



State of Alaska
Department of Labor and Workforce Development
Division of Labor Standards and Safety

AKOSH Program Directive #16-02

Effective: November 23, 2016

To: All AKOSH Enforcement Supervisors and Staff

From: Grey Mitchell, Director 

Date: November 20, 2015

Subject: AKOSH Training Program for Compliance Personnel

This memo is to provide an alternative to OSHA instruction TED 01-00-019, Mandatory Training Program for OSHA Compliance Personnel.

One main difference is AKOSH has nine courses for each enforcement officer to complete as opposed to OSHA requiring eight in the first three years of employment. AKOSH intends to use OTI when possible to complete the instructions of the directive but intends to develop and use other equivalent resources in order to fulfill the training plan.

Currently, AKOSH has assigned the Training Specialist II as the training coordinator with responsibilities to develop curriculum and coordinate course delivery and monitor, document and report training accomplishments.

AKOSH supervisors and enforcement officers will be instructed to comply with the information in the attached AKOSH program directive 16-02 to ensure training program effectiveness. Please make sure all AKOSH supervisors and enforcement staff has been provided a copy of this directive. This directive is effective November 23, 2015.

Clarifications: For the purpose of all OSHA Program Directive(s) adopted by AKOSH, the following terms are defined:

Where U.S. Department of Labor, Occupational Safety and Health Administration (OSHA) refers to the following positions or locations; in Alaska their equivalent will be:

Area Director = Chief of Alaska Occupational Safety and Health (AKOSH) Enforcement section

Area Office = Labor Standards and Safety Division, AKOSH office located at 1251 Muldoon Road, Suite 109, Anchorage, Alaska

Assistant Area Director = Chief of Alaska Occupational Safety and Health (AKOSH) Enforcement section

Assistant Secretary = Commissioner, Alaska Department of Labor and Workforce Development

Deputy Assistant Secretary = Deputy Commissioner, Alaska Department of Labor and Workforce Development

National Office = Commissioner's Office, Alaska Department of Labor and Workforce Development

OSHA = Alaska Occupational Safety and Health (AKOSH) Enforcement/ Compliance and Consultation & Training sections, located at 1251 Muldoon Road, Suite 109, Anchorage, Alaska

Occupational Safety and Health Review Commission (OSHRC) = Alaska Occupational Safety and Health Review Board (AKOSHRB)

Regional Administrator = Director, Labor Standards and Safety, Alaska Department of Labor and Workforce Development

Regional Office = Alaska Department of Labor and Workforce Development, Labor Standards and Safety, Director's Office, 1111 W. 8th Street, Suite 304, Juneau, Alaska

RSOL = Department of Law

SST (Site Specific Targeting) = High Hazard Targeting System (HHT)

Secretary = Commissioner, Alaska Department of Labor and Workforce Development

Attachment: AKOSH Training Program for Compliance Personnel

Comparison of OSHA TED 01-00-019 and AKOSH PD 16-02

cc: Ken Atha, Regional Administrator, USDOL, Region X, OSHA
Dave Kearns, Acting Deputy Regional Administrator, OFSO, Region X, OSHA
Dave Baker, Assistant Regional Administrator, OTS, Region X, OSHA
Abby Lopez, State Programs Manager, Region X, OSHA
Gail Eisenberg, Regional Training Coordinator, Region X, OSHA
Scott Ketcham, Area Director Anchorage, USDOL, Region X, OSHA – Anchorage
Greg Cashen, Deputy Commissioner, State of Alaska, DOL&WD
Krystyna Markiewicz, Chief, Consultation & Training, LS&S, AKOSH
Keith Bailey, Chief, Enforcement, LS&S, AKOSH
Ron Anderson, OHS, Enforcement, LS&S, AKOSH
Shannon Devon, Regulations Specialist II, LS&S, AKOSH
Yana Rekoun, Project Assistant, LS&S, AKOSH



**State of Alaska
Department of Labor and Workforce Development
Division of Labor Standards and Safety**

AKOSH PD 16-02

Effective Date: November 23, 2015

AKOSH Training Program for Compliance Personnel

I. Purpose, Scope and Application

This instruction applies statewide and provides guidance and direction to the Alaska Occupational Safety and Health (AKOSH) Enforcement Section concerning policies and procedures for training of Safety Compliance Officers and Industrial Hygienist Compliance Officers (collectively referred to as Compliance Safety and Health Officers or "CSHOs"). It is essential that CSHOs have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish AKOSH's mission of promoting safe and healthful working conditions in Alaska. To facilitate this effort, AKOSH established requirements and guidance for training throughout a CSHO's career.

The goal of this instruction is to assist CSHOs and their supervisors with direction, guidance and training options that directly contribute to the CSHO's ability to adequately represent AKOSH while competently enforcing Alaska's occupational safety and health laws and regulations with a high degree of effectiveness and professionalism.

This directive updates the guidance in AKOSH PD #09-02

II. Background

The AKOSH Enforcement section recognizes the necessity for thoroughly trained CSHOs in order to adequately carry out the provisions of Alaska Statute § 18.60.010 – § 18.60.105 and the provisions of Alaska's federally-approved Occupational Safety and Health State Plan. Training is critical to assist CSHOs to be fully prepared to fulfill their duties to effectively enforce Alaska's workplace safety and health requirements with the goal toward ensuring safe and healthy workplaces across the state in a consistent and accurate manner.

