

ALASKA OCCUPATIONAL SAFETY AND HEALTH

FFY 2022 ANNUAL 21(d) PERFORMANCE PLAN

I. 21d PROGRAM INFORMATION

General Program Overview

The Alaska Occupational Safety and Health (AKOSH) Consultation and Training (C&T) program entered the 21d program, formerly the 7(c)(1) program in 1984. The program functions as a section of the State of Alaska, Department of Labor and Workforce Development, Division of Labor Standards and Safety. The project maintains offices in Anchorage, Juneau, Palmer, and Fairbanks.

Mission Statement

Work in partnership with Alaskan workers and employers toward eliminating workplace injuries, illnesses and deaths.

Purpose

Encourage voluntary compliance of Alaska employers with occupational safety and health standards and recommendations with an emphasis on small employers operating in high hazard industries.

AKOSH Strategic Goals

To achieve its vision, AKOSH has established three strategic goals to guide the development of programs and activities. The successful accomplishment of any one of the strategic goals will not be possible without parallel successes in relation to other goals. For example, a focus on reducing hazard exposures, injuries, illnesses and deaths in the workplace will be difficult to achieve without realizing the goal to engage workers and employees in this effort.

AKOSH's success in meeting the goals and objectives outlined in the strategic plan will be measured through results, which depend on a concerted effort from each of the agency's programs. For example, when a particular issue is being emphasized as an objective, it is expected that inspections will be targeted to insure compliance, training workshops will be offered to build necessary knowledge and skills, outreach material will be distributed, and consultation visits will be offered.

AKOSH is committed to three strategic goals for the five-year period of October 1, 2018 through September 30, 2023.

- ◆ *Improve workplace safety and health in both public and private sectors as evidenced by a reduction in the rate of injuries, illnesses, and fatalities through AKOSH programs and services.*
- ◆ *Promote a safety and health culture (both public and private sectors) in the Alaskan workplace through compliance assistance, cooperative programs, and consultation assistance.*
- ◆ *Secure public confidence through excellence in the development and delivery of AKOSH programs and services.*

Consultation and Training (21d grant) Program

The Alaska Occupational Safety and Health Program is located in the Alaska Department of Labor and Workforce Development (DOLWD), Division of Labor Standards and Safety. A Commissioner, who is appointed by the Governor, heads the department. A Director, who is appointed by the Commissioner, heads the Division of Labor Standards and Safety, and has the authority to perform those duties delegated by the Commissioner and charged by statute (Alaska Statute 18.60.010 - 18.60.105), which include the following elements:

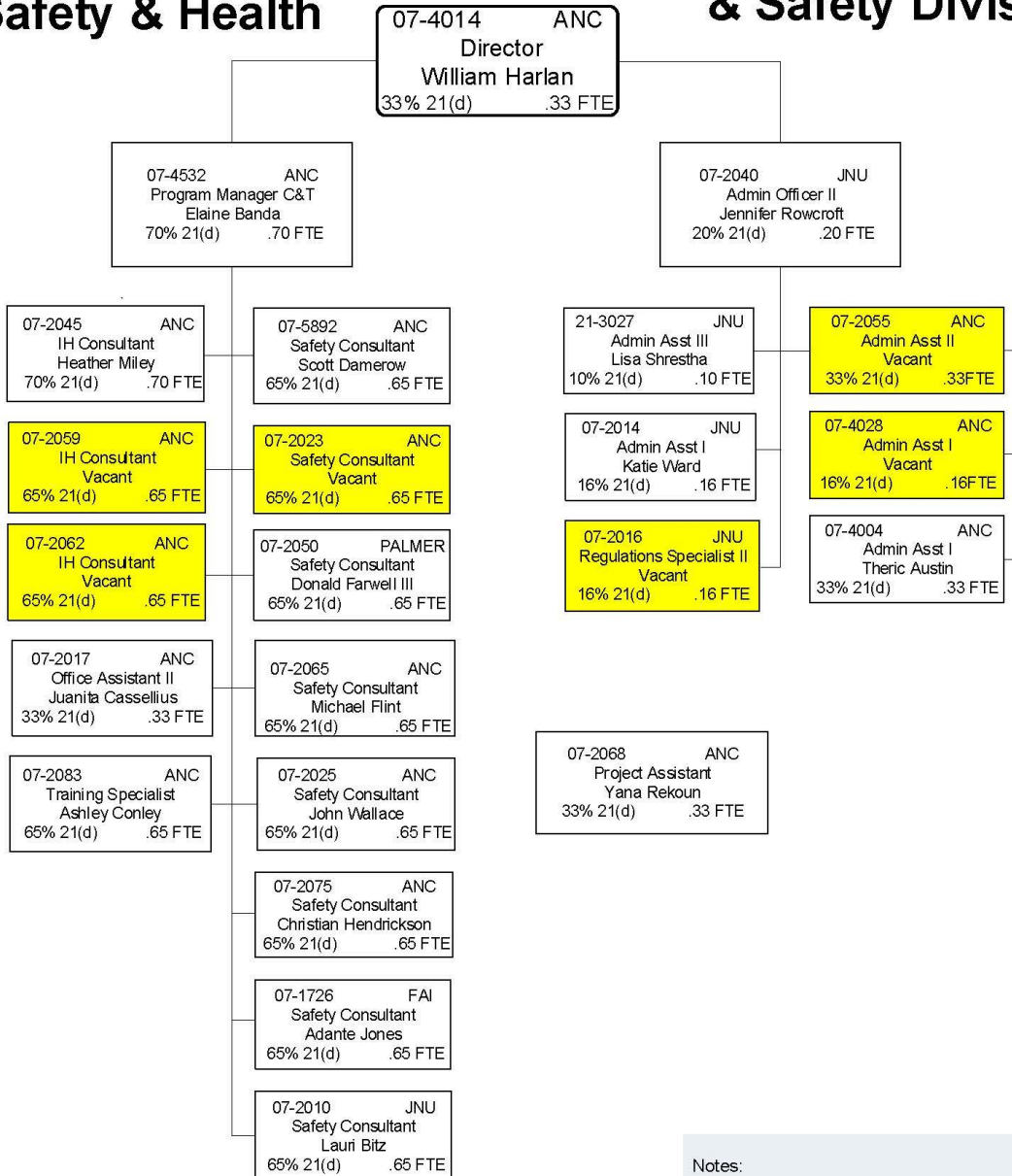
- Encourage Alaskan employers to voluntarily comply with safety and health standards, particularly small businesses in high-hazard industries;
- Provide C&T services through on-site consultative activities as described in 29 CFR 1908 and AS 18.60.030(14) (upon the request of an employer);
- Design educational and other programs to address specific needs of groups or individuals being served. This includes providing statewide classes customized for construction, transportation and warehousing, seafood processing and general industry;
- Dispense information and publications to employers and participate in safety-related activities to increase safety and health awareness throughout Alaska;
- Support Alaska's strategic outcome and performance goals as outlined in this strategic plan.

This annual project plan details the specific activities and strategies the C&T program will use in FFY2022 to support AKOSH's strategic goals.

APPENDIX D-2

FFY22 Consultation and Training Organizational Chart

Occupational Safety & Health
21(d) FFY 2022
Labor Standards & Safety Division



- Notes:
- PCN 07-2055 re-class in FY22 to meet business needs
 - PCN 4028 Planning to fill in FY22
 - PCN 21-3027 Added to LSS in FY21
 - PCN 07-2059 planning to fill in FY22
 - PCN 07-2062 planning to fill in FY22
 - PCN 07-2023 planning to fill in FY22
 - PCN 07-2016 planning to fill in FY22
 - PCN 07-4533 deleted due to legislative cuts in FY22

III. OPERATIONAL DESCRIPTION BY ANNUAL PERFORMANCE GOAL

The C&T program supports the FFY2022 AKOSH Annual performance goals with emphasis on those consultation activities specified in goals: 1.1; 1.2; 1.3; 1.4, 2.1.a, 2.1.b and 2.1.c; 2.2 - exclusive 21(d) goal, 3.1.a and 3.1.b.

FY2022 Performance Goals 1.1, 1.2, 1.3, 1.4, 2.1.a, 2.1.b, 2.1c

Federal/State Area of Emphasis Statement	On-Site Consultation Strategy	Description of Planned On-Site Consultation Activities	Anticipated Outcome of On-Site Consultation Activities
GOAL 1.1: Reduce the Number of Workplace Fatalities under AKOSH Jurisdiction			
By the end of FFY 2023 reduce the rate of workplace fatalities under AKOSH jurisdiction (5-year plan)	<p>1.1 Concentrate on the primary causes of fatalities and the industries where fatalities take place to include construction, seafood and healthcare industries.</p> <p>1.1 Influence attitudes about workplace safety and health in Alaska through consultative outreach and training efforts to encourage employers to seek voluntary compliance measures.</p> <p>1.1 Make safety and health information and materials easily accessible to employers and workers.</p>	<p>1.1. Promotion of AKOSH consultation and training services, industry-specific hazard control systems and safety and health program management improvement.</p> <p>1.1 Providing training classes, training materials and seminars. Evaluations will be distributed to participants at the end of each training session to determine effectiveness.</p> <p>1.1 Participating in conferences and trade shows and/or home shows when possible. Major safety conferences include Alaska Governor’s Safety and Health Conference, VPP Conference (national and regional), Associated General Contractor Conference, and American Society of Safety Professional Conference. Attendance at other safety events will be considered.</p> <ul style="list-style-type: none"> • Conduct 25 formal safety-related training events 	<p>1.1 By the end of FFY 2023 reduction of the rate of workplace fatalities under AKOSH jurisdiction by at least 10% in comparison to the average annual rate of fatalities from FY 2012 to FY 2016.</p> <p><i>Baseline: 1.2 fatalities per 100,000 employees. The average annual number of fatalities under AKOSH jurisdiction from January 1, 2012 through December 31,2016, expressed as a rate per 100,000 employees</i></p> <p>Data Source: OIS fatality investigation counts</p>

