

Chapter 2

PROGRAM PLANNING

I. Introduction.

Iowa OSHA's mission is to assure the safety and health of Iowa's working men and women by adopting and enforcing standards and regulations; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health as well as the development of comprehensive safety and health management systems. Effective and efficient use of resources requires careful, flexible planning. In this way, the overall goals of hazard abatement and employee protection are best served.

II. Iowa OSHA Responsibilities.

A. Providing Assistance to Small Businesses.

1. In 1996, the Congress passed the Small Business Regulatory Enforcement Fairness Act ([SBREFA](#)) to respond to the concern expressed by the small business community that Federal regulations were too numerous and complex, and that small business needed special assistance in understanding and complying with those regulations.
2. Iowa OSHA is required to have in place programs to provide guidance and compliance assistance. These programs must contain procedures to answer inquiries by small businesses. These programs also provide information on and advice about compliance with the statutes and regulations, interpretations, and applications of the law to specific sets of facts supplied by the small business.

B. Iowa OSHA Outreach Program.

The Iowa Labor Commissioner or designee will ensure that Iowa OSHA maintains an outreach program appropriate to local conditions and the needs of the State. The plan may include Federal OSHA support services, compliance assistance services, assistance in developing compliance safety and health management systems, training and education services, referral services, cooperative programs, abatement assistance, and technical services.

C. Responding to Requests for Assistance.

All requests from employers or employees for compliance information or assistance shall receive timely, accurate, and helpful responses from Iowa OSHA. See the section on Information Requests in this chapter for additional information.

III. Iowa OSHA Cooperative Programs Overview.

Iowa OSHA offers a number of avenues for businesses and organizations to work cooperatively with the Agency. Compliance Officers should discuss the various cooperative programs with employers.

A. Voluntary Protection Program (VPP).

The Voluntary Protection Program (VPP) is designed to recognize and promote effective safety and health management. A hallmark of VPP is the principle that management, labor, and OSHA can work together in pursuit of a safe and healthy workplace. A VPP participant is an employer that has successfully designed and implemented a health and safety management system at its worksite, and it is exempt from programmed inspections.

NOTE: See [CSP 03-01-003](#), *Voluntary Protection Programs (VPP): Policies and Procedures Manual*, dated April 18, 2008, for additional information.

B. Onsite Consultation Program.

1. Iowa OSHA onsite consultation programs are available in Iowa under [Section 21\(d\)](#) and [23\(g\)](#) agreements with Federal OSHA.
 - a. The State Onsite Consultation Program offers a variety of services at no cost to employers. These services include assisting in the development and implementation of an effective safety and health management system, and offering training and education to the employer and employees at the worksite. Smaller businesses in high hazard industries or those involved in hazardous operations receive priority.
 - b. The State Onsite Consultation Program is separate from OSHA's enforcement efforts. Under onsite consultation programs, no citations are issued, nor are penalties proposed.

2. **Safety and Health Achievement Recognition Program (SHARP).**

- a. Another program that recognizes employers' efforts to create a safe workplace and exempts them from programmed inspections is the Safety and Health Achievement Recognition Program (SHARP). This program is administered by the State Onsite Consultation Program but is funded under [Section 21\(d\)](#) of the Act.
- b. SHARP is designed to provide incentives and support those employers that implement and continuously improve effective safety and health management system(s) at their worksite. SHARP participants are exempted from OSHA programmed inspections.

NOTE: See [CSP 02-00-003](#), *Consultation Policies and Procedures Manual*, dated November 19, 2015 or most current document, for additional information.

C. **Strategic Partnerships**

Organizations can enter into Strategic Partnerships with OSHA to address specific safety and health issues. In these partnerships, OSHA enters into extended, voluntary, cooperative relationships with groups of employers, employees, and employee representatives (sometimes including other stakeholders, and sometimes involving only one employer) in order to encourage, assist, and recognize efforts to eliminate serious hazards and to achieve a high level of employee safety and health.

NOTE: See [IACSP 03-02-003](#), *IOSH Strategic Partnership Program for Worker Safety and Health*, dated July 1, 2014, for additional information.

D. **Alliance Program.**

Through the Alliance Program, Iowa OSHA works with groups committed to safety and health, including businesses, trade or professional organizations, unions and educational institutions, to leverage resources and expertise to develop compliance assistance tools and resources and share information with employers and employees to help prevent injuries, illnesses and fatalities in the workplace. Iowa OSHA and the organization sign a formal agreement with goals that address training and education, outreach and communication, and promote dialogue on workplace safety and health.