AKOSH Enforcement will strive to meet training requirements through course attendance at OSHA's Training Institute (OTI) whenever practical. However, due to limitations of OTI offerings and other influences, AKOSH will also pursue other competency-based equivalent training options as needed to meet CSHO training needs. This will include training courses presented in coordination with other OSHA-approved state plans, in-house training with senior CSHO's and supervisors and

contract training augmented with in-house training as necessary to address AKOSH specific issues and perspectives associated with the particular training course.

III. Goals and Objectives of CSHO Training

The goal of this directive is to establish standards, directions and guidance for CSHOs and their supervisors regarding training and to ensure that CSHOs are adequately prepared to effectively enforce Alaska's workplace safety and health standards.

A. AKOSH Curriculum.

1. AKOSH requires formal training for CSHOs using a competency-based approach to curriculum, similar to the OSHA CSHO Functional Competency Model described in OSHA Directive, TED 01-00-019.
2. AKOSH's training model is based on the concept that formal training alone is insufficient to establish the foundation for proficiency in the necessary competencies. A combination of formal training, mentorship, work experiences, and interpersonal development must be cultivated to produce a well-qualified CSHO.
3. AKOSH will achieve formal training curriculums through a combination of courses through OTI, OSHA Ed. Center, state-plan administered training, contract training providers, and in-house AKOSH training courses. Courses may be blended with a combination of external training and internal AKOSH training to ensure that Alaska-specific issues are adequately incorporated into training courses. Contracted training will be supplemented with AKOSH policy and situational guidance to ensure concepts are directly correlated to AKOSH operations.
4. Training will include flexibility to allow for technological training delivery, self-directed learning, mentorship and job experience based learning, and formal in-person instruction.

B. AKOSH Enforcement's primary goal is to ensure that CSHOs receive adequate formal training within their first three years to effectively perform the full array of journey level CSHO functions. Upon completion of the courses identified through Individual Training Plans (ITPs) established through coordinated efforts by supervisors, CSHOs and the AKOSH Training Coordinator, the following competencies are anticipated:

1. Working knowledge of the fundamentals of inspection/investigation preparation, safety and health compliance policy and procedures, hazard recognition, employee exposure, employer knowledge through evaluation, documentation and control to identify and eliminate workplace safety and health hazards.
2. Basic knowledge of engineering controls and abatement methodologies to eliminate exposure to recognized workplace hazards.
3. An effective comprehension of basic industrial processes and the ability to make quantitative observations and measurements.

4. The ability to properly calibrate and use measuring instruments, take samples and interpret lab results (primarily Industrial Hygienists).
 5. The ability to perform independent inspections or participate as a member in team inspections in most high hazard industries in Alaska.
 6. The ability to identify and find appropriate AKOSH safety and health laws and regulations and correctly apply them for the purpose of accurately citing applicable standards or advising on hazards.
 7. The ability to seek out, collect and document relevant information to support citations, organize case files, and present inspection data accurately in legal proceedings as needed.
 8. The ability to complete, organize and compile all electronic and hard-copy forms necessary to support the inspection findings.
 9. The ability to make appropriate referrals to industrial hygienists or safety specialists.
 10. The ability to conduct an accident investigation, interview witnesses and obtain all necessary information and documentation to support conclusions, findings and citations.
 11. An understanding of physical and electronic evidence and when to secure evidence and ensure chain of custody requirements are met.
 12. The ability to articulate allegations, facts and supporting documentation and complete clear, concise written investigative reports to effectively demonstrate the reasoning for CSHO recommendations associated with accident investigations.
 13. The ability to verbally explain in a clear and professional manner the circumstances and courses of action taken in the context of Alaska's Occupational Safety and Health standards enforcement to demonstrate the foundation and validity of citations, penalty calculations, interpretations, and other factors during informal conferences, depositions, and formal OSH Review Board proceedings.
 14. The ability to apply logic to solve problems, identify and evaluate potential sources of information and generate alternatives to solve problems without prior precedents.
 15. The ability to analyze evidence to draw conclusions and determine causal factors based on qualitative and quantitative methods.
 16. An understanding of AKOSH discrimination protections under AS 18.60.089 and demonstrated ability to explain the provisions.
 17. An understanding of the AKOSH consultation program and demonstrated ability to explain how the program works.
 18. The ability to foster constructive, professional working relationships with others through tact, respect, trust and professionalism and the ability to show empathy and concern when dealing with victims of workplace accidents or others affected by a workplace accident.
- C. Formal Training. AKOSH goals regarding the timing of training are subject to employee development, course availability and funding and ITPs will

include the necessary degree of flexibility to accommodate these potential limitations. In limited cases, exceptions to the timing of training may be established through the waiver or extension processes established in this directive.

