occupational Safety and Health Act of 1970 (Act). 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.

This report is a performance report of Utah OSHA activities accomplished for the fulfillment of requirements included in the Strategic Plan (FFY 2015 - 2019) and identified in the FFY 2014 23(g) Grant Application.

## 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 FFY 2014, Utah OSHA performed 1,162 total compliance interventions. Total Utah OSHA interventions include inspections, investigations, visits, and compliance assistance in the public and private sectors. These interventions removed 41,882 employees from 1,293 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's 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 participation in compliance interventions, presentations and the Voluntary Protection Program (VPP).

## Compliance Activity

<b>1. Emphasis Initiatives</b>	
Public Sector - Inspections	38
Construction Industry - Inspections	40
Utah Reportable Accidents	336
Process Safety Management - Inspections	1
Trenching Excavation	40

<b>2. Fatality Cases Reported to UTAH OSHA</b>	
Reported to Utah OSHA	26
Inspections accomplished	14
Investigations accomplished	12
<b>3. Serious Injury Cases Reported to UTAH OSHA</b>	
Reported to Utah OSHA	389
Inspections accomplished	173
Investigations accomplished	178
<b>4. Safety and Health Complaints</b>	
Safety and Health complaints received	319
Inspections accomplished	148
Investigations (Phone/Fax) accomplished	38
Referred to other agencies	15
<b>5. General Industry</b>	
Total General Industry	435
Inspections accomplished	387
Interventions accomplished	48
<b>6. Construction</b>	
Total Construction	409
Inspections accomplished	355
Interventions accomplished	54
<b>7. Public Sector</b>	
Total Public Sector	167
Inspections accomplished	55
Public Sector Consultation Visits	63
Public Sector Interventions	49
<b>8. Whistleblower Complaints</b>	
Whistleblower complaints received	78
Investigations accomplished	41
Merit Cases	0
Referred to another agency	9
Administratively screened and closed	28
<b>9. VPP applications received presentations and/or pre-audits accomplished.</b>	
Total Participants	6
Applications received	1
Presentations accomplished	1
Pre-audits accomplished	0
Recertification audits accomplished	0
<b>10. Compliance Outreach</b>	
Safety Awareness Week	1200
Utah Steps Symposium	1100
National Safety Stand-Down to Prevent Falls in Construction	100
<b>Total Outreach Activities Accomplished</b>	<b>2400</b>

## Federal Guidance Adopted

CPL 02-14-01 2014 645	Site-Specific Targeting 2014 (SST-14)	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	Utah OSHA adopted on January 20, 2014.
TED 01-00-019 2014 704	Mandatory Training Program for OSHA Compliance Personnel	Utah OSHA did not adopt. Utah OSHA developed its own training program.
CPL-02-01-056 2014 684	Inspection Procedures for Accessing Communication Towers by Hoist	Utah OSHA is planning to adopt identical. Effective on March 17, 2015.
CPL 02-00-157 2014 646	Shipyard Employment Tool Bag Directive	Utah OSHA did not adopt; no maritime application.
CPL-02-00-158 2014 705	Inspection Procedures for Respiratory Protection Standard	Utah OSHA is planning to adopt identical. Effective on March 5, 2015.
CPL-03-02-003 2014 626	OSHA Strategic Partnership Program for Worker Safety and Health	Utah OSHA did not adopt.

## Compliance Outreach

Utah OSHA is providing outreach to employers on fall protection standards. Management staff is working with the local building inspectors and construction trade associations to keep them informed of changing Utah OSHA requirements. Many opportunities to share the safety message were made available this year. Presentations were made at the Association of General Contractors of Utah, Utah Chapter ICC Conference, Southern Utah Builders Association Conference, Tri-County Building Inspectors, the Utah Oil & Gas Industry Association and the First Annual Safety Conference for Oil & Gas Industries, Utah Steps Symposium and National Safety Stand-down to Prevent Falls in Construction. Utah OSHA also sponsored Workplace Safety Week, where staff was dispatched to various cities to interact with and educate the general public. During this week, the message of safety and awareness was delivered to a significant number of employers, employees and public, along with information and free resources they can use to improve their safety programs. These activities will continue in FFY 2015 as opportunities present themselves.