NOTE: See [CSP 04-01-002](#), *OSHA Alliance Program*, dated April 12, 2016, for additional information.

NOTE: See [Section VI.H](#) of this chapter, *Enforcement Scheduling and Interface with Cooperative Program Participants*, for additional information.

IV. Enforcement Program Scheduling.

A. General.

1. OSHA’s priority system for conducting inspections is designed to allocate available Iowa OSHA resources as effectively as possible to ensure that maximum feasible protection is provided to working men and women. The Iowa OSHA Administrator or designee will ensure that inspections are scheduled within the framework of this chapter, that they are consistent with the objectives of the Agency, and that appropriate documentation of scheduling practices is maintained.
2. The Iowa OSHA Administrator or designee will also ensure that Iowa OSHA resources are effectively distributed during inspection activities. If an inspection is of a complex nature, the Iowa OSHA Administrator or designee may consider utilizing additional resources (e.g., the Federal Health Response Team). Iowa OSHA will retain control of the inspection.

B. Inspection Priority Criteria.

Generally, the priority for inspection categories is shown in Table 2-1 below:

Table 2-1: Inspection Priorities

Priority	Category
First	Imminent Danger
Second	Fatality/Catastrophe
Third	Complaints/Referrals
Fourth	Programmed Inspections

Note: IOSHA will determine the inspection priority of a catastrophe using the Memorandum entitled, “Revised Interim Enforcement Procedures for Reporting Requirements under 29 C.F.R. 1904.39”, dated March 4, 2016, or unless superseded by future agency-approved correspondence.

1. **Efficient Use of Resources.**

Deviations from this priority list are allowed so long as they are justifiable, lead to the efficient use of resources, and promote effective employee protection. An example of such a deviation would be when the Iowa OSHA Administrator commits a certain percentage of resources to programmed Special Emphasis Program (SEP) inspections such as a National Emphasis Program (NEP), a Local Emphasis Program (LEP), or Regional Emphasis Program (REP). Inspection scheduling deviations must be documented in the case file.

2. **Follow-up Inspections.**

In cases where follow-up inspections are necessary, they shall be conducted as promptly as resources permit. In general, follow-up inspections shall take priority over all programmed inspections and any unprogrammed inspection in which the hazards are anticipated to be other-than-serious.

NOTE: See [Chapter 7](#), *Post-Citation Procedures and Abatement Certification*, for additional information.

3. **Monitoring Inspections.**

When a monitoring inspection is necessary, the priority is the same as for a follow-up inspection.

NOTE: See [Chapter 7](#), *Post-Citation Procedures and Abatement Verification*, for additional information.

4. **Employer Information Requests.**

Contacts for technical information initiated by employers or their representatives will not trigger an inspection, nor will such employer inquiries protect the requesting employer against inspections conducted pursuant to existing policy, scheduling guidelines and inspection programs established by the Office.

5. **Reported Imminent Danger, Catastrophe, Fatality, Amputations, Accidents, Referrals or Complaints.**

The Iowa OSHA Administrator or designee will act in accordance with established inspection priority procedures.

NOTE: See [Section V.](#) of this chapter, *Unprogrammed Activity – Hazard Evaluation and Inspection Scheduling*, for additional information.

C. **Effect of Contest.**

If an employer has contested a citation and/or a penalty from a previous inspection at a specific worksite, and the case is still pending before the Employment Appeal Board, the following guidelines apply to additional inspections of the employer at that worksite:

1. If the employer has contested the penalty only, the inspection will be scheduled as if there were no contest;
2. If the employer has contested the citation itself or any items therein, then programmed and unprogrammed inspections will be scheduled, but all violative conditions under contest will be excluded from the inspection unless a potential imminent danger is involved.

NOTE: See [Paragraph IV.B.](#), *Inspection Priority Criteria*, of this chapter for additional information.