1. AKOSH CSHOs will be expected to complete at least four training courses from the following list during the first 18 months on the job. The highest priority shall be to complete courses a) and b) or c), e) and f) during the first 12 months.
 - a. Initial Compliance (OTI #1000 or equivalent, plus Alaska state-specific protocols)
 - b. Introduction to Health Standards for Industrial Hygienists (OTI #1250 or equivalent)
 - c. Introduction to Safety Standards for Safety Officers (OTI #1050 or equivalent)
 - d. Construction Standards (OTI #2000 or equivalent)
 - e. Investigative Interviewing Techniques (OTI #1310 or equivalent)
 - f. Incident Command System – ICS 200 (OTI #8200 or equivalent)
 - g. Hazardous Waste Operations (HAZWOPER) – 40 hour certification
 - h. AKOSH Seafood Industry Safety Training
2. From 18 to 36 months, CSHOs will be expected to complete an additional five training courses from the following list and the list above based on the ITP established in conjunction with supervisors. At a minimum, after 36 months, CSHOs are expected to complete course a), b) or c), d), e) and f) from the list above and all courses listed below.
 - a. Accident Investigation (OTI #1230 or equivalent)
 - b. Inspection Techniques and Legal Aspects (AKOSH delivered or OTI #1410 with AKOSH supplemented training)
 - c. Evaluation of Safety and Health Management Systems (OTI #2450 or equivalent)
 - d. Health Hazard Analysis for Safety Officers (OTI #1080 or equivalent)
3. After completion of the nine courses expected during the first 36 months of employment under sections 1 and 2, AKOSH CSHOs will be expected to complete at least 40 hours of safety and health technical training annually. Any remaining courses under section 1 and 2 that have not been taken by the CSHO would be a priority depending on the ITP established with supervisors and program needs.
4. Courses offered by OTI, the University of Washington – Northwest OSHA Education Center for Occupational Health, OSHA Region X (Pacific Northwest OSHA Education Center), the Hammer Training Center in Washington State, approved state-plans or other contracted training providers covering occupational safety and health topics shall be counted as technical training. Specific health and safety courses will be arranged and presented through contracted services by AKOSH internal training coordinators as needed and as resources are available. (Appendix 1)

contains course descriptions for courses established for the first 36 months of a CSHOs career. Technical training course examples beyond the courses established for the first 36 months are attached in Appendix 2 and 3.) Equivalency must be based on a comparative analysis of curriculum and competencies.

- D. Mentorship. During the initial year, AKOSH CSHOs will be assigned a senior CSHO mentor, who along with supervisors, will provide on-the-job instruction, preferably with active case files, during the first 90 to 180 days on the job as outlined below. Appendix 4 provides a checklist for documenting on-the-job training accomplishments.
1. New Hire Orientation (first 30 days)
 - a. Alaska Department of Labor and Workforce Development and Division of Labor Standards and Safety organizational descriptions
 - b. History of workplace safety and health Alaska and federal AKOSH statutes and regulations
 - c. AKOSH Field Operations Manual
 - d. Introduction to state and federal web-sites
 - e. Federal OSHA's role with AKOSH
 - f. Introduction to jurisdiction
 - g. Strategic Plan; Annual Plan; Emphasis programs
 2. Standards (first 60 days)
 - a. Alaska statutory and regulatory authorities
 - b. Scope and sequence of Alaska-adopted federal standards and state-specific standards
 - c. Online standards search exercises
 - d. Letters of interpretation
 - e. National consensus standards
 - f. Manufacturer standards for use
 - g. General duty clause
 3. Site Inspection (first 90 days)
 - a. Inspection types
 - b. Preparations: PPE; inspection focus; anticipated hazards; documentation methods;
 - c. Introductions, identification and opening
 - d. Walk around - who should be included?
 - e. Interviewing - confidentiality; protection from retaliation
 - f. Documentation: photos, measurements, notes, recordings
 - g. Hazard abatement
 - h. Closing
 4. Case Management (first 120 days)
 - a. Introduction to OIS (OSHA Information System)
 - b. Case file organization
 - c. Four elements of violation and documentation
 - d. Vertical standards described

- e. Types of alleged violations
 - f. Gravity Based Penalty Calculations
 - g. Alleged Violation Descriptions and Case File Narratives
5. Complaints and Accidents (first 180 days)
- a. Types of complaints and responses
 - b. Complainant notifications (union involvement?)
 - c. Accident reporting
 - d. Fatality condolence letter procedures
 - e. Preliminary case review with Law
 - f. Criminal considerations - Chain of Custody
 - g. Case outcome notification processes to complainant or victim's family
- E. Continuing Education and Technical Training.
- Upon completion of the initial three years of work experience and mandated training, AKOSH CSHOs are expected to complete a minimum of 40 hours of safety and/or health training annually. AKOSH anticipates that training and development will be flexible based on the individual needs of each CSHO as established in the ITP and program needs for particular skill development. As industries develop in Alaska and/or are refined, it is anticipated that additional technical training courses will be developed and that training needs and plans will need periodic adjustment. (Appendix 2 and 3 contain course examples, but this is not to be construed as an exhaustive list.)
- F. Professional Development and Certification.
- Like OSHA's training plan, AKOSH training requirements support a CSHO's pursuit of professional development and certification. CSHO's are encouraged to strive for certifications within the confines of program limitations. For example, certain required courses may not correlate to competencies required for certification and budget constraints may limit opportunities to fund certification courses that are above and beyond mandated training.

