

# MIOSHA

Construction Safety and Health Division (CSHD)  
Michigan Occupational Safety and Health Administration (MIOSHA)  
Department of Labor and Economic Opportunity (LEO)

## DIVISION INSTRUCTION

DOCUMENT IDENTIFIER:

CSHD-COM-09-1R5

DATE:

July 31, 2024

### **SUBJECT: Construction Inspection Targeting**

- I. Purpose. This instruction establishes the Michigan Occupational Safety and Health Administration (MIOSHA), Construction Safety and Health Division (CSHD) programmed inspection targeting plan for the construction industry.
- II. Scope. This instruction applies to MIOSHA CSHD field enforcement operations.
- III. References.
  - A. Agency Instruction MIOSHA-STD-23-2, Fall Prevention National Emphasis Program (NEP), as amended.
  - B. Asbestos Abatement Contractors Licensing Act, MCL 338.3101 et seq., P.A. 135 of 1986, as amended.
  - C. MIOSHA Field Operations Manual, as amended (FOM).
  - D. MIOSHA Strategic Plan FY 2024-2028 Summary, Emphasis 1.3 and 1.4.
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Next Review Date. This instruction will be reviewed three years from date of issuance.
- VI. Cancellations. All previous versions of this division instruction.
- VII. History. History of previous versions include:

CSHD-COM-09-1R4, November 12, 2020  
CSHD-COM-09-1R3, June 15, 2016  
CSHD-COM-09-1R2, September 14, 2015  
CSHD-COM-09-1R1, October 30, 2012  
CSHD-COM-09-1, October 5, 2009
- VIII. Contact. Lawrence Hidalgo, Jr., Director
- IX. Originator. Lawrence Hidalgo, Jr., Director
- X. Background.
  - A. Because of the transitory nature of construction worksites, and the fact that construction worksites frequently involve more than one construction employer, inspections are selected from a list of construction worksites rather than a list of construction employers. Inspections can also be conducted based on a safety officer/industrial hygienist (SO/IH) identifying construction projects that are viewed while traveling in their work areas. Inspections of worksites which are conducted based upon objective or random selection criteria are programmed.

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- B. The current system for scheduling random inspections in the construction industry uses national data on anticipated or active construction projects from F.W. Dodge and selects projects for inspection using a model developed by the University of Tennessee and currently administered by the federal Occupational Safety and Health Administration (OSHA) Office of Statistical Analysis.
  - C. MIOSHA CSHD receives a monthly list of inspection targets from an OSHA contractor (currently the Eastern Research Group) that are selected at random by the model. This list is referred to as the “Dodge report.”
  - D. The Dodge report is designed to provide timely information on known active construction projects, including the project's location and the name of the owners, project managers, and contractors working on the projects. See [Section XIII.A.](#) of this instruction for OSHA Information System (OIS) Coding required for these inspections.
  - E. The CSHD construction inspection targeting plan also relies on building permits. SOs/IHs may stop at state and local governmental agencies that issue building permits and request to see/obtain a copy of their building permits list. The SOs/IHs should select those projects for inspecting that do not appear on the Dodge report. See [Section XIV.C.](#) of this instruction for OIS Coding required for these inspections.
  - F. Specifically identified hazards or a narrow range of construction activities are addressed by other MIOSHA targeting systems like state emphasis programs or special initiatives (e.g., Agency Instruction MIOSHA-STD-23-2, Fall Prevention National Emphasis Program (NEP), as amended).
- XI. Significant Changes.
- A. Updated the referenced documents and hyperlinks in the Reference section. See Section III. References.
  - B. Updated the Background language with the following changes.
    - 1. Deleted language, “the mobility of the construction industry” and added language, “Inspections can also be conducted based on a safety officer/industrial hygienist (SO/IH) identifying construction projects that are viewed while traveling in their work areas. Inspections of worksites which are conducted based upon objective or random selection criteria are programmed.” See Section X. Background, A.
    - 2. Added language, “This list is referred to as the Dodge report.” See Section X. Background, C.
    - 3. Added language, “See [Section XIII. A.](#) of this instruction for OSHA Information System (OIS) Coding required for these inspections.” See Section X. Background, D.
    - 4. Added language, “See [Section XIV.C.](#) of this instruction for OIS Coding required for these inspections.” See Section X. Background, E.