## Public Sector SHARP

During FFY 2014, there were no new public sector Safety and Health Achievement Recognition Program (SHARP) companies. There are currently seven Public Sector SHARP entities.

## Public Sector Consultation Activities

The Public Sector Consultation Program conducted 63 visits statewide. Of the 63 visits conducted, 49 were initial visits, 12 were training and assistance visits and 2 were follow-up visits.

As a result of the 49 initial visits conducted, 240 serious hazards were identified and abated.

The Public Sector Consultation Program conducted 68 interventions and of the 68 interventions conducted, 17 were safety related, 9 were health and 42 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
49	Initial visits
12	Training classes after initial visits
2	Follow-up
<b>63</b>	<b>Total Public Sector Consultation</b>

Interventions	Type
49	Outreach
19	Training not associated with a visit
<b>68</b>	<b>Total Public Sector Consultation</b>

Date	Type	Location	Employer
10/23/13	10-hr Gen. Ind. Class	Vernal	Uintah County
10/21/13	10-hr Gen. Ind. Class	Vernal	Uintah County
12/16/13	10-hr Gen. Ind. Class	Vernal	Uintah County
12/18/13	10-hr Gen. Ind. Class	Vernal	Uintah County
1/14/14	4-hr Gen. Ind. Class	Tooele	Tooele County
1/22/14	10-hr Const. Class	Salt Lake City	Salt Lake City
2/11/14	10-hr Gen. Ind. Class	West Valley City	West Valley City
2/24/14	8-hr HAZWOPER	Salt Lake City	UDEQ
3/6/14	HazCom Training	LC 319	UALD
3/20/14	Trench Training	Utah OSHA Offices	Utah OSHA
3/26/14	10-hr Const. Class	Salt Lake City	UDOT
4/2/14	10-hr Gen. Ind. Class	Tocqueville	Tocqueville City
4/29/14	10-hr Gen. Ind. Class	West Jordan City Hall	West Jordan City
5/28/14	10-hr Gen. Ind. Class	Salt Lake City	Salt Lake City
6/25/14	10-hr Gen. Ind. Class	West Jordan City Hall	West Jordan City
7/1/14	8-hr Asbestos	Brigham City	Box Elder Co. School District
7/10/14	2-hr Haz Com Class	Richfield	Richfield City
9/3/14	30-hr Const. Class	State Capitol	UDFCM
9/30/14	1-hr Confined Spaces	Sandy	APWA Conference

## 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 in the compliance and consultation staff to assist in identifying potential candidates. Other means available to promote VPP in Utah are the Labor Commission website, the Labor Commission newsletter, Utah OSHA SafetyLine Newsletter and professional associations. Utah OSHA has continued the agreement with federal OSHA to utilize the use of Federal “Special Government Employees” (SGEs) to assist the Compliance staff in VPP audits.

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

- a. Holly Frontier Woods Cross Refinery
- b. KapStone Container Corp
- c. Nucor Building Systems-Utah
- d. Nucor Steel

Farmland Foods has submitted a new application in FFY 2014

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	04/25/2013	4/25/2018	19
6	Conoco Philips	12/10/2012	Merit	N/A	12/12/2017	10

## Utah OSHA Staff Changes

In FFY 2014, five positions were filled. Division Director Christopher Hill was hired in September, 2014 to replace the previous Director who resigned from Utah OSHA in June, 2014. The vacant Compliance Manager position was filled by Utah OSHA Compliance Supervisor Holly Lawrence in November, 2013; the title of the manager position was changed to Compliance Section Chief. The vacant Compliance Supervisor position was filled by Utah OSHA Industrial Hygienist Neira Acevedo-Ramos in December, 2013. A Senior Business

Analyst position was created and the position was filled by Marty Windham in January, 2014. A Program Support position was filled by Sharon Glisson in January, 2014 where 50% of her time is dedicated to Compliance support and the remaining 50% to Consultation and Education Services. Three Compliance Safety and Health Officers (CSHOs) left for other employment opportunities in the latter part of the fiscal year and had not been replaced by the end of the fiscal year.

