

ILLINOIS DEPARTMENT OF LABOR

# STATE OF ILLINOIS

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## ILLINOIS OSHA

FY 2024 State OSHA Annual Report (SOAR)

October 1, 2023 through September 30, 2024

**JB Pritzker**  
**Governor**

**Jane R. Flanagan**  
**Director**



**ILLINOIS DEPARTMENT OF LABOR STATE PLAN  
FFY 2024 STATE OSHA ANNUAL REPORT**

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## EXECUTIVE SUMMARY

The Illinois Department of Labor (IDOL) Division of Occupational Safety and Health (IL OSHA) submits this State OSHA Annual Report (SOAR) to the federal Occupational Safety and Health Administration (OSHA). The SOAR covers activity from October 1, 2023, through September 30, 2024. This submission is in accordance with federal OSHA Instruction: State Plan Policies and Procedures Manual dated May 6, 2020.

In FY 2024, IL OSHA continued to reduce the number of vacancies that have created problems and challenges in several areas, including past funding deobligations, unmet inspection goals, and failure to complete the final developmental step necessary to become a certified state plan.

Authorized staffing levels for the 23(g) program include a Division Chief, two Regional Enforcement Managers, two Consultation Supervisors, one Administrative Assistant, one Office Associate, 11 Public Safety Inspectors, three Industrial Hygienists, two Safety Consultants, three Industrial Hygiene Consultants, an Occupational Safety and Health (OSH) Coordinator, and a Marketing and Outreach Coordinator. At the end of FY 2024, there were only three full-time vacant positions (Public Safety Inspectors). IL OSHA remains committed to filling all vacant positions subject to stable and proportional federal funding.

During FY 2024, inspectors met 86% of the planned inspections (411 of 480), exceeded the number of planned health inspections (128 of 96), responded to six work-related fatalities, attended at least one training course each, and trained many employers and employees on critical topics with a focus on “lessons identified become lessons learned.” Additionally, IL OSHA met and, in some instances, exceeded most State Plan Activity Mandated Measures (SAMMs).

In FY 2024 the whistleblower program continued to improve under the supervision of the Division’s Occupational Safety and Health (OSH) Coordinator. The Division also referred a whistleblower case to the Illinois Office of the Attorney General’s Special Litigation Division for court enforcement, after our administrative investigation substantiated the allegations of retaliation against a whistleblower.

Most importantly, on February 28, 2024, IL OSHA submitted its certification application to OSHA. IL OSHA looks forward to becoming the 27<sup>th</sup> certified state plan.

## STATE PLAN OVERVIEW

IL OSHA operates a state and local government only developmental state plan that is pending certification. The Division Chief of IL OSHA administers the Illinois State Plan under the leadership of the Director of IDOL. IL OSHA enforces safety and health standards in state and local government workplaces, provides consultation services, investigates occupational safety and health whistleblower complaints, adopts “at least as effective as” federal OSHA standards, and provides outreach services. Federal OSHA enforces private-sector safety and health standards in Illinois.

On September 1, 2009, IDOL received developmental State and Local Government Plan approval (see 74 Fed. Reg. 45114, 2009) to establish all structural elements necessary to be deemed effective. IL OSHA submitted application for certification on February 28, 2024.

The constituency covered under the Illinois Occupational Safety and Health Act includes over 8,500 units of state and local government<sup>1</sup> with an estimated 742,351 state and local government employees in Illinois.<sup>2</sup>

IL OSHA’s organizational structure is on page four. The program continues to further its mission of providing safe and healthful workplaces for all state and local government employees in Illinois through program areas that include:

Administration - Responsible for the overall operation of the IL OSHA program and for policy decisions.

Safety and health compliance - Responsible for safety and health enforcement activities within state and local government establishments/operations.

Safety and health consultation - Responsible for providing safety and health consultation services to state and local government employers (23(g)) and private-sector employers (21(d)).

Standards - Responsible for adoption and distribution of federal OSHA standards.

Discrimination - Responsible for investigation of whistleblower protected activities under section 11(c) of the OSH Act (Section 110 of IL OSH Act) as they relate to state and local government employee discrimination.