		<ul style="list-style-type: none"> • Conduct 10 safety related presentations • Provide 2 OSHA 10-Hour training sessions to the general public. One 10-hour in General Industry and one 10-hour in Construction. 	
GOAL 1.2: Reduce the Number of Workplace Injuries and Illnesses in the Construction Industry			
Reduce the overall rate of injuries and illnesses in the construction industry (NAICS 236-238990)	<p>1.2 Conduct seminars, workshops, on-site consultation, and special programs target training and consultation. Evaluations will be distributed to participants at the end of each training session to determine effectiveness.</p> <p>1.2 Target training and consultation visits toward employees and employers in the construction industry those activities most likely to experience "struck by" and "falling" and trenching and excavation incidents.</p>	1.2 Number of seminars, workshops, on-site consultations, and special programs completed in the construction industry.	<p>1.2 Reduction of the overall rate of injuries and illnesses in the construction industry by 2% per year from the baseline average 2.02 (FFY 2012-2016).</p> <p><i>The FY 2022 goal is to conduct at least 85 visits related to construction industry and to decrease the baseline to 1.86 per 100 employees.</i></p> <p>Data Source: OIS Compliance Assistance and Evaluations reports, Injury/Illnesses data: Alaska State Workers Compensation lost time claims, and Employment Data: Alaska State Department of Labor and Workforce Development</p>
GOAL 1.3: Reduce the Number of Workplace Injuries and Illnesses in the Healthcare Industry			
Reduce the overall rate of injuries and illnesses in the healthcare industry (NAICS 621-624410)	1.3 Conduct seminars, workshops, on-site consultation, and special programs. Evaluations will be distributed to participants at the end of each training session to determine effectiveness.	1.3 Number of seminars, workshops, on-site consultations, and special programs completed in the healthcare industry	<p>1.3 Reduction of the overall rate of injuries and illnesses in the healthcare industry by 2% per year from the baseline average 1.34 (FFY 2012-2016).</p> <p><i>The FY 2022 goal is to conduct at least 30 visits¹ related to healthcare industry and to decrease the baseline to 1.23 per 100 employees.</i></p>

¹ Due to understaffing in the AKOSH Consultation IH section, Consultation and Training is expected to have one fully trained IH by February 2022 with an additional IH in training status. The expectation for an IH with 1 year is a minimum of 30 visits for a highly acceptable evaluation. See IQAP Appendix E.

	1.3 Target training and consultations toward those activities most likely to experience "slips, trips, falls", "overexertion and bodily reaction", "contact with object" and "workplace violence" incidents.		Data Source: OIS Compliance Assistance and Evaluations reports, Injury/Illnesses data: Alaska State Workers Compensation lost time claims, and Employment Data: Alaska State Department of Labor and Workforce Development
GOAL 1.4: Reduce the Number of Workplace Injuries and Illnesses in the Seafood Processing Industry			
Reduce the overall rate of injuries and illnesses in the seafood processing industry (NAICS 31171-311712, 42446-424460, and 445220)	1.4 Focus consultation and outreach efforts on the causes of "falling", "caught in or between", and "pinch-point" (or amputation) incidents. Evaluations will be distributed to participants at the end of each training session to determine effectiveness. 1.4 Target training and consultations toward those activities most likely to experience "falling", "caught in or between", and "pinch point" (or amputation) incidents.	1.4 Number of on-site consultation and training visits, and compliance assistance in seafood processing industry.	1.4 Reduction of the overall rate of injuries and illnesses in the seafood processing industry by 2% per year from the baseline average 4.3 (FFY 2012-2016). <i>The FY 2022 goal is to conduct at least 8 visits² related to seafood processing industry and to decrease the baseline to 3.96 per 100 employees.</i> Data Source: OIS Compliance Assistance and Evaluations reports, Injury/Illnesses data: Alaska State Workers Compensation lost time claims, and Employment Data: Alaska State Department of Labor and Workforce Development
GOAL 2.1.a: Develop and Deliver Training to Workers and Employers in the Construction Industry			
Develop and deliver training to workers and employers in the construction industry that targets the most likely causes of injuries, illnesses, and fatalities.	2.1.a Develop and deliver training to workers and employers in the construction industry with emphasis on construction to include residential, commercial, and general industry. 2.1.a Target outreach training and consultations towards those activities most likely to cause "struck by" or "falling" injuries or fatalities.	2.1.a Number of formal and informal training events conducted in construction and number of employees trained.	2.1.a <i>The FY 2022 goal is to conduct 50 construction events and to train at least 800 workers in the construction industry included in the total of 1500 employees trained in all industries</i> Data Source: OIS, Injury/Illnesses data: Alaska State Workers Compensation lost time claims, and Employment Data: Alaska State Department of Labor and Workforce Development.

² Due to the shortened seafood season, an understaffed AKOSH Consultation and Training section and the remoteness of many seafood plants' locations, scheduling seafood visits is challenging. Additionally, many seafood plants have tightened their visit restriction after COVID-19, making it difficult to visit their worksites.

GOAL 2.1.b: Develop and Deliver Training to Workers and Employers in the Healthcare Industry			
<p>Develop and deliver training to workers and employers in the healthcare industry that targets the most likely causes of injuries, illnesses, and fatalities.</p>	<p>2.1.b Develop and deliver training to workers and employers in the healthcare industry with emphasis on home healthcare, assistant living homes, nursing homes, hospitals, dentist offices, and all health related industries. Selection of training will be made at the employer's request.</p> <p>2.1.b Target outreach training and consultations towards those activities most likely to cause "slips, trips, and falls", "overexertion and bodily reaction", "contact with objects", "Covid-19" or "workplace violence" injuries or fatalities. Selection of training will be made at the employer's request.</p>	<p>2.1.b Number of formal and informal training events conducted in healthcare and number of employees trained.</p>	<p>2.1.b <i>The FY 2022 goal is to conduct 50 healthcare events and to train at least 400 workers in the healthcare industry included in the total of 1500 employees trained in all industries</i></p> <p>Data Source: OIS, Injury/Illnesses data: Alaska State Workers Compensation lost time claims, and Employment Data: Alaska State Department of Labor and Workforce Development.</p>
GOAL 2.1.c: Develop and Deliver Training to Workers and Employers in the Seafood Processing Industry			
<p>Develop and deliver training to workers and employers in the seafood processing industry that targets the most likely causes of injuries, illnesses, and fatalities.</p>	<p>2.1.c Develop and deliver training to workers and employers in the seafood processing industry.</p> <p>2.1.c Target outreach training and consultations towards those activities most likely to cause "caught in or between", "pinching" and amputation injuries or fatalities.</p>	<p>2.1.c Number of formal and informal training events conducted in the seafood processing industry and number of employees trained.</p>	<p>2.1.c <i>The FY 2022 goal is to conduct 7 training events and to train at least 70 workers in the seafood processing industry included in the total of 1500 employees trained in all industries</i></p> <p>Data Source: OIS, Injury/Illnesses data: Alaska State Workers Compensation lost time claims, and Employment Data: Alaska State Department of Labor and Workforce Development.</p>

Strategies to achieve goals 1.1, 1.2, 1.3, 1.4, 2.1a, 2.1b, and 2.1c:

Alaska Occupational Safety and Health, Consultation and Training's (AKOSH C&T) goal is to promote and deliver safety and health programs and trainings for preventing injuries, illnesses and fatalities in Alaska's small to medium-size companies statewide in the public and private sectors.

AKOSH C&T has established the following strategies to address the training needs of workers involved in the high-risk and hazardous industries of construction, seafood, and healthcare. Consultation's Youth Emphasis was stalled in FY2020 due to COVID-19; however, efforts are in place to jumpstart youth outreach and training. The Training Coordinator plays a significant role in reinvigorating training activities that are now possible as Alaska is reopening in 2021.

- AKOSH will continue to integrate its consultation and training efforts, with its enforcement efforts in order to focus on high hazard industries and workplaces. To address particular hazards and issues that cause accidents or represent recognized threats to worker safety and health, AKOSH will continue to promote industry-specific hazard control systems, safety, and health program management improvements.
- Initial consultation visits and training efforts in construction (NAICS industry sector code 23) will concentrate primarily on hazard training associated with "falls", "struck-by", "crystalline silica", trenching, and "caught-in/between".
- Consultation and Training (C&T) will provide promotional activities to include any combination of training, brochure distribution, community outreach, partnerships, and by attending safety conferences and conducting safety presentations.
- Initial visits and training efforts in the healthcare will concentrate primarily on "slips, trips, and falls", "overexertion and bodily reaction", "contact with objects", "COVID-19", and "workplace violence".
- Initial visits and training efforts in the seafood processing will concentrate primarily on "falls", "struck-by," and "caught-in/between" type hazard training.
- C&T will monitor accidents that result from targeted causes for the duration of the plan, devise, and disseminate prevention strategy information. Monitoring will be conducted when employers notify C&T of work-related accidents. Information will be logged and if necessary, a consultant will be assigned to assist the employer to help design a prevention strategy or devise a safety plan. The action will remain open in the log until the consultant notifies the CPM the activity is closed.
- Training Coordinator will be responsible to notify employers, employees, and the general public when AKOSH Consultation training events will be held. Notification can be posted via social media, AKOSH website, and other media distribution.
- Training Coordinator will ensure all Consultation training activities, significant activities, and other Consultation achievements are recorded and reported to the Program Manager of Consultation as part of the Federal Quarterly Review.
- Training Coordinator will work with schools, youth associations, employers who hire youth, and other youth groups to promote AKOSH Consultation and Training services.
- Training Coordinator will attend youth and safety related conferences to promote Consultation services.
- Training Coordinator will provide the Program Manager of Consultation and Training with a monthly report on the number of formal training events conducted and number of attendees.
- Training Coordinator, as well as all consultants, will ensure Training Presentation Evaluations are distributed to participants for every formal training presentation. Training Coordinator will be responsible for collecting evaluations and ensuring evaluations are electronically logged. Program Manager of Consultation will review evaluations for training trends and training effectiveness.
- Program Manager of Consultation and Training will assign consultants and trainers as needed to fulfill the requirements of the training plan.

Activities

- Provide training classes for the general public in construction related activities focusing on fall protection, excavation, and personal protective equipment, silica, developing safety and health plan, COVID-19, bloodborne pathogen, and other site specific training at the request of the employer.
- Conduct at least one OSHA 10-hour in General Industry for the general public with a minimum of 10 or more participants,
- Conduct at least one OSHA 10-hour in Construction for the general public with a minimum of 10 or more participants,
- Conduct at least one OSHA 30-hour in General Industry or Construction upon request of public or private sector employers who have a minimum of 15 or more employees or public participants
- Conduct 25 formal safety-related training events
- Conduct 10 safety related presentations
- Promote C&T Services at Alaska Governor's Safety and Health Conference through outreach, presentations, and networking opportunities,
- Participate in safety related conferences to include Alaska Governor's Safety and Health Conference, Associated General Contractor Conference, American Society of Safety Professional Conference, and other safety-related conferences.

