

**U.S. Department of Labor**

Office of Inspector General  
Washington, DC 20210



December 29, 2021

MEMORANDUM FOR: DOUGLAS PARKER  
Assistant Secretary of Labor for  
Occupational Safety and Health

*Carolyn R. Hantz*

FROM: CAROLYN R. HANTZ  
Assistant Inspector General  
for Audit

SUBJECT: Audit of COVID-19 OSHA's Actions to Address  
Increasing & Severe Injuries at Warehouse Facilities of  
Large Online Retailers

Please be advised the Office of Inspector General is initiating an audit to determine what actions OSHA has taken to address the increase in severe injuries at warehouse and order fulfillment facilities of online and other retailers as a consequence of the COVID-19 pandemic.

We will contact your audit liaison to schedule a meeting to discuss the audit objective, scope, and methodology. The work is expected to begin immediately after the meeting, and we would appreciate you notifying appropriate officials of our plans.

To facilitate the start of the audit, we would appreciate if OSHA could start providing the items listed in the attached Document and Data Request immediately. If you have questions, please contact Nicholas Christopher, Audit Director, at (312) 353-2176 or [christopher.nicholas@oig.dol.gov](mailto:christopher.nicholas@oig.dol.gov).

cc: Robert Sanders  
Director, OSHA's Office of Audit

**Documentation Request**

**Item #    Description**

1. OIS User Manual
2. Policies & Procedures related to recording injuries
3. Example of documentation (inspection casefile) for high-risk injuries
4. A list of NAICS industries with the highest injury rates for the period of 10/1/2016 to 09/30/2021
5. Injury and illness Code Dictionary
6. Copies of National and Regional organization charts
7. The Draft Warehouse NEP that is currently in development, to also include: applicable documentation/data that prompted OSHA to draft a Warehouse NEP

**Data Request**

**Item #    Description**

8. List of NAICS industry codes – we are focusing on injuries that occur in warehouse facilities or distribution facilities that are used to distribute products for retail or wholesale purposes for either brick and mortar organizations or online sellers. To that end, please list any NAICS codes used by OSHA to identify warehouses and order fulfillment/distribution centers, whether stand-alone warehouses or the warehouse arms of online sellers.
  9. Detailed Injury data for each NAICS code in #8, for the period of 10/01/2016 through 9/30/2021 to include:
    1. NAICS code
    2. Employer Identification Number
    3. Employer Name
    4. Date of injury
    5. Nature of Injury Code
    6. Nature Title
    7. Event Code
    8. Event Title
  10. Inspections: All federal and state plan inspections for the period of 10/01/2016 to 9/30/2021, to include the following for NAICs listed in #8:
    1. Insp Id / Opt Rpt Id
    2. Activity\_nr
    3. Open Conference Date
    4. Establishment Name / Site City – State – Zip
    5. Employer Identification Number
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6. NAICS – SIC / Inspected NAICS
7. Inspection Category / Type / Scope
8. Case Close Date
9. Emphasis Program
10. Strategic Program
11. nr\_in\_estab (employees)

11. Violations (Originating from inspections above in #10) - All federal and state plan violations.

1. Activity\_nr
2. naics\_code
3. open\_date
4. close\_conf\_date
5. close\_case\_date
6. citation\_id
7. viol\_type
8. issuance\_date
9. insp\_type
10. gravity
11. nr\_exposed
12. nr\_in\_estab
13. standard cited

12. Complaints - All federal and state plan complaints for all NAICS Codes provided above in #8, detailing all complaints OSHA received during the period of 10/01/2016 through 9/30/2021.
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