

IOSHA Local Emphasis Program

IA/LEP 4

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- **Record Type:** Local Emphasis Program
 - **Directive Number:** IA/LEP 4
 - **Subject:** Inspection Targeting System to Reduce Injuries and Deaths on Worksites in the Construction Industry.
 - **Issued:** Mar. 16, 2009
 - **Revised:** Oct. 7, 2025
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Iowa OSHA IA/LEP 4

Iowa Department of Inspections, Appeals, and Licensing
Iowa Occupational Safety and Health (IOSHA)

ABSTRACT

- Purpose:** This Notice describes policies and procedures for the local implementation of an emphasis program to target commercial and residential construction worksites.
- Scope:** This Notice applies to construction worksites throughout the State of Iowa, under the jurisdiction of the State of Iowa.
- References:** OSHA Instructions: CPL 04-00-002, CPL 02-00-025, CPL 02-00-170, CLP 02-00-155, STD 03-11-002; IACPL 2-00-160 (FOM); OSHA Memorandum, Subject: Guidance to Compliance Officers for Focused Inspections in the Construction Industry; and the latest census for Iowa Geographic Areas.
- Cancellations:** None
- Expiration:** This LEP is subject to re-evaluation to determine the continued need for the local emphasis program.
- Action Offices:** State of Iowa.
- Originating Office:** State of Iowa.
- Contact:** 515.350.7393

By and Under the Authority of:

Stephen J. Slater

Iowa OSHA Administrator/Deputy Labor Commissioner

Revised by

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TABLE OF CONTENTS

Contents

IOSHA Local Emphasis Program	1
IA/LEP 4	1
ABSTRACT	1
I. Purpose.	4
II. Scope.....	4
III. Action.	4
IV. Expiration.....	4
V. References.	4
VI. Background.	4
VII. Scheduling.	5
VIII. Inspection Procedures.	6
IX. Deletion Criteria.....	6
X. Recording in Salesforce.....	7

- I. **Purpose.** This Notice describes policies and procedures for implementing a Local Emphasis Program (LEP) for programmed safety and health inspections of construction sites in the State of Iowa.
- II. **Scope.** This Notice applies to construction worksites within the jurisdictional boundaries of the State of Iowa.
- III. **Action.** The Iowa OSHA Administrator shall ensure that the procedures established in this Instruction are adhered to in the scheduling of programmed inspections.
- IV. **Expiration.** This Notice is effective until cancelled or superseded.
- V. **References.**
 - a. OSHA Instruction CPL 04-00-002 (11/13/2018), Procedures for Approval of Local Emphasis Programs (LEPs).
 - b. OSHA Instruction CPL 02-00-025 (01/04/1995), Scheduling System for Programmed Inspections, and CPL 02-00-155 (09/06/2013) for Inspection Scheduling for Construction.
 - c. OSHA Instruction CPL 02-00-170 (07/18/2024), Enforcement Exemptions and Limitations under the Annual Appropriations Act.
 - d. OSHA Instruction IA/CPL 02-00-160, Field Operations Manual (FOM) (02/11/2018).
 - e. OSHA Memorandum, Subject: Guidance to Compliance Officers for Focused Inspections in the Construction Industry, 08/22/1994 (Rev (2) 09/20/95).
 - f. OSHA Instruction STD 03-11-002, Compliance Guidance for Residential Construction (06/16/2011).
 - g. The Latest Census for Iowa Geographic Areas.
- VI. **Background.** Successful construction inspection scheduling has always been challenging. Currently, construction safety and health inspections conducted by the state office in Iowa have been based primarily on the following triggers:

- A. Unprogrammed Activity, such as Fatalities, Complaints and Certified Safety and Health Official (CSHO) Self-referrals.
- B. Local Emphasis & National Emphasis Programs.
- C. Programmed Inspections targeting Construction (CT's) are derived from the random selection of worksites throughout Iowa. These inspections are compiled from information provided by Dodge Construction Network, and retrieved from the United States Department of Labor's Construction Inspection Targeting Application.