Impact

This type of intervention strategy will lead to positive changes in employer and employee perceptions and commitments toward maintaining optimal workplace safety and health, which will ultimately produce a significant reduction in serious accidents and improve safety in high hazard industry workplaces.

FY2022 Performance Goals 2.2, 3.1.a and 3.1.b

State Area of Emphasis Statement	On-Site Consultation Strategy	Description of Planned On-Site Consultation Activities	Anticipated Outcome of On-Site Consultation Activities
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GOAL 2.2: Promote Cooperative/Partnership Agreements and Recognition Programs

<p>Promote cooperative/partnership agreements and recognition programs as a means of lowering accident/fatalities rates. (21d Annual Plan exclusive goal)</p>	<p>2.2 Encourage the growth of SHARP participation through press releases, speaking engagements, community outreach, brochure distribution, and word-of-mouth</p> <p>2.2 Maintain current SHARP/Pre-SHARP related sites while striving for additional sites.</p>	<p>2.2 Promote SHARP at every consultation visit for employers who meet the criteria for Pre-SHARP/SHARP eligibility.</p> <p>2.2 Distribute SHARP brochures or handouts to all Business Connection locations in Alaska</p> <p>2.2 Encourage more SHARP/Pre-SHARP related sites and get public recognition in the communities that the sites are located.</p> <p>2.2 Host a recognition ceremony for every employer who is awarded SHARP status. Provide an opportunity for the Commissioner of the Department of Labor to attend SHARP ceremony and present award.</p> <p>2.2 Attend seminars and conferences to promote SHARP program</p> <p>2.2 Promote SHARP through trade shows with the AKOSH informational booth.</p> <p>2.2 Encourage employers to create safety committees at every opportunity.</p>	<p>2.2 By the end of FY 2022, AKOSH projects to gain 2 (two) new SHARP sites, 5 SHARP renewals and two (2) Pre-SHARP sites. <i>The FY2022 goal is a total of 11 SHARP sites and 2 pre-SHARP sites.</i></p> <p>2.2 Injuries and illnesses will be reduced and maintained at SHARP/Pre-SHARP related sites.</p> <p>2.2 Promotion of success of SHARP/Pre-SHARP sites and mentorship encouragement and networking opportunities will encourage other businesses to focus resources toward reducing workplace injuries, illnesses, and fatalities.</p>
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GOAL 3.1.a AKOSH staff is Well Trained and Knowledgeable

Work with the OSHA Training Institute, Region X staff and other sources to access training for consultation staff in standards and specialized subjects necessary to effectively carry out strategic and annual goals.

3.1.a Continue to identify and schedule training of all existing and new AKOSH personnel

3.1.a AKOSH will strive to ensure AKOSH staff members receive OTI additional training beyond the standard OSHA 1500 On-Site Consultation to further their knowledge, skills and abilities as consultants. Such training is needed to increase staff retention and ensure staff are highly trained and capable of performing their duties as trained professionals. Additional OTI courses include, but are not limited to:

Safety:

OSHA 2000 Construction Standards
OSHA 2450 Evaluation of Safety & Health Systems
OSHA 2050 Cranes in Construction
OSHA 2010 Hazardous Material

Industrial Hygiene:

OSHA 1250 Introduction to Health Standards for Industrial Hygienists
OSHA 2200 Industrial Noise
OSHA 2220 Respiratory Protection

3.1.a Schedule OTI equivalent training and other training for 21d consultants according to the training plan.

3.1.a Maintain training plan for 21d personnel.

3.1.a Improved knowledge of consultation personnel that consequently will reduce employee turnover, increase employee retention and improve safety and health conditions at workplace visited.

3.1.a All new hires will attend OSHA #1500 in-person or OSHA #1501 virtual. Experienced safety consultants will attend at least one safety course per year offered via OTI or the OSHA Continuing Education Center from the University of Washington.

In addition to OSHA 1500, all Health Consultants will attend the following courses within year 1:

- OSHA 521 OSHA Guide to Industrial Hygiene
- Asbestos Abatement Certification
- Asbestos Inspector Certification
- Hazardous Paint Certification
- EPA/AHERA Inspector Certification
- HAZWOPER 40-hour (for new-hires)
- HAZWOPER Refresher for renewals

	<p>3.1.a Continue discussion and promotion of local Region X training events and conferences to minimize negative impacts of training level on other performance goals.</p> <p>3.1.a Support staff members who are interested in obtaining their outreach trainer's certification to become outreach trainers to teach 10-hour and 30-hour Construction and/or General Industry courses.</p> <p>3.1.a Update and implement annual training plan for FY 2022.</p> <p>3.1.a Develop individual training plans for all consultants and track until completion.</p>	<p>3.1.a Pursue OTI equivalent courses scheduled in Alaska and one in another Region X state for FFY 2022.</p>	
GOAL 3.1.b Conducting Annual Reviews of Consultation Case Files			
<p>AKOSH will conduct annual reviews of consultation case files to evaluate effectiveness and consistency of services</p>	<p>3.1.b AKOSH will strive to maintain adequate and accurate consultation documentation and procedures.</p> <p>3.1.b AKOSH will train staff on documentation issues to avoid future occurrences.</p>	<p>3.1.b Conduct annual case files review for each consultant. CPM will review 20% of the consultants' case files in a consultant's evaluation year. An evaluation year is 52 weeks after the hire date.</p> <p>3.1.b CPM will conduct yearly on-site evaluations as needed to ensure adequate consultant performance, in accordance with IQAP <i>On-the-Job Evaluation</i> section.</p>	<p>3.1.b Improved knowledge and competency of consultation personnel that consequently will improve safety and health conditions at workplace visited.</p>

Projected Program Activities - 21(d) consultation

FFY 2022 OPERATING PLAN

This table is for Consultation Projects in State-Plan states that have not adopted Federal measures and goals.

ACTIVITY & AREAS OF EMPHASIS	Safety	Health	Both	Total
1. TOTAL VISITS	233	40	0	273
a. Agriculture	0	0	0	0
b. Construction	75	10	0	85
c. General Industry	150	30	0	180
d. Maritime	8	0	0	8
2. Visits Related to Emphasis Industries	Total			
a. Emphasis Industry - Construction	85			
b. Emphasis Industry - Seafood	8			
c. Emphasis Industry – Healthcare	30 ³			
Total Visits Related to Emphasis Industries	123			
3. Visits Related to Emphasis Safety & Health Hazards	Total			
a. Emphasis Hazard – Falls	40			
b. Emphasis Hazard – Amputations	5			
c. Emphasis Hazard – Slips, workplace violence, contact with objects (in Healthcare)	25			
d. Emphasis Hazard – Trenching and Excavation	10			
e. Emphasis Hazard – Crystalline Silica	20			
4. SHARP and Pre-SHARP				
a. Total Current SHARP sites (at time of application)	9			
b. Projected New SHARP sites in FY 2022	2			
c. Projected SHARP Renewals in FY 2022	5			
d. Projected Total SHARP sites at the end of FY 2022	11			
e. Total Projected Pre-SHARP sites in FY 2022	2			
5. Total Projected Compliance Assistance Activities	175			

³ Healthcare visits will be significantly impacted as Consultation lost its senior consultant. Currently Consultation has one healthcare consultant with less than 6 months experience and is expected to be fully trained by February 2022.

IV. PROGRAM IMPACT FACTORS

A few potential factors could negatively impact the program, interfering with the ability to meet goals. These factors include:

- COVID-19 severely impacted the private sector as many businesses shut down and employees were laid off. Although businesses are reopening, most employers are focusing their efforts on other priorities such as hiring staff and becoming fully operational. Furthermore, many of Consultation's repeat clients which are mostly small business, suffered the greatest impact as several of them closed permanently.
- COVID-19 continues to have a significant impact on the seafood processing industry special emphasis program. Many seafood plants are located in remote Alaska areas and still require COVID testing. This requirement may result in a visit cancellation should an outbreak in the plant occur during a scheduled visit.
- Due to the very short seafood season combined with the remoteness of several seafood site, only a small window of opportunities exists to conduct seafood visits.
- Although staff turnover has been significantly reduced, as vacant positions are being filled; 3 of 8 or 38% of consultants have less than one year experience. Additionally, the senior health consultant transferred to the Federal Government, leaving 1 (one) health consultant who has been with C&T for 5 months. The request to hire 2 (two) additional health consultant has been submitted and is pending approval. C&T staff, health consultants in particular, require extensive training and certification, and they are not expected to conduct visits until training is completed.
- Healthcare visits will be significantly impacted as Consultation lost its senior consultant. Currently Consultation has one healthcare consultant with less than 6 months experience and is expected to be fully trained by February 2022. Consultation is in the process of pending approval to hire another IH, which could take an estimated 3-4 months until another IH is hired.
- Pending funding, a lack of adequate funding to cover increased costs such as airfare and accommodations, could result in reduced services, which in turn will have a negative impact on workplace accident rates.
- The overall goal for FY 2022 is 270 private sector visits and 75 public sector visits. This slight reduction is due to newly hired staff who spend 5-7 months in training and are exempted from visit goals while in training. It is also due to the negative remnants COVID-19 had on local small businesses.

V. CHANGES TO INTERNAL QUALITY ASSURANCE PROGRAM

- Internal Quality Assurance program had been revised; see in the Attachment 1.

