



# Office of Program Policy Analysis And Government Accountability



John W. Turcotte, Director

December 1997

## Review of the Division of Safety, Department of Labor and Employment Security

### Abstract

- The Division has not carried out its statutory mandate to ensure that private sector employers implement safety programs and committees. However, this mandate appears to be unworkable and may not result in the best use of state funds.
- As an alternative to enforcing this requirement, the Division provides voluntary consultation services to private sector employers. However, this activity duplicates services provided by the federal Occupational Safety and Health Administration and workers' compensation insurance carriers. Due to a lack of outcome measures, the Division cannot show that its alternative provides a benefit in improving workplace safety.
- Unless the Division can develop a viable alternative that results in a better use of state resources, the Legislature should eliminate funding for the Division's State Consultation services, which would save \$1.4 million.

### Purpose

Chapter 96-316, Laws of Florida, directed our Office to conduct a performance audit of the Division of Safety within the Department of Labor and Employment Security. Our study focuses on the Division's enforcement and consultation activities related to private sector employers during Fiscal Years 1995-96 and 1996-97. The Division is currently operating under Performance-Based Program Budgeting. OPPAGA will

conduct a justification review during Fiscal Year 1998-99 to examine all of the Division's activities.

### Background

The Division of Safety was created to reduce the incidence of employee injuries, occupational illnesses, and fatalities. The Division establishes policies, procedures, and standards that employers must follow to improve workplace safety. These activities are intended to provide a safer work environment for citizens and reduce workers' compensation insurance claims and rates for employers.

The Division provides various safety services to public and private sector employers. The state and local governments share responsibility for the safety of public sector employees, and the Division administers a public sector program that performs inspections and enforces safety standards for public sector employers. The federal Occupational Safety and Health Administration (OSHA) has primary jurisdiction for workplace safety in the private sector. OSHA has contracted with Florida for assistance in enforcing federal occupational safety and health standards for private sector employers. Under this contract, the Division inspects private sector employers for compliance with OSHA safety standards. The Division informs OSHA of violations that it detects that private sector employers do not correct so that OSHA can take enforcement actions.

Historically, Florida did not establish or enforce separate state safety standards for private sector employers.<sup>1</sup> However, the 1993 Legislature, meeting in Special Session, enacted several law changes (Ch. 93-416, Laws

<sup>1</sup> Under federal law, states may not establish safety standards for private sector employers in areas where federal standards exist. However, states may assert jurisdiction over private sector employers in areas where no OSHA standards exist.

## Findings

**The Division has not carried out its legislative mandate to ensure that private sector employers implement safety programs and committees. However, these mandates appear to be unworkable.**

Although the Division has performed some of the activities required by the 1993 law, it has not implemented other requirements. The Division has developed approximately 200 generic safety programs that employers may adopt to help reduce workplace injuries. These programs include components such as: management commitment and involvement in workplace safety; providing safety training, establishing first aid programs, accident investigation, and recordkeeping procedures; and developing written safety rules, policies, and procedures that are available to employees.

However, the Division has not effectively implemented the requirement to identify employers with a high frequency or severity of workplace injuries, and it has not exercised its inspection and enforcement authority over these employers. Rather, the Division has focused its efforts on providing employers with voluntary safety inspection and consultation services without threat of penalty.

The Division encountered two primary problems in attempting to implement the law. First, the Division lacks the data needed to identify individual employers that have high injury rates and are required to have a safety committee or program. The Division has attempted to use worker's compensation claims data to identify high-risk industries and businesses. However, these data are often 18 months old before they are available for analysis due to the time period needed to process and report worker's compensation claims.

Using the available data to identify businesses with high injury and illness rates is impracticable because analysis shows that industry and business injury rates are highly variable from year to year. Businesses that have high injury or illness rates in one year often experience lower rates in following years and, thus, would not be subject to the law's requirement for safety programs, safety committees, inspections, and enforcement.

The second problem the Division encountered in attempting to implement the law was major resistance from the private sector employers that the law was designed to benefit. Industry groups complained that the new state standards were unduly burdensome and intrusive, and they opposed attempts to enforce the law and impose penalties for noncompliance. For example, a proposed Division rule that would have prohibited

of Florida) to help address rising workers' compensation claims and insurance rates. Although most of these changes applied to workers' compensation claims, the Legislature also enacted new state safety standards for public and private sector employers. The Division was given responsibility for enforcing these standards and was directed to:

- identify employers with a high frequency or severity of work-related injuries;
- develop safety programs for these employers;
- inspect these employers' work sites for compliance with developed safety programs;
- ensure that employers with 20 or more employees and/or with a high frequency or severity of injuries and illness implement safety committees<sup>2</sup>; and
- sanction employers who did not comply with the law.