D. **Enforcement Exemptions and Limitations.**

1. In providing funding for OSHA, Congress has consistently placed restrictions on enforcement activities for two categories of employers: small farming operations and small employers in low-hazard industries. Congress may place exemptions and limitations on OSHA activities through the annual Appropriations Act.
2. Before initiating an inspection of an employer in these categories the Office will evaluate whether the Appropriations Act for the fiscal year would prohibit the inspection. Where this determination cannot be made beforehand, the CSHO will determine the status of the small farming operation or a small employer in a low-hazard industry upon arrival at the workplace. If the prohibition applies, the inspection shall immediately be discontinued.

NOTE: See [CPL 02-00-051](#), *Enforcement Exemptions and Limitations under the Appropriation Act*, dated May 28, 1998, for additional information.

E. Preemption by a Federal Agency.

1. [Section 4\(b\)\(1\)](#) of the Act states that the Act does not apply to working conditions over which federal agencies exercise statutory responsibility to prescribe standards for safety and health. The determination of preemption by a Federal agency is, in many cases, a highly complex matter.

Under [Section 875-10.2\(1\)](#) of the Iowa Administrative Code, “None of the standards in this chapter shall apply to working conditions of employees with respect to which federal agencies other than the United States Department of Labor, exercise statutory authority to prescribe or enforce standards or regulations affecting occupational safety or health.”

2. If a question arises, usually upon receipt of a complaint, referral, or other inquiry, consult the list of [Memorandums of Understanding \(MOU\)](#) on the OSHA website to determine if the issue has been previously addressed. A MOU is an agreement created to address/resolve coverage issues and to improve the working relationships between Federal agencies and organizations regarding employee safety and health.
3. At times, an inspection may have already begun when the coverage jurisdiction question arises. Any such situation will be brought to the attention of the Iowa OSHA Administrator or designee as soon as it arises, and will be dealt with on a case-by-case basis.
4. Two examples of MOUs include the following:
 - b. [Mine Safety and Health Administration](#) - Interagency Agreement between the Mine Safety and Health Administration and OSHA, dated March 29, 1979.
 - c. [United States Coast Guard/U.S. Department of Transportation](#) - Authority of Coast Guard and OSHA regarding enforcement of safety and health standards aboard vessels inspected and certified by the Coast Guard, dated March 4, 1983.

F. United States Postal Service.

1. [The Postal Employee Safety Enhancement Act of 1998](#) applies the Act to the U.S. Postal Service in the same manner as the Act applies to a private sector employer.
2. All State Plan States elected not to cover the U.S. Postal Service. Thus, Federal OSHA retains authority to cover the U.S. Postal Service nationwide. Federal coverage in State Plan States encompasses U.S. Postal Service employees and contract employees engaged in U.S. Postal Service mail operations. Coverage includes contractor-operated facilities engaged in mail operations and postal stations in public or commercial facilities. State Plan States continue to exercise jurisdiction over all other private sector contractors working on U.S. Postal Service sites who are not engaged in U.S. Postal Service mail operations, such as building maintenance and construction employees. See the Final Rule on State Plans Coverage of the U.S. Postal Service. *Federal Register*, June 9, 2000 ([65 FR 36618](#)).
3. Violations documented during inspections initiated at a U.S. Postal Service site will be cited with penalties in accordance with the FOM and other applicable OSHA policies for the private sector.

NOTE: See [CPL 02-00-122](#), *Enforcement Guidance for the U.S. Postal Service*, dated April 16, 1999, for additional information.

G. Home-Based Worksites.

1. Iowa OSHA will not perform any inspections of employees' home offices. A home office is defined as office work activities in a home-based setting/worksites (e.g., filing, keyboarding, computer research, reading, writing) and may include the use of office equipment (e.g., telephone, facsimile machine, computer, scanner, copy machine, desk, file cabinet).
2. Iowa OSHA will only conduct inspections of other home-based worksites, such as home manufacturing operations, when it receives a complaint or referral alleging that a violation of a safety or health standard exists that threatens physical harm, that an imminent danger is present, or that there was a work-related fatality.

NOTE: See [CPL 02-00-125](#), *Home-Based Worksites*, dated February 25, 2000, for additional information.

H. Inspection/Investigation Types.

1. Unprogrammed.

- a. Inspections scheduled in response to alleged hazardous working conditions identified at a specific worksite are classified as unprogrammed. This type of inspection responds to:

Imminent Dangers;
Fatalities/catastrophes;
Complaints; and
Referrals.

- b. It also includes follow-up and monitoring inspections scheduled by the Office.

