




State of Alaska
Department of Labor and Workforce Development
Division of Labor Standards and Safety

AKOSH Program Directive #21-04

Date: June 15, 2021

To: All AKOSH Staff

From: William Harlan, Director 

Subject: High Hazard Targeting System (HHT): A “Program Planned” system for efficient asset management and inspection target selection process.

I. Purpose.

This AKOSH Program Directive implements an alternative targeting system that allows for additional non-construction programmed inspections designed to use limited assets in the most effective means possible while providing for an unbiased method for selecting worksites for inspection.

II. Scope.

This applies statewide to AKOSH programmed general industry inspections planned under this selection system.

III. References.

- AKOSH PD 19-10, High Hazard Targeting System
- AKOSH PD 21-02, Field Operations Manual (FOM), January 28, 2021
- OSHA Instruction CSP 01-00-005, State Plan Policies and Procedures Manual, May 6, 2020
- OSHA Instruction CSP 03-02-003, OSHA Strategic Partnership Program for Worker Safety and Health, November 6, 2013

IV. Cancellations.

AKOSH PD 19-10 AKOSH High Hazard Targeting System (HHT).

V. Action.

The AKOSH Chief of Enforcement has operational jurisdiction over this directive and shall ensure that the procedures established in this directive are followed when conducting

inspections made under this program. The Director of Labor Standards and Safety Division has oversight responsibilities.

VI. Background.

Since the introduction of the AKOSH High Hazard Target (HHT – AKOSH PD 03-01) list in early 2003, as an equivalent to OSHA’s Site-Specific Targeting System (CPL 02), AKOSH has used an equivalent to OSHA’s targeting system to provide supplemental, high hazard targets for programmed enforcement inspections. In 2010, AKOSH adopted the Industry Specific Targeting System (ISTS – AKOSH PD 10-06). The ISTS had flaws that caused small companies with less than 10 employees to be targeted, so a revised targeting system is being utilized as approved in AKOSH PD 11-04. AKOSH PD 13-02 had been revised to update currently adopted NEPs, defined small employers, explained how employers with multiple sites who are on HHT list are going to be inspected, and updated AKOSH office locations and to update titles of HHT management key persons. Additional PD 19-10 had been revised to update referenced documents and to include worksite clarifications.

VII. Definitions.

- A. AKOSH High Site Specific Targeting System (SST). Employers with three or more lost time incidents as reported through the Alaska Division of Worker’s Compensation database for the previous year shall be identified and placed on a list. Each employer will then be evaluated based on the number of lost time incidents in comparison to the number of workers employed to determine the employer’s loss time rate per 100 employees. Those employers with lost time rates in excess of 90 percent of the overall average lost-time rate for all employers in Alaska as outlined in the AKOSH Performance Results (see: <https://www.omb.alaska.gov/html/performance/program-indicators.html?p=77&r=1> listed for the most recent fiscal year shall be placed on a targeted list of employers.

- B. NAICS. Equates to the North American Industry Classification System.

VIII. Description of the AKOSH Site Specific Targeting (SST).

- A. Initial Targeting List - Report. An Occupational Safety and Health report will be provided by the State of Alaska Data Processing unit based on an established Sequential Query Language (SQL) query from the State of Alaska Workers’ Compensation database and other databases. This report will be used to identify employers with three or more loss time incidents during the previous year. The report will then be converted and merged into a Microsoft Excel spreadsheet and sorted by the North American Industry Classification System code (NAICS), Company Name, Federal Employer Identification Number - FEIN, # of Injuries, # of Employees, Loss time rate per 100 employees, Employer Address, City Location). Unnecessary fields will be deleted and removed from the Excel document. The report will list employers who have three or more lost time incidents. Employers with lost time rates at least 10 percent below the overall average for all employers in Alaska will be removed from the list. The employer’s lost time rate per 100 employees will be calculated by dividing the # of lost time incidents by the # of employees and then multiplying by 100.

- B. Any employer with a loss time rate per 100 employees greater than 90 percent of the overall lost time rate for all employers in Alaska will be placed on the targeting list. For example, the overall lost time rate per 100 employees in Alaska was 1.6 for 2010. Consequently, any employer with a rate greater than 1.44 will be placed on the targeting list.
- C. Any small non-construction employer with 10 or less employees is removed from the targeting list.
- D. The initial list report will then be sorted by employer location such that those communities within approximately 60 road miles of Juneau, Anchorage/Wasilla and Fairbanks will be posted to three separate “urban area” lists. These urban areas have resident AKOSH Enforcement Compliance Safety and Health Officers (CSHO), so these areas generally do not require overnight travel to conduct inspections. The sites on these lists will then be randomly ordered and assigned to CSHOs for enforcement inspection activity. Once an employer is inspected, the next employer on the list will be subject to inspection.
- E. An employer with multiple sites will remain on the list until all sites have been inspected.
- F. Each location more than 60 road miles from Juneau, Anchorage/Wasilla and Fairbanks will be separated from the initial list and placed on a “rural area” list. The Chief of AKOSH Enforcement shall assign CSHO to perform inspections from the rural area list based on seasonality, injury trends, and other factors. Whenever possible, CSHOs will be assigned to conduct programmed inspections from the rural area list in combination with a complaint or accident inspection in the area.

IX. Adjustments and Deletions

The Project Assistant through the Chief of AKOSH Enforcement will be responsible for making appropriate adjustments and deletions to the inspection list. Appropriate reasons for adjustment/deletion are:

- A. Establishment is no longer in business.
- B. Establishment on the list is in federal, rather than state jurisdiction.
- C. Establishments that are exempted due to VPP, SHARP or AKOSH Consultation exemption certifications.
- D. Establishments which have had a comprehensive safety enforcement inspection during the previous calendar year may be removed from the list or may be subjected to a comprehensive health enforcement inspection and vice versa. The Chief of AKOSH Enforcement will determine whether an establishment shall be removed from the targeting list based on inspection history, industry hazards and establishment injury and illness data.

