

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

Section / Pages	OSHA Directive	Section / Pages	AKOSH Directive
NA / Abstract – 1	<p>Purpose: This Instruction provides National, Regional, and Area Office personnel with policy and guidelines for implementing competency-based training programs for OSHA compliance personnel.</p> <p>Scope: This Instruction applies OSHA-wide.</p>	NA / 1	<p>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.</p> <p>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.</p> <p>This directive updates the guidance in AKOSH PD #09-02</p>
VII / 2-3	<p>Goals and Objectives of CSHO Training: Competency-Based Curriculum.</p> <p>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 represent OSHA with a high degree of professional expertise.</p> <p>A. Competency-Based Curriculum.</p> <ol style="list-style-type: none"> 1. The OSHA Training Institute offers formal training for CSHOs with a competency-based approach to curriculum, using the CSHO Functional Competency Model as the guide. A copy of the CSHO Competency Model and related information on the OTI curriculum and professional certification can be found on OSHA’s Directorate of 	III/ 2-3	<p>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.</p> <p>A. AKOSH Curriculum.</p> <ol style="list-style-type: none"> 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

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

	<p>Training and Education (DTE) Intranet web pages.</p> <p>2. It is important to note that competence cannot be achieved through formal training alone. Proficiency requires a mix of experiences over time, personal initiative to develop to the highest level of professionalism possible, and structured on-the-job training as well as formal training.</p>		<p>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.</p> <p>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.</p> <p>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.</p> <p>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:</p> <ol style="list-style-type: none"> 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
--	--	--	---

		<p>processes and the ability to make quantitative observations and measurements.</p> <ol style="list-style-type: none"> 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
--	--	--

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

			<p>foundation and validity of citations, penalty calculations, interpretations, and other factors during informal conferences, depositions, and formal OSH Review Board proceedings.</p> <p>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.</p> <p>15. The ability to analyze evidence to draw conclusions and determine causal factors based on qualitative and quantitative methods.</p> <p>16. An understanding of AKOSH discrimination protections under AS 18.60.089 and demonstrated ability to explain the provisions.</p> <p>17. An understanding of the AKOSH consultation program and demonstrated ability to explain how the program works.</p> <p>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.</p>
<p>VII / 2-3</p>	<p>B. Formal Training Program. OTI’s formal training program provides a wide range of training opportunities and learning experiences to assist CSHOs with their professional development goals. A flexible program that incorporates technology-enabled learning, self-study packages, on-the-job experiences and formal training has been developed to accommodate the varying levels of experience and competence during the initial three-year period of a CSHO’s career. OTI’s safety, health and construction training paths reflect basic requirements and competencies applicable to all CSHOs as well as those intending to gain additional expertise.</p> <p>In addition, OTI’s flexible, yet structured, approach to curriculum meets the needs of CSHOs with highly diverse</p>	<p>III / 3</p>	<p>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.</p> <p>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.</p> <p>a. Initial Compliance (OTI #1000 or equivalent, plus Alaska state-specific protocols)</p> <p>b. Introduction to Health Standards for Industrial</p>

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

<p>academic backgrounds and experiences. Supervisors and managers are encouraged to incorporate their office’s safety and health technical training priorities into the CSHO’s training program. For example, the needs of the Area Office may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. Other Area Office needs may include providing CSHOs with technical training required in OSHA Directives (e.g., Process Safety Management (PSM) training for PSM Team Leaders and Members). Phases 1 and 2 of the training program can overlap, allowing Regional Administrators to incorporate four technical courses as needed during the CSHO’s first five years provided the CSHO has completed both the #1000 Initial Compliance and one of the Standards courses. Selection of the technical courses to be attended and determination of the sequencing and priority are at the Regional Administrator’s discretion.</p> <p>To provide CSHOs with the requisite knowledge, skills, and abilities to competently perform their job, this Instruction provides a two-phase approach to completing the mandatory training requirements for CSHOs throughout their career: Phase 1 - Initial Courses and Phase 2 - Technical Courses.</p> <p>1. Phase 1 – Initial Courses Training Requirements: Each CSHO will be required to complete a minimum of eight initial courses offered by the OSHA Training Institute (OTI) during the first three years of his/her career as a CSHO. The order and sequence of these courses are as prescribed in this Instruction.</p> <p>2. Phase 2 – Technical Courses Training Requirements: Each CSHO will be required to complete a minimum of six additional technical courses through Year 8 of their career. Beginning with Year 9, they must complete a minimum of one technical course every three years.</p>	<p>Hygienists (OTI #1250 or equivalent)</p> <ul style="list-style-type: none"> 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 <ul style="list-style-type: none"> 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. <ul style="list-style-type: none"> 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 9 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
--	---

