OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR **Occupational Safety and Health Administration**

DIRECTIVE NUMBER: CPL 02-01-067	
SUBJECT: Site-Specific Targeting (SST)	
DIRECTORATE: Directorate of Enforcement Programs	
SIGNATURE DATE: 4/8/2025	**EFFECTIVE DATE:** 5/20/2025

ABSTRACT

Purpose: This Instruction provides guidance for OSHA's Site-Specific Targeting (SST) inspection program. This program applies only to general industry establishments.

Scope: OSHA-wide.

References: OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995.

OSHA Instruction CPL 02-00-164, Field Operations Manual (FOM), April 14, 2020.

Update to Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR 1904.41(a)(1) and (a)(2) | OSHA.gov | Occupational Safety and Health Administration, April 16, 2024.

Cancellations: This Instruction cancels CPL 02-01-064, Site-Specific Targeting (SST), February 7, 2023.

This Instruction terminates two years from the effective date, unless replaced by a new Instruction. Upon the expiration or replacement of this Instruction, inspection cycles already underway must be completed as provided in paragraph X.B.

State Impact: Notice of Intent and Equivalency required. See paragraph VI, Federal Program Change.

Action Offices: National, Regional, and Area Offices.

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By and Under the Authority of

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Executive Summary

This Instruction updates OSHA's Site-Specific Targeting (SST) inspection program, which uses employer-submitted Form 300A data for calendar years (CY) 2021, 2022, and 2023. The SST program is OSHA's main site-specific programmed inspection initiative for non-construction workplaces that have 20 or more employees. The SST program uses objective data from injury and illness information that employers submit pursuant to 29 CFR § 1904.41.

This program helps OSHA achieve the goal of ensuring that employers provide safe and healthful workplaces by directing enforcement resources to those workplaces with the highest rates of injuries and illnesses.

This Instruction identifies key references, describes the inspection target list, provides scheduling and inspection procedures, and information on OSHA Information System (OIS) coding.

Significant Changes

Based on OSHA's past enforcement experience, the following changes have been incorporated into this current SST plan:

- For high-rate establishments, the SST plan selects individual establishments for inspection based on CY 2023 Form 300A data. The previous SST used CY 2021 data.
- For upward trending establishments, the SST plan selects individual establishments for inspection based on CY 2021 through 2023 Form 300A data. The previous SST used CY 2019 through 2021 data.
- The low-rate establishments list is generated using CY 2023 Form 300A data. The previous SST used CY 2021 data.
- The non-responders list is generated using CY 2023 data. The previous SST used CY 2021 data.

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I. Purpose.

This Instruction updates OSHA's Site-Specific Targeting (SST) inspection program, which uses employer-submitted Form 300A data for calendar years (CY) 2021, 2022, and 2023. The SST program is OSHA's main site-specific programmed inspection initiative for general industry workplaces and does not include construction worksites.

II. Scope.

This Instruction applies OSHA-wide.

III. References.

A. Occupational Safety and Health Act of 1970, 29 U.S.C. 651.

B. 29 CFR Part § 1904, Recording and Reporting Occupational Injuries and Illnesses.

C. 29 CFR Part § 1908, Consultation Agreements.

D. Revisions to the Voluntary Protection Programs to Provide Safe and Healthful Working Conditions, Federal Register, January 9, 2009 (74 FR 927).

E. ADM 03-01-005, OSHA Compliance Records, August 3, 1998.

F. CPL 02-00-025, Scheduling System for Programmed Inspections, January 4, 1995.

G. CPL 02-00-164, Field Operations Manual (FOM), April 14, 2020.

H. CPL 02-00-169, Severe Violator Enforcement Program (SVEP), September 15, 2022.

I. CPL 02-00-170, Enforcement Exemptions and Limitations under the Annual Appropriations Act, July 18, 2024.

J. CSP 01-00-005, State Plan Policies and Procedures Manual, May 6, 2020.

K. CSP 02-00-005, Consultation Policies and Procedures Manual, September 6, 2023.

L. CSP 03-01-005, Voluntary Protection Programs (VPP): Policies and Procedures Manual, January 30, 2020.

M. Update to Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records under 29 CFR 1904.41(a)(1) and (a)(2), April 16, 2024.

IV. Cancellations.

A. This Instruction cancels CPL 02-01-064, Site-Specific Targeting (SST), February 7, 2023.

B. This Instruction terminates two years from the effective date, unless replaced by a new Instruction. Upon the expiration or replacement of this Instruction, inspection cycles already underway must be completed as provided in paragraph X.B.