Appendix I
ANNUAL TRAINING PLAN – FY 2022

State: **Alaska**

Date: **6/15/2021**

List Personnel by Name, and Position (i.e., MGT, S/S, H/S, S, H, TS, TH, or SEC)	Percent of Time on the 21(d) Agreement	Training Activity and Location	Percent of Cost Allowable for Federal funding	Cost of Training (Include Per Diem, Airfare, Registration Fee, Misc., etc.)	Training Cost Charged to Agreement ¹				Competency Area that Training will Address*
					100% Fed Eligible ²	90% Fed Allowable ³	10% State Allowable ⁴	Total Charged to Agreement ⁵	
PCN 07-4532 E. Banda, MGT, Anchorage	70%	OSHCN Conference, Location TBD, 5 days including travel	100%	\$ 2,042.00	\$ 2,042.00			\$ 2,042.00	a,c,d,e,f,g,h
PCN 07-2023 Vacant, S, Anchorage	65%	OSHA 1500, Introduction to On-Site Consultation, Arlington Heights, IL, Dates: TBD, 33 days – virtual course	100%	\$ 0	\$ 0			\$ 0	a,b,c,d,f,h
PCN 07-2059, Vacant, H, Anchorage	65%	OSHA 1500, Introduction to On-Site Consultation, Arlington Heights, IL, Dates: TBD, 11 days – virtual course	100%	\$ 0	\$ 0			\$ 0	a,b,c,d,f,h
PCN 07-2062, Vacant, H, Anchorage	65%	OSHA 1500, Introduction to On-Site Consultation, Arlington Heights, IL, Dates: TBD, 11 days – virtual course	100%	\$ 0	\$ 0			\$ 0	a,b,c,d,f,h

PCN 07-2045 H. Miley, H, Anchorage	70%	OSHA 3300, PSM Course Level 1, Arlighton Heights, IL, Dates: TBD, 11 days including travel	100%	\$ 3,508.00	\$ 2,455.60			\$ 2,455.60	a,b,c,d,f,h
PCN 07-2062, Vacant, H, Anchorage	65%	OSHA 3300, PSM Course Level 1, Location and Dates: TBD, 11 days including travel	100%	\$ 3,508.00	\$ 2,280.20			\$ 2,280.20	a,b,c,d,f,h
PCN 07-4532 E. Banda, MGT, Anchorage	70%	VPP National Conference, VPPPA, Location and dates TBD; 5 days including travel	100%	\$ 1,755.00	\$ 1,228.50			\$ 1,228.50	a,c,d,e,f,g,h
PCN 07-4532 E. Banda, MGT, Anchorage	70%	VPP Regional Conference, VPPPA, Boise, ID, Dates TBD; 5 days including travel	100%	\$ 1,705.00	\$ 1,193.50			\$ 1,193.50	a,c,d,e,f,g,h
VPP Coordinator, S, Anchorage	65%	VPP Regional Conference, VPPPA, Boise, ID, Dates TBD; 5 days including travel	100%	\$ 1,705.00	\$ 1,108.25			\$ 1,108.25	a,b,c,d,f,h
PCN 07-2010, L. Bitz, S, Juneau	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK, 5 days including in-state travel.	90%	\$ 2,170.00		\$ 1,269.45	\$ 141.05	\$ 1,410.50	a,b,c,d,f,h
PCN 07-2010, L. Bitz, S, Juneau	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK, 5 days including in-state travel.	90%	\$ 2,170.00		\$ 1,269.45	\$ 141.05	\$ 1,410.50	a,c,d,e,f,g,h

PCN 07-1726 A. Jones, S, Fairbanks	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK, 5 days including in-state travel.	90%	\$ 2,120.00		\$ 1,240.20	\$ 137.80	\$ 1,378.00	a,b,c,d,e,f,h
PCN 07-1726 A. Jones, S, Fairbanks	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK, 5 days including in-state travel.	90%	\$ 2,120.00		\$ 1,240.20	\$ 137.80	\$ 1,378.00	a,b,c,d,f,h
PCN 07-1726 A. Jones, S, Fairbanks	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 5 days including in-state travel	90%	\$ 1,770.00		\$ 1,035.45	\$ 115.05	\$ 1,150.50	a,b,c,d,f,g,h
PCN 07-2010, L. Bitz, S, Juneau	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 1,770.00		\$ 1,035.45	\$ 115.05	\$ 1,150.50	a,b,c,d,f,g,h
PCN 07-2045 H. Miley, H, Anchorage	70%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 173.25	\$ 19.25	\$ 192.50	a,b,c,d,f,g,h
PCN 07-2062 Vacant, H, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK,	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,g,h

		Dates TBD; 2 days, no travel							
PCN 07-2059, Vacant, H, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,g,h
PCN 07-2083 A. Conley, TS, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,g,h
PCN 07-2050 D. Farwell, S, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,g,h
07-2025 J. Wallace, S, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,h
PCN 07-2065 M. Flint, S, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,h
PCN 07-2075 C. Hendrickson, S, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC),	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,g,h

		Anchorage, AK, Dates TBD; 2 days, no travel							
PCN 07-5892 S. Damerow, S, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,h
PCN 07-2023, Vacant, S, Anchorage	65%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 2 days, no travel	90%	\$ 275.00		\$ 160.88	\$ 17.88	\$ 178.75	a,b,c,d,f,g,h
PCN 07-2059 Vacant H, Anchorage	65%	Asbestos Abatement Certification for Contractors and Supervisor 40-hr, EMI, Anchorage, AK, no travel	90%	\$ 550.00		\$ 321.75	\$ 35.75	\$ 357.50	a,b,c,d,f,h
PCN 07-2045 H. Miley H, Anchorage	70%	Asbestos Abatement Certification for Contractors and Supervisor 40-hr, EMI, Anchorage, AK, no travel	90%	\$ 550.00		\$ 346.50	\$ 38.50	\$ 385.00	a,b,c,d,f,h
PCN 07-2062 Vacant, H, Anchorage	65%	Asbestos Abatement Certification for Contractors and Supervisor 40-hr, EMI, Anchorage, AK, no travel	90%	\$ 550.00		\$ 321.75	\$ 35.75	\$ 357.50	a,b,c,d,f,h
PCN 07-2059 Vacant, H, Anchorage	65%	EPA/AHERA Inspector Certification, EMI, Anchorage, AK, no travel	90%	\$ 500.00		\$ 292.50	\$ 32.50	\$ 325.00	a,b,c,d,f,h

PCN 07-2045 H. Miley, H, Anchorage	70%	EPA/AHERA Inspector Certification, EMI, Anchorage, AK, no travel	90%	\$ 500.00		\$ 315.00	\$ 35.00	\$ 350.00	a,b,c,d,f,h
PCN 07-2062 Vacant, H, Anchorage	65%	EPA/AHERA Inspector Certification, EMI, Anchorage, AK, no travel	90%	\$ 500.00		\$ 292.50	\$ 32.50	\$ 325.00	a,b,c,d,f,h
PCN 07-2059 Vacant, H, Anchorage	65%	Hazardous Painter Certification EMI, Anchorage, AK, no travel	90%	\$ 250.00		\$ 146.25	\$ 16.25	\$ 162.50	a,b,c,d,f,h
PCN 07-2045 H. Miley, H, Anchorage	70%	Hazardous Painter Certification EMI, Anchorage, AK, no travel	90%	\$ 250.00		\$ 157.50	\$ 17.50	\$ 175.00	a,b,c,d,f,h
PCN 07-2062 Vacant, H, Anchorage	65%	Hazardous Painter Certification EMI, Anchorage, AK, no travel	90%	\$ 250.00		\$ 146.25	\$ 16.25	\$ 162.50	a,b,c,d,f,h
PCN 07-2059 Vacant, H, Anchorage	65%	HAZWOPER, EMI, Anchorage, AK, no travel	90%	\$ 700.00		\$ 409.50	\$ 45.50	\$ 455.00	a,b,c,d,f,h
PCN 07-2062 Vacant, H, Anchorage	65%	HAZWOPER, EMI, Anchorage, AK, no travel	90%	\$ 700.00		\$ 409.50	\$ 45.50	\$ 455.00	a,b,c,d,f,h
PCN 07-2045 H. Miley, H, Anchorage	70%	HAZWOPER Refresher, EMI, Anchorage, AK, no travel	90%	\$ 300.00		\$ 189.00	\$ 21.00	\$ 210.00	a,b,c,d,f,h
PCN 07-2059 Vacant, H, Anchorage	65%	OSHA 521 Guide to Industrial Hygiene, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2045 H. Miley, H, Anchorage	70%	OSHA 521 Guide to Industrial Hygiene, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 409.50	\$ 45.50	\$ 455.00	a,b,c,d,f,h

Consultation Annual Program Plan
October 1, 2021 to September 30, 2022

PCN 07-2062 Vacant, H, Anchorage	65%	OSHA 521 Guide to Industrial Hygiene, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2065 M. Flint, S, Anchorage	65%	OSHA 501 Trainer Course in OSHA Standards for General Industry, University of WA, Anchorage, AK, no travel	90%	\$ 650.00	\$ -	\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2025 J. Wallace, S, Anchorage	65%	OSHA 501 Trainer Course in OSHA Standards for General Industry, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2023 Vacant, S, Anchorage	65%	OSHA 510 OSHA Standards for the Construction Industry, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2025 M. Wallace, S, Anchorage	65%	OSHA 510 OSHA Standards for the Construction Industry, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2065 M. Flint, S, Anchorage	65%	OSHA 510 OSHA Standards for the Construction Industry, University of WA, Anchorage, AK, no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2050 D. Farwell, S, Anchorage	65%	OSHA 511 OSHA Standards for General Industry, University of WA, Anchorage, AK no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h

Consultation Annual Program Plan
October 1, 2021 to September 30, 2022

PCN 07-2075 C. Hendrickson, S, Anchorage	65%	OSHA 511 OSHA Standards for General Industry, University of WA, Anchorage, AK no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2083 A. Conley, TS, Anchorage	65%	OSHA 7845 Recordkeeping Rule Seminar	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2062 Vacant, H, Anchorage	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-2045 H. Miley, H, Anchorage	70%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK no travel	90%	\$ 650.00		\$ 409.50	\$ 45.50	\$ 455.00	a,b,c,d,f,h
PCN 07-2059 Vacant, H, Anchorage	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
07-2075 C. Hendrickson, S, Anchorage	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
PCN 07-5892 S. Damerow, S, Anchorage	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center.	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h

		Anchorage, AK no travel							
PCN 07-2050 D. Farwell, S, Anchorage	65%	OSHA Continuing Education Training through Pacific Northwest OSHA Education Center. Anchorage, AK no travel	90%	\$ 650.00		\$ 380.25	\$ 42.25	\$ 422.50	a,b,c,d,f,h
TOTAL				\$ 45,473.00	\$ 10,308.05	\$ 18,585.08	\$ 2,064.68	\$ 30,954.80	

*Competency Areas:

- | | | |
|---|---|---------------------------------------|
| a. Recognition and Evaluation of Occupational Hazards | d. Provide Hazard Prevention & Control Assistance | g. Promote OSHA Consultation Services |
| b. Evaluate Safety and Health Management Systems | e. Manage Program Processes and Reports | h. OSHA Consultant Professionalism |
| c. Provide Occupational Safety and Health Training | f. Provide Off-Site Technical Support | i. Other (specify) |

ATTACHMENT 1

**Alaska Occupational Safety and Health Consultation
Internal Quality Assurance Program (IQAP)
for C&T Program Manager**

Developed by
Occupational Safety and Health
Program Manager of Consultation and Training
June 2021

The information in this guide describes the framework of service delivery and philosophy of the Consultation Services Section of the Alaska Occupational Safety and Health section of AKOSH.