IV. Organizational Responsibilities

- A. Training Coordinator. The AKOSH Training Coordinator oversees training curriculum development and documentation of course materials and training records for CSHOs. The AKOSH Training Coordinator assists in the development of ITPs and maintains schedules of upcoming training opportunities and regularly communicates with the Chief of AKOSH Enforcement to ensure CSHO's are registered for upcoming courses required to satisfy the ITPs. The AKOSH Training Coordinator will provide regular reports of CSHO training accomplishments to help ensure that training goals are met. The AKOSH Training Coordinator will provide comparative analyses when necessary to demonstrate equivalency with OTI curriculum.

- B. Chief of AKOSH Enforcement/ Asst. Chief of AKOSH Enforcement. The Chief and Assistant Chief of AKOSH Enforcement shall participate in development of ITPs for CSHOs and provide the Training Coordinator with training needs and participate as necessary to develop curriculum and present training materials. The Chief of AKOSH Enforcement is responsible to ensure that CSHOs receive training as outlined in ITPs or that appropriate actions such as waivers or extensions are completed to ensure the training process remains on schedule.
- C. The Division Director shall support mandated training for CSHOs as outlined in this directive while concurrently supporting improvement of existing training and development of additional training and professional development opportunities within the State of Alaska.

V. Training Schedule, Waivers and Extensions

- A. Waiver from Required Training Program
 - 1. Waiver Conditions. The training program outlined in this instruction is recommended to be completed during the first three years of a CSHO's career, but may not be possible given budgetary and other constraints. Normally new AKOSH enforcement staff will not engage in independent inspections before completing the courses and on-the-job training established for the first year of employment. The Division Director with authority over AKOSH has discretion to waive any of the required courses listed, with the exception of the #1410 Inspection Techniques and Legal Aspects course or equivalent. Waivers shall be used rarely and shall be granted only in exceptional circumstances.
 - 2. Assessment and Documentation. The Chief must assess and document that the CSHO has demonstrated the knowledge, skill and ability to perform the tasks listed in the course objectives for the course being waived. After an assessment has been made, waiver requests shall be submitted in writing by the Chief to the Division Director. The waiver request will document specific training and experience to demonstrate why the CSHO does not need to attend the specified course. The documentation will include how the CSHO has acquired the levels of knowledge, skills and abilities reflected in the objectives of the course for which the waiver is being requested. Not only must equivalent technical knowledge and skills be documented, but the documentation shall also indicate that the CSHO has institutional understanding of AKOSH and applicable OSHA specific policies and procedures. For example, criteria may include experience as a former compliance officer with OSHA or another OSHA State Plan State.
 - 3. Only the Division Director can grant a waiver from this training directive. The Division Director shall respond to waiver requests in writing.

4. The AKOSH training coordinator shall annotate the CSHO's training record to reflect required courses waived by the Division Director.
- B. Time Extensions
1. The time requirements for completing the training shown in this instruction must be met. Only the Division Director can grant a time extension, which must be based on extenuating circumstances. The time allowed to complete the eight required courses should also allow insertion of technical courses throughout the three-year period.
 2. Technical courses may be taken at any time during the three-year period after the CSHO has completed both #1000 Initial Compliance and one of the standards courses.
- C. Time Extension Conditions
1. If there are circumstances that prevent the CSHO from completing the required courses within the three-year period, the Division Director may extend the time for completion of the required courses for a period of up to one year, unless budgetary and/or other limitations make the time period impossible or infeasible to achieve. The use of time extensions is recommended to only extend the time allowed for a CSHO to complete the eight required courses to a maximum of four years from his/her employment date.
 2. Time Extension Requests
Time extensions shall be submitted in writing by the Chief to the Division Director. Time extension requests include the reason(s) additional time is needed by the CSHO to complete the required training, the amount of time requested and the course(s) that will be completed during the requested time extension.
 3. Time Extension Approvals
The Division Director shall respond to the time extension request in writing.
 4. Training Record Annotated
The AKOSH Assistant Chief of Enforcement shall annotate each CSHO training record to reflect any extensions of time granted by the Division Director. The AKOSH training coordinator shall act as a backup to ensure that each CSHO's training record are annotated to reflect the extension of time.

VI. Individual Training Plans

- A. Role of Individual Training Plans. An Individual Training Plan is an active plan to aid a CSHO to achieve organizational and individual training goals. ITP's must be reviewed and updated annually by the Training Coordinator,

CSHO and supervisor (Chief or Asst. Chief) to monitor achievements and focus efforts toward mandated training and professional development needs.

B. Initial 36 month training plans should include the following:

1. Mandated training as outlined in this instruction;
2. Specific regional training; and,
3. Other developmental training as determined by the supervisor.

C. Continuing Education and Technical Training.

Upon completion of the initial three years of work experience and mandated training, AKOSH CSHOs are expected to complete a minimum of 40 hours of safety and/or health training annually. AKOSH anticipates that training and development will be flexible based on the individual needs of each CSHO as established in the ITP and program needs for particular skill development. As industries develop in Alaska and/or are refined, it is anticipated that additional technical training courses will be developed and that training needs and plans will need periodic adjustment. (Appendices 2 and 3 are provided to assist supervisors and CSHOs prepare ITP goals, but these lists are not to be construed as exhaustive and the ITP may include other courses that are not listed in this directive.)