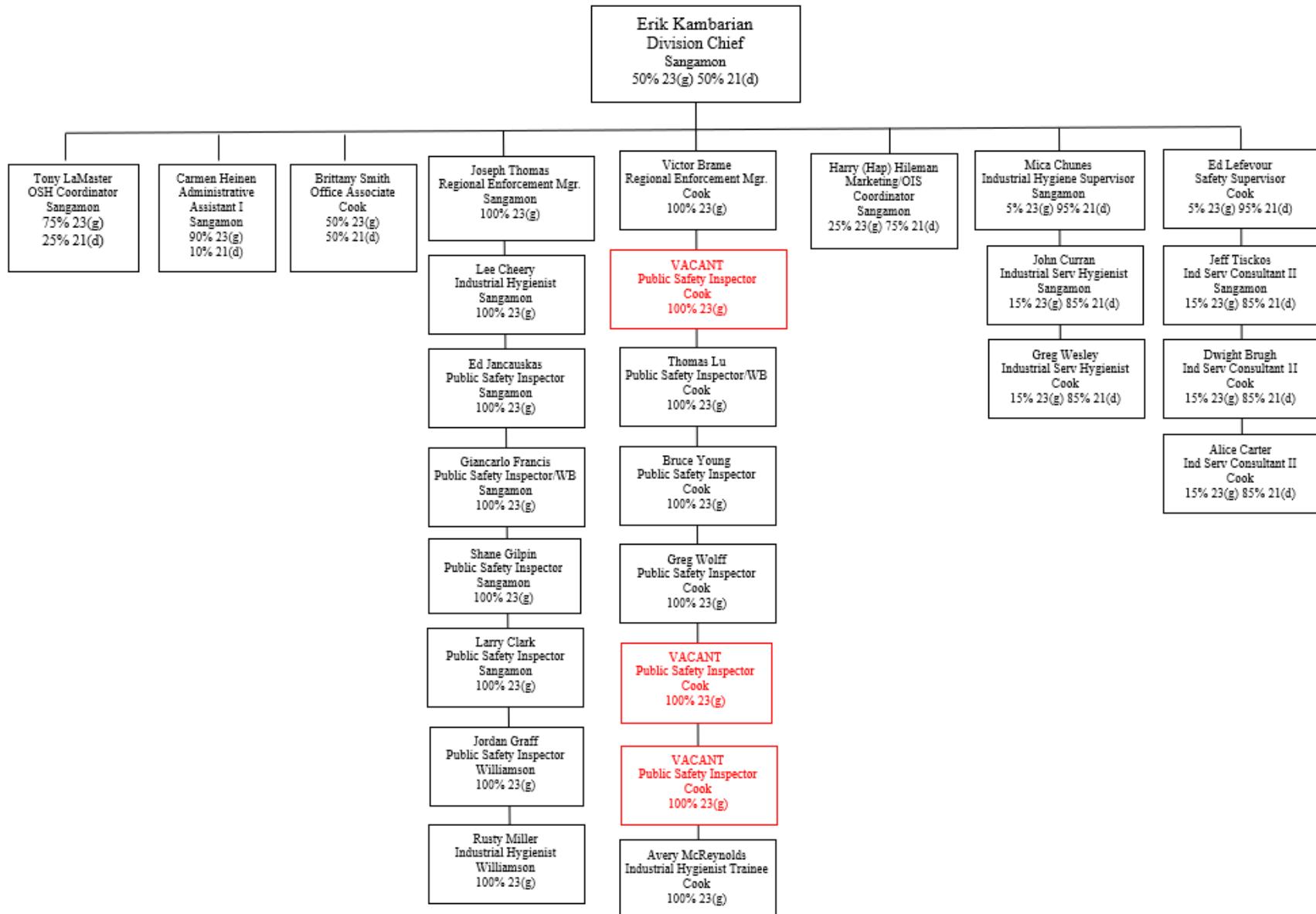
Training - Responsible for providing training to state and local government employers and employees, developing training materials, and ensuring safety and health inspectors/consultants are fully trained.