Introduction IQAP

Goal

The overall goal of the Consultation and Training Program is to assist Alaska employers in implementing and maintaining an effective safety and health program and to ultimately become self-sufficient in managing their program.

Purpose

The purposes of the Alaska Consultation Program, is to work with small businesses defined as employers with fewer than 250 employees at a fixed worksite and no more than 500 employees corporation-wide to help them achieve a safe and healthy worksite.

Alaska Consultants

We encourage consultants to be leaders with positive attitudes. They are trained and qualified to provide safety and health recommendations to Alaska employers. They function as a team and a state-wide resource where staff and management work together for the common goal of helping employers solve problems and identify potential hazards at their worksites to improve their self-sufficiency.

Required Elements of an Internal Quality Assurance Program (IQAP).

In accordance Directive CSP 02-00-004 Consultation Policies and procedures Manual, Consultation Projects must operate internal quality assurance programs to ensure the maintenance of program requirements that are covered by assurances in the Project's On-site Consultation Cooperative Agreement. A comprehensive quality assurance program must include systems to ensure:

A. On-the-job evaluations

- i. Supervision—the Program Manager of Consultation and Training/Consultation Program Manager (CPM) is responsible for the following:

DAILY

- a. **Written reports**—CPM reviews all written consultation reports and is the signing authority. Once signed, CPM return signed reports to the consultants who sends to the employer.
- b. **Extension requests**—CPM is responsible for reviewing and signing all extension requests. The consultant must indicate in the case file notes whether interim protection is required, the nature of the recommended interim protection, the date the interim protection must be in place and the dates that interim protections are expected to be replaced with the final agreed upon protections. Extensions to the interim protection periods must also be documented in the case file.
- c. **Request for Services.** CPM is responsible for managing Consultation requests. Managing includes tracking and distributing Request to staff. Employers must make a written request for C&T Services. Request for Services are monitored on a daily basis. All request must receive a response from AKOSH within 7 business **days** from the date the request was made by the employer. See copy of AKOSH C&T at this link:
http://labor.alaska.gov/lss/forms/consultation_training_form.pdf

- d. **Remote location**—due to the uniqueness of Alaska, employers that are deemed “remote” remote meaning the only means of travel is by plane, boat, skiff, or snow machine, or unconventional modes of transportation, C&T must closely monitor requests from these locations. Travel is approved by the LSS Director to remote sites only if the consultant has three or more visits to the remote site. CPM is responsible for ensuring the consultants stay in contact with the employer, acknowledging receipt of request and estimated visit date.

WEEKLY

- **Weekly staff meeting.** Staff meetings are conducted once a week. Current staff meeting are held Mondays from 10am—11am. Topics of discussion include current trends, organizational updates, upcoming holidays/scheduled leave, upcoming conferences or activities, monthly/quarterly goals, training topics, etc.
- **Weekly manager’s meeting.** The Program Manager of Consultation and Training attends the weekly and sometimes bi-weekly LSS Director’s staff meeting. This meeting include all four sections of LSS.
- **Weekly progress reports**
 - Task list reports are generated twice a month, usually on the 1st and the 15th of each month and sent individually to each consultants

QUARTERLY

- **Safety Minutes**—CPM along with consultants are responsible for writing Safety minutes for TRENDS Magazine. Consultants send their articles to the CPM.
- **Quarterly Reviews**—CMP is required to attend quarterly federal report meeting
- **Employee Ride Alongs**—CPM will participate in a ride-along with C&T staff members. The purpose of the ride-along is to assess the employee’s performance while in the field. The ride-along will be documented in Appendix B of the IQAP for record.

YEARLY

- **Employee Ride Alongs**—CPM will participate in a ride-along with C&T staff members. The purpose of the ride-along is to assess the employee’s performance while in the field. The ride-along will be yearly, at least once within a consultant’s evaluation year. Ride Alongs will be documented in Appendix B of the IQAP for record.

AS NEEDED

- **Updating Website**—The Program Manager of Consultation and Training is responsible for submitting current information to the webmaster pertaining to the AKOSH C&T website.
- ii. **Training**—The CPM is responsible for designing and overseeing the new employee orientation program. The new employee program key elements are: State of Alaska Supervisor Checklist and New Employee Orientation, Web based OTI Course # 1500 “Introduction to On-site Consultation and OTI OSHA Course Introduction to Safety for Safety Officers or Introduction to Industrial Hygiene for Industrial Hygienists. After the initial orientation, a formal training plan

shall be developed based on the individual needs of the consultant and the availability of formal classes at the OTI in Chicago, OTI Education Centers and other training institutions. The new consultant is assigned a senior consultant who shall act as mentor for the new consultant in an On-the-Job-Training (OJT) Program covering all phases of consultation; preparation, on site visit, report writing and follow up activities. The OJT Program shall typically last up to one year.

The use of AKOSH SOP 002 in addition to the federal IDP is used to help assist and guide all new hires through the training process. SOP 002 is used to establish policy and procedures for the AKOSH new employee training program to ensure systematic approach to new employee training. Evaluations are conducted at the end of 6 months for a new hire and again before the new hire's employment anniversary date.

A new consultant shall perform 21(d) onsite consultation visits only after receiving OSHA Regional Administrator approval.

The CPM will annually develop, design and administer a personal professional development-training plan for all consultants. The plan is designed to ensure all consultants are acceptably proficient in the Consultant Function-Competency Statements outlined in Appendix K of the CPPM.

The CPM (Program Manager of Consultation and Training or designee) shall perform at least one on the job evaluation (OJE) of all consultants. Each OJE will include a written report of recommendations for professional development. A copy of each OJE shall be placed in each consultant's personal professional file. If there are major deficiencies with a consultant's professional performance, the CPM will consult with the Director to determine what corrective actions or additional training may be required to correct the deficiency.

B. Review Work Products

1. Trainee—experienced employees are paired with newer employee or trainees, to assist with training and reviewing case visits. When a new supervisor is placed in supervisory position with outstanding managerial skill but little practical skill, the peer-to-peer review will be conducted until the supervisory is fully trained in using the OIS system and completed the OSHA 1500 course at the OSHA Training Institute.

2. Review written reports—all consultants' Written Reports are reviewed and signed by the CPM. Consultants have 15 days from closing conference to send written reports to the CPM. The CPM has 3 days to review and return to consultants for corrections. All written reports are required to be sent to the employer within 20 federal working days after the closing conference.

The consultant who conducts the on-site visit must prepare a Written Report to the Employer at the conclusion of an initial visit. The original report must be sent to the employer as soon as possible, but not longer than 20 federal working days after the closing conference.

If chemical substance sampling was conducted during the visit and laboratory results are not available when the report is due, the consultant must send an interim report that addresses issues or hazards that are not dependent on sampling results. The sampling results and any associated hazards must be sent as an addendum to the report as soon as they are available.

The written report to the employer restates the employer's request and describes the working conditions examined by the consultant. In the report, the consultant:

- Evaluates the employer's safety and health management system and provides recommendations for making it more effective
- Identifies specific hazards and describes their nature, including references to applicable standards or codes
- Identifies the seriousness of the hazards
- If possible, includes suggestions for correction and [additional assistance](#).

Every written report to the employer must be sent with a cover letter explaining the employer's obligations subsequent to the visit. When serious hazards are identified, the Consultation Project Manager **must** ensure that the cover letter includes specific information and instructions concerning the "List of Hazards".

OSHA considers the written report to the employer confidential business information covered under Exemption 4 of the Freedom of Information Act (FOIA). The Consultation Project can only provide the report to the employer.

If the employer participates in a recognition and exemption program or is in inspection deferral status, the name of the company is released so that the employer can be removed from the programmed inspection schedule.

3. Former employees—when a consultant leaves AKOSH C&T, the CPM is responsible for ensuring the former employee's caseload is reassigned to other staff. The Task List report is the best indicator that shows what reports are pending. Once the CPM reassigns the visit, the information is updated in the OIS system with the new consultant's name who is taking over the visit. The new consultant is required to contact the employer, introduce themselves, and continue with C&T services.

- a. Separation paperwork and requirements.** The following items need to be completed when a staff member the following documentation is required to be sent to payroll in a singular packet:
 - Employee resignation letter or email
 - PARF
 - Employee final timesheet
 - SOA Employee clearance form
 - Employee final performance evaluation
- b. Other AKOSH documentation.** The CPM processes the below documents and sends to AKOSH Project Assistant:
 - Lan/Delete Mainframe Request
 - OIS Account User Request

FISCAL Years

Federal Fiscal Year

1 st quarter	October 1—December 31
2 nd quarter	January 1-March 31
3 rd quarter	April 1—June 30
4 th quarter	July 1—September 30

State Fiscal Year

1 st quarter	July 1—September 30
2 nd quarter	October 1—December 31
3 rd quarter	January 1—March 31
4 th quarter	April 1—June 30

4. Training requirements. Training requirements are outlined in SOP 002, see **APPENDIX B** and each consultants' training plan is developed by the CPM. Additional training requirements are outlined in the consultant's Individual Development Plan (IDP) which is also developed by the CPM and must have Federal approval. An example of an IDP is located in the back of this IQAP in **APPENDIX D**.

5. Technical links found on the OSHA website:

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910>

<https://www.osha.gov/laws-regs/regulations/standardnumber/1926>

http://labor.alaska.gov/lss/forms/2019_CPPM.pdf

<http://labor.alaska.gov/lss/osshome.htm>

6. The Consultation Function Competency Statement. To ensure AKOSH is hiring qualified individuals to fill the Consultation and Training Safety consultant position, an example of interview questions are framed modeled in accordance with the AKOSH follows a 3-prong process:

- i. After all potential candidates have been interview for a position and wishes to select an individual for hire, the CPM must seek approval for the Federal Regional Administrator (RA) **before** making a job offer. A letter must be written outlining the candidate's job qualifications and a copy of the candidate's résumé must be included.
- ii. Upon approval to hire from the RA, the CPM must then submit an Individual Development Plan (IDP) to the RA and outline a plan of action for the trainee
- iii. Upon completion of the IDP, the CPM must submit a completed IDP, indicating all of the items completed and request approval to work from the 2(d) grant. An example of this is located in APPENDIX D. The RA will respond indicating the consultant has completed the training program and can work from the 21(d) grant.