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

			<p>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.</p>
<p>VIII / 4-5 X / 10-13</p>	<p>Phase 1 - Initial Courses, Through Year 3: The following courses will be taken after the CSHO has completed one of the Standards courses.</p> <ul style="list-style-type: none"> • #1310 Investigative Interviewing Techniques. • #1410 Inspection Techniques and Legal Aspects. <p>NOTE: The #1410 Inspection Techniques and Legal Aspects course is the only course that cannot be waived per Section XI.</p> <ul style="list-style-type: none"> • #2450 Evaluation of Safety and Health Management Systems. • #1230 Accident Investigation. <p>At least one of the following courses will be taken during a CSHO’s initial three-year period to enhance multi-disciplinary competence.</p> <ul style="list-style-type: none"> • Safety career path. CSHOs will take at least one of the following: <ul style="list-style-type: none"> - #1080 Health Hazard Awareness for Safety Officers - #1250 Introduction to Health Standards for Industrial Hygienists - #2000 Construction Standards • Health career path. CSHOs will take at least one of the following: <ul style="list-style-type: none"> - #1280 Safety Hazard Awareness for Industrial 	<p>III / 4</p>	<ol style="list-style-type: none"> 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. <ol style="list-style-type: none"> 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

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

	<p>Hygienists</p> <ul style="list-style-type: none"> - #1050 Introduction to Safety Standards for Safety Officers - #2000 Construction Standards • Construction career path. CSHOs will take at least one of the following: <ul style="list-style-type: none"> - #1280 Safety Hazard Awareness for Industrial Hygienists - #1050 Introduction to Safety Standards for Safety Officers - #1080 Health Hazard Awareness for Safety Officers - #1250 Introduction to Health Standards for Industrial Hygienists <p>Additionally, prior to the end of Year 3, the following course is required:</p> <ul style="list-style-type: none"> • The #8200 Incident Command System I-200 course, or equivalent training (i.e., course conducted by other governmental agencies or web-based course) must be taken during the initial three years of training; however, the specific sequence is not critical. 		<p>above and all courses listed below.</p> <ol style="list-style-type: none"> 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)
VIII / 5	<p>Phase 2 - Technical Courses: Regional Administrators will approve technical courses to be taken by CSHOs based on Area Office needs following the guidelines of this instruction.</p> <ul style="list-style-type: none"> • Four technical courses by the end of Year 5. • Two technical courses completed in Years 6 through 8. • A minimum of one technical course every three years beginning with Year 9 throughout the CSHO's career. 	III / 4	<p>3. After completion of the 9 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.</p>
		III / 4-5	<p>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</p>

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

			<p>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.</p>
<p>VIII / 3-5</p>	<p>Mandatory CSHO Training: Figure 1 illustrates a recommended training sequence for the CSHO’s first three years. Phase 1 - Initial Courses, Through Year 3: The following courses will be taken after the CSHO has completed one of the Standards courses.</p> <ul style="list-style-type: none"> • #1310 Investigative Interviewing Techniques. • #1410 Inspection Techniques and Legal Aspects. <p>NOTE: The #1410 Inspection Techniques and Legal Aspects course is the only course that cannot be waived per Section XI.</p> <ul style="list-style-type: none"> • #2450 Evaluation of Safety and Health Management Systems. • #1230 Accident Investigation. <p>At least one of the following courses will be taken during a CSHO’s initial three-year period to enhance multi-disciplinary competence.</p> <ul style="list-style-type: none"> • Safety career path. CSHOs will take at least one of the following: <ul style="list-style-type: none"> - #1080 Health Hazard Awareness for Safety Officers - #1250 Introduction to Health Standards for Industrial Hygienists - #2000 Construction Standards • Health career path. CSHOs will take at least one of the following: 	<p>V / 4</p>	<p>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.</p> <ol style="list-style-type: none"> 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. <ol style="list-style-type: none"> 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