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<sup>1</sup>Source: Illinois Office of the Comptroller, September 2023.

<sup>2</sup> US Census Public Sector Annual Surveys and Census of Governments 2022.

## ILLINOIS OSHA END FY 2024 ORGANIZATIONAL CHART



## SUMMARY OF ANNUAL PERFORMANCE PLAN RESULTS

<b>Strategic Goal #1: Improve workplace safety and health in Illinois state and local government workplaces.</b>	
<b>Annual Performance Goal # 1.1</b>	Reduce the number of injuries and fatalities in the targeted high-hazard industries that are prone to serious safety hazards identified in federal OSHA's emphasis programs (trenching, excavations, and fall hazards associated with working at height).
<b>Strategy</b>	<p>Conduct safety-related inspections in the targeted high-hazard industries.</p> <ul style="list-style-type: none"> <li>• 237310 Highway, Street, and Bridge Construction</li> <li>• 922160 Fire Protection</li> <li>• 221310 Water Supply and Irrigation Systems</li> <li>• 221320 Sewage Treatment Facilities</li> </ul>
<b>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</b>	<p><b>Baseline Average Activity Measures:</b></p> <ul style="list-style-type: none"> <li>• 122 serious safety violations abated in NAICS 237310</li> <li>• 68 serious safety violations abated in NAICS 922160</li> <li>• 65 serious safety violations abated in NAICS 221310 and 221320</li> </ul> <p><b>Intermediate Outcome:</b> By the end of FY 2024, increase the number of serious safety violations abated in the targeted high-hazard industries (NAICS 237310, 922160, 221310 and 221320) by 12% over the baseline average.</p> <p><b>Primary Outcome Measure:</b> By the end of the five-year strategic plan, increase the number of serious safety violations abated in the targeted high-hazard industries (NAICS 237310, 922160, 221310 and 221320) by 15% over the baseline average.</p>
<b>FY 2024 Results</b>	<ul style="list-style-type: none"> <li>• 290 serious safety violations abated in NAICS 237310</li> <li>• 149 serious safety violations abated in NAICS 922160</li> <li>• 111 serious safety violations abated in NAICS 221310 and 221320</li> </ul>
<b>Conclusion</b>	IL OSHA exceeded this activity measure in FY 2024. Baseline: 255    FY24: 550    116% over baseline average

## SUMMARY ANNUAL PERFORMANCE PLAN RESULTS

<b>Annual Performance Goal # 1.2</b>	Reduce the number of illnesses and fatalities in the targeted high-hazard workplaces that are prone to serious health hazards identified in federal OSHA's emphasis programs (lead, silica hexavalent chromium, respiratory protection, hazard communication, metals, asbestos, noise, bloodborne pathogens and airborne and surface contaminants)
<b>Strategy</b>	<p>Conduct health-related inspections in the targeted high-hazard hazard industries.</p> <ul style="list-style-type: none"> <li>• 237310 Highway, Street, and Bridge Construction</li> <li>• 922160 Fire Protection</li> <li>• 221310 Water Supply and Irrigation Systems</li> <li>• 221320 Sewage Treatment Facilities</li> </ul>
<b>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</b>	<p><b>Baseline Average Activity Measures:</b></p> <ul style="list-style-type: none"> <li>• 13 serious health violations abated in NAICS 237310</li> <li>• 7 serious health violations abated in NAICS 922160</li> <li>• 6 serious health violations abated in NAICS 221310 and 221320</li> </ul> <p><b>Intermediate Outcome:</b> By the end of FY 2024, increase the number of serious health violations abated in the targeted high-hazard industries (NAICS 237310, 922160, 221310 and 221320) by 12% over the baseline average.</p> <p><b>Primary Outcome Measure:</b> By the end of the five-year strategic plan, increase the number of serious health violations abated in the targeted high-hazard industries (NAICS 237310, 922160, 221310 and 221320) by 15% over the baseline average.</p>
<b>FY 2024 Results</b>	<ul style="list-style-type: none"> <li>• 46 serious health violations abated in NAICS 237310</li> <li>• 117 serious health violations abated in NAICS 922160</li> <li>• 43 serious health violations abated in NAICS 221310 and 221320</li> </ul>
<b>Conclusion</b>	IL OSHA exceeded this activity measure in FY 2024. Baseline: 26    FY24: 206    692% over baseline average

