



INDIANA

DEPARTMENT OF LABOR

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Directive: SEP-IOSHA-HH Manufacturing

Subject: Emphasis Program for High Nonfatal Occupational Injury and Illness Rates in Indiana
Manufacturing Industry Groups

Effective Date: March 21, 2025

ABSTRACT

Purpose: The purpose of this State Emphasis Program (SEP) is to address Indiana manufacturing industry groups with high rates of nonfatal workplace injuries and illnesses.

References: Indiana Field Operations Manual (IFOM)
IOSHA and INSafe Five-Year Strategic Plan (Federal Fiscal Years 2023-2027)
Site-Specific Targeting Directive (SST)
Amputations National Emphasis Program (Amputations NEP)

Expiration: This Instruction will terminate five years from the effective date.

Action Offices: Indiana Occupational Safety and Health Administration (IOSHA) Safety and Health/Industrial Hygiene Divisions and INSafe

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By and under the authority of:

Mike Speedy
Commissioner of Labor – IOSHA

I. **Purpose**

The purpose of IOSHA's implementation of this SEP is for safety inspections of establishments in those manufacturing industry groups that have high rates of nonfatal injuries and illnesses within the larger manufacturing industry. By effectively targeting the manufacturing industry groups with the highest incident rates for outreach and inspection activities, this program complements the Indiana Department of Labor's (IDOL's) mission to *advance the safety, health, and prosperity of Hoosiers in the workplace* by proactively identifying and addressing the hazards associated with working in such environments and near or with hazardous equipment and machinery.

II. **Scope**

This notice applies to all IOSHA Compliance Safety and Health Officers (CSHOs) and INSafe Safety and Health Consultants

III. **References**

Indiana Field Operations Manual (IFOM)
IOSHA and INSafe Five-Year Strategic Plan (Federal Fiscal Years 2023-2027)
Site-Specific Targeting Directive (SST)
Amputations National Emphasis Program (Amputations NEP)

IV. **Cancellations**

None

V. **Expiration**

This Instruction will terminate five years from the effective date unless renewed.

VI. **Policy**

IOSHA shall use this SEP as described herein as the basis for scheduling and conducting inspections of Indiana workplaces where the federal Bureau of Labor Statistics (BLS) has identified through the Survey of Occupational Injuries and Illnesses (SOII) a high rate of nonfatal occupational injury or illness within the Indiana manufacturing industry. Establishments targeted in this SEP shall be selected from the five manufacturing industry groups with the highest nonfatal occupational injury and illness rates in the overall manufacturing industry. The list of targeted manufacturing industry groups shall be updated and posted on the IDOL website via a memorandum.

This policy is consistent with the IOSHA and INSafe Five-Year Strategic Plan (Federal Fiscal Years 2023-2027) and submitted annually with the federal 23(g) grant funding request.

VII. **Background**

According to the federal BLS SOII, the Indiana 2023 overall nonfatal occupational injury and illness rate for Indiana is 2.6 per 100 full-time equivalent workers. The nonfatal occupational injury and illness rate for the Indiana manufacturing industry for 2023 is 3.0 per 100 full-time equivalent workers. The Indiana manufacturing industry's nonfatal occupational injury and illness rate is more than 15 percent higher than the State's overall rate.

While the manufacturing industry's overall nonfatal occupational injury and illness rate is 3.0, there are smaller industry groups within the manufacturing industry with higher incident rates.

As most work-related activities covered by this SEP are done within an enclosed environment, IOSHA's ability to conduct inspections within high hazard/high incident rate establishments has often been limited to the receipt of formal employee complaints of exposure to serious hazards, reports of work-related amputations and worker hospitalizations, and fatalities.

VIII. Local (State) Emphasis Program Goals

The overarching goal of this SEP is to minimize and eliminate worker exposure to hazards which are known to be present in the manufacturing industry. The elimination and reduction of exposure to hazards commonly faced by workers in these establishments will lead to a decrease in the number of serious work-related injuries, illnesses, and fatalities.

