

CANCELLED



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

AKOSH Program Directive 09-02

Date: January 26, 2009

To: Distribution List

From: Grey R. Mitchell, Director

Subject: **TED 01-00-018 Initial Training Program for OSHA Compliance Personnel**

This Program Directive, PD 09-02, is formal notice that the Alaska Department of Labor and Workforce Development, Division of Labor Standards and Safety recognizes and will implement TED 01-00-018 Initial Training Program for OSHA Compliance.

This instruction describes the revised training program for AKOSH compliance personnel and supersedes AKOSH PD 92-7. 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 AKOSH with a high degree of professional expertise.

Please ensure that all members of your staff receive a copy of this program directive.

Effective Date: February 2, 2009

Attachment: AKOSH Initial Training Program for Compliance Personnel

Distribution List

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

AKOSH Initial Training Program for Compliance Personnel

I. Executive Summary

This instruction provides guidance and direction to the Alaska Occupational Safety and Health Administration (AKOSH) concerning policies and procedures for training of Compliance Safety and Health Officers (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 for Alaska's working men and women. In this instruction, AKOSH has provided detailed guidance for training required during the initial three-year period of 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 represent AKOSH with a high degree of professional expertise.

II. Significant Changes

This instruction describes the revised training program for AKOSH compliance personnel and supersedes AKOSH PD #92-7.

Changes include:

- During the first three years of his/her career, each newly-hired CSHO will be required to complete a minimum of eight courses or demonstrate competency through experience and/or past training to meet or exceed the core competencies established in courses offered by the OSHA Training Institute (OTI). The recommended order and sequence of these courses are as prescribed in this instruction.
- This instruction along with the OTI training program offers the opportunity to incorporate a minimum of four additional technical courses into the CSHO's initial three-year training plan.
- Each CSHO and his/her supervisor will be required to track progress throughout the initial three-year period. An Individual Development Plan

- (IDP) will be updated at least annually. The IDP (Form DL-80) or equivalent form may be used as a planning and tracking document for reference by the CSHO and his/her supervisor to ensure that the CSHO receives all required training.
- A time extension policy has been added and the waiver policy has been clarified.
- Appendix A has been revised and expanded. Appendix A combines formalized training with self-instruction and on-the-job training recommendations in a comprehensive format. Supervisors and CSHOs will find this a useful tool for planning and sequencing professional development during the first year of the CSHO's career.
- Appendix B has been added to provide supervisors with recommended CSHO self-instruction and follow-up on-the-job training to reinforce OTI training or equivalent training provided in years two and three.
- Appendix C lists OTI courses that are required or recommended in OSHA directives as a quick reference guide. This reference may be used to assist supervisors and CSHOs in developing IDPs for continuing professional development.

A. Competency-Based Curriculum Guidance

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 Training and Education Intranet web pages.

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.

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 training³ 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.

C. Technical Training during the First Three Years

OTI's flexible yet structured approach to curriculum meets the needs of CSHOs with highly diverse academic backgrounds and experiences. Supervisors and managers are encouraged to incorporate their office's training priorities into the CSHO's training program. For example, the needs of AKOSH may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. The OTI training program offers the opportunity to incorporate up to four additional technical courses at any time during the CSHO's initial three year training plan provided the CSHO has completed both the #1000 Initial Compliance and one of the Standards courses, unless additional technical courses become available in Alaska or in proximity to Alaska. Selection of the technical courses to be attended and determination of the sequencing and priority are at the Division Director's discretion.

First Three Years of CSHO Training

OSHA Training Institute Career Path for CSHOs [First Three Years] (see Figure 1) illustrates a recommended training sequence for the CSHO's first three years.

A. The following two courses must be completed within the first year of a CSHO's Career, unless scheduling, budget or other factors beyond the CSHO's and their supervisor's control make completion impossible. Although these courses are required during the first year, there is no limit to the number of courses a CSHO may take during any year.

1. #1000 Initial Compliance.
2. One of the following courses on OSHA Standards.
 - a. #1050 Introduction to Safety Standards for Safety Officers (safety career path/safety specialists)
 - b. #1250 Introduction to Health Standards for Industrial Hygienists (health career path/industrial hygienists)

B. All Safety CSHO's will be expected to take OTI course #2000 Construction Standards or equivalent.

C. The following OTI or equivalent courses will be taken after the CSHO has completed one of the Standards courses.

1. #1310 Investigative Interviewing Techniques

2. #1410 Inspection Techniques and Legal Aspects

NOTE: The #1410 Inspection Techniques and Legal Aspects course is the only course that cannot be waived per Section XI.

3. #2450 Evaluation of Safety and Health Management Systems
4. #1230 Accident Investigation

D. At least one of the following courses will be taken during a CSHO's initial three year period to enhance multi-disciplinary competence.