## SUMMARY ANNUAL PERFORMANCE PLAN RESULTS

<b>Strategic Goal #2: Promote a safety and health culture in Illinois state and local government workforce.</b>	
<b>Annual Performance Goal # 2.1</b>	<p>Increase knowledge of hazard awareness and prevention to reduce injuries, illnesses, and fatalities.</p>
<b>Strategy</b>	<p>Conduct compliance assistance activities for targeted high hazard industries.</p> <ul style="list-style-type: none"> <li>• 237310 Highway, Street, and Bridge Construction</li> <li>• 922160 Fire Protection</li> <li>• 221310 Water Supply and Irrigation Systems</li> <li>• 221320 Sewage Treatment Facilities</li> </ul> <ul style="list-style-type: none"> <li>• Develop training programs for employers and employees in the targeted high-hazard industries.</li> <li>• Advertise and promote IL OSHA's training programs.</li> <li>• Post training schedules and other training-related information on IL OSHA's website.</li> <li>• Network with stakeholders and alliance partners to market training sessions.</li> </ul>
<b>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</b>	<p><b>Baseline Activity Measures:</b> Number of employers and employees trained in the targeted high-hazard industries in FY21 (NAICS 237310: 280, 922160: 326, 221310: 212 and 221320: 236).</p> <p><b>Intermediate Outcome:</b> By the end of FY 2024, increase the number of employers and employees trained in the targeted high- hazard industries (NAICS 237310, 922160, 221310 and 221320) by 12% over the baseline average.</p> <p><b>Primary Outcome Measure:</b> By the end of the five-year strategic plan, increase the number of employers and employees trained in the targeted high-hazard industries (NAICS 237310, 922160, 221310 and 221320) by 15% over the baseline average.</p>
<b>FY 2024 Results</b>	IL OSHA performed 26 compliance assistance activities directly reaching 1,589 participants. See pages 11-13 for a detailed list.
<b>Conclusion</b>	IL OSHA met this activity measure for FY 2024 achieving 35% over the baseline average.

## SUMMARY ANNUAL PERFORMANCE PLAN RESULTS

<b>Annual Performance Goal # 2.2</b>	Promote state and local government employer and employee awareness of and commitment to active participation in safety and health.
<b>Strategy</b>	100% of safety and health inspections will include employee involvement and 100% of consultation visits will include site-specific recommendations to improve the safety and health program management system at that facility.
<b>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</b>	<p><b>Activity Measures:</b></p> <ul style="list-style-type: none"> <li>• 100% of safety and health inspections where employees were included.</li> <li>• 100% of consultation visits that included site-specific recommendations.</li> </ul> <p><b>Intermediate Outcome:</b> Use OIS to track and verify 100% of safety and health inspections include employee involvement and 100% of consultation visits include site-specific recommendations.</p> <p><b>Primary Outcome Measure:</b> 100% of safety and health inspections will include employee involvement and 100% of consultation visits will include site-specific recommendations.</p>
<b>FY 2024 Results</b>	<ul style="list-style-type: none"> <li>• 100% of safety and health inspections included employee involvement.</li> <li>• 38 consultation visits that included site-specific recommendations.</li> </ul>
<b>Conclusion</b>	IL OSHA met this activity measure for FY 2024.