5. Moved language from the old E, “Specifically identified hazards or a narrow range of construction activities are addressed by other MIOSHA targeting systems like state emphasis programs or special initiatives.” See X. Background, F.
  6. Deleted language referencing an expired agency instruction used as an example. Added language, “(e.g., Agency Instruction MIOSHA-STD-23-2, Fall Prevention National Emphasis Program (NEP), as amended).” See X. Background, E.
- C. Moved language from the field staff to the Dodge report coordinator, 1. The Dodge database can be used either when connected to the S-: drive (central application) or on field staff computers (local application). The local application will allow the user to look at a three-month window of any new or open projects downloaded to their computer for the state without being connected to the S: drive. The SO/IH may opt to use the Excel sheet solely; and 2. The database search function allows staff to search by address, optional reporting number, and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the state. This information can be further narrowed by looking through the records manually on either the local application or the central application when connected to the S: drive. See XII. Dodge Database, A. Dodge Report Coordinator (DRC).
- D. Added language, “who have been provided a username and password may” to 1. Field staff who have been provided a username and password may access the S: drive at least once each month and download (refresh each month) the Dodge reports to their computers when notified by the DRC. See Section XII. Dodge Database, B. Field Staff, 1.
- E. Deleted language, “4. Field staff will search the jobsite address for each inspection in the Dodge database or Excel sheet provided, prior to submitting in OIS to ascertain if a Dodge Report number has been assigned. If found in the search, the Dodge report number will be entered in OIS as state code S-518.” See Section XII. Dodge Database, B. Field Staff.
- F. Updated language, “as its original work area” with “based on its actual geographical location” to read, “Any inspection conducted outside of an assigned work area will be documented based on its actual geographical location.” See Section XII. Dodge Database, B. Field Staff, 3.
- G. Added language, “SOs/IHs in CSHD can conduct on-site inspections based on identifying construction projects in their assigned areas using the Dodge report.” Moved language, “Safety field staff should inspect a minimum of two Dodge report projects in their area each month.” Added language, “The SO/IH shall enter optional codes “S-518” and “CTARGET” into OIS for these inspections.” See Section XII. Dodge Database, B. Field Staff, 4.
- H. Modified language in Section A and added new language to read, “SOs/IHs in CSHD can conduct on-site inspections based on identifying construction projects in

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their assigned areas using the Dodge report. Safety field staff should inspect a minimum of two Dodge report projects in their area each month. The SO/IH shall enter optional codes “S-518” and “CTARGET” into OIS for these inspections.” See Section XIII. Strategic Plan Targeting Inspections and Imminent Danger Situations, A.

- I. Added a new section that contains modified language from Section A and added new language to read, “SOs/IHs can conduct on-site inspections based on the SO/IH identifying construction projects that are viewed while traveling in their work areas. These programmed inspections are referred to as a strategic plan targeting inspections. SOs/IHs will follow the inspection priority required by the FOM; otherwise, it is at the discretion of the SOs/IHs as to when programmed inspections will be conducted. The SO/IH shall enter optional codes “CTARGET” into OIS for these inspections.” See Section XIII. Strategic Plan Targeting Inspections and Imminent Danger Situations, B.
  - J. Deleted language, while performing other work-related activities. See XIV. Programmed Inspections using Building Permits, A.
  - K. Modified language, The SO/IH shall enter optional report codes “S-521” and “CTARGET” into OIS for those inspections. See XIV. Programmed Inspections using Building Permits, C.
  - L. Modified language, “which could result in employee exposure to asbestos” to “Construction activities involving these materials have the potential to liberate asbestos fibers, which could result in employee exposure to asbestos.” Added language, “asbestos, a known” to “By targeting employers who perform asbestos-related construction work, CSHD can reduce and/or eliminate exposure to asbestos, a known carcinogen.” See XV. Programmed Inspections of Asbestos Projects, A. Background.
  - M. Added language, “The SO/IH shall enter optional code “CTARGET” in OIS for all programmed inspections.” See XV. Programmed Inspections of Asbestos Projects, D.
- XII. Dodge Database.
- A. Dodge Report Coordinator (DRC).
    - 1. Each month the DRC will provide field staff an update to the Dodge database and/or send out an Excel spreadsheet to field staff. See [Appendix A](#) for the procedure.
    - 2. If needed, the DRC will assign users, including field staff, support staff, supervisors, and managers, with a username and password. See [Appendix B](#).
    - 3. The Dodge database can be used either when connected to the S: drive (central application) or on field staff computers (local application). The local application will allow the user to look at a three-month window of any new or open projects downloaded to their computer for the state without being connected to the S: drive. The SO/IH may opt to use the Excel sheet solely.