VII. Monitoring the Training Program

Monitoring the CSHO's progress through the first three-year period is critical to ensure the success of the training program. Monitoring provides information regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of the CSHO to achieve training goals and objectives. Both the CSHO's supervisor and the Training Coordinator play major roles in the monitoring process.

A. Chief of Enforcement/ Assistant Chief of Enforcement

The CSHO's supervisor shall:

1. Ensure that each CSHO has completed the necessary prerequisites before attending OTI courses.
2. Review the CSHO's performance of recommended self-study and on-the-job training (OJT) assignments.
3. Conduct a review with the CSHO following each recommended self-study and OJT inspection activity. This review provides the supervisor with information on the progress of the CSHO and can assist in identifying areas requiring further training.
4. Determine when the CSHO has sufficient experience to participate fully in independently developing the actual case file; the OJT review may be discontinued when this has been effectively accomplished.

B. Training Coordinator

The Training Coordinator shall monitor AKOSH implementation of the training program outlined in this instruction through review of training records and evaluations of training courses through CSHO interviews, course audits, curriculum reviews and other means.

VIII. Evaluation

An overall evaluation of the training program for AKOSH compliance personnel effectiveness will be conducted by the Training Coordinator on an annual basis.

The Training program shall be evaluated by the Training Coordinator to determine whether CSHO's are receiving adequate training to carry out the purposes and requirements of AKOSH strategic goals, Alaska Law and regulation and adopted Federal OSHA regulations.

No later than March 1 of each year, the Training Coordinator shall provide a written report to the Chief of AKOSH Enforcement and the Division Director for the prior federal fiscal year. The report will include observations of the adequacy of training, a listing of courses completed for each CSHO, and an analysis of progress toward development and implementation of this directive for the previous year.

Cc: Ken Atha, Regional Administrator, USDOL, Region X, OSHA
Dave Kearns, Acting Deputy Regional Administrator, OFSO, Region X
Dave Baker, Assistant Regional Administrator, OTS, Region X
Abby Lopez, State Programs Manager, USDOL, Region X
Gail Eisenberg, Regional Training Coordinator, USDOL, Region X
Scott Ketcham, Area Director Anchorage, USDOL, Region X, OSHA – Anchorage
Greg Cashen, Deputy Commissioner, DOL&WD
Krystyna Markiewicz, Chief, Consultation & Training, AKOSH, LS&S
Keith Bailey, Chief, Enforcement, AKOSH, LS&S
Ron Anderson, OHS, Enforcement, AKOSH, LS&S
Shannon Devon, Regulations Specialist II, AKOSH, LS&S
Yana Rekoun, Project Assistant, AKOSH, LS&S
Elaine Banda, Training Specialist, LS&S, AKOSH

Appendix 1
Course Descriptions - Initial 36 months

1. **#1000 Initial Compliance, Plus AKOSH protocols.** This course is designed for newly hired CSHOs and focuses on the basic elements of conducting inspections in accordance with current AKOSH and OSHA policy. Students will be able to identify CSHO responsibilities related to carrying out the AKOSH/OSHA mission and to enforce Alaska law and regulation and adopted federal regulations. The course ensures that participants have the fundamentals of information gathering to document the *prima facie* elements in a case file and highlights the key aspects of developing and maintaining interpersonal relationships along with the importance of personal conduct and professional development. The course includes a web-based segment that must be completed prior to attending the resident portion. The course includes a follow up training session with a senior CSHO or the AKOSH Training Coordinator to clarify Alaska-specific policies, procedures, statutes and regulations upon completion of OTI segments.

2. **Standards Courses.** These courses are typically taken after the initial compliance course. Depending on whether the CSHO is a Safety Compliance Officer or an Industrial Hygienist, the CSHO will take OTI #1050 (or equivalent) Introduction to Safety Standards for Safety Officers, OTI #1250 (or equivalent) Introduction to Health Standards for Industrial Hygienists. In addition, depending on ITP goals established in coordination with supervisors, the CSHO will take OTI #2000 (or equivalent) Construction Standards. The purpose of these courses is to provide entry level CSHOs with a thorough introduction to the organization and content of the standards, hazard recognition, and documentation of identified hazards.

3. **Investigative Interviewing Techniques (#1310 or equivalent).** This course is intended to serve as a practical interviewing guide for AKOSH compliance personnel. A major component of this course includes role-play using scenarios that provide the opportunity for students to practice interviewing skills. The course emphasizes developing a plan for gathering the necessary facts, characteristics of good questioning techniques, active listening, and cross-cultural communication.

4. **Inspection Techniques and Legal Aspects (#1410 or equivalent).** This course introduces the student to inspection techniques related to OSHA compliance activity and to the associated formal requirements and processes of the legal system. Emphasis is placed on documenting a legally sufficient case file. The course includes the essential elements of conducting walk-around inspections and interviews, and analyzing, organizing and documenting information related to inspections and investigations. Students develop a sample legally defensible case file and participate in a mock trial as the culminating learning experience. This course cannot be waived as per Section XI.A.

5. **Evaluation of Safety and Health Management Systems (#2450 or equivalent).** This course emphasizes applying the principles of Safety and Health Management

Systems (SHMSs) using OSHA guidelines and policies. Upon completion, the students will be able to evaluate the effectiveness of an employer's SHMS. A focus on recordkeeping requirements assists the CSHO in identifying system deficiencies between applicable safety and health elements and illness and injury reduction. Using active training techniques, students are guided to promote the value of an effective program that contributes to reducing illness and injury.