## SUMMARY ANNUAL PERFORMANCE PLAN RESULTS

<b>Strategic Goal #3: Strengthen public confidence through excellence in development and delivery of IL OSHA programs and services.</b>	
<b>Annual Performance Goal # 3.1</b>	Respond to legal mandates (adoptions) so Illinois state and local government employees are provided full protection under the Illinois Occupational Safety and Health Act.
<b>Strategy</b>	Investigate 100% of events that result in a fatality or catastrophe as defined in the IL FOM as a result of a work-related incident of a state or local government employee within one business day. Note: the definition of a catastrophe was revised effective October 1, 2023.
<b>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</b>	<p><b><u>Activity Measures:</u></b> Number of fatalities, or catastrophes, as a result of a work-related incident.</p> <p><b><u>Intermediate Outcome:</u></b> Use OIS to track 100% of events that result in a fatality or catastrophe as defined in the IL FOM as a result of a work-related incident of a state or local government employee within one business day.</p> <p><b><u>Primary Outcome Measure:</u></b> Investigate 100% of events that result in a fatality or catastrophe as defined in the IL FOM as a result of a work-related incident of a state or local government employee within one business day.</p>
<b>FY 2024 Results</b>	Responded to six out of six work-related fatalities/catastrophes within one business day.
<b>Conclusion</b>	IL OSHA met this activity measure for FY 2024.

## SUMMARY ANNUAL PERFORMANCE PLAN RESULTS

<b>Annual Performance Goal # 3.2</b>	<p>Strengthen the technical and professional skills of IL OSHA's safety and health inspectors.</p>
<b>Strategy</b>	<ul style="list-style-type: none"> <li>• Managers will develop an annual training plan for staff.</li> <li>• On a quarterly basis, managers will review each staff member's training history and will identify areas where training would be beneficial.</li> <li>• Managers will provide information on courses offered by OSHA and the OSHA Training Institute, alliance partners, and other organizations, and encourage enrollment in these training opportunities where appropriate.</li> </ul>
<b>Performance Indicator(s) (including activity, intermediate outcome, and primary outcome measures)</b>	<p><b>Activity:</b> Each inspector and consultant will complete one training course on topics pertaining to safety and/or health in the targeted high-hazard industries.</p> <p><b>Intermediate Outcome:</b> By the end of FY 2024, each staff member will have completed at least three training courses.</p> <p><b>Primary Outcome Measure:</b> By the end of the five-year strategic plan, each staff member will have completed five training courses.</p>
<b>FY 2024 Results</b>	<p>All staff members attended at least one of the following trainings at or through the OSHA Training Institute (OTI) or other approved training courses:</p> <ul style="list-style-type: none"> <li>• OTI 1000 Initial Compliance</li> <li>• OTI 1050 Intro to Safety Standards for Safety Officers</li> <li>• OTI 1231 Accident/Incident Investigation</li> <li>• OTI 1241 Introduction to Health Standards</li> <li>• OTI 1260 Health Inspection Fundamentals</li> <li>• OTI 1310 Investigative Interviewing Techniques</li> <li>• OTI 1410 Inspection Techniques and Legal Aspects</li> <li>• OTI 1421 Whistleblower Investigation Fundamentals</li> <li>• OTI 9450 Advanced Legal Aspects for OSHA Managers</li> </ul>
<b>Conclusion</b>	IL OSHA met this activity measure for FY 2024.

## PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENTS

In FY 2024, IL OSHA achieved 86% of the projected inspections and 190% of the state and local government consultation visits.

### FY 2024 State and Local Government Inspections

	FY 2024 Projections*	FY 2024 Actuals	Percent of Goal Achieved
Safety	384	283	74%
Health	96	128	133%
Total	480	411	86%

*\*This assumes a fully staffed and fully trained staff, with 40 available work weeks in the year, and an average of 1.25 inspections per week per Safety/Health Inspector and is based on previous work experience and history.*

### FY 2024 State and Local Government Consultation Visits

	FY 2024 Projections	FY 2024 Actuals	Percent of Goal Achieved
Safety	13	23	177%
Health	7	15	214%
Total	20	38	190%

IL OSHA has four public sector employers that currently have Safety and Health Achievement Recognition Program (SHARP) status. For FY 2024, the goal was to maintain public sector employers currently in the program. In FY 2025, IL OSHA will strive to add one more public sector employer to the program.

To promote state and local government employer and employee awareness of and commitment to safety and health, IL OSHA conducted 26 compliance assistance and outreach activities in FY 2024. Outreach activities such as webinars, conference presentations, press releases, interviews, attendance at events, and informal worksite training resulted in 1,589 outreach participants.