1. Safety career path CSHOs will take at least one of the following:
 - a. #1080 Health Hazard Awareness for Safety Officers
 - b. #1250 Introduction to Health Standards for Industrial Hygienists
2. Health career path CSHOs will take at least one of the following:
 - a. #1280 Safety Hazard Awareness for Industrial Hygienists
 - b. #1050 Introduction to Safety Standards for Safety Officers
 - c. #2000 Construction Standards

D. 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.

E. As resources allow, at least four additional technical courses may be recommended for CSHO's during the initial training period.

Course Sequence

A. Unless the courses are not available, both the Initial Compliance course and a Standards course must be completed in year one of the CSHO's training path. If alternative courses are available and accessible, these courses may be completed prior to the initial compliance course the initial standards course. The following descriptions are provided for OTI courses to provide a general overview of course content and equivalency standards:

1. **#1000 Initial Compliance.** This course is designed for newly hired CSHOs and focuses on the basic elements of conducting inspections in accordance with current OSHA policy. Also emphasized is the importance of personal conduct and professional development. Role play is used to allow students to practice how to conduct an opening conference. The course ensures that participants have the fundamentals of information gathering to document the *prima facie* elements in a case file. During a mock inspection, participants work in teams to investigate and document the validity of alleged complaint items. At the conclusion of this course, the student will be able to identify CSHO responsibilities related to conducting an inspection as well as promoting, assessing and enforcing workplace safety and health compliance.

2. **Standards Courses.** The purpose of these courses is to provide CSHOs with an introduction to the organization and content of the standards, hazard recognition, and documentation of identified hazards.

a. **#1050 Introduction to Safety Standards for Safety Officers.** This course is designed specifically for safety officers and emphasizes a wide range of safety hazards covered by 29 CFR 1910. During the course, students observe staged hazardous conditions in the OTI safety laboratories where they will evaluate, document, select and apply standards and recommend corrective actions. At the conclusion of the course, the student will be able to apply inspection techniques, basic safety hazards recognition and abatement for general industry inspections.

b. **#1250 Introduction to Health Standards for Industrial Hygienists.** This course is designed specifically for industrial hygienists and emphasizes recognition, evaluation and control of a wide range of health hazards covered by 29 CFR 1910 and substance-specific standards in 29 CFR 1926. The featured practicum in this course includes analysis of the health hazards in a foundry. At the conclusion of this course, the student will be able to employ basic health hazard recognition; apply inspection sampling and instrumentation techniques and related OSHA policies; and, identify abatement methods.

c. **#2000 Construction Standards.** 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.

3. **#1310 Investigative Interviewing Techniques.** This course is intended to serve as a practical interviewing guide for OSHA 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. **#1410 Inspection Techniques and Legal Aspects.** 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. **#2450 Evaluation of Safety and Health Management Systems.** 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. **#1230 Accident Investigation.** 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. **#1280 Safety Hazard Awareness for Industrial Hygienists.** 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. **#1080 Health Hazard Awareness for Safety Officers.** 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.

c. **#2000 Construction Standards.** 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.

8. **#8200 Incident Command System I-200.** When responding to an identified incident, the CSHO will be able to operate efficiently within the parameters of an Incident Command System (ICS).

a. Regions may approve one of three options:

- 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*.

b. The Regional Training Officer/Training Designee will furnish to the Director of the Directorate of Training and Education a copy

of the approved alternative training course completion for annotation in the student's record.

Waiver from Required Training Program

A. 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. 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.

B. Assessment and Documentation

The Chief 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 Chief to the Division Director. 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 AKOSH and applicable OSHA specific policies and procedures. For example, criteria may include experience as a former compliance officer with OSHA, another OSHA State Plan State or as a former 21(d) OSHA consultant.

C. Waiver Requests

Only the Division Director can grant a waiver. The Division Director shall respond to waiver requests in writing. Copies of responses approving waiver requests shall be provided to the OSHA Regional Administrator, Director of the Directorate of Training and Education and to the Assistant Secretary.

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 Division Director.

Time Extensions

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.

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.

A. Time Extension Conditions

If there are circumstances that prevent the CSHO from completing the required courses within the three-year period, the Division Director can 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.

B. 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.

C. Time Extension Approvals

The Division Director shall respond to the time extension request in writing. Copies of the responses approving time extension requests shall be provided to the OSHA Regional Administrator, Director of the Directorate of Training and Education and to the Assistant Secretary.

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.

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 Chief and the Training Officer/Training Designee play major roles in the monitoring process.

A. The Chief of Enforcement

The CSHO's Chief shall:

1. Ensure that each CSHO has completed the necessary prerequisites before attending 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.

B. Training Officer / Training Designee

The Training Officer/Training Designee shall monitor AKOSH implementation of the training program outlined in this instruction through review of training documents.

C. 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:

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.

D. 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:

1. Training required during the three-year period as outlined in this instruction.

2. AKOSH training requirements.

3. Other developmental training as determined by the CSHO's Chief.
For example:

a. Supplemental training 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.

E. IDPs Developed after the Three-Year Period

1. An IDP helps the CSHO continue to improve his/her present performance and prepare him/her for more responsible work in accordance with his/her potential and interests, and the needs of the Agency.