V. Action Offices.

A. **Responsible Office.**
Directorate of Enforcement Programs (DEP).

B. **Action Office.**
National, Regional, and Area Offices

C. **Information Offices.**
State Plans, OSHA Training Institute, Consultation Program Managers, VPP Managers and Coordinators, Compliance Assistance Coordinators, and Compliance Assistance Specialists.

VI. Federal Program Change.

Notice of Intent and Equivalency Required.

This Instruction describes a federal program change which establishes policies and procedures regarding targeting of general industry inspections under the SST program. States with OSHA-approved State Plans are required to have their own inspection targeting systems (a "core inspection policy"), which must be revised as necessary to reflect current practices. These inspection policies and procedures must be at least as effective as OSHA's and be available for review. State Plans are required to notify OSHA whether they intend to adopt policies and procedures identical to the SST program or adopt or maintain different policies and procedures for targeting of general industry inspections.

Within 60 days of the date of notification in the State Plan Application (SPA), State Plans must respond with notice of intent, indicating if the State Plan will adopt or already has in place targeting policies and procedures that are identical to or different from the federal program. State adoption, either identically or different, should be accomplished within six months. If adopting identically, the State Plan must provide the date of adoption to OSHA, due within 60 days of adoption. If the State Plan adopts or maintains enforcement policies that differ from this SST, the State Plan must either post its different policies on its State Plan website and provide a link to OSHA or provide OSHA with an electronic copy and the name and contact information of an official within the State Plan who can assist the public with obtaining a copy. This action must occur within 60 days of the date of adoption. OSHA will provide summary information on the State Plan responses to this instruction on its website: www.osha.gov/dcsp/osp/index.html.

VII. Significant Changes.

This Instruction replaces the SST program detailed in CPL 02-01-064, February 7, 2023. The SST plan uses employer submitted data from CY 2021 - 2023 as compared to the previous SST, which used CY 2019 – 2021 data, when selecting establishments for inspections.

VIII. Background

The SST plan is OSHA's main site-specific programmed inspection initiative for non-construction workplaces that have 20 or more employees. The SST program uses objective data from injury and illness information that employers submit under 29 CFR § 1904.41. The current program helps OSHA achieve the goal of ensuring that employers provide safe and healthful workplaces by directing enforcement resources to those workplaces with the highest rates of injuries and illnesses.

By applying industry and establishment-size criteria, OSHA focuses data collection on establishments most likely to be experiencing elevated rates and increased numbers of occupational injuries and illnesses. The SST plan selects individual establishments for inspection based on their required (by 29 CFR § 1904.41) submission of Form 300A data.

The Site-Specific Targeting Program was reinstated in 2018; it was renewed on October 16, 2019, then updated on December 14, 2020, and on February 7, 2023. From April 7, 2023 – December 12, 2024, SST resulted in 652 inspections. OSHA experienced fewer "No Inspections" at SST selected establishments, compared to other non-construction programmed inspections. SST sites also had a higher rate of violations per inspection and a higher not-in-compliance rate than other non-construction programmed inspections during this period; the rate of serious violations per inspection were comparable between sites. Recent data is consistent with earlier results from the SST program. Thus, OSHA found that the SST program continues to be an effective means of using its enforcement resources.

IX. Description of the SST Plan

A. Inspection List Selection Criteria

OSHA will generate inspection lists of: (1) establishments with elevated Days Away, Restricted, or Transferred (DART) rates for CY 2023; (2) establishments with upward trending rates for the range of CY 2021-2023; (3) establishments that did not provide the required 2023 Form 300A data to OSHA; and (4) establishments with low DART rates in CY 2023 to verify data accuracy and quality control.

1. High-Rate Establishments

The SST plan selects individual establishments for inspection based on CY 2023 Form 300A data.

Because average DART rates vary widely among industries, OSHA will set one DART rate for manufacturing, (NAICS 31-33) and a different DART rate for non-manufacturing (all other NAICS, except construction) as objective selection criteria. DART rates are set based on the most recent ITA submission. This method will allow OSHA to equally target manufacturing and non-manufacturing establishments.

2. Upward Trending Establishments

OSHA will identify establishments with rates at or above twice the private sector national average in CY 2022, that have continued to trend upward annually from CY 2021 through CY 2023.

