

**STATE OF VERMONT**  
**STATE OSHA ANNUAL REPORT**  
**(SOAR)**

October 1, 2015 through September 30, 2016



**Prepared By:**

**State of Vermont**  
**Department of Labor**  
**Division of Workers' Compensation and Safety**  
**VOSHA**

## **TABLE OF CONTENTS**

	<b><u>Page</u></b>
INTRODUCTION	3
SUMMARY OF RESULTS RELATED TO THE ANNUAL PERFORMANCE PLAN	8
PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENT	13
STATE INTERNAL EVALUATION PROGRAM	14

## **Introduction;**

The Vermont Occupational Safety and Health State Administration (VOSHA) submits this State OSHA Annual Report (SOAR) to the Federal Occupational Safety and Health Administration (OSHA) for evaluation of the Vermont State program. The SOAR covers the time period of October 1, 2015 through September 30, 2016.

This SOAR contains the following sections:

- State Results Summary Chart
- Report on Progress Toward Achieving Strategic Plan Accomplishment

VOSHA and Project WorkSAFE (the state's OSHA 21 (d) consultation program) are administered by the Vermont Department of Labor, Division of Workers' Compensation.

In terms of staffing, FY 2016 was a relatively stable year for VOSHA. VOSHA only needed to replace one safety compliance safety and health officer (CSHO) who resigned in the spring. VOSHA was able to fill this vacancy in August of 2016. While the overall number of personnel remains constant, VOSHA does have one new CSHO on board since the FY 2015 SOAR was submitted to OSHA.

- The following is VOSHA's staffing at the beginning of FY 2017:
  - Director of Workers Compensation and Safety; 1
  - VOSHA Program Manager; 1
  - VOSHA Compliance Supervisor; 1
  - VOSHA Administrative Assistant; 1
  - VOSHA Safety Compliance Officers; 4
  - VOSHA Health Compliance Officers; 3
  - VOSHA Health/Safety Compliance Officer; 1
  - VOSHA 11(c) Whistleblower Investigator; 1
  - Total; 13 \*NOTE; Director of Workers Compensation and Safety is not a dedicated VOSHA FTE.

The consultation and enforcement programs continue to operate with no changes. Although the consultation and enforcement programs do not share personnel and maintain their own offices in different locations, the two programs share common goals to ensure workplace safety and health in the State of Vermont. Therefore, the VOSHA and Project WorkSAFE managers work closely together to develop strategies for achieving these goals.

VOSHA was not able to enroll the new safety CSHO in OSHA's mandatory training program for new compliance officers before the end of FY 2016, but will attempt to do so in FY 2017. In other areas, VOSHA continues to pursue training for CSHOs from both the OSHA Training Institute (OTI) as well as other sources. In FY 2016, all of VOSHA's CSHOs completed training, as shown below.

- VOSHA Compliance Program Manager
  - 40 Hour Hazardous Waste Operations and Emergency Response (HAZWOPER)
  - FEMA ICS 100
  - FEMA ICS 200
  - FEMA ICS 120
  - FEMA ICS 130

- VOSHA Compliance Supervisor
  - OSHA 2050 Cranes in Construction
  - 40 Hour Hazardous Waste Operations and Emergency Response (HAZWOPER)
  - FEMA ICS 100
  - FEMA ICS 200
- Senior Industrial Hygienist;
  - 40 Hour Hazardous Waste Operations and Emergency Response (HAZWOPER)
  - FEMA ICS-100
  - FEMA ICS 200
- 11(c) Whistleblower Investigator;
  - OSHA 1410 Inspection Techniques and Legal Aspects
  - OSHA 1610 Interviewing Techniques for Whistle Blowers
  - FEMA ICS 100 07/13/2016
  - FEMA ICS 200 07/13/2016
- \* Industrial Hygienist:
  - 40 Hour Hazardous Waste Operations and Emergency Response (HAZWOPER)
  - OSHA 1410 Inspection Techniques and Legal Aspects
  - FEA ICS 100
  - FEMA ICS 200
- Senior Safety Compliance Officer;
  - FEMA ICS 100
  - FEMA ICS 200
  - 40 Hour Hazardous Waste and Emergency Response (HAZWOPER)
- \* Industrial Hygiene/Safety Compliance Officer;
  - OSHA 2055 Cranes in Construction
  - OSHA Special Government Employee Training
  - OSHA 1410 Inspection Techniques and Legal Aspects
  - 40 Hour Hazardous Waste and Emergency Response (HAZWOPER)
  - FEMA ICS 100
  - FEMA ICS 200
- Senior Industrial Hygienist;
  - FEMA ICS 100
  - FEMA ICS 200
  - 40 Hour Hazardous Waste and Emergency Response (HAZWOPER)
- \* Safety compliance Officer;
  - OSHA 1410 Inspection Techniques and Legal Aspects
  - OSHA 2055 Cranes in Construction
  - FEMA ICS 100
  - FEMA ICS 200
  - Hazardous Waste Operations and Emergency Response (HAZWOPER)
- \*Safety compliance Officer;
  - No training in FY 2016
- \* Safety Compliance officer;
  - OSHA 2055 Cranes in Construction
  - OSHA 1410 Inspection Techniques and Legal Aspects
  - FEMA ICS 100
  - FEMA ICS 200