2. At a minimum, each CSHO is expected to attend a safety and health 17 related course once every three years. Appendices C and D are provided to assist supervisors and CSHOs in preparing IDPs for continuing development.

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.

The Training program shall be evaluated by AKOSH 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 Federal OSHA law and regulation.

Appendix A. Recommended CSHO Training Activities for Year One

Appendix A. Recommended CSHO Training Activities for Year One

Background and Description of Appendix A. This Appendix is recommended as a tool for supervisors of first year CSHOs.

The OSHA Training Institute (OTI) offers formalized training for CSHOs through its competency-based approach to curriculum. As a professional, the CSHO will acquire additional knowledge, skills, abilities and behaviors through other sources such as Self-Instruction (S.I.) and On-the-Job Training (O.J.T.) which enhance the formal training a new CSHO receives at OTI. This Appendix offers recommendations for both S.I. and O.J.T. activities to be completed along with formal training at OTI.

The Appendix A table lists activities that should be completed in the Area Office prior to and after attending specified OTI courses. Items listed in the "Activity" column should be completed by all CSHOs. Activities recommended specifically for safety specialists, industrial hygienists or construction specialists are listed in the last three columns. Each activity and discipline-specific recommendation is provided to complement material covered in the formal OTI training courses.

Time allotted to accomplish S.I. and O.J.T. assignments should be compatible with the newly-hired CSHO's current knowledge, skill and experience levels. The supervisor should verify the CSHO's ability to successfully complete S.I. and O.J.T. assignments. Training assignments may also be supplemented by other comparable task assignments deemed appropriate and/or equivalent by the supervisor.

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
PRIOR to Attending OSHA Training Institute's Course #1000 Initial Compliance					
O.J.T.	Work with office administrative personnel to identify and become familiar with office administrative procedures (both personnel and citation processing)	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
	Work with a team leader or assigned mentor to review the <i>Area Office New Employee Orientation Checklist</i> on the CSHO Resources page (Intranet) This will be helpful especially during the first weeks of CSHO employment	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		

Appendix A. Recommended CSHO Training Activities for Year One

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
O.J.T.	Explore the OSHA Intranet and Internet sites Begin with the following: OSHA Intranet: * Current NCR system or new OSHA Information System, OIS (general application) * OSHA forms (e.g., OSHA-1, -1A, and -1B) * Use of OSHA Integrated Management Information System (IMIS) data * SAVES – Standard Alleged Violation Elements * Directorate of Information Technology (DIT) Help Desk page (review topics related to data entry, program applications, FAQs, the Oracle and stand-alone applications and other application-based training provided by DIT) OSHA Public Page (Internet): * Current <i>Field Inspection Reference Manual</i> (FIRM) or new <i>OSHA Field Operations Manual</i> (OFOM) * Directives system * <i>OSHA Technical Manual</i> (OTM) * Whistleblower protection program	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>	OSHA-1B (IH) form	<i>No Additional Discipline-Specific Recommendations</i>
	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)	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
	Receive training and instructions on personal use of respirators, according to National, Regional, and Area Office programs; be fit-tested				
With team leader or assigned mentor, review basic programs such as: * Hazard Communication * The Control of Hazardous Energy (Lock-out/Tagout) * Recordkeeping					

Appendix A. Recommended CSHO Training Activities for Year One

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
S.I.	Read and review OSH Act and become familiar with: <ol style="list-style-type: none"> 1. which employers and employees are covered and 2. the responsibilities of employers and employees 	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
	Review the contents of 29 CFR 1910 and 29 CFR 1926 and become familiar with the types of hazards covered by OSHA regulations Consult with team leader 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	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
	Review the public (Internet) and Intranet web pages related to OSHA's compliance assistance: <ul style="list-style-type: none"> * Alliance Program * Compliance Assistance * Consultation Programs * Small Business Initiatives * Strategic Partnership Program * Voluntary Protection Programs 	__/__/____			
	Review the Regional Emergency Management Plan (REMP)	__/__/____			
O.J.T.	Accompany a fully-qualified CSHO on a programmed inspection and observe the following: <ul style="list-style-type: none"> * Inspection preparation * Calibration of instruments * Opening conference * Walkthrough * Use of instruments or other measuring devices * Closing conference * Preparation of citations 	__/__/____	Instruments might include Santronics AC sensor, velometer	Instruments might include air or noise sampling equipment	Instruments might include inclinometer, engineering rod
	Accompany a fully-qualified CSHO on a general schedule follow-up inspection	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		