- E. Establishments actively receiving consultation assistance.
- F. Establishment has entered partnership agreement with AKOSH Consultation and Training Section that calls for the establishment to receive a low priority for scheduled enforcement inspections.

X. Inspection procedures

- A. Scope. Inspections conducted under this plan will be comprehensive programmed safety and/or health inspections as defined by the Field Operations Manual - FOM (OSHA Instruction CPL 02-00-164) and conducted in accordance with the procedures described therein and in other relevant guidance documents. Chief of AKOSH Enforcement will determine whether a combined comprehensive safety and health inspection would reflect efficient use of resources based on any inspection history, the hazards of the industry, and the injury and illness data for the establishment. CSHOs must inspect the targeted worksite for all potential hazards (safety and health) and make effective referrals to an Industrial Hygienist or Safety Compliance Officer when appropriate.
- B. Citations. Violations will be cited according to the FOM and other guidance documents.
- C. OSHA Injury and Illnesses Log 300 Data. During inspections under this directive, the CSHO shall collect OSHA 300 log data to ensure proper reporting of injuries and illnesses. CSHOs shall check injury and illness records that support the OSHA 200/300 log, as appropriate, to validate the OSHA 300 reported data.

XI Relationship to Other Programs

- A. Unprogrammed Inspections. Unprogrammed inspections will be conducted according to Alaska statute/regulation, the FOM, or other applicable guidance documents. If the occasion for an unprogrammed inspection (e.g., complaint, fatality, imminent danger, or catastrophe) arises with respect to an establishment that is also to receive a programmed inspection under the AKOSH HHT plan, the two inspections may be conducted either concurrently or separately.
- B. Emphasis Programs. Some establishments may be selected for inspection under the AKOSH HHT plan and under one or more other initiatives (National Emphasis (NEP) or Local Emphasis (LEP) programs). Programs based upon particular hazards (such as silica, lead or amputations) or on particular industries may be run concurrently with the AKOSH HHT plan. Wherever an establishment shows up on the plan and on another inspection list, the inspections should be scheduled at the same time. Compliance officers will apply all applicable OIS codes to the inspection.

XII Clarifications

A. Worksite Clarification

1. Industries without Permanent Workplaces

For industries such as NAICS Code 561730, Landscaping Services that do not have permanent worksites, the establishment list will normally identify only the employer's central office. AKOSH will, so far as possible (e.g., by visiting the central office), determine the location of active worksites based on the type of work scheduled and the length of time remaining to complete the project.

2. Office-Only Sites

The HHT is not intended to include establishments that are office-only facilities. If a CSHO arrives at an establishment and discovers that there is only an office at the site, the CSHO should determine what site or sites are associated with the OSHA Form 300A data. If the Form 300A data includes information for a site (or sites) in addition to an office, then an inspection of the site (or one of the sites) with the highest number of lost time injuries and illnesses may be conducted if within the AKOSH's jurisdiction.

NOTE: Recordkeeping rule § 1904.30 requires an employer to keep a separate OSHA 300 Log for each establishment that the employer expects to be in operation for one year or longer.

3. Records Only Inspections

When a CSHO determines that a worksite was included on the inspection list because of incorrect data submitted by the employer, a "records only" inspection may be conducted.

For "records only" inspections, the CSHO **must** conduct a partial walkthrough of the workplace and interview employees to verify the establishment's injury and illness experience. Any serious violations that are observed in plain view or brought to the attention of the CSHO must be investigated pursuant to FOM procedures.

4. Non-Responders

If, upon initiating an inspection of a non-responder establishment, the establishment provides evidence that they are not subject to the requirements of 29 CFR § 1904.41 due to size or industry, the CSHO should stop the inspection and code the event as a "No Inspection."

- B. For the purpose of all OSHA Program Directive(s) adopted by AKOSH, the following terms are defined:

Where U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) refers to the following positions or locations, in Alaska their equivalent will be:

Area Director = Director, Labor Standards and Safety Division, Alaska Department of Labor and Workforce Development

Area Office (AO) = Labor Standards and Safety Division, AKOSH office located at 1251 Muldoon Road, Suite 109, Anchorage, Alaska

Assistant Area Director = AKOSH Chief of Enforcement and AKOSH Chief of Consultation and Training

Assistant Secretary = Commissioner, Alaska Department of Labor and Workforce Development

Deputy Assistant Secretary = Deputy Commissioner, Alaska Department of Labor and Workforce Development

National Office = Commissioner's Office, Alaska Department of Labor and Workforce Development, PO Box 111149 Juneau, Alaska 99811-1149

OSHA = Alaska Occupational Safety and Health (AKOSH) Enforcement/ Compliance and Consultation & Training sections, located at 1251 Muldoon Road, Suite 109 and Suite 104, Anchorage, Alaska

Occupational Safety and Health Review Commission (OSHRC) = Alaska Occupational Safety and Health Review Board (AKOSHRB)

Regional Administrator = Director, Labor Standards and Safety Division, Alaska Department of Labor and Workforce Development

Regional Office = Alaska Department of Labor and Workforce Development, Labor Standards and Safety Division, 1251 Muldoon Road, Suite 113, Anchorage, Alaska

RSOL = Department of Law

SST (Site Specific Targeting) = High Hazard Targeting System (HHT)

Secretary = Commissioner, Alaska Department of Labor and Workforce Development

cc: Arlene Lamont, Area Director, Anchorage, OSHA, Region X
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