Except for the relatively few programmed inspections, the major triggers for inspection rely on hazardous conditions to occur and be observed by OSHA, or for an accident to occur that is reported to OSHA. The only truly random programmed (not response initiated) inspections, CT's, are subject to institutional drawbacks. These include reliance on bids, permits, and other filings submitted by Dodge Construction Network to initiate tracking. Many of the construction sites in the State of Iowa's jurisdiction do not appear on the CT list. These are primarily projects done without permits and frequently conducted by smaller employers. Many of these projects are of short duration and also tend to employ many immigrant workers, who historically are less likely to file complaints with OSHA. All of these factors are associated with a higher risk of construction injuries and fatalities and will compliment traditional targeting methods.

A study of Occupational Fatalities in Iowa from 2016-2025 showed that 33% of the 233 Iowa OSHA fatality investigations during this period were in the construction industry. Many of those construction fatalities occurred in less populated areas where inspectors would not normally be, w/out a complaint or referral of some kind being made. Of the fatalities that occurred in the Construction Industry, over 50% involved employers with less than 10 employees. Construction according to the latest BLS data the construction industry in Iowa has a fatality rate over 4 times higher than the manufacturing segment. This LEP will complement existing strategies and get our CSHOs into areas of the state where fatalities are occurring and assist in gaining access to smaller employers.

IOSHA investigated workplace fatalities have trended lower as of late. The percentage of those fatalities that occur within the construction industry continue to be a significant percentage of the total workplace fatalities in the state. Iowa OSHA inspectors will continue getting to less populated areas of the state of Iowa more frequently, and continue to be more visible to smaller employers.

VII. [Scheduling](#). Selection of construction sites for emphasis program inspections.

- A. Iowa OSHA will use the latest census for Iowa Geographic Areas to create a list of towns/cities with a population of 3,200 people or greater (Iowa OSHA believes that population centers of this size are more likely to have active construction sites than smaller towns/cities).
- B. Once a list of towns/cities is created, a list of corresponding zip code areas will be identified (it is anticipated that many of the larger cities have more than one zip code). The total list of zip code areas will become the inspection pool. The list of zip codes will then be arranged by an Executive Officer who will assign a number and corresponding map to the towns/cities.
- C. Next the zip codes are selected at random into groups of 36-38 per inspection cycle. There are six such cycles in the year, with every zip code area being selected at least twice.

VIII. [Inspection Procedures.](#)

- A. When a CSHO is assigned a Zip code for inspection, the CSHO will drive the streets of that Zip code searching for active construction sites. It will not be necessary to visibly observe a hazard before entering the site.
- h. When the CSHO finds an active construction site, the CSHO will enter the site and conduct the inspection according to the OSHA Instruction IA/CPL 02-00-160, Field Operations Manual (FOM), February 11, 2018, or the latest version of the Construction Inspection Manual. Procedures outlined in the OSHA Memorandum for Focused Inspections in Construction will be followed, as applicable. The CSHO will document all hazardous work exposures as well as review safety programs, as applicable.
- B. The scope of all inspections conducted under this LEP will be comprehensive safety inspections. If health hazards are identified (such as noise, silica, hexavalent chromium, asbestos, etc.) and cannot be adequately addressed by the inspecting CSHO, a referral may be made to another CSHO able to adequately address the health hazards identified.
- C. If adequate safety programs exist and no hazards are identified by the CSHO, the inspection will be considered in compliance.

IX. [Deletion Criteria.](#) Inspections at selected jobsites will not commence if one to the following conditions exist:

- A. The jobsite has had a CT programmed inspection within the last trimester (3 months).

- B. The jobsite has had a comprehensive safety inspection within the last trimester (3 months).
- C. An employer on a jobsite is currently a VPP or SHARP employer, unless a serious hazard or imminent danger relative to that employer is observed. In addition, an employer who is participant in a “Consultation in Progress”, unless a serious or imminent danger relative to that employer is observed.
- D. The jobsite is a construction site where all work is being performed inside the dwelling on the premises of an occupied residence. (Note: Worksites such as re-roofing, electrical service, guttering, trenching and other construction projects that are viewed from public access will be inspected. These sites may require entry onto the owner’s property but not inside their residence.)

X. [Recording in Salesforce](#). An in inspection will be created in Salesforce as follows:

- A. Inspections conducted under this LEP are to be created from the Salesforce Home tab and with an Initiating Type of “Program Planned”. Special Emphasis Program ZIPCODE will be toggled to chosen under the Emphasis Programs section of the Casefile Inspection.

Iowa OSHA Administrator/Deputy Labor Commissioner

Date

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