Appendix A. Recommended CSHO Training Activities for Year One

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
Attend OTI Training: Course #1000 Initial Compliance - including web-based segment prior to instructor-led (i.e., classroom) training		__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
S.I.	Review the contents of 29 CFR 1915, 1917, and 1918 Consult with team leader or assigned mentor to determine whether the office has a history of making inspections under these standards	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	Review the contents of 29 CFR 1928 Consult with team leader or assigned mentor to identify limitations to carrying out inspections under this Part	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
O.J.T.	If the Area Office conducts inspections under the 29 CFR 1915, 1917 and 1918 standards, accompany a fully qualified CSHO on an inspection involving shipyard employment and marine cargo handling industries	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	If the Area Office conducts inspections under the 29 CFR 1928 standard, accompany a fully qualified CSHO on an inspection involving agriculture operations	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	Identify consensus or other standards referenced in the OSHA standards Discuss with the supervisor whether the provisions of the identified standards are incorporated by reference or are advisory in nature Determine how personnel in your office access copies of needed consensus standards	__/__/__	All Subparts in 1910 (excluding Subpart Z except Hazard Communication Std. - 1910.1200) Also, refer to 29 CFR 1910.6	1910 Subparts I, J and Z Also, refer to 29 CFR 1910.6	1926.65, 1926.95 through 1926.102, 1926.104, and 1926.152 (or other standards assigned by the supervisor)

Appendix A. Recommended CSHO Training Activities for Year One

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
O.J.T.	Specific to your career path, accompany a fully qualified CSHO on an inspection and discuss related technical information from that inspection	__/__/____	Example: after inspection involving storage of flammable and combustible liquids, discuss chemistry related to fire and solvents	Example: after an inspection involving lead exposures, discuss toxicology and health effects, dose-response relationships, feasible engineering controls	Example: after a trench inspection, discuss the following: trigonometry applicable to trenching and mechanics
	With a team leader or assigned mentor, identify the instruments used by personnel in your specific discipline that are maintained at the Area Office (e.g., detector tube pumps, carbon monoxide and/or multiple gas meters, receptacle (three-light) tester, sound level meters, camera, tape measure)	__/__/____	Examples include: Santronics AC sensor, voltage tester	Examples include: air monitoring equipment, noise instrumentation, velometers, heat stress monitors	Examples include: engineering rod, inclinometer, penetrometer, calipers
	With a team leader or assigned mentor, review the 5(a)(1) process for your Region	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
Attend OTI Standards Course per Selected Discipline		__/__/____	Course #1050 Introduction to Safety Standards	Course #1250 Introduction to Health Standards	Course #2000 Introduction to Construction Standards
O.J.T.	Work with a team leader or assigned mentor to identify and become familiar with OSHA's Nationally Recognized Testing Laboratory (NRTL) program	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		

Appendix A. Recommended CSHO Training Activities for Year One

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
O.J.T.	With a team leader 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)	_/_/____	Examples include: Santronics AC sensor, voltage tester	Examples include: air monitoring instrumentation, noise dosimeters, four gas meters	Examples include: engineering rod, inclinometer, penetrometer, calipers
S.I.	Review the office library's basic texts, references, and materials related to your discipline's hazards and controls	_/_/____	<i>No Additional Discipline-Specific Recommendations</i>		
	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. Include: <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 OSHA standards 	_/_/____	Examples include: amputations, electrical	Examples include: noise, temperature stress, exposure to toxic air contaminants	Examples include: fall from heights, trenching
O.J.T.	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: <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) * Recommended penalties 	_/_/____	<i>No Additional Discipline-Specific Recommendations</i>		