## **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.

## **Local Emphasis Program for the Construction Industry**

Utah OSHA developed and implemented a local emphasis program (LEP) for the construction industry on August 1, 2014, with the emphasis of inspections in both residential and commercial construction. The goal of this program is to establish an enforcement initiative to reduce the incidents of injury, illness and fatalities among workers in the construction industry by focusing on struck-by, caught-in/between, electrical and fall hazards. Utah OSHA used the 2010 census to create a list of towns/cities with populations of 1,000 or more people. The towns/cities were placed in random order with a scheduling cycle for inspections set to 15 towns/cities per cycle. Upon completion of each cycle, the next cycle will be selected for inspection.

## **Local Emphasis Program for Amputations**

Utah OSHA's inspection history and employers' accident reporting trends indicate that employee exposures to unguarded or inadequately guarded machinery and equipment, together with associated hazardous energy exposures during servicing and maintenance activities, occur in many workplaces. Based on this information, Utah OSHA recognized the need to develop a LEP, implemented on November 1, 2014, designed to identify and reduce workplace hazards due to machinery and equipment which are causing or are likely to cause amputations in general industry. Establishments which typically have equipment and/or machinery that are known to cause serious injury, including amputations, and death, were identified by their North American Industry Classification System (NAICS) and included in the Amputation LEP. The identified establishments will be arranged on an inspection scheduling list and each establishment on the list will be assigned a sequential number with the first establishment on the list being number one. From the inspection scheduling list, a random list will then be developed, using a random number list or an internet-based randomized sequence generator. The first cycle of twenty-five establishments starting from the top of the randomized list will be selected for inspection. Compliance Safety and Health Officers (CSHOs) will be assigned inspections starting with the first establishment in a cycle and continuing until the current cycle is completed. Once a cycle is completed, the establishments selected in that cycle will be removed from the inspection scheduling list, for 24 months, and placed on the completed establishment list. The remaining

inspection scheduling list will be randomized again and the first twenty-five establishments will be selected for the next inspection cycle. This process will be repeated until the entire scheduling list is completed. All inspections conducted under this LEP will be comprehensive machine guarding and lockout/tagout (LOTO) inspections, with the primary purpose of identifying amputation hazards.

## **Process Safety Management 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 Week**

For the week of June 23-27, 2014, Utah OSHA staff were dispatched to places frequented by the general public, interacting with the public and providing valuable information regarding safety and health. Focus was placed on educational efforts in various cities. Over 1200 individuals and employers participated in this event.

Utah OSHA's intent was to educate as many individuals as possible about how they can share possible life-saving practices with coworkers, family and friends. Free handouts, flyers and DVDs related to workplace safety and health were made available to employers, employees and the general public. Utah OSHA staff, which included CSHOs and Consultants, were available to answer any safety-related questions and provide resources.

## **Staff Training Activity**

The following training was provided to CHSO's:

### **Utah Safety Council Courses**

Safety Management Systems: Strategies for Business Course

### **OSHA Training Institute**

3380 – Enhanced 40-Hour Health and Safety Course for CSHOS

1420 – Basic Whistleblower Investigations

### **Rocky Mountain Center for Occupational and Environmental Health**

8-Hour HAZWOPER Refresher

Annual refresher course in practices and procedures in asbestos abatement

### **OSHA Webinar**

#0071-Isocyanates NEP

#0075 – Noise Hazards

#0077 Transitioning to Safer Chemicals

#0081 – Revised Electric Power Standards

### **Other Webinars**

NFPA Article 250 – Grounding and Bonding  
Practicing Proactive Silica Dust Housekeeping  
OIS Training