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

	<ul style="list-style-type: none"> - #1280 Safety Hazard Awareness for Industrial Hygienists - #1050 Introduction to Safety Standards for Safety Officers - #2000 Construction Standards • Construction career path. CSHOs will take at least one of the following: - #1280 Safety Hazard Awareness for Industrial Hygienists - #1050 Introduction to Safety Standards for Safety Officers - #1080 Health Hazard Awareness for Safety Officers - #1250 Introduction to Health Standards for Industrial Hygienists <p>Additionally, prior to the end of Year 3, the following course is required:</p> <ul style="list-style-type: none"> • The #8200 Incident Command System I-200 course, or equivalent training (i.e., course conducted by other governmental agencies or web-based course) must be taken during the initial three years of training; however, the specific sequence is not critical. 		<p>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.</p> <ul style="list-style-type: none"> 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)
VIII / 5	<p>Phase 2 - Technical Courses: Regional Administrators will approve technical courses to be taken by CSHOs based on Area Office needs following the guidelines of this instruction.</p> <ul style="list-style-type: none"> • Four technical courses by the end of Year 5. • Two technical courses completed in Years 6 through 8. • A minimum of one technical course every three years beginning with Year 9 throughout the CSHO's career. 	III / 4	<p>3. After completion of the 9 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.</p>
IX / 7-10	<p>Organizational Responsibilities: National Office. National Office Directors shall support the training program, as appropriate, by providing resources, supplying current information on the status of agency programs, standards, regulations, and directives, ensuring program consistency, and auditing Regional Office training</p>	IV / 6-7	<p>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</p>

<p>programs.</p> <p>B. The Directorate of Administrative Programs. The Director, Directorate of Administrative Programs will ensure to the extent possible that money is budgeted and available to Regions for OSHA compliance personnel to complete all mandatory training. Note that other courses designated as mandatory by OSHA’s Assistant Secretary will be included in the CSHO’s training program, thus requiring additional funding support.</p> <p>C. The Directorate of Training and Education. The Director, Directorate of Training and Education shall be responsible for providing programs to educate and train OSHA compliance personnel in the skills and knowledge required to perform their duties. Responsibilities include:</p> <ol style="list-style-type: none"> 1. Planning, developing and conducting Agency technical and specialized training courses and seminars. 2. Conducting needs assessments and gap analyses to identify training needs for compliance personnel. 3. Developing classroom and technology-enabled training products designed to support the training and development of CSHOs. 4. Maintaining and updating competency-based training information on the OSHA Intranet to assist CSHOs in selecting OSHA Training Institute courses and other training and development opportunities that match his/her Individual Development Plans (IDPs) and other professional development needs. 5. Maintaining and updating the technology-enabled OTI course catalog on the OSHA Intranet. 6. Conducting evaluations of training courses and programs designed for compliance personnel. 7. Annotating the CSHO’s training records to reflect waived required training and time extensions for required training. 8. Annotating the CSHO’s training records to reflect 		<p>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 AKSOH Training Coordinator will provide comparative analyses when necessary to demonstrate equivalency with OTI curriculum.</p> <p>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.</p> <p>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.</p>
--	--	--

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

	<p>alternative training for the #8200 Incident Command System I-200 course.</p> <p>9. Preparing a courtesy report for the Regions, the Assistant Secretary, the Deputy Assistant Secretary, the Director of the Directorate of Enforcement Programs, and the Director of the Directorate of Construction listing the courses that have been waived and time extensions granted by the Regional Administrator within the past twelve months. The report will be made available once per fiscal year and will reflect data from the previous twelve months only.</p> <p>D. The OSHA Training Institute. The OSHA Training Institute Director shall be responsible for the scheduling and delivery of occupational safety and health training. Specific responsibilities include:</p> <ol style="list-style-type: none"> 1. Overseeing and conducting courses and seminars for federal and state compliance officers, consultants, compliance assistance specialists, regional and national office staff and other federal agency personnel. 2. Participating in the design and development of technical and specialized courses, including development of course materials, detailed lesson plans, and other educational aids necessary to carry out Institute training programs. <p>E. Regional Administrators. The Regional Administrator (RA) shall direct the execution of the region-wide training and education program in accord with OSHA policy, through the designated Assistant Regional Administrator (ARA). Specifically, in addition to Phase 1 requirements, the RA will:</p> <ol style="list-style-type: none"> 1. Approve six additional technical courses: Four technical courses during the initial five-year period, and two technical courses in Years 6 through 8 of a CSHO's training program. 2. Approve at least one technical course every three years 		
--	--	--	--