*(\* Denotes staff who were hired in either FY 2014 or FY 2015 and who have not yet completed the basic CSHO training track.)*

VOSHA has adopted TED 01-00-019, OSHA's Mandatory Training Program for Compliance Personnel. VOSHA will continue to follow the training track outlined in the directive, as well as explore new training opportunities, especially for senior CSHOs.

With the new mandatory reporting of serious injuries, coupled with ever increasing awareness of the ability to use the site to file complaints, VOSHA's website seems to have more traffic. VOSHA has received more complaints via the website and has experienced a slight increase in the frequency of reports of serious injuries. The VOSHA manager continues to discuss the VOSHA website whenever outreaches are conducted.

#### Compliance Assistance Activities:

In July 2016, VOSHA participated in Operation Vigilant Guard, a joint emergency drill conducted in the State of Vermont. This effort included the Vermont National Guard, the State of Vermont (various state agencies as well as the state emergency operations center . SEOC) and various emergency services acting through their Local Emergency Planning Committees (LEPCs). VOSHA's role in the event was twofold.

- 1) VOSHA was an active player with staff in the SEOC as well as in the field providing safety officer services to the various emergency scenarios.
- 2) VOSHA was actively monitoring real time safety and health issues in these scenarios. Of particular mention, VOSHA deployed four digital Wet Bulb Globe Thermometer (WBGT) heat index monitors to the field to advise on heat stress. This activity alone resulted in an intervention in a particularly strenuous rescue scenario in which the CSHO worked with the Incident Commander to institute a rest/shade/hydration schedule for the players. In at least one other scenario, an incident commander called the SEOC and requested a CSHO to come to a site and monitor fall protection in the construction of a temporary bridge.

VOSHA views Operation Vigilant Guard as critical to its role in statewide emergencies. By taking part in this activity, VOSHA accomplished two very important objectives;

- 1) VOSHA staff learned their potential roles in providing assistance in the field and within the scope of incident command structure, as well as VOSHA's critical role in the SEOC as the designated safety officer to the SEOC Commander.
- 2) VOSHA was able to engage the emergency response community in a way that introduced them to the types of services it could provide in the event of a statewide emergency. By providing this outreach, VOSHA was able to demonstrate that it could play a critical role in statewide events and catastrophes.

In addition to the above mentioned Operation Vigilant Guard exercise and the months of meetings and hours of planning leading up to the July activity, VOSHA has started to integrate with other statewide committees. These committees have been a traditional part of the duties of the VOSHA management. But with the drastic amount of attention and work needed to bring the program back to acceptable performance, the VOSHA managers chose not to be active in those committees. Three of these committees that VOSHA actively participates in at this time are as follows:

- 1) State Emergency Response Committee (SERC): This is a statewide meeting held bi-monthly at the SEOC in Waterbury. This bi-monthly meeting encompasses the Vermont Department of Public Safety and Homeland Security, VOSHA, Agency of Natural Resources, Vermont Department of Agriculture and Health, among others, and the various LEPCs from around the state. This meeting is usually attended by the VOSHA Manager.

- 2) State Elevator Board: This committee consists of the Vermont Department of Public Safety, Fire Prevention Division, various elevator inspection and regulatory entities as well as VOSHA. These monthly meetings are usually attended by the VOSHA Compliance Supervisor.
- 3) Vermont Fire Service Training Counsel: This committee which meets quarterly concentrates on fire service training for Volunteers as well as professional Fire Fighters. The meetings usually include the Director of Fire Service Training, The Vermont Agency of Natural Resources, VOSHA and representatives of local volunteer and professional fire services.