### **FEMA**

IS-100 – introduction to Incident Command System  
IS-200 – ICS for Single Resources and Initial Action Incident  
IS-700 – National Incident Management System

### **In-House Training**

Sampling Pumps  
Monitoring Equipment  
Excavation  
Annual Respirator Training  
Global Harmonized System (GHS)  
Effective Interviewing Strategies  
Scaffolds  
Legally Sufficient Case File Training  
Local Emphasis Training  
Willful Citations  
No Advance Notice  
Ethics  
OSHA 300 Recordkeeping

### **OSHAcademy Courses**

Bloodborne Pathogens Program Management  
Conducting a Job Hazard Analysis  
Conducting Occupational Safety and Health Training  
Confined Space Program  
Developing OSHA Training  
Effective Accident Investigation  
Effective Safety Committee Meetings  
Electrical Safety Basics  
Emergency Action Plans  
Energy Control Program - LOTO  
Fall Protection Program  
Fire Prevention Plans  
Fleet Safety Management  
Hazard Analysis and Control  
Hazard Communication Program  
Introduction to Ergonomics  
Introduction to Industrial Hygiene  
Introduction to Occupational Safety and Health Training  
Introduction to Safety Management  
OSHA 300 Recordkeeping

Personal protective Equipment  
Preventing Workplace Violence  
Safety Management System Evaluation  
Safety Supervision and Leadership

**Other**

Blue Stakes Damage Prevention Awareness Seminar  
First Aid  
CPR

## **Occupational Medicine Cooperation with University of Utah**

During FFY 2014, three 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 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 and has limited the amount of out-of-state travel due to the cost of such travel. Two CSHOs participated in whistleblower investigation training which was located out-of-state and another CSHO traveled out-of-state to participate in a VPP audit with Federal OSHA as a training opportunity. In addition to these out-of-state training opportunities, training has been provided to Utah OSHA staff at the local level at low or no cost through in-house training, webinars, OSHA Academy courses and courses taken locally. Utah OSHA utilizes the expertise of its 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. By taking advantage of training opportunities offered locally and using internet resources, it is estimated there is a cost savings of \$18,000 per training course, taking into account the average attendance of 18 CSHOs to each course and an estimated cost factor of \$1,000 per CSHO per course.

## **Telecommuting Program**

Utah OSHA continues to use the telecommuting program; there are currently three CSHOs in the program. This initiative has proven effective to assist 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	CSHO Training
Petition for Abatement Modification	Industrial Hygiene Process
Denial of Entry Warrant	Review of Form 55

In FFY 2015, 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 compensation levels for personnel 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 trained and 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 not had an increase in the fatality rate for industries that are under Utah OSHA's jurisdiction with a rate of 1.1, a 0.0% reduction from the BLS 2010-2012 baseline of 1.1. Although there was no reduction of the fatality rate in Utah, the rate of 1.1 is below the preliminary 2013 national BLS rates of the all-worker fatal injury rate of 3.2.

Interventions and outreach conducted by Utah OSHA have contributed to the reduction of the total recordable injury and illness case rate from 4.6, which is the average of the 2010 - 2012 BLS data, to the currently published 2013 rate of 3.4, a 17 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 Utah OSHA's VPP program in FFY 2013; however, Utah OSHA has refocused its commitment to VPP based on available resources. Utah OSHA has a designated CSHO for the administration of VPP and has sent this CSHO to the Region VIII VPPPA Conference and a VPP application workshop. This CSHO has also participated in a Federal OSHA VPP site visit in another state. In addition, this CSHO attended the VPPPA National Conference and VPP PSM workshop in August, 2014 and hosted a VPP application workshop in October, 2014.