3. Low-Rate Establishments

To verify the reliability of the Form 300A data reported to OSHA, the agency will generate a random sample of establishments with low DART rates, using the CY 2023 data.

4. Non-Responders

OSHA will generate a random sample of establishments that failed to provide the required Form 300A data to OSHA CY 2023. Inclusion of these non-responding employers is intended to discourage employers from not complying with their obligation to report injury and illness information to avoid inspection.

If, upon arrival, compliance officers learn that a listed establishment is only an administrative office, refer to paragraph X.D.2, Office-Only Sites.

X. Scheduling

The Office of Statistical Analysis will provide each Area Office (AO) access to OSHA Tools Dashboard, which provides each Area Office their SST-23 list that provides the establishments on the Inspection List. Only OSHA and State Plan States will have access to this information.

A. Maintaining Inspection List/Cycles and Documentation

The AO is responsible for maintaining the documentation necessary to demonstrate that it has instituted the SST inspection list and cycles in accordance with the requirements of this Instruction. This includes documenting all deletions, deferrals, or other modifications such as rationale for expanding inspections to cover health hazards. AOs may pre-emptively expand the scope of an SST inspection to include health hazards prior to entry based on (a) prior inspection history of the establishment, or (b) knowledge of an establishment's industry classification). The AO must maintain all such inspection lists, cycles, and documentation for a period of three years after all inspections conducted under this SST plan have become a final order. See paragraph B.1.b.(1)(c)3 in CPL 02-00-025, Scheduling System for Programmed Inspections (1/4/1995).

B. Cycle Size

AOs must generate inspection cycles using the SST software that randomly selects the establishments and shall determine inspection cycle size (i.e., 5 to 50 establishments) based on available resources and the geographic range of the

office. Larger generated cycles will allow greater flexibility and efficiency of scheduling. Once initiated, however, the entire cycle must be completed. If a cycle larger than 50 establishments would provide the AOs with more efficient use of staff, the office must first request Regional Office approval.

Within a cycle, the AO may schedule and inspect the selected establishments in any order that makes efficient use of available resources.

After opening an inspection, AOs should use the "Update" function of the SST application to enter the inspection number in the activity ID field.

After completing a cycle, the AO may generate a subsequent new cycle using the SST interface.

AOs must have opened an inspection of all establishments in an existing cycle before inspecting any establishments in a newly generated cycle. However, OSHA Instruction CPL 02-00-025, Scheduling System for Programmed Inspections (1/4/1995), paragraph B.1.b(1)(e)1, lists criteria for permissible carryovers from one cycle to another cycle.

C. Use of SST OSHA Tools Dashboard

Each AO must use the "Create" function of the SST web-based application to create cycles from the SST inspection lists and use the application to update the inspection lists to enter deletions and inspections conducted. AOs shall not create cycles manually.

After initiation of an inspection, the AO shall update the application to connect the inspection number with the particular establishment.

D. Worksite Clarification

As part of the pre-inspection process, the AO shall verify that all procedures for accurate targeting have been followed in accordance with Chapter 3 of the FOM. If the worksite is not subject to the data submittal criteria, an inspection shall not be initiated.

Contact the Directorate of Technical Support and Emergency Management (DTSEM), the Office of Statistical Analysis, to correct any data discrepancies. Report any discrepancies directly through the SST application.

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. The AO will, so far as practicable (e.g., by visiting the central office), determine the location of any active worksites based on the type of work scheduled and the length of time remaining to complete the project. At the Area Director's discretion an inspection should be conducted if possible.

2. Office-Only Sites

The SST is not intended to include establishments that are office-only facilities. If a Compliance Safety and Health Officer (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 DART rates shall be conducted if within the AO'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. Non-Responders

The CSHO should conduct an inspection of the non-responder establishment in accordance with this directive. If, upon initiating an inspection of a non-responder establishment, the establishment provides documentation that they in fact submitted CY 2023 Form 300A data or provides evidence that they are not subject to the requirements of 29 CFR § 1904.41 due to size or industry, the inspection shall be terminated, and the event coded as a "No Inspection."

E. Deferrals

1. OSHA On-Site Consultation Program

Establishments that have achieved Safety and Health Achievement Recognition Program (SHARP) status are deferred from OSHA or State Plan programmed inspection schedules for up to two (2) years upon initial approval or up to three (3) years for subsequent renewal periods (see 29 CFR 1908.7(b)(4)(i)(B)). Pre-SHARP establishments are deferred from OSHA or State Plan programmed enforcement inspection schedules for up to 18 months (see 29 CFR 1908.7(b)(4)(i)(A)).

