Agency Priority Goal Action Plan

Worker Safety: Reduce Trenching and Excavation Hazards

Goal Leaders:

Goal Leader: Loren Sweatt, Acting Assistant Secretary for Occupational Safety and Health

Deputy Goal Leader: Scott Ketcham, Acting Director, Directorate of Construction
Overview

Goal Statement
- By September 30, 2019, increase trenching and excavation hazards abated by 10 percent compared to FY 2017 through inspections and compliance assistance at workplaces covered by the Occupational Safety and Health Administration.

Challenge
- The primary challenge associated with this goal is to reduce injuries and fatalities by identifying and abating hazards related to trenching and excavation working conditions, given that trenching and excavation may only be one phase of a construction project. Although the risk of a trenching or excavation accident is high in new construction, the risk is not only limited to new construction, but also may include repair and system upgrades.

Opportunity
- OSHA will reduce injuries and fatalities by targeting workplaces where there are potential trenching and excavation hazards for inspections as well as outreach.
- OSHA will work with industry associations and the public utilities that hire a significant portion of the work to create a public-private effort to impact these injuries and fatalities.
- OSHA will increase inspection activity focusing on trenching and excavation hazards, which should result in fewer injuries and fatalities – the ultimate outcome for DOL and American workers.
Opportunity

- Fatalities associated with trenching and excavation hazards are preventable by using widely recognized and established safety practices. Recently, there has been a sharp increase in the number of these fatalities. By collecting and properly analyzing inspection data, potential hazards may be identified and corrected, reducing casualties. Below is BLS data showing this trend, especially the spike in fatalities between 2015 and 2016.

BLS Census of Fatal Occupational Injuries (CFOI) data on trenching fatalities:

<table>
<thead>
<tr>
<th>Year</th>
<th>All industries*</th>
<th>Construction only</th>
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</thead>
<tbody>
<tr>
<td>2017:</td>
<td>24</td>
<td>20</td>
</tr>
<tr>
<td>2016:</td>
<td>37</td>
<td>33</td>
</tr>
<tr>
<td>2015:</td>
<td>25</td>
<td>17</td>
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<tr>
<td>2014:</td>
<td>13</td>
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<td>2013:</td>
<td>22</td>
<td>17</td>
</tr>
<tr>
<td>2012:</td>
<td>17</td>
<td>13</td>
</tr>
<tr>
<td>2011:</td>
<td>21</td>
<td>13</td>
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* BLS numbers often include fatality events that are outside OSHA’s jurisdiction.
Leadership

Loren Sweatt, Deputy Assistant Secretary for Occupational Safety and Health
Scott Ketcham, Acting Director, Directorate of Construction

Oversight
OSHA Regional Administrators (OSHA Regions 1-10)

Management
OSHA Area Directors

IT Management
OSHA Information System (OIS) Team

Data Analysis
Directorate of Technical Support and Emergency Management (DTSEM) and Directorate of Construction (DOC) Leadership and Staff
Strategies:

- Target workplaces where there are potential trenching and excavation hazards for inspections as well as outreach.
- Work with industry associations and the public utilities who hire a significant portion of the work to create a public-private effort to impact these injuries and fatalities.
- Identify which inspections have hazards related to trenching and excavation.
- Determine the best approach for counting the number of trenching and excavation hazards abated as a result of Compliance Assistance activity.
- Update the OSHA Information System (OIS) to be able to identify and count trenching and excavation hazards abated.
Summary of Progress – FY 19 Q3

- OSHA continues to conduct outreach activities to raise awareness about the hazards associated with trenching and excavation activities and the proper measures to protect employees.

- OSHA continues to provide guidance materials and compliance assistance services regarding the OSHA requirements to protect employees during trenching and excavation activities.

- OSHA continues to conduct onsite inspections to ensure that trenching and excavation activities are conducted safely and that any hazards identified are abated.

- OSHA is working together with the North American Excavation Shoring Association (NAXSA) to promote safety by planning four major outreach events during 2019.
Key Milestones

- OSHA met these milestones by identifying the hazards and inspections related to trenching and excavation.
- OSHA will continue to implement its Trenching NEP that addresses hazards related to trenching and excavation.

<table>
<thead>
<tr>
<th>Milestone Summary</th>
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<tr>
<td><strong>Key Milestone</strong></td>
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<td>Identify the hazards and inspections related to trenching and excavation, and begin counting these events in the OSHA Information System (OIS).</td>
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<td>Identify and count compliance assistance efforts and the trenching and excavation hazards abated through those events.</td>
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The preliminary data through Q3 FY 2019 is relatively low likely due to weather-related factors, since less trenching activity can be expected during the winter months. These operations are short in duration and local weather has a lot to do with construction activities and affects OSHA’s resultant inspection activities. The number provided through the 3rd quarter is also affected by the delay from when an abatement occurs to when the abated violation is entered into the OSHA Information System (OIS) database. It is important to note that the number of hazards abated through the 3rd quarter of FY 2019 is higher than last year at this time.
Data Accuracy and Reliability

- Means used to verify and validate measured values: For federal enforcement data, supervisors of the field staff monitor the data to ensure accurate data entry. The staff who obtain this information are trained government investigative personnel with the required skills and knowledge in field operations, and are responsible for the data until reported to the OSHA Information System (OIS). OIS also has built-in edit checks that force users to enter specific data before they are able to save records in the system. OSHA enters and maintains federal enforcement data on government-owned computer systems that meet applicable standards for security and reliability. State Plans and Consultation programs also use OIS and follow a similar validation/verification method.

- Sources for the data: OSHA’s Agency Priority Goal (APG) uses three data sources: 1) federal enforcement data, 2) State Plan enforcement data, and 3) consultation program data. All three sources are OIS, where OSHA field staff enter the data, supported by user guides and data dictionaries. OSHA then adds OIS data for these three components together to produce the APG number of trenching and excavation hazards abated.

- Level of accuracy required for the intended use of the data: To ensure a high level of accuracy in federal enforcement data, area offices, regional offices, and directorates in the national office run OIS reports. If any of these offices observes data anomalies, they report them to the OIS team. State Plans and Consultation programs similarly manage their own data through OIS and report anomalies to the Regional monitors, the OIS team, or OSHA National Office.

- Limitations to the data at the required level of accuracy: For federal enforcement data, one issue that can affect accuracy, particularly with quarterly data, is the delay from when an abatement occurs to when the abated violation is entered into the OIS database. For State Plan enforcement and Consultation program data, there may also be a delay similar to that of federal enforcement.

- How the agency has compensated for such limitations, if needed, to reach the required level of accuracy: OSHA mitigates the accuracy limitations by relying more on annual data, which has better accuracy than quarterly data, as the primary measure for goal achievement. The quarterly data are treated as preliminary data, and OSHA includes a corresponding note with the presentation of the data regarding this issue in the quarterly updates. In addition, OSHA will use year-over-year comparisons to help assess and track progress consistently relative to prior years. For State Plans and Consultation, OSHA may also consult regional monitors to verify the level of accuracy for the data provided.
Contributing Programs

Organizations:
  o OSHA Regional and Area Offices
  o Trade Associations
  o State Occupational Safety and Health Agencies

Program Activities:
  o OSHA Information System (OIS)
  o National and Local Emphasis Programs
  o Consultation programs, Compliance Assistance staff, alliances, and partnership programs

Stakeholder Consultations

OSHA will consult with industry associations and the public utilities who hire a significant portion of the work to aid in the efforts to reduce these injuries and fatalities.