Appendix A. Recommended CSHO Training Activities for Year One

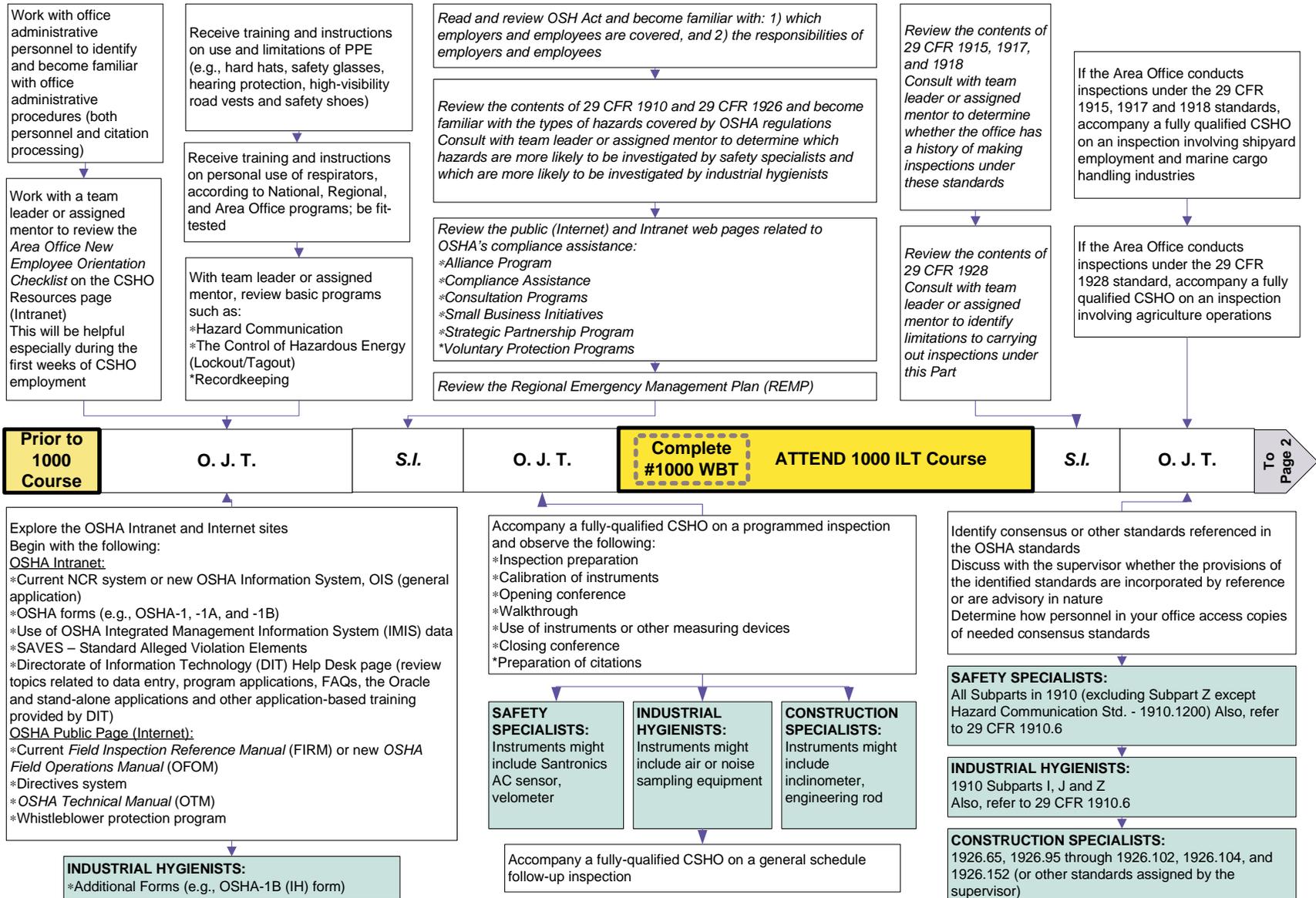
Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
O.J.T.	Participate in a follow-up inspection and perform the following: * Review the case file to determine equipment necessary to evaluate the implementation of controls * Prepare all 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	___/___/____	No Additional Discipline-Specific Recommendations		
	With a team leader or assigned mentor, discuss regional review process for multi-employer worksite inspections	___/___/____			
	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 Area Director	___/___/____			
	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 Area Director	___/___/____			

Appendix A. Recommended CSHO Training Activities for Year One

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
S.I.	Perform a literature and web search to resolve a problem in hazard identification and control Develop a written report incorporating the information	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
O.J.T.	Observe an experienced CSHO recommending penalties to the Area Director	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	Attend an informal conference	__/__/__			
S.I.	For each of three inspection case files assigned by the supervisor, prepare a written report that summarizes * 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	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	Review three Area Office accident investigation case files assigned by the supervisor	__/__/__			