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4. The database search function allows staff to search by address, optional reporting number, and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the state. This information can be further narrowed by looking through the records manually on either the local application or the central application when connected to the S: drive.

B. Field Staff.

1. Field staff who have been provided a username and password may access the S: drive at least once each month and download (refresh each month) the Dodge reports to their computers when notified by the DRC. Inspection activity that is generated by a Dodge report will be assigned an optional reporting number by the Dodge database when the OIS information is inputted. The SO/IH may opt to use the Excel sheet solely.
2. Since Dodge reports drop off the area list every three months, field staff must copy/save a particular Dodge report project that they may want for a future inspection (e.g., larger projects they may not be able to inspect right away).
3. Any inspection conducted outside of an assigned work area will be documented based on its actual geographical location. The out-of-area safety officer/industrial hygienist (SO/IH) will inform the SO/IH from the assigned area that an inspection was conducted in their area. This may be done via email or phone call.
4. SOs/IHs in CSHD can conduct on-site inspections based on identifying construction projects in their assigned areas using the Dodge report. Safety field staff should inspect a minimum of two Dodge report projects in their area each month. The SO/IH shall enter optional codes “S-518” and “CTARGET” into OIS for these inspections.

C. Support Staff.

1. Support staff will add information from OIS to the Dodge database.
2. The search function in the database allows administrative staff to search by address, optional reporting number and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the state. This information can be further narrowed by looking through the records manually.
3. Administrative staff will enter the information on either the “Add” screen for all new inspections or the “Edit” screen for existing inspection reports and any uninspected Dodge report numbers.

D. Supervisors.

1. Supervisors will monitor the area Dodge report list and field inspection activity each month, as needed.
2. Supervisors may assign a minimum of two Dodge report projects for inspection to each field staff each month, as appropriate.
3. Supervisors are responsible for monitoring field staff to ensure compliance with this instruction.
4. If needed, the search function within the database allows supervisors to search for projects by address, optional reporting number, and/or Dodge report number. The use of asterisks before and after a street name/partial street name or address will return all records with the specified information in the state. This information can be further narrowed by looking through the records manually. The supervisor may opt to use the monthly Excel sheet solely.

XIII. Strategic Plan Targeting Inspections and Imminent Danger Situations.

- A. SOs/IHs in CSHD can conduct on-site inspections based on identifying construction projects in their assigned areas using the Dodge report. Safety field staff should inspect a minimum of two Dodge report projects in their area each month. The SO/IH shall enter optional codes “S-518” and “CTARGET” into OIS for these inspections.
- B. SOs/IHs can conduct on-site inspections based on the SO/IH identifying construction projects that are viewed while traveling in their work areas. These programmed inspections are referred to as a strategic plan targeting inspections. SOs/IHs will follow the inspection priority required by the FOM; otherwise, it is at the discretion of the SOs/IHs as to when programmed inspections will be conducted. The SO/IH shall enter optional codes “CTARGET” into OIS for these inspections.
- C. SOs/IHs, are expected to stop and conduct an inspection when potential “imminent danger” conditions are viewed. Such conditions include but are not limited to:
  1. Employees working at heights where there is a high probability of a fall resulting in death or serious injuries.
  2. Employees working in trenches greater than five feet deep, where there is a high probability of cave-in and there are no protective systems in place to prevent a cave-in.
  3. Employees working with cranes, boom trucks, aerial lift platforms or other equipment in close proximity to overhead power lines.
  4. Employees working on roadway projects where the lack of traffic control may result in an immediate hazard.

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5. Employees working at projects where there is a potential for excessive exposure to lead, silica, noise, asbestos, hexavalent chromium, or isocyanate containing compounds.
6. Other conditions are to be discussed with the SO's/IH's immediate supervisor.
7. Staff have discretion to address other situations where observed hazards may result in a high gravity, serious violative conditions.
8. The SO/IH shall enter optional code "CTARGET" into OIS for these inspections.