IX. Enforcement Activities and Procedures

The following procedures will be used in targeting, scheduling, and tracking inspections conducted under this SEP:

A. Inspection Priority

Inspections under this directive will be prioritized in accordance with Chapter 2 of the IFOM.

B. Unprogrammed Activities

Complaint inspections, referral inspections, and fatality inspections for any establishment within the industry groups as identified in this SEP shall be evaluated for inspection consistent with the procedures described in Chapter 9 of the IFOM.

C. Programmed Inspections

A randomized targeting list of employers and establishments will be maintained. Using that list, employers and establishments will be selected for programmed inspections.

NOTE: When possible, inspections conducted under this SEP will be combined with other programmed and unprogrammed inspections. This SEP may be combined with other existing initiatives such as SEPs, NEPs, or Site-Specific Targeting.

X. Programmed Inspection Site Selection

The five manufacturing NAICS codes with the highest injury and illness rates will be selected for targeted, programmed inspections while this directive remains active.

A. Generation

Each year, a new targeting list will be generated based on the five manufacturing industry groups (four-digit NAICS codes) with the highest injury and illness rates. Accordingly, an updated appendix of targeted NAICS codes will be added to this directive within four weeks of the release of the latest SOII.

The targeting list is created by using information provided by the federal Occupational Safety and Health Administration's Office of Statistical Analysis (OSA). The office will generate three separate lists based on geographical areas of the state (North, Central, and South).

B. Deletions

The office may delete from its targeting list:

1. Any establishment that is not appropriately classified under a targeted NAICS code for that year.
2. Any establishment that has had a comprehensive inspection under this directive or the SST directive within the last three years and resulted in no serious citations issued.
3. Any establishment that is exempted from programmed inspections due to strategic partnerships in accordance with the terms of the partnership agreement.
4. Any establishment that is exempted from programmed inspections due to a cooperative program such as active VPP and INSHARP sites.

C. Inspection Scheduling

Each of the three targeting lists may be scheduled and used independently from each other to make efficient use of available resources. Lists do not need to be completed in order as long as the entire list is completed.

XI. Inspection Procedures

A. Scope

Inspections performed under this SEP shall be comprehensive in scope.

B. Verify Establishment Size

At the opening conference, the CSHO will verify the number of employees under the employer's control. The establishment must have employed a minimum of 10 employees at any point during the previous calendar year.

C. 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.

D. Collection and Review of Injury and Illness Data

During inspections under this instruction, CSHOs will review the OSHA 300 logs, 300A summaries, and 301 incident reports for five prior calendar years. Refer to IFOM Chapter 3, Section VI, *Review of Records* for further guidance on review of injury and illness data. CSHOs should also verify that the employer has submitted information to the OSHA Injury Tracking Application (ITA) as appropriate for the most recent year.

E. Safety Orders

Safety orders for violations and corresponding proposed penalties shall be made in accordance with the IFOM and other relevant policies and procedures.

XII. OSHA Information System (OIS) Recording and Coding

To ensure the appropriate information is captured in OIS for inspections conducted under this SEP, CSHOs and Supervisors are directed to do the following:

- Inspections conducted under this SEP from the master list will be coded as “Programmed Planned” under the heading in OIS titled, “Initiating Type” and “HH Manufacturing” under SEP.
- Referrals, including serious injuries reported by employers and others will be recorded as “Unprogrammed” under the heading in OIS titled, “Initiating Type” and “HH Manufacturing” under SEP.
- Complaints received by IOSHA within the prescribed industries for the period will be recorded as “Unprogrammed” under the heading in OIS titled, “Initiating Type” and “HH Manufacturing” under SEP.

XIII. CSHO Protection and Training

Inspections under this SEP are to be conducted by CSHOs who have received training on the SEP. CSHOs shall wear all appropriate personal protective equipment (PPE) including, but not limited to, the following: safety-toed shoes, and safety glasses. Other PPE shall be used as necessary. CSHOs shall consult their Supervisor or Division Director for any additional guidance regarding PPE requirements.