Participation in the above committees is important as it fulfills VOSHA's role in statewide safety and health as compelled by the Vermont State Legislature.

VOSHA still maintains two active partnerships with the following entities:

- The Vermont Safety and Health Council
- Vermont Rural Water Association

As a result of the growth in commitments in FY 2016 mentioned above, the number of participants in VOSHA's outreach efforts has correspondingly increased. In FY 2016 VOSHA was responsible for a total of 85 outreaches. While the VOSHA Manager was still responsible for the majority of the outreaches (48), the Compliance Supervisor significantly increased his outreaches (16) with the remaining 21 outreaches being direct service of the VOSHA staff while involved in Operation Vigilant Guard activities.

It is difficult to quantify the exact numbers of those affected by these outreaches. However, VOSHA has counted 1,643 attendees and affected employees in formal outreaches not including Vigilant Guard activities. VOSHA estimates that the Vigilant Guard activities alone accounted for hundreds of participants.

For additional compliance assistance specialist (CAS) activities, VOSHA uses the services of Project WorkSAFE's administrative assistant for the dissemination of information to stakeholders, organizing training and outreach materials, and organizing information on the VOSHA website. VOSHA accounts for this staff member's time at a .1 full-time equivalent (FTE).

VOSHA continues its work in the Green Mountain Voluntary Protection Program (GMVPP). Though VOSHA expected to conduct two re-certifications at GMVPP sites, VOSHA had to postpone them because of the undertaking of Operation Vigilant Guard. However, VOSHA fully expects to conduct the two re-certifications that were postponed as well as two more that are due in FY 2017. In addition, VOSHA plans to conduct one new site visit in FY 2017. There are five employers that are now recognized as GMVPP STAR sites.

The GMVPP is still the only formal partnership program that VOSHA recognizes. As such, VOSHA places a high value on maintaining the integrity of this program. The VOSHA Program Manager, continues to manage this program.

In FY 2014 VOSHA submitted a new, five-year strategic plan; FY 2016 reflects the second year of performance in that plan.

In FY 2016 VOSHA continued efforts to submit rules for rulemaking. However, VOSHA encountered an unexpected difficulty with Lexis Nexis, the organization contracted by the State of Vermont to record new rules.

This difficulty revolved around a misunderstanding of the way in which rules are listed as being either a Part or Sub-Part of the standard. This resulted in rules being improperly deleted from listing. While VOSHA worked with the Vermont Secretary of State to resolve this issue, at least two rules (Silica in General Industry and Maritime as well as the rule to Improve Tracking of Injury and Illnesses) were delayed. VOSHA expects to submit these rules early in FY 2017. In addition, VOSHA expects to submit legislation to address OSHA's penalty changes. VOSHA intends to submit a reorganization of rules in FY 2017. This reorganization will accomplish the adoption of the Standards Improvement Project, Phase III.

Among the standards that were completed in FY 2016;

- \*Maritime, standards improvement as well as amendments, adoption 4/21/2016
- Confined Space in Construction, adoption 2/20/2016
- \*Amendments to the Steel Erection Standard, adoption 2/20/2016

Rules not currently adopted but expected in FY 2017, are as follows;

- \*Standards Improvement Project Phase III for Construction and General Industry, projected adoption 06/2017
- Improved tracking of injury and illnesses
- Silica exposure General industry, maritime, and Construction

(\* Denotes Standards which are classified as overdue for adoption in the 2014 FAME)

After a tumultuous 2014 and 2015, VOSHA began FY 2016 with 8 CSHOs (3 Health, 4 Safety and 1 Health/Safety) and 1 full time 11(c) Whistleblower investigator. However, VOSHA had to fill a mid-year safety CSHO vacancy, which was done prior to FY 2017. All vacant positions are currently filled. Still, VOSHA did anticipate some difficulty with changing of staff and the associated training. Knowing this, VOSHA requested a reduced number of inspections for FY 2016. The inspection goal was lowered from 350 to 300 total inspections. In fact, VOSHA was able to conduct a total of 393 inspections for FY 2016. This unexpected number was the result of a high level of experience and skill of the new staff, which allowed some to be assigned inspections at a higher than expected rate.