XIV. Programmed Inspections using Building Permits.

- A. SOs/IHs may also obtain a list of active construction projects from state and local governmental agencies that issue building permits.
- B. SOs/IHs are encouraged to and may stop at state and local governmental agencies that issue building permits and request to see/obtain a copy of their building permits list. The SOs/IHs should select those projects for inspecting that do not appear on the Dodge report.
- C. The SO/IH shall enter optional report codes "S-521" and "CTARGET" into OIS for those inspections.

XV. Programmed Inspections of Asbestos Projects.

- A. Background. Asbestos abatement, encapsulation and demolition projects are construction activities that are continually being conducted in Michigan. Asbestos is often found in thermal system insulation, surfacing material, wallboard, floor tile, roofing and siding materials, and construction mastics. Construction activities involving these materials have the potential to liberate asbestos fibers which could result in employee exposure to asbestos. Asbestos exposure has been associated with asbestosis, lung cancer and mesothelioma. By targeting employers who perform asbestos-related construction work, CSHD can reduce and/or eliminate exposure asbestos, a known carcinogen.
- B. Targeting. Contractors performing friable asbestos removal or encapsulation work in Michigan must provide project notifications ten calendar days prior to any non-emergency asbestos project. Emergency notices may be submitted at any time. The notifications must indicate the start and end dates and other job-related information. CSHD evaluates the notices for the purpose of inspection targeting. CSHD will attempt to inspect 50% of all new asbestos licensees who are performing work in Michigan during the first year of licensure. CSHD will attempt to inspect 50% of the asbestos licensees who are performing work in Michigan at least once every three years. Inspections will be targeted based upon the best utilization of CSHD resources.
- C. Re-inspection Program. Only licensed asbestos abatement contractors will be selected for re-inspections. A licensed asbestos abatement contractor is a business

entity that is licensed under the asbestos abatement contractors licensing act (Act 135 of the Public Acts of 1986, as amended). Re-inspections have the highest priority of all the different types of programmed inspections. A licensed asbestos abatement contractor will be placed on the re-inspection list if the contractor was issued six or more serious violations during any inspection. CSHD will wait at least six months from the case closure date before listing the contractor on the reinspection list. Submission of notification of correction or payment of penalty does not preclude the contractor from being placed on the re-inspection list. A re-inspection should be completed within one year of appearing on the reinspection list unless the licensed asbestos abatement contractor is not active. The industrial hygiene supervisor will check each year after the contractor is listed on the re-inspection list to see if the contractor renewed its asbestos abatement license. The industrial hygiene supervisor will remove a contractor from the re-inspection list if the contractor is no longer licensed. Otherwise, a licensed asbestos abatement contractor will remain on the list until re-inspected. A licensed asbestos abatement contractor will continue to be re-inspected until it no longer meets the re-inspection criteria. CSHD will not re-inspect a licensed asbestos abatement contractor on the re-inspection list, and the contractor will be removed from the re-inspection list, if the contractor is inspected because of a complaint, referral, or other unprogrammed activity, and the complaint/referral/unprogrammed inspection results in five or fewer serious violations. The industrial hygiene supervisor will assign and track re-inspections. The supervisor will develop and provide re-inspection program updates with the CSHD quarterly inspection data reports.

- D. The SO/IH shall enter optional code “CTARGET” in OIS for all programmed inspections.



## Appendix A

### Procedure for Dodge Reports

1. Receive email from Dwayne Whitten or other representatives providing the list. Example below.

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**From:** Dwayne Whitten <[Dwayne.Whitten@erg.com](mailto:Dwayne.Whitten@erg.com)>  
**Sent:** Friday, November 3, 2023 2:35 PM  
**To:** Paul, Brian (LEO) <[paulb@michigan.gov](mailto:paulb@michigan.gov)>  
**Cc:** Kile, Tarah (LEO) <[KileT@michigan.gov](mailto:KileT@michigan.gov)>; Hidalgo, Lawrence (LEO) <[HidalgoL@michigan.gov](mailto:HidalgoL@michigan.gov)>; John Carroll <[John.Carroll@erg.com](mailto:John.Carroll@erg.com)>  
**Subject:** C-Target Lists

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

Brian,

Attached are the CTarget 2023-11 (#300) lists. Please let John and me know if you have any questions or concerns.