7. Relationship of Consultation Programs to Enforcement. Every consultant must ensure the employer they are visiting is not under Enforcement jurisdiction before scheduling a C&T visit. To find out if an employer is under Enforcement search the following link:

<https://www.osha.gov/pls/imis/establishment.html>

- i. If the employer is under Enforcement, the consultant must communicate with the employer why a visit cannot be conducted and encourage the employer to contact AKOSH C&T after they are no longer with enforcement.
- ii. After the consultants notifies the employer, the CPM follows up with a formal letter stating due to the Enforcement review, C&T is unable to provide Consultation services. A sample letter is located in back of this IQAP APPENDIX C.

8. Program, state, or other policies and procedures.

The following are contacts to assist with OIS and program management training:

Eric Christensen	619-557-5909	christensen.eric@dol.gov	Programmatic
Christine Hirai	510-637-3823	hirai.christine@dol.gov	Programmatic (alt)
Mary Shannon	202-836-1663	shannon.mary@dol.gov	OIS
Jeff Thompson	208-426-2211	jthomps@boisestate.edu	Idaho C&T Manager
Lou Flores	360-902-5237	flos235@LNI.wa.gov	WA C&T Manager

C. Ensuring that hazards are identified, correction advice is offered to employers, and abatement is verified.

It is recommended that the CPM runs the Uncorrected Hazard Report on a weekly basis to ensure consultants are following up with employer abatements and hazards are being abated in a timely manner.

- i. The **abatement** of all hazards identified during the consultation visit must continue to be verified through the agreed-upon hazard correction period
- ii. The employer is required to provide certification of abatement to the consultant
- iii. If the employer fails to take the action necessary to correct hazards within the agreed upon time frame or for any extensions, the consultant contacts the employer and offers an extension.

An employer may request an extension of the correction due date(s) for a serious hazard(s). An extension may be granted when the employer demonstrates evidence:

- Of a good faith effort to correct the hazard(s) within the established time frame
- That the correction has not been completed because of factors beyond the employer's reasonable control
- That the employer is taking available interim steps to safeguard the employees against the hazard(s) during the correction period

In order for the consultation visit to remain in progress, the employer must meet certain conditions. The "consultation visit in progress" is terminated when the employer fails to do any one of the following:

- Immediately correct imminent danger situations identified during the on-site visit
- Correct serious hazards within the established time frame(s) including extensions
- Provide interim protection for each serious hazard until it has been corrected
- Post the List of Hazards
- Meet any other agreed-upon conditions

If the consultant is unable to verify the correction of a serious hazard before the consultant leaves the worksite, the Consultation Project Manager must ensure that at a minimum, the employer provides written verification that the serious hazards identified in the written report to the employer have been corrected by their correction due dates.

If the employer cannot meet the agreed upon due dates they need to request an extension citing the reasons for the delay and provide a new estimated correction date.

- iv. **Extensions**—when an employer is granted an extension, the following must be documented and placed in the case file:
- A written request for the extension from the employer that explains why the correction was not completed in the established time frame
 - Evidence from the employer that the employer is safeguarding employees against the hazard with interim protection during the correction period
 - A [new List of Hazards](#) (a copy of which is sent to the employer and, if applicable, the employee representative) as a result of the approved extension and the revised correction due dates

v. **Referral to Enforcement**

Either of the following conditions are grounds for referral to federal or state OSHA enforcement by the Consultation Project Manager:

- An imminent danger situation that is not immediately corrected by the employer
- A serious hazard that is not corrected within the established time frame

D. Program management that includes:

1. Clearly written and regularly communicated policies and procedures. The federal CPPM is the resource for managing Consultation and Training. The link can be found at: http://labor.alaska.gov/lss/forms/2019_CPPM.pdf

2. Use of data and other information to effectively manage the program. The following is a list of reports that are run by the C&T program manager on a recurring basis:

- a. MARC report—monthly
- b. Task List report—weekly
- c. Overdue Hazard report—weekly
- d. Hazard abatement report—weekly
- e. 20 federal working days from closing conference—weekly
- f. Pending reports—twice a month
- g. Workflow request—immediately
- h. Extension request—daily

3. **Prioritization**—The seven priority levels the Consultation Project Manager uses to determine the hazardousness of a worksite are listed below:

- **First Priority** - given to imminent danger situations and congressional designations
- **Second Priority** - given to smaller employers in targeted industries
- **Third Priority** - given to OSHA's site-specific targeting (SST) inspections
- **Fourth Priority** - given to smaller employers in high-hazard industries.
- **Fifth Priority** - given to smaller employers not in high-hazard industries
- **Sixth Priority** - given to mid-sized employers (including franchises)
- **Seventh Priority** - given to larger employers.

NAICS Codes for AKOSH Local Emphasis: Utilize the Consultation High Hazard List or the NAICS Look-up Tool to assist with prioritizing employers. Prioritization should be given to the following:

- high hazard employers (as defined by the high hazard list—Excel Spreadsheet)
- small business employers (as defined by CPPM)
- local emphasis employers (Below are AKOSH Local Emphasis Programs
 - a. Healthcare— NAICS 621-624410
 - b. Construction—NAICS 236-238990
 - c. Seafood— NAICS 31171-311721
NAICS 42446-424460
NAICS 445220

4. How to determine what Requests haven't been satisfied in OIS (and remain pending)

- a. **Requests Pending** Report in OIS (Project Office Operational Folder) – Good to run weekly/bi-weekly and to clean up data at year-end
 - i. This report will show all requests entered that remain in draft with no visits, and also requests finalized with visits that have no open conference date

5. Show how many visits that relate to high hazard industries

- b. **MARC** Report in OIS (Performance Measure Folder)- Good to run monthly and quarterly
 - i. This report shows your performance on mandated activities. All MARC measures include draft and final visits with the exceptions of Measures 3 and 4. Measure 3 only captures final visits and Measure 4 only captures final initial visits that are closed to ensure we are pulling the latest data for conferring with employees and for hazards abated. Therefore, the initial visits count in Measure 3 will not equal the initial visit count in Measure 1 and serious hazards count in Measure 4 will not equal the serious hazards count found in other CNS reports.
 - ii. Ownership—Private sector
 - iii. Ownership—Local and State Government

6. Show year-end performance on FY goals and to help you write your CAPR/SOAR

- c. **Consultation Annual Project Plan Tracking report** in OIS (Project Office Operational Folder) – Good to run monthly/quarterly/year-end
 - i. Provides you with the ability to capture the data you need to prepare your annual CAPPs, CAPRs, and other Year-End Reports, as well as a starting point for meetings between Regions and Projects.

- d. **Coding Summary Report** in OIS (Consultation Activity Reports folder) – Good to monthly/quarterly/year-end (good for State Plan States with their own strategic plan)
 - i. This report provides you with activity counts based on National, Local, and State Emphasis Programs codes entered and the number of requests and visits associated with those codes. If a particular code does not appear on the tab, none of the requests or visits selected in the report included the code. A visit that has multiple NEP/ LEP/ SEP/ Strategic entries is counted under each code listed.

7. How to ensure data entered in finalized and showing on reports

- e. **Task List Report** in OIS ((Project Office Operational Folder) Good to run weekly/bi-weekly and to clean up data at year-end

- i. Effective report to indicate cases that are still active in OIS (cases that remain in draft or do not have a case close date). This report displays cases that have not yet been closed and it indicates draft/final of the request and the visit as well as the status of hazard abatement, safety and health assessment, and written report.

E. Individual accountability is managed through report viewing. Individuals are notified is their CSHO ID appears on any of the reports listed above. Consultants are required to take necessary steps to ensure completeness.

F. Maintenance of program uniformity through regular communication, updates, and meetings. Staff meeting will be conducted every Monday at 10am, mandatory for all C&T staff. Remote staff member will attend via SKYPE. The program manager will keep copies of all staff meeting.

G. Promoting and marketing of consultation services to targeted employers and stakeholders.

- i. C&T published a brochure to market its services. When consultants conduct outreach, they are required to leave employer with a C&T brochure that explains our services.
- ii. Brochures are left at the Department of Labor Business Connection. This is a service for employers working with Department of Labor
- iii. Consultants attend conferences, speak at industry related functions, and are members of task groups as a means to promote C&T services.

H. Evaluating service delivery using random audits (and other optional evaluative tools, such as surveys, questionnaires, focus groups, or training evaluations) to check for broad, programmatic trends in service delivery. Training with programmatic training will determine and how to conduct self-audits.

I. Other mandatory requirements:

- A. Travel process—as needed
- B. Timesheet—must be submitted to LSS every other Friday
- C. Leave Requests—as needed
- D. Union Contracts—as needed
 - GGU
 - LTC
- E. Overtime Authorization Process as needed
- F. Case file reviews—1-2 per month. CPM is responsible for reviewing consultant case files. At least one case file per month will be reviewed.

G. Ride alongs—Once per quarter the CPM will accompany the consultant on a ride-along visit.

H. Workers Compensation Information

- Insurer Name—Penser North America
- FEIN#--926001182
- UI #--588997
- Submit Workers Comp forms to doa.dop.roi@alaska.gov
- Insurer Type—Self Insured

I. Program Manager of Consultation and Training Responsibility Overview

- Supervise daily activities of Consultation staff members
- Conduct at least one “On the Job (OFE) evaluation with each employee per year. Record on Appendix A.
- Conduct OJE with each new employee as a requirement for an employee to be released to conduct visit alone.
- Email Federal OSHA for approval to be released
- Approve all extensions for hazards
- Assign visits, training, and travel, for Consultation staff
- Approve/Disapprove all travel requests
- Approve all overtime for staff
- Provide quarterly input information to Project Assistant for the federal quarterly review
- Review, approve, or deny staff leave requests
- Review, approve, or deny staff training requests
- Review and sign staff timesheets
- Write performance evaluations for staff
- Conduct weekly staff meeting
- Monitor annual performance goals

8. **Special Programs**—below are a list of the special programs. Each program is assigned a lead coordinator and a backup. Schedule monthly meetings with team to ensure the programs are effective and meeting requirements.

- VPP Coordinator
- SHARP Coordinator
- CHASE Coordinator

APPENDIX C

The AKOSH Training Progression Table (TPT) lists activities that shall be completed within **6 months** after hire date.