NOTE: This category includes all employers/employees directly affected by the subject of the unprogrammed inspection activity, and is especially applicable on multi-employer worksites.

NOTE: Not all complaints and referrals qualify for an inspection. See [Chapter 9, Complaint and Referral Processing](#), for additional information.

NOTE: See [CPL 02-00-124, Multi-Employer Worksite Citation Policy](#), dated December 10, 1999, for additional information.

2. Unprogrammed Related.

Inspections of employers at multi-employer worksites whose operations are not directly addressed by the subject of the conditions identified in a complaint, accident, or referral are designated as unprogrammed related.

3. Programmed.

Inspections of worksites which have been scheduled based upon objective or neutral selection criteria are programmed inspections. The worksites are selected according to adopted scheduling plans for safety and for health or under local, regional, and national special emphasis programs.

4. **Program Related.**

Inspections of employers at multi-employer worksites whose activities were not included in the programmed assignment, such as a low injury rate employer at a worksite where programmed inspections are being conducted for all high rate employers.

V. **Unprogrammed Activity – Hazard Evaluation and Inspection Scheduling.**

Enforcement procedures relating to unprogrammed activity are located in subject specific chapters of this manual:

- Imminent Danger, see [Chapter 11](#), *Imminent Danger, Fatality, Catastrophe, and Emergency Response*.
- Fatality/Catastrophe, see [Chapter 11](#), *Imminent Danger, Fatality, Catastrophe, and Emergency Response*.
- Emergency Response, see [Chapter 11](#), *Imminent Danger, Fatality, Catastrophe, and Emergency Response*.
- Complaint/Referral Processing, see [Chapter 9](#), *Complaint and Referral Processing*.
- Whistleblower Complaints, see [Chapter 9](#), *Complaint and Referral Processing*.
- Follow-ups and Monitoring, see [Chapter 7](#), *Post-Citation Procedures and Abatement Verification*.

VI. **Programmed Inspections.**

A. Reserved.

B. **Scheduling for Construction Inspections.**

Due to the mobility of the construction industry, the transitory nature of construction worksites, and the fact that construction worksites frequently involve more than one employer, inspections are scheduled from a list of construction worksites rather than construction employers. The University of Tennessee will provide the Office a randomly selected list of construction projects from identified or known covered active projects. This list will contain the projected number of sites which the Office has reported it plans on inspecting during the next month. Projects are selected in accordance with the inspection schedule for construction.

NOTE: See [CPL 02-00-141](#), *Inspection Scheduling for Construction*, dated July 14, 2006.

C. **Reserved.**

D. **Special Emphasis Programs (SEPs).**

Special Emphasis Programs provide for programmed inspections of establishments in industries with potentially high injury or illness rates that are not covered by other programmed inspection scheduling systems or, if covered, where the potentially high injury or illness rates are not addressed to the extent considered adequate under the specific circumstances. SEPs are also based on potential exposure to health hazards. Special emphasis programs may also be used to develop and implement alternative scheduling procedures or other departures from national procedures. Special emphasis programs can include National Emphasis Programs, Regional Emphasis Programs and Local Emphasis Programs.

1. **Identification of Special Emphasis Programs.**

The description of the particular Special Emphasis Program shall be identified by one or more of the following:

- a. Specific industry;
- b. Trade/craft;
- c. Substance or other hazard;
- d. Type of workplace operation;
- e. Type/kind of equipment; and
- f. Other identifying characteristic.

2. **Special Emphasis Program Scope.**

The reasons for and the scope of a Special Emphasis Program shall be described; and may be limited by geographic boundaries, size of worksite, or similar considerations.

3. **Pilot Programs.**

National or local pilot programs may also be established under Special Emphasis Programs. Such programs may be conducted for the purpose of assessing the actual extent of suspected or potential hazards, determining the feasibility of new or experimental compliance procedures, or for any other legitimate reason.

E. **National Emphasis Programs (NEPs).**

Federal OSHA develops National Emphasis Programs to focus outreach efforts and inspections on specific hazards in a workplace. Iowa OSHA will adopt National Emphasis Programs on a case-by-case basis after evaluation of the program and its applicability to the state.