If a consultation visit is "in progress" at an establishment, it will take priority over OSHA programmed inspections, including an SST. A consultation visit will be considered "in progress" regarding the working conditions, hazards, or situations covered by the consultation visit from the beginning of the opening conference through the end of the hazard correction due dates and any extensions (29 CFR § 1908.7(b)(1)).

If an establishment has requested an initial full-service comprehensive consultation visit for safety and health from an On-Site Consultation program and that visit has been scheduled by the program, a programmed inspection may be deferred for up to 90 calendar days from the date of the notification by the On-Site Consultation program to the Regional Office. No extension of the deferral beyond 90 calendar days shall be granted unless the consultation visit continues to be "in progress." As an exercise of its authority to schedule inspections, the agency may assign a lower priority to worksites where consultation visits are scheduled (Field Operations Manual, CPL-02-00-164, Chapter 2, Section VI.H.2.c).

2. VPP Applicants

When the AO receives notification from the VPP Manager that a VPP on-site review has been scheduled, the AO will remove the applicant from any programmed inspection list (including an SST inspection list) for a period of up to 75 days prior to the scheduled on-site review. The AO will also remove the applicant workplace from any programmed inspection list for the duration of VPP participation, unless the site chooses otherwise (see paragraph XI.C., Deletions – VPP or SHARP). See also Revisions to the Voluntary Protection Programs to Provide Safe and Healthful Working Conditions, Federal Register, January 9, 2009 (74 FR 927).

F. Inspection Priority

While unprogrammed inspections are normally prioritized, this Instruction adds the following procedures:

1. An AO must inspect all establishments on the SST inspection list unless, in consideration of available resources, such as implementing ongoing agency emphasis programs, the Regional Administrator authorizes the AO to conduct a smaller number of inspections from the list. Such authorization will normally require the AO to complete all inspections in the current cycle. The Regional Administrators will submit their yearly

targets in the annual performance plan stating how many SST inspections the Region plans on conducting.

2. All Federal OSHA offices having coverage over sites in State Plan states are expected to inspect all establishments on their inspection lists (e.g., U.S. Post Offices, ship and boat building, and repairing sites) where there is Federal OSHA coverage. For establishments in NAICS 3366, Ship and Boat Building, Federal OSHA and the State Plan must coordinate to determine whether the State Plan, Federal OSHA, or both have coverage over the establishment.

XI. Deletions

AOs will be responsible for making appropriate deletions, as stated below, from the inspection cycle. Deletions will also include establishments no longer in business, in accordance with CPL 02-00-025, Scheduling System for Programmed Inspections, at B.1.b.(1)(b)6.d. The AO must fully explain and document in the file the reason for the deletion.

Deletion criteria for previous inspections, public sector employers, VPP, or SHARP establishments shall be applied either before or after creating a cycle.

A. Previous Inspections

The AO will delete an establishment from the inspection list if the establishment has received a comprehensive safety or health inspection within 36 months of the creation of the current inspection cycle. For deletion purposes, an establishment's comprehensive inspection date is the opening conference date of that inspection. If the opening conference date occurred within the previous 36 months of the current SST inspection cycle, delete the establishment from the SST inspection list.

NOTE: When updating an establishment list, do not use the deletion codes H# (Health inspection) and S# (Safety inspection) described in B.1.b.(1)(b)6.d. of CPL 02-00-025, Scheduling System for Programmed Inspections.

The SST interface tracks the opening conference date entered for establishments deleted for the above listed reason (previous comprehensive inspection). Once the 36-month period passes, the interface makes that establishment available again for selection.

NOTE: Do not delete Severe Violator Enforcement Program (SVEP) establishments or establishments related to a SVEP case. These establishments are not entitled to an inspection deferral.

B. Public Sector Employers

The AO will delete any public sector employers (i.e., federal, state, or local government) on the inspection lists.

NOTE: The OSH Act was amended in 1998 to include the U.S. Postal Service as an "employer" subject to OSHA enforcement.

C. VPP and SHARP

1. If an establishment is an approved participant in OSHA's VPP, the area office shall delete it from the inspection lists.

2. If an establishment is an approved participant in SHARP (administered by OSHA's On-Site Consultation Program), the area office shall delete it from the inspection lists per 29 CFR § 1908.7(b)(4)(i)(B).