6. **Accident Investigation (#1230 or equivalent).** This course covers the key elements that are essential to conducting successful accident investigations. Major topics include investigation planning, documenting the scene, collecting facts through interviewing, failure analysis and analytical tools, collecting and analyzing physical evidence, and control strategies. Using a case file and interactive class workshops, students work in teams to gather and analyze evidence to develop facts, findings and conclusions.

7. **Multi-Disciplinary Courses**

a. **Safety Hazard Awareness for Industrial Hygienists (#1280 or equivalent).** This course provides industrial hygienists with the knowledge and skills to become aware of selected safety hazards related to common worksite processes. By the end of the course, students will be able to decide if a referral is appropriate in accordance with OSHA's occupational safety standards and guidelines.

b. **Health Hazard Awareness for Safety Officers (#1080 or equivalent).** This course equips safety specialists with the skills to recognize health hazards while conducting workplace inspections and investigations. During the course, students participate in laboratories where they use detector tube pumps to screen for potential air contaminants and sound level meters to screen for noise hazards. By the end of the course, students will be able to decide if a referral is appropriate in accordance with OSHA's occupational health standards and guidelines.

8. **Construction Standards (#2000 or equivalent).** This course is specifically designed for safety specialists and industrial hygienists who specialize in construction inspections. The CSHO will become acquainted with how the building process proceeds from site clearing to building finishing. Corresponding subparts of 29 CFR 1926 are presented in conjunction with the building process. The course features a field trip to a construction site to emphasize and reinforce learning.

9. **Incident Command System I-200 (#8200 or equivalent).** When responding to an identified incident, the CSHO will be able to operate efficiently within the parameters of an Incident Command System (ICS). Training record documentation will include one of the following options or equivalent:

- OTI #8200 course which covers the content of ICS-100 and ICS-200 as specified by the National Integration Center (NIC).
- An equivalent ICS training sponsored by another government agency (federal, state, or local); such a course must follow the guidelines developed by the NIC provided in the *National Standard Curriculum Training Development Guidance* document. The

most current version of this document can be found on the Federal Emergency Management Agency's (FEMA's) National Incident Management System (NIMS) Training Internet web pages. Additionally, instructors must have qualifications specified by the NIC as posted on these web pages.

- FEMA ICS-100 and ICS-200 online courses. These NIMS courses are located on FEMA's Emergency Management Institute Independent Study Program Internet website. The current title for ICS-100 is *IS-100, Introduction to Incident Command System I-100* and the current title for ICS-200 is *IS-200, ICS for Single Resources and Initial Action Incidents*.

10. Hazardous Waste Operations (HAZWOPER) - 40 hour certification. CSHOs will develop the necessary understanding and awareness of chemical and biological hazards and the plans, procedures and protective equipment to ensure compliance with OSHA standards for emergency response, clean-up, storage, disposal and treatment of hazardous substances or uncontrolled hazardous waste sites (29 CFR 1910.120, Hazardous Waste Operations and Emergency Response).

11. AKOSH Seafood Industry Training (10-hour). This course provides hazard recognition and awareness training to allow CSHOs to identify alleged violations of occupational safety and health standards in Alaska's seafood processing industry. CSHOs will become familiar with the various aspects of seafood processing operations and equipment and review common violations and causes of accidents. The training will improve the overall effectiveness of seafood processing enforcement inspections.

Appendix 2
Safety Technical Courses

| Topic | Type | Provider | Duration |
|--|---------------|---|------------------------------------|
| Electrical Hazards | Classroom | OTI #2030, Ed Ctr/ Contractor/Internal | 3-5 days |
| Fall Protection | Classroom | OTI #3110, Ed Ctr/ Contractor/Internal | 2 days |
| Crane & Rigging Safety | Classroom | OTI #2050, Internal/ Contractor | 1-5 days |
| Excavating & Trenching | Classroom | OTI #3010, Ed Ctr/Contractor/Internal | 1-2 days |
| Demolition Safety | Classroom | OTI #3500, Ed Ctr/ Contractor/Internal | 2-3 days |
| Explosive Standards | Classroom | Internal/ Contractor | 1 day |
| Lockout/Tagout | Classroom | Internal/Contractor | 1-2 days |
| Flammable Liquids | Classroom | OTI, Ed Ctr/ Contractor | 2 days |
| Machine Guarding | Classroom | OTI #2040, Ed Ctr/ Contractor | 2-3 days |
| Scaffolds | Classroom | OTI #3080, Ed Ctr/Internal/Contractor | 1-2 days |
| Logging/Sawmill Safety & Health | Classroom | OTI #3070, Internal/Contractor | 5-6 days |
| Tunneling | Classroom | OTI #3020, Contractor | 3-5 days |
| Tower Safety | Classroom/web | OTI #3150, Contractor | 3-4 days |
| Spray Finishing | Classroom | OTI, University of Washington/Contractor | 4-5 days |
| Forklifts | Classroom/web | Internal/ Contractor | 1 day |
| Steel Erection | Classroom | OTI, Internal/ Contractor | 2-3 days |
| Concrete, forms & shoring | Classroom/web | OTI #3030, Ed Ctr/Contractor/Internal | 3 days |
| Confined Spaces | Classroom | OTI, Contractor/Ed Ctr/Internal | 3 days |
| Construction Processes | Classroom | Contractor/ Internal/ AGC | 5 days- construction inspectors |
| Rigging | Classroom | Internal or Contractor | 3 days |
| Hazardous materials | Classroom | OTI #2010, Ed. Ctr/Contractor/Internal | 3-4 days |
| Welding Safety | Classroom | OTI #3220, Ed. Ctr/Contractor/Internal | 2-3 days |
| MUCDT Traffic Control/Flagging | Classroom | Contractor | 1 hr |
| Construction Safety Hazards Refresher | Classroom | Internal or contractor | 3-5 days |