### FY 2024 State and Local Government Compliance Assistance

	FY 2024 Projections	FY 2024 Actuals	Percent of Goal Achieved
SHARP Participants	0	4	100%
Outreach Participants*	1180	1,589	135%

*\*Outreach participants are the total number of trainees/participants anticipated to be affected by state outreach activities during the period, such as formal training, workshops, seminars, speeches, conferences, and informal worksite training*

- October 18, 2023 – Conducted outreach training at the Illinois Rural Water Association Northern Conference. 40 participants attended the training, representing 35 employers with 525 employees.
- October 29, 2023 – Conducted outreach training at the Illinois Firefighters Association Conference. 12 participants attended the training, representing 10 fire departments with 225 employees.

- December 5, 2023 – Conducted outreach training at a meeting of Metro-East Illinois fire departments. 30 participants attended the training, representing 20 fire departments with 660 employees.
- December 21, 2023 – Conducted outreach training at the Illinois Society of Fire Service Instructors Training Program Manager Course. 20 participants attended the training, representing 16 fire departments with 320 employees.
- January 19, 2023 – Conducted outreach training at the Illinois Fire Chief's Volunteer and Combination Officer Conference. 30 participants attended the training, representing 25 fire departments with 400 employees.
- February 13, 2024 – Conducted outreach training at a fire science class provided by Lewis and Clark Community College. 12 participants attended the training, representing 8 fire departments with 120 employees.
- February 15, 2024 – Conducted outreach training at Troy Fire Protection District. 25 firefighters attended the training, representing 2 fire departments with 75 employees.
- February 17, 2024 – Conducted outreach training at the Illinois Association of Fire Protection District Winter Conference with 200 fire service members in attendance representing 100 fire departments with 2,500 employees.
- February 20, 2024 – Conducted outreach training at the Mutual Aid Box Alarm System Command Conference with 200 fire service members in attendance representing 125 fire departments with 7,500 employees.
- February 21, 2024 – Conducted outreach training at the Illinois Rural Water Association Conference with 200 members in attendance representing 150 employers and 1,000 employees.
- March 6, 2024 – Conducted outreach training at Princeton Fire Department. 47 firefighters attended the training, representing 18 fire departments with 400 employees.
- March 7, 2024 – Conducted outreach training at regional meeting hosted by Illinois Rural Water Association. 14 participants attended the training, representing 7 employers with 60 employees.
- March 8, 2024 – Conducted outreach training with the Illinois Municipal League Risk Management Association. Four loss control specialists attended the training, representing 700 public sector employers in Illinois.
- March 19, 2024 – Conducted outreach training at the Illinois Wastewater Professionals Conference. 15 participants attended the training, representing 12 employers with 120 employees.

- April 9, 2024 – Conducted outreach training at the Office of the State Fire Marshal Fire Advisory Commission meeting. 20 fire service leaders attended the training, representing 15 fire departments with 6,000 employees.
- May 2, 2024 – Conducted outreach training at the Midwest Hazardous Materials Conference. 28 firefighters attended the training, representing 20 employers with 750 employees.
- May 6, 2024 – Conducted outreach training at a Fire Officer Training Program Manager course. 20 firefighters attended the training, representing 16 fire departments with 900 employees.
- May 14, 2024 – Conducted outreach training at the Illinois Association of County Engineers Conference. 100 participants attended the training, representing 60 highway departments with 700 employees.
- May 18, 2024 – Conducted outreach training at the Office of the State Fire Marshal Training Officer Boot Camp. 60 firefighters attended the training, representing 48 fire departments with 6,000 employees.
- May 21, 2024 – Conducted outreach training at the Associated Firefighters of Illinois Legislative Conference. 250 firefighters attended the training, representing 180 fire departments with 10,000 employees.
- May 22, 2024 – Conducted outreach training at the Illinois Fire Service Institute Leadership Development and Decision Making course. 30 firefighters attended the training, representing 25 fire departments with 1,100 employees.
- July 22, 2024 – Conducted outreach training at Staunton Fire Protection District. 20 firefighters attended the training, representing one fire department with 40 employees.
- July 25, 2024 – Conducted training at the St. Clair County Fire Chief's Association meeting. 30 fire chiefs attended the training, representing 25 fire departments with 500 employees.
- September 12, 2024 – Conducted outreach training for public sector employers in the metro east. 75 participants attended the training, representing 19 public employers with 1,200 employees.
- September 18, 2024 – Conducted outreach training at the Illinois Fire Service Conference. 75 fire service leaders attended the training, representing 60 fire departments with 2,500 employees.
- September 27, 2024 – Conducted outreach training at the Illinois Firefighters Association Down and Dirty Conference. 40 firefighters attended the training, representing 18 fire departments with 450 employees.