The 1993 law also established new requirements for workers' compensation insurance carriers. These companies were required to advertise and provide safety consultations to their policyholders upon request and to distribute the employer safety programs developed by the Division of Safety to these policyholders. Insurance carriers are also required to submit an annual report to the Division on their consultation activities.

The Division was allocated \$10.3 million and 177 positions in Fiscal Year 1997-98. Of these positions, 52 are assigned to the Division's public sector program, 24 are allocated to the OSHA contract, and 34 are allocated to the State Consultation service that is responsible for implementing the 1993 law relating to private sector employers. The Division's remaining 67 positions perform a variety of support services such as data processing for all three programs and cannot readily be allocated to the individual programs. The Division provides services through five district offices, which are located in Jacksonville, Miami, Orlando, Tampa, and Tallahassee. Staff in these offices conduct investigations and provide assistance to public and private sector employers.

The Division is primarily funded through an assessment on workers' compensation insurance policies. Of the Division's allocation, \$8.9 million is derived from this assessment. An additional \$1.2 million is derived from contracts with OSHA and \$145,000 from a contract with the federal Bureau of Labor Statistics.

<sup>2</sup> Safety committees were initially required for all employers with 10 or more employees; Ch. 96-316, Laws of Florida, changed this to the current 20-employee threshold.

individual employees from lifting more than 50 pounds was widely criticized as impractical and excessive regulation.

Several businesses indicated that they would legally challenge Division attempts to enforce the requirement that all employers with 20 or more employees establish safety committees. These committees are to establish procedures for safety inspections and accident investigations and maintain safety committee records. The law and the Division's rules require that these committees be composed of employees and management. The potential plaintiffs allege that this mandate conflicts with National Labor Relations Board rulings governing employee work groups.

We concluded that the current statutory requirements mandating safety committees and programs are unworkable. While these initiatives may be beneficial when applied to employers who are encountering high workplace injuries, the Division is unable to effectively carry out its duties to identify these industries and businesses because injury rate data is constantly changing, outdated, and imprecise. Mandating that most employers establish safety committees and programs is not cost-effective and may violate federal law. Businesses will incur costs to establish these committees and programs, yet these initiatives will produce few benefits for low-risk employers.

**As an alternative to the enforcement role established by law, the Division has focused its efforts on providing voluntary safety education services for private sector employers. However, this activity duplicates services that should be provided by the federal Occupational Safety and Health Administration and workers' compensation insurance carriers. Due to a lack of outcome measures, the Division cannot show that its alternative provides a benefit in improving workplace safety.**

Since 1994, the Division has not pursued an enforcement role and has focused its efforts on providing employers with voluntary safety inspections and consultation services. These services are called State Consultations and include facilities inspection and employer safety instruction. However, these services duplicate OSHA and insurance carrier functions and do not represent a good use of limited state funds. The Division has allocated an estimated \$1.4 million and 34 staff to provide State Consultation services for Fiscal Year 1997-98.

The State Consultation services by the Division are identical to those it performs under its contract with OSHA. Both the State Consultation and OSHA services include hazard identification and correction assistance and safety and health training. The Division provided State Consultation services to approximately 1,600 private sector work sites in the two-year period 1995 and 1996. During the same period, the Division provided OSHA contracted services to nearly 2,600 private sector work sites. State Consultation services are totally funded by the state while OSHA services are 90% federally funded.<sup>3</sup>

The only notable difference between the services provided by the Division under the OSHA contract and the State Consultation service is that businesses undergoing an OSHA-funded inspection must agree to correct identified safety problems. Businesses undergoing State Consultation inspections do not have to correct identified safety problems. Businesses may choose whether to receive an OSHA-funded or a State Consultation inspection.

The Division's State Consultation service also duplicates safety consultation services provided by insurance carriers. The law requires insurance carriers to provide free safety consultation services to policyholders upon request. Similar to the Division's services, insurance carriers' safety consultation services promote the use of safety programs and committees, as needed. Insurance carriers reported that they provided almost 50,000 safety consultations during the November 1996 to November 1997 period. Thus, the Division's services constitute only a small percentage of the safety consultations available for employers. The Division does not coordinate its consultation services with those offered by workers' compensation insurance carriers to avoid duplication of effort.