XIV. Evaluation Procedures

It is important this program be evaluated in a timely manner to assess its potential future value and to make any modifications necessary.

IOSHA will complete an evaluation to review the following information:

1. The rates of nonfatal occupational injuries and illnesses for those industry groups targeted by the SEP in the most current year which data is available.
2. The number of inspections conducted under this SEP in-compliance from the data available in OIS.
3. The number of violations recorded as abated in OIS.
4. The number of employees or establishments impacted by outreach activities.

The Division Directors shall prepare and submit the mid and final evaluation reports to the Deputy Commissioner of IOSHA. INSafe will provide documentation of outreach activities in support of this SEP.

XV. Outreach Activities

IOSHA will work with INSafe to implement a 90-day initial outreach program that supports the purpose of this SEP prior to beginning targeted enforcement-related activities under this program. IOSHA will ensure outreach will continue during the enforcement phase of this program as well. Outreach activities will be conducted by both IOSHA and the Agency’s workplace safety and health consultation division, INSafe. Outreach activities will be directed towards as many stakeholders affected by this program as practicable. The purpose of the outreach will be to inform interested parties

of the existence, purpose, and objectives of this program. The Agency will also promote employer and employee knowledge and awareness of injury or illness-causing hazards, and their abatement covered by this SEP. The method of outreach is the Agency's discretion and may consist of one or more of the following:

- Mass mail/email communications or program information
- Information posted to and available on the IDOL's website
- Onsite consultation provided by INSafe
- Training and assistance provided by INSafe
- Stakeholder, Trade Association/Organization Meetings and other events
- Presentations to affected groups
- Media News Releases, Advisories or e-blast
- Social media messaging

XVI. Industry Identification

IOSHA shall conduct an annual review of the Indiana specific nonfatal occupational injury and illness data, as provided by the federal BLS SOII. Following this review, IOSHA shall update this instruction with appendices that identify the top five injury and illness rates for manufacturing industry groups NAICS codes. These NAICS codes will be identified for targeted inspection activities.

Appendix A
Indiana Manufacturing Industry Groups Targeted by this SEP
for January 1, 2025-December 31, 2025

The following table identifies those five manufacturing industry groups (four-digit NAICS) targeted by this SEP from March 14, 2025, through December 31, 2025.

NAICS	Industry Group Description	Total Recordable Case Rate
3315	Foundries	6.9
3361	Motor Vehicle Manufacturing	6.4
3219	Other Wood Product Manufacturing	5.1
3362	Motor Vehicle Body and Trailer Manufacturing	4.8
3212	Veneer, Plywood, and Engineered Wood Product Manufacturing	4.7

Appendix B
Indiana Manufacturing Industry Groups Targeted by this SEP
for January 1, 2026-December 31, 2026

The following table identifies those five manufacturing industry groups (four-digit NAICS) targeted by this SEP from January 1, 2026, through December 31, 2026.

NAICS	Industry Group Description	Total Recordable Case Rate

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Appendix C
Indiana Manufacturing Industry Groups Targeted by this SEP
for January 1, 2027-December 31, 2027

The following table identifies those five manufacturing industry groups (four-digit NAICS) targeted by this SEP from January 1, 2027, through December 31, 2027.

NAICS	Industry Group Description	Total Recordable Case Rate

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Appendix D
Indiana Manufacturing Industry Groups Targeted by this SEP
for January 1, 2028-December 31, 2028

The following table identifies those five manufacturing industry groups (four-digit NAICS) targeted by this SEP from January 1, 2028, through December 31, 2028.

NAICS	Industry Group Description	Total Recordable Case Rate

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Appendix E
Indiana Manufacturing Industry Groups Targeted by this SEP
for January 1, 2029-December 31, 2029

The following table identifies those five manufacturing industry groups (four-digit NAICS) targeted by this SEP from January 1, 2029, through December 31, 2029.

NAICS	Industry Group Description	Total Recordable Case Rate

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