F. **Local Emphasis Programs (LEPs) and Special Emphasis Programs (SEPs).**

LEPs and SEPs are types of special emphasis programs which are applicable to the state. LEPs and SEPs are generally based on knowledge of local industry hazards or local industry injury/illness experience. LEPs and SEPs must be developed and approved when inspections are targeted to a specific industry(ies), hazard(s), or other workplace characteristic(s), e.g., as part of, or in conjunction with, a local initiative or problem-solving project. A list of LEPs and SEPs may be found on the www.Iowaworkforce.org/labor website under Iowa Occupational Safety and Health (IOSH) Enforcement.

G. **Other Special Programs.**

The Agency may develop programs to cover special categories of inspections which are not covered under a Special Emphasis Program.

H. **Inspection Scheduling and Interface with Cooperative Program Participants.**

1. Employers who participate in voluntary compliance programs may be exempt from programmed inspections and eligible for inspection deferrals or other enforcement incentives. The Iowa OSHA Administrator or designee will determine whether the employer is actively participating in a Cooperative Program that would impact inspection and enforcement activity at the worksite being considered for inspection. Where possible, this determination should be made prior to scheduling the inspection.
2. Information regarding a facility's participation in the following programs should be available prior to scheduling inspection activity:
 - a. VPP Program;
 - b. Pre-SHARP and SHARP Participants;

3. **Voluntary Protection Program.**

a. **Iowa VPP Manager Responsibilities.**

The State VPP manager must keep the Iowa OSHA Administrator or his/her designee informed regarding VPP applicants and the status of participants in the VPP. This will prevent unnecessary scheduling of programmed inspections at VPP sites and ensure efficient use of resources. The Iowa OSHA Administrator or his/her designee should be informed:

- That the site can be removed from the programmed inspection list. Such removal may occur no more than 75 days prior to the onsite evaluation;
- Of the site's approval for the VPP program;
- Of the site's withdrawal or termination from the VPP program; and
- If the VPP Manager is the first person notified by the site of an event requiring enforcement, the VPP Manager must instruct the site to contact the Iowa OSHA Administrator's Office.

b. **Programmed Inspections and VPP Participation.**

- **Inspection Deferral.**

Approved sites must be removed from any programmed inspection lists for the duration of participation, unless a site chooses otherwise. The applicant worksite will be deferred starting no more than 75 calendar days prior to the commencement of its scheduled pre-approval onsite review.

- **Inspection Exemption.**

The exemption from programmed inspections for approved VPP sites will continue for as long as they continue to meet VPP requirements. Sites that have withdrawn or have been terminated from VPP will be returned to the programmed inspection list, if applicable, at the time of the next inspection cycle.

c. **Unprogrammed Enforcement Activities at VPP Sites.**

When the Office receives a complaint, or a referral other than from the OSHA VPP onsite team, or is notified of a fatality, catastrophe, or other event requiring an enforcement inspection at a VPP site, the Iowa OSHA Administrator or designee must initiate the inspection following normal OSHA enforcement procedures.

- The Office must immediately notify the State VPP Manager of any fatalities, catastrophes or other accidents or incidents occurring at a VPP worksite that require an enforcement inspection; as well as of a referral or complaint that concerns a VPP worksite, including complaint inquiries that would receive a letter response.
- If the VPP Manager is the first person notified by the site of an event requiring an enforcement inspection, the VPP Manager must instruct the site to contact the Iowa OSHA Administrator.
- The inspection will be limited to the specific issue of the unprogrammed activity. If citations are issued as a result of the inspection, a copy of the citations will be sent to the VPP Manager. See [CSP 03-01-003](#), *Voluntary Protection Programs (VPP): Policies and Procedures Manual*, dated April 18, 2008.

4. **Consultation.**

a. **Consultation Visit in Progress.**

- If an onsite consultation visit is in progress, it will take priority over OSHA programmed inspections as outlined below. An onsite consultation visit will be considered "in progress" in relation to the working conditions, hazards, or situations covered by the visit from the beginning of the opening conference through the end of the correction due dates and any extensions thereof. If an onsite consultation visit is already in progress it will terminate when the following kind of OSHA compliance inspection is about to take place:

- Imminent danger inspection;
- Fatality/catastrophe inspection;
- Complaint inspections; and/or
- Other critical inspections, as determined by the Iowa Labor Commissioner.

Note: Other “such critical inspections” may include, but are not limited to, referrals as defined in [Chapter 9, *Complaint and Referral Processing*](#). Following an evaluation of the hazards alleged in a referral, if the Iowa Labor Commissioner determines that enforcement action is required prior to the end of an abatement period established by the state consultation project, the consultation visit in progress shall be immediately terminated to allow for an enforcement inspection.