Although it is operating under Performance-Based Program Budgeting, the Division lacks any outcome measures that assess whether the services it provides under the State Consultation service are effective in reducing workplace injuries. As we reported in our March 1997 assessment of the Division's performance measures, the Department lacks measures that gauge the impact of the Division's efforts in reducing workplace accidents. We continue to believe that the Division needs to be held accountable for the results of its services. Without such information, we question whether the Division's voluntary services, which constitute only a small fraction of the safety consultation services provided to private sector employers, represent a good use of limited state resources.

<sup>3</sup> A separate unit within the Division performs consultations performed under the OSHA contract.

## Conclusions and Recommendations

We believe that the Legislature should change the Division of Safety's private sector responsibilities mandated by Ch. 442, F.S. The requirement that the Division monitor and enforce the use of safety programs and committees is controversial and problematic to enforce. The Division's current emphasis on providing voluntary consultation services to employers is not consistent with legislative intent, duplicates services provided by OSHA and private workers' compensation insurance carriers, and may not represent a good use of limited state resources.

We recommend that the Division's role in enforcing state workplace safety standards be changed or eliminated. Specifically, the Division should examine its activities and develop options for consideration by the 1998 Legislature. These alternatives should be developed in consultation with stakeholders such as representatives of employee groups, industry, and insurance carriers. One potential role for the Division could be to analyze statewide and industry-specific injury data to identify potential accident prevention factors. This information could then be given to businesses and workers' compensation insurance carriers to help resolve safety problems. This option would likely require fewer resources than the Division's current activities.

If the Division is unable to develop viable alternatives to its current role, the Legislature should amend ss. 442.0105 and 442.012, F.S., to rescind the separate state safety standards and eliminate funding for the Division's State Consultation service. This would produce an annual cost savings of \$1.4 million. This reduction in expense, which is paid through assessments on workers' compensation insurance policies, could be used to support other activities that provide more cost-effective outcomes or be used to reduce the workers' compensation assessment rate and, thus, provide a tax cut to businesses.

We also continue to recommend that the Division develop outcome measures for all of its activities and report these measures to the Legislature. This will improve the Legislature's ability to determine if Division services are effective and needed.

## Agency Response From the Department of Labor and Employment Security

The Department of Labor and Employment Security does not agree conceptually with some of our findings and recommendations. At press time we were discussing the Department's response and OPPAGA's potential reaction with Department staff. These documents are available upon request and will be reprinted on our Web site.

OPPAGA provides objective, independent, professional analyses of state policies and services to assist the Florida Legislature in decision-making, to ensure government accountability, and to recommend the best use of public resources. Copies of this report may be obtained by telephone (850/488-0021 or 800/531-2477), by FAX (850/487-3804), in person (Claude Pepper Building, Room 312, 111 W. Madison St.), or by mail (OPPAGA Report Production, P.O. Box 1735, Tallahassee, FL 32302).

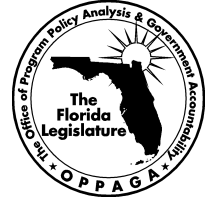
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## Office of Program Policy Analysis And Government Accountability



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# Addendum to OPPAGA Report No. 97-25 Agency Response From the Department of Labor and Employment Security

## Agency Response From the Department of Labor and Employment Security

### INTRODUCTION

The Department of Labor and Employment Security (DLES) does not agree with many of the findings and recommendations in this review. Statements are made about the Division of Safety's programs in general, yet OPPAGA's review concentrates on the State Consultation program. The Department's response addresses these issues.

Over \$2.4 million in savings for fiscal year 1995-96 can be directly attributed to the State Consultation program in prevented claims. We also know that there are several million dollars more in workers' compensation insurance premiums that the Florida business community will save as a result of this program. The review ignores the Department's efforts in the last two years to fulfill our statutory obligations and the significant progress the Division of Safety has made in shifting resources to a consultation, education, and training approach. This strategic shift was taken with the tacit approval of the Legislature and support from Florida's employers, professional associations, unions, and trade associations, after it was agreed that more meaningful, longer lasting results will occur when employees are trained to perform their jobs safely. The Department has adopted a consultation, education, and training approach in order to serve the 97-98 percent of Florida employers who want to comply with the law. However, we still retain the right of entry to pursue the small percentage of employers who may knowingly and willfully continue to violate Florida's workplace safety and health laws.