Thanks,  
Dwayne

Dwayne Whitten  
Eastern Research Group, Inc.  
[Dwayne.Whitten@erg.com](mailto:Dwayne.Whitten@erg.com)  
Office: (434) 979-0218 ext. 4101  
Cell: (434) 962-3832

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Note: See how the “zip” drive folder is wrong. This is intentional due to it being an access file (size).

2. Save the attachment to your desktop.
3. Rename the file to “.zip” instead of “\_zip”.
4. Open the file.
5. Extract the file to your desktop. Leave it as an Access file for now.
6. Open the Access file.
7. Double click the left-hand column where it states “LoadSites.” It will then open the file up and the right-hand side (ID, DR Num, etc.) will expand.

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ID	DR_NUM	VEI	CURR_DT	
07-778401	25		4/23/2019	Northern San
11-569852	21		12/5/2018	Fairview Sew
13-578321	20		4/30/2019	CMU North Qi
13-596891	20		4/30/2019	MCCC East an
13-632021	14		4/15/2019	District E Gold
13-695460	30		6/26/2019	W. K. Kellogg
14-536101	13		4/11/2019	County Sherif
14-630479	9		3/12/2019	Adams North
14-722440	17		2/27/2019	Elementary Sc
15-417353	9		4/17/2019	Essexville-Hai
15-536837	14		4/4/2018	U of M Michig
15-536869	15		1/22/2019	Edward Henry
15-541342	9		3/11/2019	White State H
15-596891	12		3/15/2019	Peloton Place
15-616646	10		6/1/2019	Idaho Avenue
15-671010	6		3/27/2019	Spectrum Hea
16-406182	15		7/13/2019	Cooley ES (Ad
16-406233	14		4/16/2019	Waterford Sch
16-428841	8		6/4/2019	New Sparta M
16-434667	21		7/3/2019	Zen Apartmer
16-485653	19		7/11/2019	Department c

- Right click the “LoadSites” box on the left (see above for reference). A chart will open up. Hover over Export, then select Excel.
- A box will pop-up. Follow the steps below to export. Select OK.

Export - Excel Spreadsheet

Select the destination for the data you want to export

Specify the destination file name and format.

File name: C:\Users\allene2\Documents\LoadSites.xlsx

File format: Excel Workbook (\*.xlsx)

Specify export options.

We will not import table relationships, calculated columns, validation rules, default values, and columns of certain legacy data types such as OLE Object.

Search for "OLE Object" in Microsoft Access Help for more information.

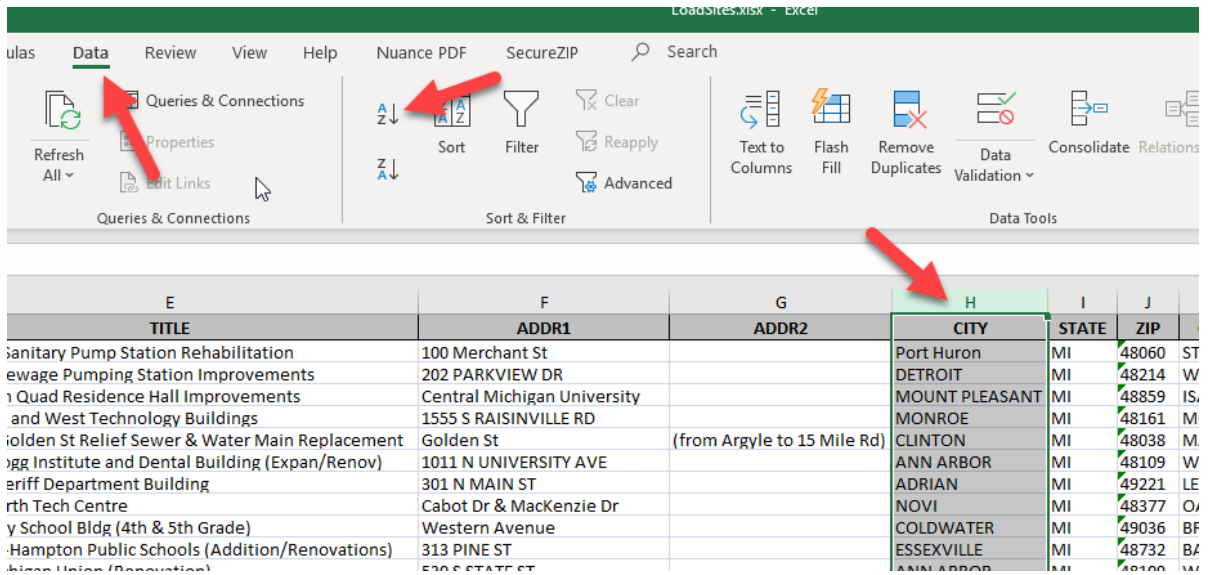
Export data with formatting and layout. Select this option to preserve most formatting and layout information when exporting a table, query, form, or report.