## Annual Performance Goal USG 2 Results Table

Annual Performance Goal USG2 – Reduce Injuries and Illnesses (Mandatory)					
<b>Goal</b>	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 <b>total recordable cases rate (TRC)</b> .				
<b>Outcome</b>	Reduce the rate of workplace injuries and illnesses lower than the baseline.				
<b>Annual Performance</b>	Annual reduction in total workplace injuries and illnesses rate for all industries.				
	<i>USG2 Strategy</i>	<i>Industry</i>	<i>Baseline</i>	<i>2014 Goal</i>	<i>Result</i>
	<i>Change in Utah Total Annual Recordable Case Rate (Baseline BLS 3 year average TRC for FFY 2010-2012)</i>	<i>All Combined</i>	<i>4.6</i>	<i>&lt;4.6</i>	<i>3.4</i>
<b>Strategy</b>	<ol style="list-style-type: none"> <li>1. Focus Utah OSHA inspections, interventions and outreach activities on industry sectors with the highest injury incident rates related to the leading causes of injuries and illnesses in Utah.</li> <li>2. Review YTD injuries and illnesses reported to Utah OSHA to identify specific areas of emphasis for the development and implementation of Local Emphasis Programs.</li> <li>3. Adopt National Emphasis Programs, as appropriate, for high risk industries.</li> </ol>				
<b>Outcome Indicator(s)</b>	Reduction in total annual recordable case rates in industries under Utah OSHA jurisdiction. Number of compliance interventions conducted in general industry. Number of compliance interventions conducted in construction. Number of consultation interventions conducted in general industry. Number of consultation interventions conducted in construction. Number of consultation outreach activities.				
<b>Results (2014)</b>	<b>Compliance</b>	<b>Inspections</b>	<b>Interventions/55s</b>	<b>Total</b>	
	General Industry	387	48	435	
	Construction	355	54	409	
	Total	742	102	844	
	<b>Public Sector</b>	<b>Visits</b>	<b>Intervention/66s</b>	<b>Total</b>	
	General Industry	33	30	62	
	Construction	30	19	49	
	Total	63	49	112	
	Total Utah OSHA	<b>Inspections/Visits</b>	<b>Forms 55/66</b>	<b>Total</b>	
		805	151	956	
<b>Data Source(s)</b>	BLS most current available TRC rate for the state. There is a delay of one year. IMIS for intervention data.				
<b>Baseline</b>	Baseline rate from the average of 2010 – 2012 BLS data.				

## Annual Performance Goal USG 3 Results Table

Annual Performance Goal USG3 – Safety and Health Culture (Non-mandatory)				
<b>Goal</b>	Increase participation in Recognition Programs and Compliance Assistance to promote workplace safety and health.			
<b>Outcome</b>	Increase by 1% the number of compliance interventions. Conduct presentations to promote Recognition applications.			
<b>Annual Activity</b>	<b>Interventions</b>	<b>Baseline</b>	<b>2014 Goal</b>	<b>2014 Results</b>
	Public Sector Consultation Visits	42	45	63
	Public Sector Consultation Interventions	20	25	49
	VPP Applications	1	1	1
	VPP Participants	5	5	6
	Public Sector SHARP Applications	2	2	0
	Public Sector SHARP Participants	4	5	7
	Partnerships	1	1	0
<b>Strategy</b>	<ol style="list-style-type: none"> <li>1. Promote Public Sector-Consultation Services to increase the number of requests.</li> <li>2. Promote VPP and partnerships to increase the number of applications and participants.</li> <li>3. Promote Compliance Assistance.</li> </ol>			
<b>Outcome Indicator(s)</b>	<ol style="list-style-type: none"> <li>1. Number of 23(g) Public Sector-Consultation visits</li> <li>2. Number of interventions form 55s/66s</li> <li>3. Number of VPP participants.</li> <li>4. Number of VPP new applications</li> </ol>			
<b>Data Source(s)</b>	IMIS Reports			
<b>Baseline</b>	Baselines are determined by previous performance, staffing, resources, focus and emphasis			