The Department has been successful in using a consultation, education, and training approach, as evidenced by the positive results below:

- Florida employers receiving safety and health consultation, education, and training services provided by the Division in 1995-96 saw their employee total case incidence rate decline by 4.9 percent and their employee lost workday incidence rate decline by 8.9 percent.
- Over nine thousand Florida employers received a two-percent reduction in their workers' compensation insurance rates from 1995-97, as a result of implementing workplace safety programs. This represents savings of over \$8.5 million to the Florida business community.
- Customer satisfaction surveys show that 88 percent of the customers using Division services in 1996 were satisfied with those services.
- The State Consultation program produced these results during the last two years:
  - Trained over 29,500 employees in safe on-the job work procedures;
  - Identified more than 12,500 workplace hazards; and
  - Developed over 1,950 safety programs for Florida employers.
- Research has shown that lasting improvements in workplace safety are made through consultation, education, and training, as compared with strict enforcement. Input from Florida's employers and customer councils continues to reinforce this approach.

**OPPAGA Report: The Division has not carried out its legislative mandate to ensure that private sector employers implement safety programs and committees. However, these mandates appears to be unworkable. [Page 2]**

**Agency Response:** The Department agrees that enforcement of the safety programs and committees mandate is not workable. The Department's redirection to a consultation, education, and training approach is working.

The approach assists employers in implementing safety and health requirements through onsite safety and health assessments, safety and health program development, assistance in establishing safety committees, hazard identification, and education and training. By utilizing the consultation, education, and training approach, the Department believes that mandates specified by the Legislature have been adequately addressed to ensure employers are implementing safety programs and safety committees. More importantly, the Department's efforts have resulted in reductions in lost work time, fewer occupational illnesses and injuries, and lower workers' compensation premium costs to employers. The Department is prepared to present to the Legislature in the upcoming session a proposal for continuing the State Consultation program's consultation, education, and training approach to safety and health.

**OPPAGA Report: The Division has not effectively implemented the requirement to identify employers with a high frequency or severity of workplace injuries... [Page 2]**

**Agency Response:** The Department agrees that the methodology used to identify individual high-frequency employers as described in F. A. C. 381-74.002(9) has not been implemented; however, a method for identifying employers in high-hazard industries has been developed and is being used for marketing the Division's services to employers. Between 1993 and 1996, there were changes in legislation and administrative rulemaking that affected how employers with a high frequency of accidents were to be identified by the Division. During this period, a methodology for identifying high-frequency employers was proposed to legislative committees and other interested groups. Consensus on implementing the proposal proved difficult due to concerns about "branding" businesses as high-frequency employers and not taking into account the number of employees at a business location. A lack of reliable, historical data also contributed to difficulties with this methodology. By using a different methodology (a copy of which was given to OPPAGA auditors on October 13, 1997), the Division has and continues to identify employers whose industries fall into the high-hazard category. This information is provided to field personnel to market the safety and health consultation, education, and training services available.

The Division continues to collect data that will enable it to more clearly focus resources for helping those Florida employers with a high frequency of workplace accidents. The review questioned the reliability of the data since they are often 18 months old before they are available for analysis. All occupational safety and health data take approximately one year after the reference year to collect. The "age" of the data is well within the nationally accepted norm of 24 months for occupational injury and illness data. As the Division refines data collection methods, ways of obtaining data that are even more current will become available.

**OPPAGA Report: ...it [the Division] has not exercised its inspection and enforcement authority over these [High-frequency] employers. [Page 2]**

**Agency Response:** The Department agrees that it has not exercised its enforcement authority. Based upon input from employers, insurance carriers, and unions during the numerous workshops and hearings held during this period, and in response to the desires of our customers, the Department chose to establish a consultation, education, and training approach to improve occupational safety and health in the State of Florida. Research has shown that lasting improvements in workplace safety are made through consultation, education, and training, as compared with strict enforcement. The Division continues to receive input from employers, customer councils, and surveys which reinforces this approach.