Appendix A. Recommended CSHO Training Activities for Year One

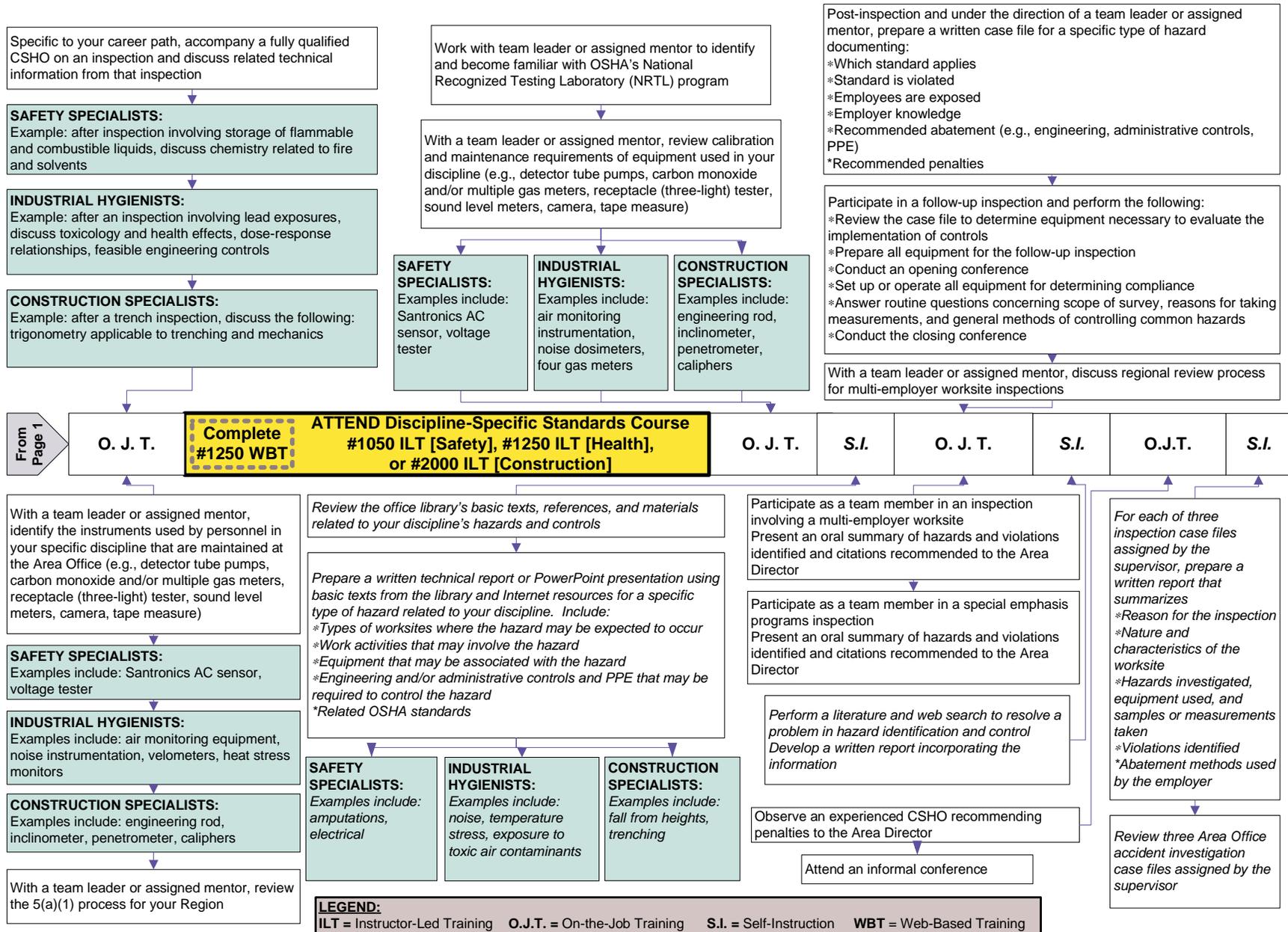
CSHO First Year Training Plan [TED Appendix A] Summary - Page 1 of 2



LEGEND:
ILT = Instructor-Led Training **O.J.T.** = On-the-Job Training **S.I.** = Self-Instruction **WBT** = Web-Based Training

Appendix A. Recommended CSHO Training Activities for Year One

CSHO First Year Training Plan [TED Appendix A] Summary - Page 2 of 2



Appendix B. Recommended CSHO Training Activities for Years Two and Three

Appendix B. Recommended CSHO Training Activities for Years Two and Three

Background and Description of Appendix B. This Appendix is a tool for supervisors of CSHOs to use to plan training during the CSHO's second and third years of employment. Ideally, the courses would be taken in the order listed. The proposed sequence assists CSHOs with building professional expertise by setting incremental, achievable goals.

Some of the initial courses recommended for years two and three include an application of technical knowledge; however, the initial courses are not intended to provide an in-depth perspective in a specific technical area. OTI offers additional courses that deal specifically with skills and knowledge in several technical areas related to safety, health or construction. Refer to Appendix D *Correlation of OTI Courses to Professional Certification* for more detailed information about OTI courses that relate to professional certification.

After completion of each of the required courses and optional recommended technical courses, supervisors should assign CSHOs inspections which further reinforce the retention and transfer of the course learning objectives.

Years two and three offer the CSHO opportunities to reach professional development goals by:

- Completing the required OTI courses
- Selecting optional technical courses to support professional development
- Self-Instruction (SI)
- On-the-Job Training (OJT)
- Completing training required by various directives as assigned per Regional and Area Office plans (Refer to Appendix C for more information).

Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
#1310 Investigative Interviewing Techniques	After completion of: <ul style="list-style-type: none"> ○ #1310 <i>Investigative Interviewing Techniques</i> ○ <i>and</i> ○ #1230 <i>Accident Investigation</i> CSHOs should: <ul style="list-style-type: none"> ○ Participate in three accident/fatality investigations under the guidance of a team leader and/or an experienced CSHO ○ Be given the opportunity to demonstrate effective investigative interviewing techniques 	None	This course does not specifically apply technical knowledge related to safety, health or construction.