Appendix 3
Industrial Hygiene Technical Courses

| <u>Topic</u> | <u>Type</u> | <u>Who</u> | <u>Length</u> |
|---|--------------------|--|----------------------|
| Confined Spaces | Classroom | OTI, Ed Ctr/Contractor/Internal | 3-4 days |
| Respiratory Protection | Classroom | OTI #2220, Ed Center/ Contractor/Internal | 2-3 days |
| Industrial Ventilation | Classroom | OTI #2210, Ed. Ctr./Contractor/Internal | 3-4 days |
| Toxicology | Classroom | OTI #2230 | 3-5 days |
| PSM I, II, III | Classroom | OTI | 5-10 days |
| Biohazards | Classroom | OTI | 2-3 days |
| Spray Finishing | Classroom | Contractor/University of Washington | 3-4 days |
| Hazardous Paint Cert. | Classroom | Contractor | 2 days |
| Noise Control | Classroom | OTI #2200, Ed Ctr/Contractor/Internal | 2-3 days |
| Welding Health Hazards | Classroom | Contractor/ Internal | 1 day |
| Haz Mat | Classroom | OTI #2010 | 5 days |
| Haz Mat | Online | Ed. Ctr. #2015 | 3-4 days |
| Tunneling | Classroom | OTI #3020 | 5 days |
| Ammonia | Classroom | Contractor/AVTEC | 2-3 days |
| Emergency Response | Classroom | OTI/Contractor/ DEMHS | TBD |
| Lead | Classroom | Contractor/Internal | 1 day |
| Heat Illness | Classroom | Internal | 1 day |
| Asbestos | Online/classroom | Internal | 1 day |
| Asbestos 40-hr Certification | Classroom | Contractor | 4-5 days |
| AHERA Asbestos Building Inspector Certification | Classroom | Contractor | 3 days |
| Air Monitoring - Instrumentation | Classroom | Internal | TBD |
| Ergonomics | Classroom | OTI #2250, Ed Center /Contractor/Internal | 1-3 days |
| Construction Health Hazards | Classroom | Internal, Washington State Plan, Contractor | 2-3 days |

Appendix 4. Recommended On-the-job Training Documentation

This Appendix is recommended as a tool for mentors and supervisors to assist CSHOs document on-the-job training achievements.

| Activity Description | Date Completed |
|---|----------------|
| Work with office administrative personnel to identify and become familiar with office administrative procedures (both personnel and citation processing) | ___/___/___ |
| Explore the AKOSH and OSHA Intranet and Internet sites Begin with the following: OSHA Intranet: ❖ Current OSHA Information System, OIS (general application) ❖ OSHA forms (e.g., OSHA-1, 1A, and 1B) ❖ IH – (OSHA 1B (IH) form) ❖ Use of OSHA Integrated Management Information System (IMIS) data ❖ SAVES – Standard Alleged Violation Elements ❖ PADS – Physical Agent Data Sheets AKOSH and OSHA Public Page (Internet): ❖ Current <i>AKOSH Field Operations Manual (FOM)</i> ❖ Directives system ❖ Whistleblower protection program | ___/___/___ |
| Receive training and instructions on use and limitations of PPE (e.g., hard hats, safety glasses, hearing protection, high-visibility road vests and safety shoes) | |
| Receive training and instructions on personal use of respirators, be fit-tested | |
| With supervisor or assigned mentor, review basic programs such as: ❖ Hazard Communication ❖ The Control of Hazardous Energy (Lock-out/Tag-out) ❖ Recordkeeping ❖ Fall protection ❖ Emergency Action Plans | ___/___/___ |

| Activity Description | Date Completed |
|--|----------------|
| Read and review AKOSH State Plan and OSH Act of 1970 and become familiar with: 1. which employers and employees are covered and 2. the responsibilities of employers and employees 3. jurisdiction between state and federal OSHA | ___/___/___ |
| Review the Alaska regulations adopting federal regulations by reference and applicable contents of 29 CFR 1910 and 29 CFR 1926 and become familiar with the types of hazards covered by OSHA regulations as adopted under the Alaska Administrative Code Consult with supervisor or assigned mentor to determine which hazards are more likely to be investigated by safety specialists and which are more likely to be investigated by industrial hygienists | ___/___/___ |
| Review the AKOSH web page for consultation and training programs. Receive a briefing from a consultant regarding the purpose and processes of consultation and training within AKOSH | ___/___/___ |
| Review Annual Plan for AKOSH Enforcement and AKOSH Consultation and Training and most recent Federal Annual Monitoring Evaluation report. | ___/___/___ |
| Accompany a fully-qualified CSHO on a programmed inspection and observe the following: ❖ Inspection preparation ❖ Calibration of instruments ❖ Opening conference ❖ Walkthrough ❖ Use of instruments or other measuring devices ❖ May include Santronics AC sensor, velometer, 4 gas meter, air or noise sampling equipment ❖ Closing conference ❖ Preparation of citations | ___/___/___ |
| Accompany a fully-qualified CSHO on a general schedule follow-up inspection | ___/___/___ |