The State Consultation program has been well received by all customers and achieved significant results in its short history. The Division's State Consultation program has conducted approximately 1,600 consultations, which include over 2,600 employer visits during the time period covered by this review. In addition, 12,150 workplace hazards were identified, 1,950 written programs were developed, and 29,500 employees were trained.

The implementation of policies and procedures has effectively promoted the importance of compliance through the reporting of hazards to employers. Division consultation reports, which identify deficiencies, reiterate to employers the necessity of implementing safety programs and safety committees. These consultations clearly outline the employers' responsibilities to correct identified hazards, comply with reasonable workplace safety standards, encourage employee participation, and provide required training. Our evaluation of the customer feedback reveals that this approach has helped reduce workplace injuries and illnesses.

**OPPAGA Report: ..potential plaintiffs allege that this mandate [that employers establish safety committees] conflicts with National Labor Relations Board rulings governing employee work groups. [Page 3]**

**Agency Response:** The Department takes issue with this statement. The National Labor Relations Act essentially prohibits employers from engaging in unfair labor practices--for instance, by dominating or interfering with the formation or administration of any labor organization. Safety committees do not per se violate the federal Act. The Florida Legislature has averted conflict with the federal Act by requiring that the membership of safety committees be composed equally of employer and employee representatives, and by exempting safety committees whose composition, selection, and function are determined by a collective bargaining agreement. Contrary to the assertion in OPPAGA's comment, the National Labor Relations Board has never ruled that a state-mandated workplace safety committee violates the federal Act. Moreover, neither the

state statute nor Division rule has been administratively or judicially attacked.

**OPPAGA Report:** As an alternative to the enforcement role established by law, the Division has focused its efforts on providing voluntary safety education services for private sector employers. However, this activity duplicates services provided by the federal Occupational Safety and Health Administration and worker's compensation carriers. Due to a lack of outcome measures, the Division cannot show that its alternative provides a benefit in improving workplace safety. [Page 3]

**Agency Response:** The Department strongly disagrees with the first part of the finding cited above. The focus of the federal Occupational Safety and Health Administration (OSHA) is different from services provided by the State Consultation program. The federal OSHA program concentrates on larger employer site inspections for hazard identification and abatement purposes, and is strictly an enforcement entity in the private sector.

Furthermore, at the state level, the federal 7(c)(1) program and the State Consultation program are two completely separate and distinct consultative services. The 7(c)(1) program is funded by an OSHA grant and is encumbered with federal administrative and program requirements. The 7(c)(1) program can provide services to Florida employers with 250 employees or less at one site who fall within OSHA-defined, high-hazard industry groups, which are based on national data. While employers can request consultations for the 7(c)(1) program or be referred by OSHA, they must agree to abide by OSHA administrative and program requirements to receive services, which begin with hazard identification and abatement. If the identified hazards are not abated, the employers are referred to OSHA. For this reason alone, many employers opt instead for the State Consultation program.

The State Consultation program, which is funded by the Workers' Compensation Administrative Trust Fund, focuses on employers in high-hazard industries defined by Florida injury/illness data. This program utilizes a collaborative approach whereby employers can have access to safety and health services without the constraints of the 7(c)(1) program. Elimination of the State Consultation program would severely restrict the comprehensive safety and health consultation, education, and training assistance available to Florida's private sector employers. The program has the flexibility to help any Florida business, regardless of size. Experience has shown that employers who have exemplary safety programs can avoid OSHA inspections.

**OPPAGA Report:** The Division's State Consultation service also duplicates safety consultation services provided by insurance carriers. [Page 3]

**Agency Response:** The Department disagrees with this statement. Insurance carriers perform services that are

related to insurability of the workplace and the amount of workers' compensation insurance premiums to be charged. Insurance carriers are primarily concerned with loss control and claims management. The Division's primary concern is to determine if worksites are safe. The State Consultation program focuses on Florida's employers who have a high incidence of injuries and illnesses. In numerous instances, Florida's insurance carrier representatives refer insured employers to the Division for consultation, education, and training services. Industry-specific safety programs for employer groups have been developed and continue to be provided to workers' compensation insurance carriers for distribution to Florida employer policyholders. The Division has established an excellent working relationship with Florida's insurance carriers. As a result of this partnership with carriers, services are provided to many more employers who are at risk of having accidents.

