

DOSH DIRECTIVE

Department of Labor and Industries
Division of Occupational Safety and Health
Keeping Washington safe and working

2.25

Focused Inspections at Construction Worksites

Updated: June 20, 2024

I. Purpose

This Directive provides guidance to Compliance Safety & Health Officers (CSHOs) related to conducting focused safety or hygiene inspections at construction worksites.

II. Scope and Application

This Directive applies to all DOSH operations statewide. It replaces all previous instructions on this issue, whether formal or informal. This Directive has been updated with current ABC of Western Washington logo and contact information, and supersedes DD 2.25, Focused Inspections at Construction Worksites, dated July 20, 2023.

III. Background

Since 1995, the Department of Labor and Industries has included a provision for inspectors enforcing the Washington Industrial Safety and Health Act (WISHA) to engage in “Focused Inspections”.

A focused inspection is a programmed inspection of an employer in which the focus is limited to certain potentially hazardous areas, operations, conditions, or practices at the worksite, which are most likely to cause fatalities and/or serious injuries to workers.

The purpose of a focused inspection is to reduce the amount of time spent in an inspection by focusing the efforts of DOSH inspectors on certain hazards.

This policy recognizes the work performed by participating employers and employer associations in their efforts to advance safety and health in the construction industry, by implementing effective safety and health programs and audit processes, which identify and abate hazardous conditions at the worksite.

IV. Inspection Policy

A. Conducting a Focused Inspection.

1. A programmed inspection of an employer who is a participating member (*see Appendix*) in a safety and health recognition program and who is eligible (*see Section IV.C.*), will be conducted as a “focused inspection” according to this section.
2. Employers must provide verification of participation in an approved trade association safety recognition program by either a banner or other identifying means.

3. A **focused safety inspection** is expected to include an assessment of hazards related to falls, electrocution, excavation and trenching, overhead and struck-by, traffic control, motor vehicle operation and other potential serious hazards that come to the CSHO's attention during the course of the inspection.
4. A **focused hygiene inspection** is expected to include an assessment of respiratory hazards, hearing loss, confined spaces, dermal and eye exposure to corrosives and other potential serious hazards that come to the CSHO's attention during the course of the inspection.
5. A focused inspection is not expected to include a review of written records and programs that may be required. However, a review of site-specific plans may be required to address questions when related hazards are identified.
6. If a review of one or more programs is necessary based on issues found at the site, the focused inspection can include a review of all or a portion of the program in question.
7. CSHOs are expected to conduct and document employee interviews to verify implementation of safety and health plans, programs and training.
8. CSHOs must not cite general violations identified and abated during the course of a focused inspection, in accordance with this section. This does not apply to general violations that are regulatory or statutory such as OSHA 300 logs or posting of Citation and Notices.
9. When serious violations whose nature or number suggests systemic problems with the implementation of safety and health programs are identified, or if required programs are substantially deficient or do not exist, the CSHO will discontinue the focused inspection and conduct a comprehensive inspection.
10. The Compliance Supervisor must be consulted when a focused inspection is expanded to a comprehensive inspection.

B. General Inspection Procedures.

1. When inspections are conducted as a result of an Accident, Complaint or Referral (ACR), the CSHO must inspect the worksite and review records and programs as necessary to address the items in the ACR. When the CSHO becomes aware of issues that are not within the scope of the ACR, the inspection will be conducted in accordance with *Section IV.A.* in this Directive, if the employer is eligible.
2. Employers at the worksite who are not part of a recognition program will be inspected in accordance with the procedures outlined in the DOSH Compliance Manual.
3. General or Upper-Tier contractors will be inspected in accordance with DOSH Directive 27.00, General or Upper-Tier Contractor (Stute) Responsibility.
4. Employers at worksites which require site-specific programs are not eligible for focused inspections.

C. Focused Inspections Eligibility.

1. DOSH approves employer eligibility for focused inspections.
2. An employer can be removed from focused inspection eligibility at any time. Reasons may include, but are not limited to the following:
 - Repeat serious violations.
 - Willful violations.
 - Placement in Severe Violator Enforcement Program (SVEP).
 - Conduct that interferes with a full and orderly inspection.
3. Whenever DOSH takes action to remove an association member, DOSH will notify the association.

D. Employer Associations.

1. Employer associations interested in participating in the focused inspection program must submit a letter of interest to DOSH Deputy Assistant Director that includes:
 - A description of their overall safety recognition program.
 - How the program will address and reduce hazards for employees of member companies.
 - The procedure for review of programs, audits, audit frequency, and training.
2. DOSH Deputy Assistant Director will periodically conduct an onsite review of an association safety and health recognition program, including but not limited to the following:
 - Process for approving new member companies.
 - Number of new member companies.
 - Frequency of employer audits.
 - Results of employer audits.
 - Changes to safety and health recognition program.
 - Other work the association has performed to promote safety and health for member companies.
3. DOSH Deputy Assistant Director approves employer associations' eligibility for focused inspections.

V. Who to Contact

DOSH staff who have questions or need additional guidance or interpretive assistance are encouraged to contact DOSH Deputy Assistant Director, or Compliance Operations or Technical Services.

VI. Review and Cancellation

DOSH will review this Directive for applicability within two years from the effective date, and it will remain effective until superseded or canceled.

Approved:



Craig Blackwood, L&I Assistant Director
Division of Occupational Safety and Health

APPENDIX

DOSH APPROVED SAFETY AND HEALTH RECOGNITION PROGRAMS

Logo	Company Name	Contact Name, Phone and Email
	Associated Builders & Contractors of Western Washington	Will Carithers, Director of Safety (425) 646-8000 training@abcwestwa.org
	Inland Pacific Chapter of Associated Builders and Contractors, Inc.	Suzanne Schmidt, President/CEO (509) 534-0826 sschmidt@ipcabc.org
	Associated General Contractors Of Washington Safety Team®	Mandi Kime, Director of Safety (206) 284-0061 mkime@agcwa.com
	Inland Northwest Associated General Contractors Safety Team®	Curt Nead, Director of Safety (509) 535-0391 cnead@nwagc.org
	Building Industry Association of Washington	Andy Arrants, Education Manager (360) 352-7800 x 147 andya@biaw.com
	Mechanical Contractors Association of Western Washington	Scott Middleton, General Counsel & Government Affairs Director (206) 442-9029 smiddleton@mcaww.net