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

	<p>beginning in Year 9 throughout the CSHO's career.</p> <p>3. Grant waivers and time extensions in accord with the procedures explained in Sections XI and XII of this Instruction.</p> <p>F. Assistant Regional Administrators. The Assistant Regional Administrator (ARA) designated by the Regional Administrator directs the planning and execution of the Region's training and education program through the Regional Training Officer/Training Designee.</p> <p>G. Regional Training Officers/Training Designees. The Regional Training Officer/Training Designee (RTO/TD) shall serve as a focal point for each region, assisting the Assistant Regional Administrator (ARA) in coordinating and managing the Region's training and education programs. For regions that do not have a designated Regional Training Officer, the Regional Administrator will determine the appropriate designee. The RTO/TD shall assist the ARA to ensure the successful implementation of the training program for regional compliance personnel as outlined in this instruction. Specifically, the RTO/TD shall:</p> <ol style="list-style-type: none"> 1. Provide guidance and assistance to supervisors and CSHOs concerning information contained in this instruction as well as Department of Labor (DOL) and OSHA training policies and procedures. 2. Implement the Regional training and education program. 3. Assist in providing resource material and current training information to Area Directors concerning the implementation of the objectives of the training program. 4. Process training requests, maintain training records, and provide training registration information to managers, supervisors and CSHOs. 5. Provide the Director of the Directorate of Training and Education with a copy of the alternative training completion for the #8200 Incident Command System I-200 		
--	---	--	--

	<p>course.</p> <p>6. Evaluate and monitor all records of training.</p> <p>H. facilitating the development and training of the CSHOs under his/her supervision. The AD directs the execution of the training program in accord with regional procedures and protocols. The AD shall ensure the successful implementation of the training program for compliance personnel as outlined in this Instruction. Specifically, the AD shall:</p> <ol style="list-style-type: none"> 1. Ensure the professional development of CSHOs under his/her supervision in accord with the detailed training options outlined in this Instruction and Appendices. 2. Identify and document through an Individual Development Plan (IDP) process the training needs of CSHOs assigned to his/her supervision, and plan and coordinate all training. 3. Provide and coordinate instruction, assistance, and guidance that is consistent with the IDP process for CSHOs to meet the training program objectives outlined in this Instruction. 4. Review and discuss training progress with each CSHO under his/her supervision during the mid-year and annual performance reviews. 5. Assign, as needed, experienced personnel to assist in the on-the-job training of newly-hired CSHOs. 6. Access and document CSHO abilities and send waiver requests per section XI.B. and requests for time extensions per section XII.B. to the Regional Administrator for approval. <p>I. Compliance Safety and Health Officer (CSHO). The CSHO has the responsibility to perform to the best of his/her ability in all training programs. Specifically, the CSHO shall:</p> <ol style="list-style-type: none"> 1. Discuss his/her performance and training progress with their supervisors. 2. Participate in the planning of training activities. 		
--	--	--	--

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

	3. Fully attend, participate in, and complete all assigned training courses, seminars and other events.		
XI / 13-14	Waiver from Required Training Program	V / 7-8	Training Schedule, Waivers and Extensions
	<p>A. Waiver Conditions. The training program outlined in this instruction is required to be completed during the first eight years of a CSHO's career. Regional Administrators have discretion to waive any of the required courses listed, with the exception of the #1410 Inspection Techniques and Legal Aspects course. Waivers shall be used rarely and shall be granted only in exceptional circumstances.</p> <p>B. Assessment and Documentation. The Area Director must assess and document that the CSHO has demonstrated that he/she can 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 Area Director to the Regional Administrator. The waiver request will document 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 OSHA-specific policies and procedures. For example, criteria may include experience as a former compliance officer with an OSHA State Plan or as a former 21(d) OSHA consultant.</p> <p>C. Waiver Requests. Only the Regional Administrator can grant a waiver. The Regional Administrator shall respond to waiver requests in writing. Copies of responses approving waiver requests shall be provided to the Director of the Directorate of Training and Education and to the Assistant Secretary.</p>		<p>A. Waiver from Required Training Program</p> <p>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.</p> <p>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.</p> <p>3. Only the Division Director can grant a waiver from</p>