Open the destination file after the export operation is complete. Select this option to view the results of the export operation. This option is available only when you export formatted data.

Export only the selected records. Select this option to export only the selected records. This option is only available when you export formatted data and have records selected.

OK Cancel

- The file will now open in Excel after a few prompts.
- While in Excel, right click on the Row box #2 and change the row height to 12.75.
- Select all of the rows (click and hold and drag down to the bottom of the list. Let go of the mouse button and hit Control-Y. It will “redo” the same function, making all the rows 12.75.
- Highlight the City Column, typically Column H. Then click Data, then A Z down. See below for example.



14. A window will pop up asking you to expand the selection. Select “Expand the selection” then click Sort. The list will now be sorted by City.
15. Highlight the County Column, typically Column K. Then click Data, then A Z down.
16. A window will pop up asking you to expand the selection. Select “Expand the selection” then click Sort. The list will now be sorted by City but also within the same county(ies).
17. Save the file to be distributed to field staff.
18. Save the file in the appropriate S: drive folder. For example: S:\bsrconsf\DODGE\2019.
19. Save the Access file on the S: drive in the appropriate area. S:\bsrconsf\DodgeDB.
20. Email the file to staff.

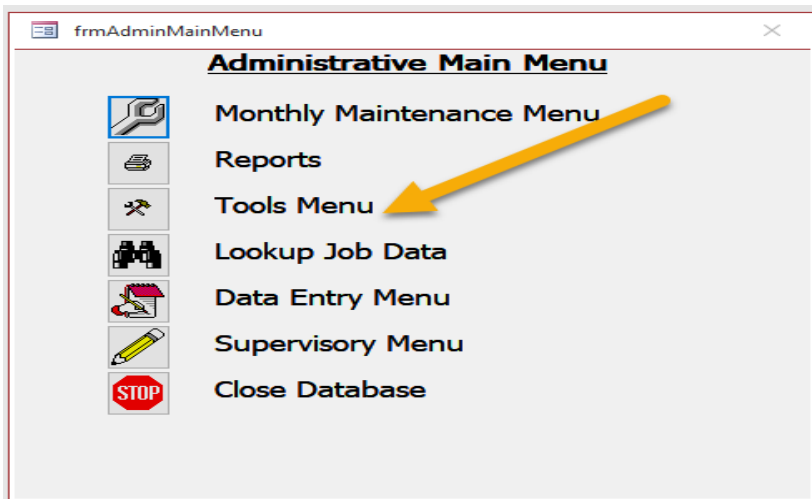
## Appendix B

### How to Add Staff/Reset Passwords in the Dodge Database

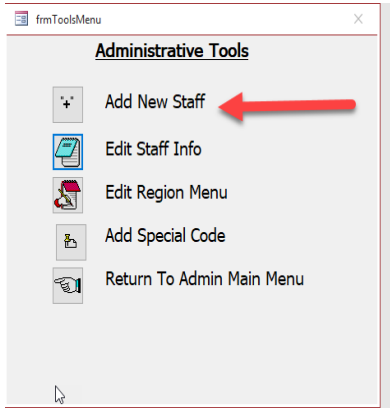
1. Log into the Dodge Database. It can be found here: S:\bsrconsf\DodgeDB. Click on the Dodge Central Icon.