**OPPAGA Report:** Due to a lack of outcome measures, the Division cannot show that its alternative provides a benefit in improving workplace safety. [Page 3]

**Agency Response:** The Department takes exception to this statement. Performance outcome measures were developed and submitted to the Governor's Office of Planning and Budget in fiscal year 1995-96. We understand that outcome measures were not adopted by the Legislature because, at the time of reporting, data were in the process of being collected and, therefore, were not available. The data for reference year 1995-96 became available in April 1997. We will continue to refine these measures with advice and counsel from the Legislature and other appropriate bodies.

The initial outcome measures submitted in fiscal year 1995-96 tracked injury/illness rates for all Florida employers. As a result of recommendations received from OPPAGA, the DLES Inspector General's Office, the Governor's Office of Planning and Budget, and private consultants, outcome measures were revised in August 1997. The revisions were designed to evaluate program effectiveness on employers who received services from the Division. They are:

- A reduction in total case incidence rate for employers served;
- A reduction in lost workday case incidence rate for employers served;
- A reduction in disabling compensable claims incidence rate for employers served;
- A reduction in lost workday case incidence rate for employers in high hazard (SIC Code) groups; and
- Customer feedback rankings.

The Department has devoted many resources over the past two years to collect quantifiable data which support its outcome measures. Beginning in fiscal year 1995-96, the Division initiated data collection procedures to quantify these outcome measures. In the first year of development, the Division was able to prove a positive impact of its consultation programs on the injury and illness experience of

employers served, through the use of a Pre- and Post-Intervention Survey.

The results of the Pre- and Post-Intervention Survey for employers served revealed:

- A decrease of 4.9% in the total case incidence rate;
- A decline of 8.9% in the lost workday case incidence rate; and
- A corresponding decline of 8.9% in the disabling compensable claims incidence rate.

Output measures record the number of services provided to public and private sector employers by the category of service. For the reference year 1997-98, the Division will be able to report program effectiveness by service type (e.g., hazard identification in the State Consultation program, etc.). Our goal is to continue to monitor the types of services employers receive, increase the number of employers utilizing these services, and detect trends that impact accident prevention strategies.

### **Conclusion and Recommendations**

As a result of customer input, the direction of the State Consultation program evolved from enforcement to voluntary compliance. This approach complements and supports the separate and distinctly different efforts of OSHA and insurance carriers to reduce workplace injuries and illnesses for private sector employers. The Division's ongoing relationships with customers and partnerships with other agencies, insurance carriers, associations, and industry groups will continue to be a driving force in developing Division strategies and program enhancements that address Florida-specific safety and health issues.

The State Consultation program in its first year of operation demonstrated effectiveness in reducing workplace injuries and illnesses for customers served. In the Pre- and Post-Intervention Survey of customers directly receiving State Consultation program services, the lost workday case incidence rate of injuries and illnesses declined 4.2 percent, while the total case incidence rate decreased 11.5 percent.

Overall, the Division's three consultation efforts (State Consultation, 7(c)(1), and Public Sector) resulted in estimated cost savings of \$12.2 million to the Workers' Compensation system. Savings attributed to the State Consultation program amounted to approximately \$2.4 million to the system. The Division does not recognize the prudence of modifying or eliminating existing State Consultation program resources that clearly exhibit a positive and cost-effective impact on reducing private sector employer injuries/illnesses and associated business operating costs.

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## **OPPAGA'S Comments on Agency's Response**

OPPAGA has reviewed the agency's response to our report and has found that it lacks sufficient basis to alter our report. We offer the following comments regarding the agency's response:

- The Department agrees that it is not implementing its statutory directive regarding the program. We believe that any change in the program's mission should be specifically authorized by the Legislature.
- The Department's alternative approach has not had a significant impact on the industry as a whole. Over the past two years, the Division has averaged annual visits to 0.2 percent of Florida worksites, which cover less than 1% of all employees. Further, we continue to contend that the Department's voluntary consultation efforts substantially duplicate services provided by OSHA and insurance carriers.
- We have serious reservations about the methodology used to produce the data the agency is using in its response and to support its performance-based program budgeting outcome measures.

This document is the Agency's Response to OPPAGA Report #97-27, Review of the Division of Safety, Department of Labor and Employment Security. Copies of this report may be obtained by telephone (850/488-0021 or 800/531-2477), by FAX (850/487-3804), in person (Claude Pepper Building, Room 312, 111 W. Madison St.), or by mail (OPPAGA Report Production, P.O. Box 1735, Tallahassee, FL 32302).

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