## MANDATED ACTIVITES

Activities mandated under the OSHA state plan program are considered core elements of IL OSHA's occupational safety and health program. Mandated activities are tracked on a quarterly basis using the State Activities Measures (SAMMs) Report in OIS which compares state activity data to an established reference point. In FY 2024, IL OSHA met (or exceeded) almost all mandated activity measures.

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)				
IL OSHA		FY 2024		
SAMM Number	SAMM Name	IL OSHA FY 2024 Results	Further Review Level (FRL)	Conclusion
1a	Average number of workdays to initiate complaint inspections (state formula)	4.27 days	5 days for safety; 10 days for health	Met.
2a	Average number of workdays to initiate complaint investigations (state formula)	1.49 days	3 days	Met.
3	Percent of complaints and referrals responded to within one workday (imminent danger)	N/A	100%	N/A – IL OSHA did not receive any imminent danger complaints or referrals in FY 2024.
4	Number of denials where entry not obtained	0	0	IL OSHA was not denied entry in FY 2024.
5	Average number of violations per inspection with violations by violation type	SWRU: 2.76	+/- 20% of National SWRU: 1.73	IL OSHA exceeded the average number SWRU violations per inspection indicating that the enforcement program is appropriately assigning limited inspection resources to high-hazard establishments.
		Other: 1.05	+/- 20% of National Other: 0.97	

Occupational Safety and Health Administration State Plan Activity Mandated Measures (SAMMs)				
IL OSHA		FY 2024		
SAMM Number	SAMM Name	IL OSHA FY 2024 Results	Further Review Level (FRL)	Conclusion
6	Percent of total inspections in state and local government workplaces	100%	100%	Met.
7	Planned v. actual inspections – safety/health	S: 283	+/- 5% of S: 384	IL OSHA did not meet safety planned v. actual inspections in FY 2024. This is largely due to a staffing shortage of inspectors.
		H: 128	+/- 5% of H: 96	IL OSHA exceeded the health planned v. actual inspections in FY 2024. This is due to a focused effort on health hazards.
8	Private sector penalty measure	N/A	N/A	N/A
9	Percent in compliance	S: 14.46%	+/- 20% of S: 34.43%	IL OSHA met or exceeded this activity measure indicating that inspection resources are appropriately focused on high-hazard establishments.
		H: 36.28%	+/- 20% of H: 46.14%	
10	Percent of work-related fatalities responded to in one workday	100%	100%	Met.
11	Average lapse time	S: 40.98 days	+/- 20% of S: 56.19	IL OSHA exceeded this activity measure. Fully electronic case files and enforcement manager supervision facilitates a quick turnaround that reduces time employees are exposed to known existing hazards.
		H: 44.19 days	+/- 20% of H: 68.23	
12	Percent penalty retained	N/A	+/- 15% of 70.53%	N/A
13	Percent of initial inspections with worker walk around representation or worker interview	100%	100%	Met.

State Plan Whistleblower Measures		
<b>IL OSHA</b>		FY 2024
<i>Metric</i>	<i>IL OSHA FY 2024 Results</i>	<i>Report Source</i>
Percent of 11(c) investigations completed within 90 days	0%	WB Performance Measures – State Plan Investigation Data
Percent of 11(c) complaints that are meritorious	20%	WB Investigation Summary
Average number of calendar days to complete an 11(c) investigation	566	WB Performance Measures – State Plan Investigation Data