Appendix B. Recommended CSHO Training Activities for Years Two and Three

Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
#1410 Inspection Techniques and Legal Aspects	<p>After completion of:</p> <ul style="list-style-type: none"> ○ #1410 <i>Inspection Techniques and Legal Aspects</i> and ○ Three inspections <p>The CSHO should discuss with his/her team leader:</p> <ul style="list-style-type: none"> ○ Whether each case has adequate documentation to defend the case during legal proceedings ○ What additional documentation might have strengthened the case 	<p>Research and read new and applicable court cases, settlement cases and other OSHA policy documents related to course content.</p>	<p>This course does not specifically apply technical knowledge related to safety, health or construction.</p>
#2450 Evaluation of Safety and Health Management Systems	<p>After completion of #2450 <i>Evaluation of Safety and Health Management System</i>, the CSHO should:</p> <ul style="list-style-type: none"> ○ Participate in a minimum of three inspections of establishments that have a written safety and health program ○ For each inspection, the compliance officer should <ul style="list-style-type: none"> • Evaluate the effectiveness of the safety and health program • Document his/her reasoning • Discuss the evaluation with his/her supervisor 	<p>Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSHA policy documents related to course content.</p>	<p>This course applies basic technical knowledge related to safety, health and construction.</p>
#1230 Accident Investigation	<p>After completion of:</p> <ul style="list-style-type: none"> ○ #1310 <i>Investigative Interviewing Techniques</i> and ○ #1230 <i>Accident Investigation</i> <p>CSHOs should:</p> <ul style="list-style-type: none"> ○ Participate in three accident/fatality investigations under the guidance of a team leader and/or an experienced CSHO ○ Be given the opportunity to demonstrate effective investigative interviewing techniques 	<p>Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSHA policy documents related to course content.</p>	<p>This course applies basic technical knowledge related to safety, health and construction.</p>

Appendix B. Recommended CSHO Training Activities for Years Two and Three

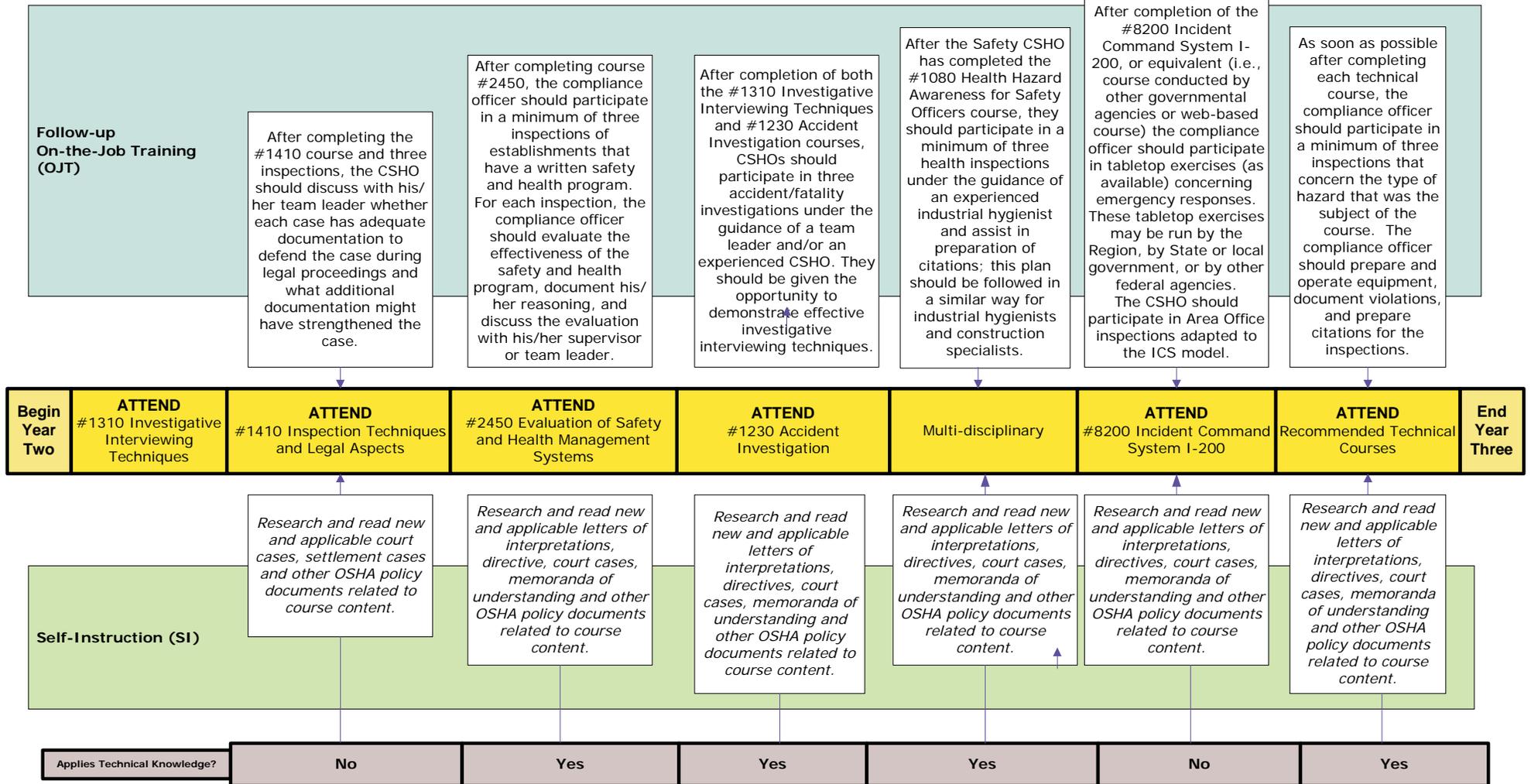
Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
<p>Safety Specialists #1080 Health Hazard Awareness for Safety Officers</p> <p>Industrial Hygienists #1280 Safety Hazard Awareness for Industrial Hygienists</p> <p>Construction Specialists #1080 Health Hazard Awareness for Safety Officers</p>	<p>Safety Specialists. After the Safety Specialist has completed the #1080 <i>Health Hazard Awareness for Safety Officers</i> course, they should participate in a minimum of three health inspections under the guidance of an experienced industrial hygienist and assist in preparation of citations.</p> <p>Industrial Hygienists. After the Industrial Hygienist has completed the #1280 <i>Safety Hazard Awareness for Industrial Hygienists</i> course, they should participate in a minimum of three safety inspections under the guidance of an experienced safety specialist and assist in preparation of citations.</p> <p>Construction Specialists. After Construction Specialists have completed the #1080 <i>Health Hazard Awareness for Safety Officers</i> course, they should participate in a minimum of three health inspections under the guidance of an experienced safety specialist and assist in preparation of citations.</p>	<p>All three disciplines: Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSHA policy documents related to course content.</p>	<p>These courses apply basic technical knowledge related to safety, health and construction.</p>
<p>#8200 Incident Command System I-200</p>	<p>After completion of the #8200 <i>Incident Command System I-200</i>, or equivalent (i.e., course conducted by other governmental agencies or web-based course) the compliance officer should participate in tabletop exercises (as available) concerning emergency responses. These tabletop exercises may be run by the Region, by State or local government, or by other federal agencies. The CSHO should participate in Area Office inspections adapted to the ICS model.</p>	<p>Research and read new and applicable letters of interpretations, directives, court cases, memoranda of understanding and other OSHA policy documents related to course content.</p>	<p>This course does not specifically apply technical knowledge related to safety, health or construction.</p>