For purposes of efficiency and expediency, an employer’s worksite shall not normally be subject to concurrent consultation and enforcement-related visits. [See IAC 875-8.7](#) for further guidance.

b. Enforcement Follow-Up and Monitoring Inspections.

If an enforcement follow-up or monitoring inspection is scheduled while a worksite is undergoing an onsite consultation visit, the inspection shall not be deferred; however, its scope shall be limited only to those areas required to be covered by the follow-up or monitoring inspection. In such instances, the consultant must halt the onsite visit until the enforcement inspection is completed. In the event OSHA issues a citation(s) as a result of the follow-up or monitoring inspection, an onsite consultation visit may not proceed until the citation(s) becomes a final order(s).

5. Pre-Safety and Health Achievement Recognition Program (Pre-SHARP) Status.

- Those employers who do not meet the SHARP requirements, but who exhibit a reasonable promise of achieving agreed-upon milestones and time frames for SHARP participation, may be granted Pre-SHARP status. Pre-SHARP participants receive a full service, comprehensive consultation visit that involves a complete safety and health hazard identification survey, including a comprehensive assessment of the worksite’s safety and health management system.
- The deferral time frame recommended by the State Consultation Project Manager must not exceed a total of 18 months from the

expiration of the latest hazard correction due date(s), including extensions. Upon achieving Pre-SHARP status, employers may be granted a deferral from OSHA programmed inspections. The following types of incidents can trigger an OSHA enforcement inspection at Pre-SHARP sites:

- Imminent danger;
- Fatality/catastrophe;
- Formal complaints.

6. **Safety and Health Achievement Recognition Program (SHARP).**

SHARP is designed to provide support and incentives to those employers that implement and continuously improve effective safety and health management system(s) at their worksite. SHARP participants are exempted from OSHA programmed inspections, see [IAC 875-8.7\(2\)d\(2\)](#).

a. **Duration of SHARP Status.**

All initial approvals of SHARP status will be for a period of up to two years, commencing with the date the Iowa State Consultation Program approves an employer's SHARP application. After the initial approval, all SHARP renewals will be for a period of up to three years.

b. **OSHA Inspection(s) at SHARP Worksites.**

As noted above, employers that meet all the requirements for SHARP status will have the names of their establishments deleted from OSHA's Programmed Inspection Schedule. However, pursuant to [IAC 875-8.7\(2\)d\(3\)](#) the following types of incidents can trigger an OSHA enforcement inspection at SHARP sites: imminent danger; fatality/catastrophe; or formal complaints.

NOTE: See [CSP 02-00-003](#), *Consultation Policies and Procedures Manual, Chapter 8: OSHA's Safety and Health Achievement Recognition Program (SHARP) and Pre-SHARP*, dated November 19, 2015, for additional information.

7. **Iowa OSHA Strategic Partnership Program (ISP).**

a. **Deferral from Programmed Inspection List for Non-Construction ISPs.**

New or renewed Iowa OSHA Strategic Partnerships (ISPs) will no longer include any programmed inspection deferral provisions. Only active VPP or SHARP worksites are eligible for this incentive. See [IACSP 03-02-003](#), *IOSH Strategic Partnership Program for Worker Safety and Health*, dated July 1, 2014, for additional information.

b. **Programmed Inspection with a Limited Scope.**

For non-construction worksites, Iowa OSHA will no longer offer a limited scope inspection to an establishment operated by an OSHA partnering employer.

c. **Deletion from Programmed Inspection List.**

New or renewed Iowa OSHA Strategic Partnerships (ISPs) will no longer include any programmed inspection deletion provisions. See [IACSP 03-02-003](#), *IOSH Strategic Partnership Program for Worker Safety and Health*, dated July 1, 2014, for additional information. Only cooperative worksites qualifying for VPP or SHARP are eligible for this benefit. In addition, new or renewed ISPs will not allow the use of IOSHA's "Phone and Fax" procedures beyond the scope of those permitted in the FOM.

8. **Alliances.**

Unlike IOSHA's ISP, VPP, and SHARP programs, Alliances do not require applications, data collection, verification, or evaluation. Alliances also do not offer incentives, such as focused inspections or inspection deferral, to their signatories.