Of the 393 inspections conducted in FY 2016, 282 were classified as safety and 112 were classified as health. In the public sector, 30 inspections were completed, and 209 inspections were conducted in construction. Of a total of 584 violations issued FY 2016, 443 were classified as serious, and 141 were classified as other-than-serious.

	Projected FY2016			Actual FY2016		
	Safety	Health	Total	Safety	Health	Total
<b>TOTAL INSPECTIONS</b>	228	72	300	281	112	393
Private Sector	214	60	274	264	99	363
Public Sector	14	12	26	17	13	30
<b>TOTAL CONSTRUCTION INSPECTIONS</b>	160	20	180	180	29	209
Residential and Commercial Construction	85	5	90	167	28	195
Highway, Street, Bridge and Work Zones	20		20	13		13
Roofing	25		25	27		27
Residential Construction	30		30	27		27
Noise/Silica/Chrome VI/lead		15	15		13	13
<b>TOTAL NON-CONSTRUCTION INSPECTIONS</b>	80	40	120	101	83	184
Food Processing	2	3	5	4	2	6
Lumber and Wood Products	10	5	15	8	0	8
Targeted NAICS/SICs	15	10	25	3	9	12
Amputations	25		25	25		25
Combustible Dust		2	2		2	2
PSM		1	1		0	0
PIT	10		10	55		55
Public Sector	14	12	26	17	13	30
Granite/Concrete	4	6	10	5	4	9
Nursing Homes		1	1	1	3	4



In the tables below, VOSHA compares Calendar Year (CY) 2016 Total Case Incident (TCIR) rates to CY 2012 baseline DART rates.

It should be noted that FY 2016 represents the second year of performance in VOSHA's five-year strategic plan. As such, goals and objectives listed below will reflect those stated in this plan.

<b>STRATEGIC GOAL #1: Insure Workplaces are Safe and Healthy</b>		
<b>GOAL</b>	<b>FY2016 OUTCOME</b>	<b>COMMENT</b>
<b>Compliance Inspection Activities (Construction)</b>		
Performance Goal 1.1- By 2019 reduce the rate of workplace injuries and illnesses in construction by 15%, from 7.9 as recorded in baseline year 2012, to 6.7 by year 2019	<b>Goal still to be decided</b>	
Performance Goal 1.1a- Reduce workplace injuries and illnesses in construction by 6% in construction by (From 7.7 to 7.5 by the close of FY 2016, over 2012 BLS baseline)	<b>Goal was exceeded</b>	The Total Case Incident Rate (TCIR) for all of construction in Vermont for the reporting year, 2015 remained at 5.9.
Conduct 80 residential and commercial building inspections	<b>Goal was exceeded</b>	In FY 2016, VOSHA conducted 167 safety and 28 health inspections in this area for a total 195.
Conduct 20 highway, street and bridge construction inspections	<b>Goal was not met</b>	In FY 2016 VOSHA conducted 13 safety and 0 health inspections in this are for a total of 13.
Conduct 25 roofing inspections	<b>Goal was exceeded</b>	In FY 2016 VOSHA conducted a total of 27 inspections in roofing. All were safety related inspections
Conduct 30 inspections at worksites in Residential Construction	<b>Goal was not met</b>	In FY 2016 VOSHA conducted 27 safety related inspections in Residential Construction
Conduct 15 inspections for health related exposures in construction including Noise/Silica/Chromium VI/Lead	<b>Goal was not met</b>	In FY 2015, VOSHA 13 inspections related to noise, silica, chromium VI, or lead

<b>STRATEGIC GOAL #1: Insure Workplaces are Safe and Healthy CONTINUED</b>		
<b>GOAL</b>	<b>FY2016 OUTCOME</b>	<b>COMMENT</b>
<b>Compliance Inspection Activities (General Industry)</b>		
Performance Goal 1.2· By 2019, reduce the rate of workplace injuries and illnesses in general industry by 15%, from 6.4 as recorded in baseline year 2012, to 5.4 by year 2019	<b>Goal still to be decided</b>	
Performance Goal 1.2a· Reduce workplace injuries and illnesses in general industry by 6% (over 2012 BLS baseline of 6.2 to 6.01)	<b>Goal was exceeded</b>	The TCIR for General Industry for General Industry in Vermont for the reporting year of 2015 was 5.4
Conduct 5 food processing inspections	<b>Goal was exceeded</b>	In FY 2016, VOSHA conducted 4 safety and 2 health inspections, for a total of 6 inspections related to food processing.
Conduct 15 lumber and wood products manufacturing inspections	<b>Goal was not met</b>	In FY 2016, VOSHA conducted 8 safety and 0 health inspections for a total of 8 inspections, related to the lumber and wood products manufacturing.
Conduct 25 inspections where there are amputation hazards	<b>Goal was met</b>	In FY 2016, VOSHA conducted 25 safety inspections, related to amputation hazards.
Conduct 10 inspections in the granite and concrete industry	<b>Goal was not met</b>	In FY 2016, VOSHA conducted 5 safety and 4 health inspections related to concrete and granite for a total of 9
Conduct 25 inspections establishments	<b>Goal was not met</b>	In FY 2016, VOSHA conducted 3 safety and 9 health inspections in Targeted NAICS and SIC codes, for a total of 12 inspections