AreaJobs	12/26/2017 2:22 PM	File folder	
Audit	11/14/2013 9:24 AM	File folder	
BKMiss	12/23/2014 10:52 ...	File folder	
FrontEnd	1/16/2020 3:19 PM	File folder	
Hardinfo	1/16/2020 3:19 PM	File folder	
Import	1/16/2020 3:19 PM	File folder	
old list	2/5/2019 11:29 AM	File folder	
cshoDodgev010410.mdb	1/30/2012 7:52 AM	PKZIP File	145 KB
DodgeCentral	8/30/2019 12:33 PM	Shortcut	1 KB
MichiganList.mdb	8/29/2019 3:57 PM	Microsoft Access ...	1,300 KB
Shortcut to cshoDodgev010410.mdb	10/8/2012 1:10 PM	Shortcut	1 KB
Shortcut to DodgeCentral (2)	10/29/2014 7:48 AM	Shortcut	1 KB
Shortcut to DodgeCentral (3)	12/27/2016 2:34 PM	Shortcut	1 KB

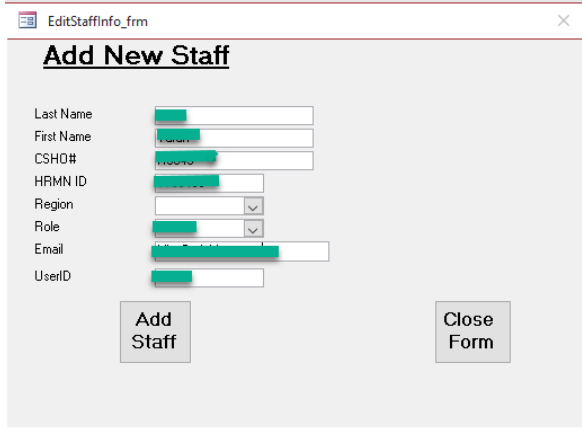
2. Login using your user ID and password.
3. After logging in, you will be placed at the Administrative Main Menu. Click on Tools Menu.



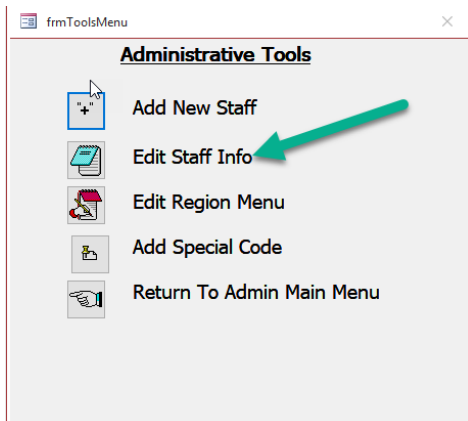
4. You will now be in a Menu called Administrative Tools, click on Add New Staff.



5. Enter in the appropriate data in the fields listed below in green for the person being added.

A screenshot of a software window titled 'EditStaffInfo\_frm'. The window displays a form titled 'Add New Staff' with the following fields: Last Name, First Name, CSHO#, HRMN ID, Region, Role, Email, and UserID. Each field contains text highlighted in green. At the bottom of the form are two buttons: 'Add Staff' and 'Close Form'.

6. Click Add staff. A box will pop up and say Record Saved. Click OK. Then another box will pop up and ask if you would like to add another staff member. Choose Yes or No. When you select No, it will put you back at the Administrative Tools Menu (Step #4). This has not fully created the account yet. You must now setup a password for whomever you just created an account for. Click on Edit Staff info.



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7. You will now be in a box that is labeled Edit Staff Information. Use the Lookup name function to quickly access the appropriate person. Verify that the person you had just added is in the database. Once you select the person, their data should automatically populate in the fields below. Click on Reset Password. This will automatically send an email from the person's email who clicked reset to the person requiring a password.

The screenshot shows a window titled "EditStaffInfo\_frm" with a close button in the top right corner. The main heading is "Edit Staff Information". Below the heading are several input fields: "Lookup Name" (a dropdown menu), "Last Name", "First Name", "CSHD#", "HRMN ID", "Region" (a dropdown menu), "Role" (a dropdown menu), "Email", and "UserID". At the bottom of the form are four buttons: "Save Changes", "Delete Staff", "Reset Password", and "Close Form". Two red arrows are overlaid on the image: one points to the "Lookup Name" dropdown menu, and the other points to the "Reset Password" button.

8. Go to your email and verify that the email sent. Now the person can use the Dodge Database.