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

	<p>D. Training Record Annotated. The Director of the Directorate of Training and Education shall annotate the CSHO’s training record to reflect required courses waived by the Regional Administrator.</p>		<p>this training directive. The Division Director shall respond to waiver requests in writing.</p> <p>4. The AKOSH training coordinator shall annotate the CSHO’s training record to reflect required courses waived by the Division Director.</p>
<p>XII / 14-15</p>	<p>Time Extensions.</p> <p>The time requirements for completing Phases 1 and 2 training shown in this instruction must be met. Only the Regional Administrator can grant a time extension, which must be based on extenuating circumstances. Technical courses may be taken at any time after the CSHO has completed both #1000 Initial Compliance and one of the Standards courses.</p> <p>A. Time Extension Conditions. If there are circumstances that prevent the CSHO from completing the eight required courses within Phase 1 or the required technical courses in Phase 2, the Regional Administrator can extend the time for completion of the required courses for a period of up to one year. Time extensions may not exceed twelve months. The use of time extensions could extend the time allowed for a CSHO to complete the eight required courses to a maximum of four years from his/her employment date.</p> <p>B. Time Extension Requests. Time extensions shall be submitted in writing by the Area Director to the Regional Administrator. 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.</p> <p>C. Time Extension Approvals. The Regional Administrator shall respond to the time extension request in writing. Copies of the responses approving time extension requests shall be provided to the Director of the</p>	<p>V / 8</p>	<p>Training Schedule, Waivers and Extensions</p> <p>B. Time Extensions</p> <p>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.</p> <p>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.</p> <p>C. Time Extension Conditions</p> <p>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.</p> <p>2. Time Extension Requests</p> <p>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.</p>

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

	<p>Directorate of Training and Education and to the Assistant Secretary.</p> <p>D. Training Record Annotated. The Director of the Directorate of Training and Education shall annotate the CSHO's training record to reflect the extension of time.</p>		<p>3. Time Extension Approvals The Division Director shall respond to the time extension request in writing.</p> <p>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.</p>
<p>Appendix A-10, B-5</p>		<p>VI / 8-9</p>	<p>Individual Training Plans</p> <p>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.</p> <p>B. Initial 36 month training plans should include the following:</p> <ol style="list-style-type: none"> 1. Mandated training as outlined in this instruction; 2. Specific regional training; and, 3. Other developmental training as determined by the supervisor. <p>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</p>

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

			<p>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.)</p>
<p>XIII / 15</p>	<p>Monitoring the Training Program: Monitoring the CSHO's progress throughout the first eight years is critical to ensure the success of Phases 1 and 2 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 Area Director and the Regional Training Officer/Training Designee play major roles in the monitoring process.</p> <p>A. The Area Director. The CSHO's Area Director shall:</p> <ol style="list-style-type: none"> 1. Ensure that each CSHO has completed the necessary prerequisites before attending mandatory OSHA training 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 developing the actual case file; the OJT review may be discontinued when this has been effectively accomplished. <p>B. Regional Training Officer/Training Designee. The Regional Training Officer/Training Designee shall monitor Area Office implementation of the training program outlined in this Instruction through review of training documents. For regions that do not have a designated</p>	<p>VII / 9-10</p>	<p>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.</p> <p>A. Chief of Enforcement/Assistant Chief of Enforcement The CSHO's supervisor shall:</p> <ol style="list-style-type: none"> 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. <p>B. Training Coordinator The Training Coordinator shall monitor AKOSH implementation of the training program outlined in this instruction through review of training records and</p>