Appendix 4. Recommended On-the-job Training Documentation

| Activity Description | Date Completed |
|---|--------------------|
| <p>Specific to your career path, accompany a fully qualified CSHO on an inspection and discuss related technical information from that inspection</p> <p>Safety Example: after inspection involving storage of flammable and combustible liquids, discuss chemistry related to fire and solvents</p> <p>IH Example: after an inspection involving lead exposures, discuss toxicology and health effects, dose-response relationships, feasible engineering controls</p> | <p>___/___/___</p> |
| <p>With a supervisor or assigned mentor, identify the instruments used by personnel in your specific discipline (e.g., detector tube pumps, carbon monoxide and/or multiple gas meters, receptacle (three-light) tester, sound level meters, camera, tape measure)</p> | <p>___/___/___</p> |
| <p>Review AKOSH General Duty Clause statute and considerations with supervisor or assigned mentor</p> | <p>___/___/___</p> |
| <p>Work with a supervisor or assigned mentor to identify and become familiar with OSHA's Nationally Recognized Testing Laboratory (NRTL) program</p> | <p>___/___/___</p> |

| Activity Description | Date Completed |
|---|--------------------|
| <p>With a supervisor or assigned mentor, review calibration and maintenance requirements of equipment used in your discipline (e.g., detector tube pumps, carbon monoxide and/or multiple gas meters, receptacle (three-light) tester, sound level meters, camera, tape measure)</p> <p>Safety Examples include: Santronics AC sensor, voltage tester</p> <p>IH Examples include: air monitoring instrumentation, noise dosimeters, four gas meters</p> | <p>___/___/___</p> |
| <p>Review the office library's basic texts, references, and materials related to your discipline's hazards and controls</p> | <p>___/___/___</p> |
| <p>Prepare a written technical report or PowerPoint presentation using basic texts from the library and Internet resources for a specific type of hazard related to your discipline (amputations, electrical for safety; noise, cold or heat stress, exposure to toxic airborne contaminants for IH) and present the information during a staff meeting.</p> <p>Include:</p> <ul style="list-style-type: none"> ❖ Types of worksites where the hazard may be expected to occur ❖ Work activities that may involve the hazard ❖ Equipment that may be associated with the hazard ❖ Engineering and/or administrative controls and PPE that may be required to control the hazard ❖ Related AKOSH/OSHA standards | <p>___/___/___</p> |
| <p>Post-inspection and under the direction of a team leader or assigned mentor, prepare a written case file for a specific type of hazard documenting:</p> <ul style="list-style-type: none"> ❖ Which standard applies ❖ Standard is violated ❖ Employees are exposed ❖ Employer knowledge ❖ Recommended abatement (e.g., engineering, administrative controls, PPE) | <p>___/___/___</p> |

Appendix 4. Recommended On-the-job Training Documentation

| Activity Description | Date Completed |
|---|----------------|
| Participate in a follow-up inspection and perform the following: <ul style="list-style-type: none"> ❖ Review the case file to determine equipment necessary to evaluate the implementation of controls ❖ Prepare all equipment for the follow-up inspection ❖ Conduct an opening conference ❖ Set up or operate all equipment for determining compliance ❖ Answer routine questions concerning scope of survey, reasons for taking measurements, and general methods of controlling common hazards ❖ Conduct the closing conference | ___/___/___ |
| With a supervisor or assigned mentor, discuss multi-employer worksite inspections and special considerations | ___/___/___ |
| Participate as a team member in an inspection involving a multi-employer worksite Present an oral summary of hazards and violations identified and citations recommended to the Chief or Assistant Chief of AKOSH Enforcement | ___/___/___ |
| Participate as a team member in a special emphasis program inspection Present an oral summary of hazards and violations identified and citations recommended to the Chief or Assistant Chief of AKOSH Enforcement | ___/___/___ |

| Activity Description | Date Completed |
|--|----------------|
| Perform a literature and web search to resolve a problem in hazard identification and control Develop a written report incorporating the information | ___/___/___ |
| Observe an experienced CSHO recommending penalties to the AKOSH Chief or Asst. Chief of Enforcement | ___/___/___ |
| Attend an informal conference | ___/___/___ |
| For each of three inspection case files assigned by the supervisor, prepare a written report that summarizes <ul style="list-style-type: none"> ❖ Reason for the inspection ❖ Nature and characteristics of the worksite ❖ Hazards investigated, equipment used, and samples or measurements taken ❖ Violations identified ❖ Abatement methods used by the employer | ___/___/___ |
| Review three accident investigation case files assigned by the supervisor | ___/___/___ |