XII. Inspection Procedures

A. Scope

SST inspections shall be comprehensive in scope. An AO may open an inspection conducted under this program as either a comprehensive safety or health inspection, based on the AO's knowledge of the workplace's potential hazards. During the course of an inspection the scope may be expanded in accordance with the FOM. In addition, if the site has been inspected previously and health hazards were found, the AO may expand the inspection to cover both health and safety hazards based on violations from that prior inspection. The AO must fully explain and document in the case file the rationale for the expanded inspection.

B. Verify NAICS

At the opening conference, the CSHO will verify the establishment's NAICS code. As needed, establish activities occurring at the workplace before determining the appropriate NAICS code.

C. Collection and Review of Illness and Injury Data

During inspections under this Instruction, CSHOs will review the OSHA 300 logs, 300A summaries, and 301 incident reports for three prior calendar years, which will include CY 2021, 2022, and 2023. Refer to the FOM, Chapter 3, Section VI, Review of Records for further guidance on review of injury and illness data.

D. Walkthrough

The CSHO should consider and evaluate potential hazards in all areas of the workplace, with a focus on areas where injuries/illnesses are documented to have occurred. The CSHO should exercise professional judgment in areas where potential hazards are present, while conducting an inspection, paying particular attention to employee exposures to hazards identified from employee interviews, in plain view, and injuries or illnesses identified on OSHA 300 and 301 forms. This may include evaluating exposures during multiple work shifts.

E. Safety and Health Management System Review

Site specific targeting inspections should include an evaluation of the employer's safety and health management system, as required in the FOM, with focus on whether it is adequate to identify and address the elevated rate of injury and illness at the worksite. Deficiencies in or lack of the employer's safety and health management system should be discussed with the employer during the closing conference and detailed in the inspection narrative.

F. Citations

Citations for violations and corresponding proposed penalties shall be made in accordance with the FOM, Chapter 6, (OSHA Instruction CPL 02-00-164) and other relevant policy and procedures.

G. Recordkeeping Violations

When conducting an inspection of non-responder employers, CSHOs must follow the guidance listed in OSHA's Update to Enforcement Procedures for Failure to Submit Electronic Illness and Injury Records, April 16, 2024 (or subsequent guidance), under 29 CFR 1904.41(a)(1) and (a)(2), for citing "failure to submit" violations.

XIII. Relationship to Other Programs

A. Unprogrammed Inspections

AOs shall conduct unprogrammed inspections according to OSHA's FOM or other relevant policies and procedures. If an unprogrammed event (e.g., complaint, fatality, or referral) occurs at an establishment that is also slated for inspection under this SST program, the two inspections should be conducted concurrently whenever possible. See paragraph XIV.C.

B. Emphasis Programs

Some establishments may be selected for inspection under the SST program and under one or more of the other OSHA enforcement initiatives (emphasis programs). Inspection programs based on specific hazards (such as combustible dust or lead), or specific industries (such as logging, scrapyards, shipbreaking, or petroleum refineries) may run concurrently with the SST program.

Whenever an establishment is scheduled for inspection based on the current cycle of the SST and another emphasis program, both inspections should be conducted concurrently as part of the same inspection. CSHOs will designate all applicable OIS codes to the inspection. See paragraph XIV.B.

XIV. Recording and Tracking

OSHA inspections conducted in response to this directive shall be coded in OIS as described in this section. All consultation activities (Request, Visit, and Compliance Assistance) conducted by On-Site Consultation programs in relation to this directive shall also be coded in OIS.

A. SST-Only Inspections

The inspection shall be coded as an Initiating Type of Programmed Planned in OIS. Record the value **SSTARG23** in the National Emphasis Program section AND the Primary Emphasis Program section.

B. SST Combined with Other Emphasis Program Inspections

For all emphasis program inspections such as NEPs, REPs, and LEPs conducted in conjunction with an SST inspection, the CSHO shall mark the inspection with an initiating type of "Programmed Planned" in OIS. Record the value **SSTARG23** in the National Emphasis Program section along with all other applicable NEP and LEP codes. Record the value **SSTARG23** in the Primary Emphasis Program section.

C. SST Combined with Unprogrammed Inspections

For all unprogrammed inspections conducted in conjunction with an SST inspection, the CSHO shall code the inspection Initiating Type with the appropriate type of unprogrammed inspection in OIS (e.g., complaint, referral). Record the value **SSTARG23** in the National Emphasis Program section.