Type of Activity

(SI) - Self-Instruction

(OJT) - On-the-Job Training

Item

(*) - Item must be signed-off by direct supervisor

(C) - Consultation section specific

Consultation TPT

Item	Type of Activity	Activity Description	Date Complete	Employee Initials	Mentor Initials
*1	SI	Review parts I, II, & III of Appendix A.			
2	OJT	Work with administrative manager to identify and become familiar with office administrative procedures.			
3	OJT	Work with travel planner to identify and become familiar with travel coordination procedures. Review and become familiar with Alaska Administrative Code.			
*4	SI	Work with supervisor to review the New Hire Checklist.			
5	SI	Research and become familiar with the Federal OSHA website.			
6	SI	Research and become familiar with the State of Alaska website.			
7	SI	Sign up for, research, and become familiar with the OSHA extranet website.			
8	SI	Research and become familiar with the Alaska Occupational Safety and Health website.			
9	OJT	Accompany a CSHOs on 6 visits and observe and participate in the following: <ul style="list-style-type: none"> ▪ Visit preparation ▪ Opening conference ▪ Walkthrough ▪ Closing conference 	1. ___/___/___ 2. ___/___/___ 3. ___/___/___ 4. ___/___/___ 5. ___/___/___ 6. ___/___/___ 7. ___/___/___ 8. ___/___/___		

10	SI	<p>Accompany Enforcement Officers on 3 separate ride-alongs to observe the following:</p> <ul style="list-style-type: none"> • Inspection preparation • SHMS discussion • Opening conference • Walk-through 			
11	SI	Review OIS User Guides.			
12	OJT	<p>Under the direction of the mentor, use OIS to conduct the following:</p> <ul style="list-style-type: none"> ▪ Generate a request form ▪ Generate a visit form ▪ Generate an compliance assistance form ▪ Generate Form 33 ▪ Generate written report ▪ Generate hazards STEPs 			
13	OJT	<p>Under the direction of the mentor, use OIS to conduct the following:</p> <ul style="list-style-type: none"> • Generate a complaint • Generate an investigation • Generate an accident report • Generate a referral 			
14	OJT	<p>Complete the following E-Learn Web courses</p> <p>OSHA 1008-Intro to OSHA for New Hires</p> <p>OHS 0073-Navigating the BLS Website</p> <p>OSHA 0109-Revised Reporting Requirements</p>			
15		At the end of 6 months, Consultation supervisor will conduct a 6-month performance evaluation.			

By signing this form, you are confirming and verifying that the material in this mentorship program has been reviewed and understood.

New employee name: _____

Mentor name: _____

Supervisor name: _____

Date completed: _____

APPENDIX D

Performance Evaluation Matrix Consultation and Training Safety Consultants

Safety Matrix for employees with 1 year or less.

Below 25 unacceptable

25-29—low acceptable

30-36—mid acceptable

37-42—high acceptable

43+ outstanding

At least 75% of visits from private sector; between 20% - 25% of visits from public sector

Safety Matrix for employees with 1 up to 2 years.

Below 29 visits—unacceptable

29-34 visits—low acceptable

35-40 visits—mid acceptable

41-49 visits—high acceptable

50+ visits—outstanding

- At least 75% of visits must be from private sector
- Between 20%-25% of visits must be from public sector
- Number of employees trained on site—50 or more
- Average number of days between closing conference and written report—15 or less
- Compliance Assistance activities 20 or more
- Follow-up visits—3 or more
- Training and education visits—3 or more

Safety Matrix for employees with 2 to 4 years.

Below 35 visits and written reports—unacceptable

36-40—low acceptable

40—49 mid acceptable

50—57 high acceptable

58+ outstanding

In addition to Consultation visits goals, other factors taken into consideration for the Performance section are the following:

- 85%—90% of visits from private sector; 10%--15% of visits from public sector
- 90%+ visits from small and/or mid-sized employers as defined by CPPM Chapter 3 with 250 employees or less at the worksite and less than 500 employees corporate-wide
- 70%+ of visits from high hazard industries as defined by CPPM Chapter 3
- Number of employees trained on-site: Unacceptable less than 49; Low acceptable less than 50-100; Mid acceptable 101-150; High acceptable 151-200; Outstanding 200+
- Average number of days between closing conference and written report: More than 20 days—unacceptable; 17-20 days—low acceptable; 14-16—mid acceptable; 11-13 days—high acceptable; 10 or less days--outstanding

- Lapse days between requests and opening conference: More than 120 days—unacceptable; 90-119 days—low acceptable; 60-89 days—mid acceptable; 30-59 days—high acceptable; 29 or less days--outstanding
- Follow-up visits goals: Unacceptable less than 4; Low acceptable less than 4-5; Mid acceptable 6-8; High acceptable 9-11; Outstanding 12+
- Training visits: Unacceptable less than 3; Low acceptable 3-4; Mid acceptable 5-7; High acceptable 8-10; Outstanding 11+
- Continue to keep average number of days for the written reports sent the employer well below the maximum 20 days
- Continue to perform at a high level in customer service, compliance assistance, and training

Safety Matrix for employees with 4 to 6 years.

Below 40 visits and written reports—unacceptable

41—47 low acceptable

48—55 mid acceptable

56—65 high acceptable

66+ outstanding

In addition to Consultation visits goals, other factors taken into consideration for the Performance section are the following:

- 85%—90% of visits from private sector; 10%--15% of visits from public sector
- 90%+ visits from small and/or mid-sized employers as defined by CPPM Chapter 3 with 250 employees or less at the worksite and less than 500 employees corporate-wide
- 70%+ of visits from high hazard industries as defined by CPPM Chapter 3
- Number of employees trained on-site: Unacceptable less than 49; Low acceptable less than 50-100; Mid acceptable 101-150; High acceptable 151-200; Outstanding 200+
- Average number of days between closing conference and written report: More than 20 days—unacceptable; 17-20 days—low acceptable; 14-16—mid acceptable; 11-13 days—high acceptable; 10 or less days--outstanding
- Lapse days between requests and opening conference: More than 120 days—unacceptable; 90-119 days—low acceptable; 60-89 days—mid acceptable; 30-59 days—high acceptable; 29 or less days--outstanding
- Follow-up visits goals: Unacceptable less than 4; Low acceptable less than 4-5; Mid acceptable 6-8; High acceptable 9-11; Outstanding 12+
- Training visits: Unacceptable less than 3; Low acceptable 3-4; Mid acceptable 5-7; High acceptable 8-10; Outstanding 11+
- Continue to keep average number of days for the written reports sent the employer well below the maximum 20 days
- Continue to perform at a high level in customer service, compliance assistance, and training

Safety Matrix for employees with 7 or more years.

Below 45 visits and written reports—unacceptable

46—52 low acceptable

53—62 mid acceptable

63—70 high acceptable

71+ outstanding

In addition to Consultation visits goals, other factors taken into consideration for the Performance section are the following:

- 85%—90% of visits from private sector; 10%--15% of visits from public sector
- 90%+ visits from small and/or mid-sized employers as defined by CPPM Chapter 3 with 250 employees or less at the worksite and less than 500 employees corporate-wide
- 70%+ of visits from high hazard industries as defined by CPPM Chapter 3
- Number of employees trained on-site: Unacceptable less than 10; Low acceptable less than 101-150; Mid acceptable 150-200; High acceptable 201-300; Outstanding 301+
- Average number of days between closing conference and written report: More than 20 days—unacceptable; 17-20 days—low acceptable; 14-16—mid acceptable; 11-13 days—high acceptable; 10 or less days--outstanding
- Lapse days between requests and opening conference: More than 120 days—unacceptable; 90-119 days—low acceptable; 60-89 days—mid acceptable; 30-59 days—high acceptable; 29 or less days--outstanding
- Follow-up visits goals: Unacceptable less than 6; Low acceptable less than 7-9; Mid acceptable 10-13; High acceptable 14-19; Outstanding 20+
- Training visits: Unacceptable less than 6; Low acceptable 7-9; Mid acceptable 10-12; High acceptable 13-15; Outstanding 16+
- Continue to keep average number of days for the written reports sent the employer well below the maximum 20 days
- Continue to perform at a high level in customer service, compliance assistance, and training

APPENDIX E

Performance Evaluation Matrix Consultation and Training Health Consultants

Health Matrix for employees with 1 year or less.

Below 10 unacceptable

11-15—low acceptable

16-20—mid acceptable

21-29—high acceptable

30+ outstanding

At least 75% of visits from private sector; between 20% - 25% of visits from public sector

Health Matrix for employees with 1 up to 2 years.

Below 15 visits—unacceptable

16-21 visits—low acceptable

22-29 visits—mid acceptable

30-37 visits—high acceptable

38+ visits—outstanding

- At least 75% of visits must be from private sector
- Between 20%-25% of visits must be from public sector
- Number of employees trained on site—25 or more
- Average number of days between closing conference and written report—15 or less
- Compliance Assistance activities 15 or more
- Follow-up visits—2 or more
- Training and education visits—2 or more

Health Matrix for employees with 2 to 4 years.

Below 20 visits and written reports—unacceptable

21-28—low acceptable

29—38 mid acceptable

38—45 high acceptable

46+ outstanding

In addition to Consultation visits goals, other factors taken into consideration for the Performance section are the following:

- 85%—90% of visits from private sector; 10%--15% of visits from public sector
- 90%+ visits from small and/or mid-sized employers as defined by CPPM Chapter 3 with 250 employees or less at the worksite and less than 500 employees corporate-wide
- 70%+ of visits from high hazard industries as defined by CPPM Chapter 3
- Number of employees trained on-site: Unacceptable less than 25; Low acceptable less than 26-50; Mid acceptable 51-75; High acceptable 75-100; Outstanding 101+
- Average number of days between closing conference and written report: More than 20 days—unacceptable; 17-20 days—low acceptable; 14-16—mid acceptable; 11-13 days—high acceptable; 10 or less days--outstanding

- Lapse days between requests and opening conference: More than 120 days—unacceptable; 90-119 days—low acceptable; 60-89 days—mid acceptable; 30-59 days—high acceptable; 29 or less days--outstanding
- Follow-up visits goals: Unacceptable less than 4; Low acceptable less than 4-5; Mid acceptable 6-8; High acceptable 9-11; Outstanding 12+
- Training visits: Unacceptable less than 3; Low acceptable 3-4; Mid acceptable 5-7; High acceptable 8-10; Outstanding 11+
- Continue to perform at a high level in customer service, compliance assistance, and training

Health Matrix for employees with 4 to 6 years.