in targeted NAIC <sup>®</sup> /SIC <sup>®</sup>		
Conduct 26 Inspections of public sector worksites	<b>Goal was exceeded</b>	In FY 2016 VOSHA conducted 17 safety and 13 health inspections in public sector, for a total of 30 inspections
Conduct 10 workplaces where Powered Industrial Trucks (PIT <sup>®</sup> ) are in use	<b>Goal was exceeded</b>	In FY 2016 VOSHA conducted 55 inspections in work places where PIT <sup>®</sup> were in use.
Conduct 1 inspections of Nursing Homes	<b>Goal was exceeded</b>	In FY 2016 VOSHA conducted 1 safety and 3 health inspections of nursing homes.
Conduct 1 inspection of a site covered by the PSM standard.	<b>Goal was not met</b>	In FY 2016 VOSHA did not conduct inspections in work areas covered under PSM
Conduct 2 inspections in workplaces with combustible dust hazards.	<b>Goal was met</b>	In FY 2016 VOSHA conducted 2 health-related inspections in work areas covered under the combustible dust standard
<b>Strategic Goal #2: Improve workplace Safety and Health through compliance Assistance, Alliances and Partnerships</b>		
<b>Goal</b>	<b>FY 2016 Outcome</b>	<b>Comment</b>
Performance Goal 2.1- Maintain recognition of excellence in safety and health management through the Green Mountain VPP	<b>Goal was met</b>	In FY 2016 VOSHA continued to be active in supporting the current Green Mountain VPP sites, including conducting quarterly meetings with the sites, review of annual reports. Because of Operation Vigilant guard and the extensive <del>lead</del> up+activities, VOSHA was forced to postpone two site renewal visits until early FY 2017. These visits were accomplished in the first month of 2017.
Performance Goal 2.2- Maintain relationships with organizations that cover targeted, high hazard areas, through the	<b>Goal was met</b>	In FY 2016 VOSHA continued to service two active alliances. These alliances were with 1) Vermont Rural Water Association and 2) Vermont Safety and Health Council. VOSHA continues a vigorous relationship with these entities and conducted a number of outreaches in FY 2016.

VOSHA Alliance Program		
Performance Goal 2.3- Maintain a reduced schedule of service to Participants in VOSHA's outreach and training programs	<b>Goal was met</b>	In FY 2016 VOSHA conducted 85 outreaches affecting more than 600 employees/stakeholders. This number represents more than 100% of the outreach achieved when VOSHA employed a full time CAS.

Green Mountain Voluntary Protection Program

<b>Company</b>	<b>Status</b>	<b>Last Approval Date</b>	<b>New Renewal Date</b>	<b>Original Approval Date</b>
Ben & Jerry's	STAR	04/28/2011	*10/31/2016	10/22/2007
Energizer Battery/Bennington	STAR	4/18/2012	*10/10/2016	8/22/2007
GE Rutland	STAR/Renewal	1/22/2015	01/22/2020	5/16/2006
IBM	STAR	2/28/2012	2/28/2017	7/14/2008
Curtis Lumber/Burlington	STAR	12/27/2013	12/27/2016	12/27/2013
Peckham Industries	Challenge			

\* Denotes on site conducted

**Alliances**

<b>Company or organization</b>	<b>Status</b>	<b>Date signed</b>
Vermont Rural Water	Active	11/15/2013
Vermont Safety and Health Council	Active	06/29/2015

## PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENT

Vermont BLS TCIR rates for the period 2015 . 2019 have been reduced for all NAICS divisions as follows:

Year	All	Private sector	Manufacturing	Construction	Public sector
2012 (baseline)	5.1	5.0	6.4	7.9	5.6
2015	5.1	5.0	6.0	5.9	5.3
2016	4.6	4.6	5.4	5.9	5.0
2017					
2018					
2019					
<b>Percent reduction from baseline year 2012</b>					
	-0%	-8%	-16%	-25.32%	-10.7%

FY 2016 was a good year for VOSHA; the staff completed the training courses required by OSHA's training directive, and there was an increase in inspection numbers and the quality of inspections. Hazard recognition has been improving as well as case writing skills. VOSHA also made a significant investment of funds in the upgrade of both industrial hygiene and safety equipment for the CSHOs. While VOSHA did experience the resignation of a senior CSHO, the Plan was able to fill the position.

In FY 2016, the VOSHA staffing pattern remains as it was in 2015. All training for the newly added CSHOs went as scheduled and most are ahead of the timeframe to accomplish the required minimum OSHA training Institute Courses. In addition, VOSHA added a number of technical courses.

VOSHA was offered the opportunity to partake in Operation Vigilant Guard in July of 2016. This activity was a joint response, simulated statewide emergency drill. The agencies involved with the drill were the Vermont National Guard, the State of Vermont (and its varying agencies) as well as Local Emergency Planning Committees (LEPCs) and their associated emergency response entities (fire departments, rescue services, HAZMAT response, etc.) and finally a number of hospital facilities. In anticipation of this event VOSHA took the opportunity to upgrade CSHO training as well as equipment capabilities. VOSHA trained all CSHOs in the HAZWOPER 40-hour Operations course as well as FEMA Incident Command. VOSHA also upgraded PPE to include Powered Air Purifying Respirators (PAPR) for CSHOs.

Operation Vigilant Guard was an important opportunity for VOSHA in five major areas:

- A) It was a chance for VOSHA to integrate the lessons learned from the last statewide emergency . Tropical Storm Irene, August 2011 . and test VOSHA's ability to fulfill an obligation to the state emergency response network as a consultative safety and health outreach service, for those emergency services responding/rebuilding in the event of a statewide emergency.
- B) It was a chance to fulfill VOSHA's formal obligation as %Safety Liaison to the Emergency Operations Manager+at the State Emergency Operations Center (SEOC).
- C) It was a chance to provide CSHOs with simulated emergency scenarios in which they could use their safety and health expertise in Incident Command Structures, working directly with and under the command of Incident Commanders.
- D) It was a chance for the various emergency response networks to meet VOSHA's CSHOs in a consultative role and understand VOSHA's mission in an actual statewide emergency.

- E) Finally, it was a chance to actually provide safety and health advice at the various play+ locations and activities. As an example, VOSHA deployed four digital Wet Bulb Globe Thermometers (WBGT) units around the state to monitor heat and heat illness. In at least one occasion, the CSHO halted an activity and worked with the incident commander collaboratively to set up a rest/shade/hydration schedule to insure no overexposures were realized.

Because of the professionalism of the staff and CSHOs of VOSHA, the State Plan was able to accomplish all the planned training, plus engage in Operation Vigilant Guard and conduct 393 inspections, which is 93 more than the projected goal in the FY 2016 grant application.

In FY 2016 the VOSHA 11(c) Whistleblower program screened 61 complaints, opened 13 new cases, and closed 16 cases (of those closed 13 cases were dismissed, 1 case was withdrawn and 2 cases were settled). As of this writing, VOSHA currently has 8 open 11(c) Whistleblower cases.

In FY 2016, VOSHA continued to perform the CAS/Green Mountain VPP functions, primarily from the manager and supervisor positions and Consultation Administrative positions. As discussed above, VOSHA conducted a total of 85 outreaches. The amount of outreaches accounts for the performance of a full-time CAS.

Though there were two GMVPP re-certifications scheduled for FY 2016, VOSHA was forced to postpone them in light of the activities leading up to, and involving, Operation Vigilant Guard. VOSHA rescheduled the re-certifications for early FY 2017 and as of this writing has completed the on-site evaluations. In addition, VOSHA anticipates two more on site re-certifications in FY 2017, and one new application (VOSHA is currently reviewing this application).

#### State Internal Evaluation Plan (SIEP)

VOSHA continues to work on changes to the SIEP with the plan of implementing them in FY 2017, as identified in the FY 2014 SOAR.