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

	Regional Training Officer, the Regional Administrator will determine the appropriate designee.		evaluations of training courses through CSHO interviews, course audits, curriculum reviews and other means.
XIV / 15-16	<p>Continuation of CSHO Development:</p> <p>A. Professional Standing, Recognition and Professional Certification. The series of courses required for Phase 1 of the CSHO's first three years provide a foundation for professionalism and proficiency. The Phase 2 required technical courses provide a higher level of knowledge and skill in order for CSHOs to more effectively fulfill OSHA's mission. While professional certification is an important career milestone, it is not the only path to gaining professional standing or recognition. CSHOs that complete new, complex or difficult assignments expand their capabilities and broaden their role as a safety and health professional inside and outside the Agency.</p> <p>B. Role of Individual Development Plans. An Individual Development Plan (IDP) is an active plan to help the CSHO achieve organizational and career goals. IDPs must be updated annually and serve as a tool to provide documentation for each CSHO to chart and monitor his/her own progress toward developmental goals. An IDP can help a CSHO:</p> <ol style="list-style-type: none"> 1. Achieve and enhance the level of knowledge and skills required to achieve the functional competencies of a CSHO. 2. Build expertise as an OSHA safety and health professional. 3. Continue professional development throughout his/her career. <p>C. IDPs for the Initial Three-Year Period. Appendices A and B serve as guidelines for supervisors to select appropriate training outlined by this instruction during the first three years. The IDP (Form DL-80) should reflect:</p> <ol style="list-style-type: none"> 1. Mandatory training - required during the three-year 	III / 6 AND VI / 8	<p>See Section III stated above – Goals and Objectives of CSHO Training; Subsections E and F</p> <p>AND</p> <p>See Section VI stated above - Individual Training Plans; Subsection C - Continuing Education and Technical Training</p>

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

	<p>period as outlined in this Instruction.</p> <ol style="list-style-type: none"> 2. Regional or Area Office training requirements. 3. Other developmental training as determined by the CSHO's Area Director. For example: <ol style="list-style-type: none"> a. Supplemental training at the Regional and Area Office level that includes formal and/or informal mentoring by higher graded personnel and/or CSHO's with specialized experience. b. Participation in various classes of inspections and a variety of industries and worksites. <p>D. IDPs Developed after the Three-Year Period.</p> <ol style="list-style-type: none"> 1. The IDP should follow the guidance outlined in OSHA Instruction PER 05-00-001 (PER 10-1.1) OSHA Training Policy. 2. An IDP helps the CSHO continue to improve his/her present performance and prepare him/her for more responsible work in accord with his/her potential and interests, and the needs of the Agency. 		
<p>XV / 16-17</p>	<p>Evaluation: An overall evaluation of the training program for OSHA compliance personnel effectiveness will be conducted by staff from the Directorate of Training and Education.</p> <p>A. Established evaluation processes and criteria include:</p> <ol style="list-style-type: none"> 1. Maintaining accreditation through third-party evaluations such as the International Association of Continuing Education and Training (IACET). OTI and DTE have been accredited by IACET since 2002. Retaining accreditation requires periodic internal reviews and reaccreditation not less than every five years. 2. Meeting or exceeding the Department of Labor's goals for effective management of human capital. One of the Department's goals requires not less than an annual review of the relationship between OTI training programs and the level of CSHO competency at various points in the 	<p>VIII / 10</p>	<p>Evaluation: An overall evaluation of the training program for AKOSH compliance personnel effectiveness will be conducted by the Training Coordinator on an annual basis.</p> <p>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.</p> <p>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</p>

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

	CSHO's career. B. OTI and DTE distribute course evaluation surveys at the end of each instructor-led class. This information provides valuable feedback from the student's perspective to determine the perceived value and impact of instruction. It also serves as a basis for proposing changes to course objectives, course content and presentation methods.			progress toward development and implementation of this directive for the previous year.
App A A1 – A10	Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1			
App B B1 – B5	Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3			
App C C1 – C20	OTI Courses Required or Recommended in OSHA Directives			
App D D1 – D2	Correlation of OTI Courses to Professional Certification			
		App 1 / 11-13	Course Descriptions – Initial 36 Months	
		App 2 / 14	Safety Technical Courses	
		App 3 / 15	Industrial Hygiene Technical Courses	
		App 4 / 16-18	Recommended On-the-job Training Documentation	