Below 35 visits and written reports—unacceptable

36—42 low acceptable

43—50 mid acceptable

51—60 high acceptable

61+ outstanding

In addition to Consultation visits goals, other factors taken into consideration for the Performance section are the following:

- 85%—90% of visits from private sector; 10%--15% of visits from public sector
- 90%+ visits from small and/or mid-sized employers as defined by CPPM Chapter 3 with 250 employees or less at the worksite and less than 500 employees corporate-wide
- 70%+ of visits from high hazard industries as defined by CPPM Chapter 3
- Number of employees trained on-site: Unacceptable less than 49; Low acceptable less than 50-100; Mid acceptable 101-150; High acceptable 151-200; Outstanding 200+
- Average number of days between closing conference and written report: More than 20 days—unacceptable; 17-20 days—low acceptable; 14-16—mid acceptable; 11-13 days—high acceptable; 10 or less days--outstanding
- Lapse days between requests and opening conference: More than 120 days—unacceptable; 90-119 days—low acceptable; 60-89 days—mid acceptable; 30-59 days—high acceptable; 29 or less days--outstanding
- Follow-up visits goals: Unacceptable less than 4; Low acceptable less than 4-5; Mid acceptable 6-8; High acceptable 9-11; Outstanding 12+
- Training visits: Unacceptable less than 3; Low acceptable 3-4; Mid acceptable 5-7; High acceptable 8-10; Outstanding 11+
- Continue to perform at a high level in customer service, compliance assistance, and training

Health Matrix for employees with 7 or more years.

Below 40 visits and written reports—unacceptable

41—47 low acceptable

48—55 mid acceptable

56—64 high acceptable

65+ outstanding

In addition to Consultation visits goals, other factors taken into consideration for the Performance section are the following:

- 85%—90% of visits from private sector; 10%--15% of visits from public sector
- 90%+ visits from small and/or mid-sized employers as defined by CPPM Chapter 3 with 250 employees or less at the worksite and less than 500 employees corporate-wide
- 70%+ of visits from high hazard industries as defined by CPPM Chapter 3
- Number of employees trained on-site: Unacceptable less than 10; Low acceptable less than 101-150; Mid acceptable 150-200; High acceptable 201-300; Outstanding 301+
- Average number of days between closing conference and written report: More than 20 days—unacceptable; 17-20 days—low acceptable; 14-16—mid acceptable; 11-13 days—high acceptable; 10 or less days--outstanding
- Lapse days between requests and opening conference: More than 120 days—unacceptable; 90-119 days—low acceptable; 60-89 days—mid acceptable; 30-59 days—high acceptable; 29 or less days--outstanding
- Follow-up visits goals: Unacceptable less than 5; Low acceptable less than 6-7; Mid acceptable 8-10; High acceptable 11-14; Outstanding 15+
- Training visits: Unacceptable less than 5; Low acceptable 6-7; Mid acceptable 8-10; High acceptable 11-14; Outstanding 15+
- Continue to perform at a high level in customer service, compliance assistance, and training

APPENDIX F

Under Enforcement Review Letter

Dear Employer,

Employer
321 E. 5th Ave
Anchorage, AK 99501

On October 7, 2019, Alaska Occupational Safety and Health Consultation and Training Section received a request for Services form dated October 3, 2019. Thank you for your interest in improving the worksite safety and health for your employees. Unfortunately, we are unable to provide consultation services to your company at this time as your business is currently under Enforcement review.

Even though we are unable to provide services to you at this time, you are still responsible for providing a safe and healthful workplace for your employees. Therefore, I would encourage you to seek other sources of safety and health assistance available to employers in your industry (e.g., your insurance carrier).

Again, thank you for requesting our assistance. Once you are no longer under Enforcement review, if we can provide any further information, please feel free to contact us.

Sincerely,

Program Manager of Consultation and Training
Alaska Occupational Safety and Health
Anchorage, AK 99504

APPENDIX G

Withdrawing/Deleting Requests

November 13, 2020

Employer Name
20 Abbott Rd #A2
Anchorage, AK 99504

Dear Employer,

On January 13, 2020 Alaska Occupational Safety and Health, Consultation and Training Section received a Request for Services form dated January 13, 2020. Your visit was assigned to [Consultant's Name].

On January 27, 2020, [Consultant's Name] received an email from you requesting to postpone the visit for a later, undetermined date. Your request has been withdrawn. Please feel free to contact our office whenever you are ready to receive Consultation services.

If we can provide any further information, please feel free to contact us.

Sincerely,

Program Manager of Consultation and Training
Alaska Occupational Safety and Health
Anchorage, AK 99504

APPENDIX H

October 6, 2019

Acting Regional Administrator
Office of Federal and State Operations
Occupational Safety and Health Administration
300 Fifth Avenue, Suite 1280
Seattle, Washington 98104

Dear (Regional Administrator Name):

I am requesting approval for **Consultant's Name** to be authorized as a consultant in the 21(d) grant program. **Consultant** has been employed as a health consultant in the Alaska Occupational Safety and Health (AKOSH) Consultation and Training program since July 1, 2019.

Consultant has a Bachelor and Master of Science Degree in Environmental and Occupational Health. Additionally, she brings to our program a combined 10 years' experience in environmental health.

Consultant has completed the following training activities and tasks in accordance with the AKOSH Consultation Training Progression Table:

- Accompanied, shadowed, and took the lead with experienced consultants on **(20) twenty Consultation Visits**
- Participated in the following activities:
 - Visit preparation
 - Opening Conference
 - Walk-through
 - Closing Conference
- Completed the following OSHA E-learn web courses
 - OSHA 1008 Intro to OSHA for New Hires
 - OSHA 0086 Recordkeeping Audit Training for VPP Managers and Team Leaders
 - OSHA 0097 Confined Spaces in Construction
 - OSHA 0075 Noise Hazards in the Workplace
 - OSHA 0051 Noise Monitoring and Evaluation Resources
 - OSHA 0084 Evaluating a Hearing Conservation Program
 - OSHA 0056 Revised Hazard Communication Standard—Aligning with GHS
 - OSHA 0071 Isocyanates National Emphasis Program
 - OSHA 0107 Silica: Regulatory Update and Outreach Resources
 - OSHA 0137 Air Sampling Strategies
- Completed the following OIS activities:
 - Generated request forms
 - Generated visit forms
 - Generated compliance assistance forms
 - Generated Form 33

- Attended and completed OSHA 1500, Introduction to On-site Consultation
- Scheduled to attend OSHA 1250 Introduction to Health Standards December 3-13, 2019

Consultant is a tremendous asset to the Industrial Hygiene section. During her time with AKOSH, in addition to completing technical training, she has conducted formal trainings on several health related matters and assisted partnership programs with health related issues.

Finally, **Consultant** has an extremely experienced health mentor, who is a certified A.S.P., and C.S.P. She has strong supervisory support as I, along with her mentor, will review her reports and perform regular evaluations of her performance to identify specific needs and adjust her training progression as needed to ensure compliance with the CPPM Appendix K. I have attached her completed Training Progression Table while in the trainee position.

Thank you for your time and consideration in this matter. If approved, I will utilize **Consultant** to conduct private sector consultation 21(d) visits and focus on efforts that will promote safe and healthy workplaces in Alaska.

Sincerely,

Program Manager of Consultation and Training
Alaska Occupational Safety and Health

Attachments: **Consultant** Complete Training Progression Table
Consultant College Degrees

cc: Director, Labor Standards and Safety
Region 10 ARA OCSP
Regional Consultation Program Manager
Anchorage Area Director

APPENDIX I

Recordkeeping Criteria

General Recording Criteria: According to 1904.7, an injury or illness is recordable if it results in one or more of the following:

- Death
- Days away from work
- Restricted work activity
- Transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- Significant injury or illness diagnosed by a PLHP

Days Away from Work

According to 1904.7(b)(3), the case is recordable if it involves one or more days away from work. The employer is required to check the box for days away on the 300 Log. The day of the injury or illness is not counted as a day away.

The employer is to count the number of calendar days away or restricted the employee was unable to work including weekend days, holidays, vacation days, etc. The employer may stop counting days when they reach 180 days away from work or days of restricted work or both. Also, the employer may stop counting days if the employee leaves the company for some reason unrelated to the injury or illness.

The employer must estimate the day count when the employee leaves the company due to reasons related to the injury or illness.

Restricted Work Activity

A case is **not** recordable under 1904.7(b)(4) if three conditions are met:

1. The employee experiences minor musculoskeletal discomfort;
2. A health care professional determines that the employee is fully able to perform all of his or her routine job functions; and
3. The employer assigns a work restriction to that employee for the purpose of preventing a more serious condition from developing

Job Transfer

Job transfers due to an injury or illnesses are considered recordable events.

According to 1904.7(b)(4), if an injured or ill employee is assigned to a job other than his or her regular job for part of the day the case is recordable. If a permanent job transfer is made on the day of the injury or illness, at least one day of restricted work activity must be recorded.

First Aid: Not Considered Medical Treatment

Below is the comprehensive list of first aid procedures according to 1904.7(b)(5)(ii). Therefore, if a procedure is not listed, it is not considered "first aid" for recordkeeping purposes.

- Using nonprescription medication at nonprescription strength
- Tetanus immunizations
- Cleaning, flushing, or soaking surface wounds
- Wound coverings, butterfly bandages, Steri-Strips
- Hot or cold therapy
- Non-rigid means of support
- Temporary immobilization device
- Drilling of fingernail or toenail, draining fluid from blister
- Eye patches
- Removing foreign bodies from eye using irrigation or cotton swab
- Removing splinters or foreign material from areas other than eye by irrigation, tweezers, cotton swabs or other simple means
- Finger guards
- Massages
- Drinking fluid for relief of heat stress

Loss of Consciousness

According to 1904.7(b)(6), all work-related cases involving loss of consciousness must be recorded. The length of time the person is unconsciousness is irrelevant.

Special Recording Criteria

According to 1904.8 - 1904.11, an injury or illness is recordable if it meets the special recording criteria for one of the following:

- Bloodborne pathogens
- Medical removal
- Hearing loss
- Tuberculosis

Bloodborne Pathogens

According to 1904.8, all work-related needle stick injuries cuts from sharp objects that are contaminated with another person's blood or [other potentially infectious material](#) must be recorded.

Furthermore, record work-related splashes or other exposures to blood or other potentially infectious material if it results in diagnosis of a bloodborne disease or meets one or more of the general recording criteria in 1904.7 must be recorded.