Appendix B. Recommended CSHO Training Activities for Years Two and Three

Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
<p>Technical Courses</p> <p>Safety Specialists Build on skills and experience in a related technical area such as machine guarding or lock-out/tagout</p> <p>Industrial Hygienists Build on skills and experience in a related technical area such as noise sampling or air contaminant sampling</p> <p>Construction Specialists Build on skills and experience in a related technical area such as conducting a trench or scaffolding inspection</p>	<p>Safety Specialists. After the Safety Specialist has completed a technical course such as the #2030 <i>Basic Electrical Principles</i> or the #2040 <i>Machinery and Machine Guarding Standards</i>, the Safety Specialist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> o Concern the type of hazard that was the subject of the technical course o Prepare and operate equipment appropriate for an inspection related to the technical area o Document violations and prepare citations for inspections related to the technical area <p>Industrial Hygienists. After the Industrial Hygienist has completed a technical course such as the #2200 <i>Industrial Noise</i> or the #2210 <i>Principles of Ventilation</i>, the Industrial Hygienist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> o Concern the type of hazard that was the subject of the technical course o Prepare and operate equipment appropriate for an inspection related to the technical area o Document violations and prepare citations for inspections related to the technical area <p>Construction Specialists. After the Construction Specialist has completed a technical course such as the #3010 <i>Excavation, Trenching and Soil Mechanics</i> or the #3080 <i>Principles of Scaffolding</i>, the Construction Specialist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> o Concern the type of hazard that was the subject of the technical course o Prepare and operate equipment appropriate for an inspection related to the technical area o Document violations and prepare citations for inspections related to the technical area 	<p>All three disciplines: Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSHA policy documents related to technical course content.</p>	<p>These courses apply technical knowledge that is beyond the basic level related to safety, health or construction.</p>

Appendix B. Recommended CSHO Training Activities for Years Two and Three

CSHO Years Two & Three Training Plan [TED Appendix B] Summary Page



Appendix C. OTI Courses Required or Recommended in OSHA Directives

Appendix C. OTI Courses Required or Recommended in OSHA Directives

This Appendix is recommended as a tool for supervisors to help determine additional training specifically required or recommended by OSHA directives. The training listed in this Appendix may be taken at any time after completion of the two required courses: #1000 Initial Compliance course and the appropriate Standards course (#1050 Introduction to Safety Standards for Safety Officers, #1250 Introduction to Health Standards for Industrial Hygienists or #2000 Construction Standards).

Directive	OSHA Personnel	OTI Course	Comments
Petroleum Refinery Process Safety Management NEP CPL 03-00-004	Team Leaders Courses #3300, #3400 and #3410 are required for Team Leaders plus prior experience in chemical industry safety and experience leading OSHA teams on large inspections	1. #3300 Safety & Health in the Chemical Processing Industry 2. #3400 Hazard Analysis in the Chemical Processing Industries 3. #3410 Advanced Process Safety Management	Completion of Course #330 prior to FY91 does not meet this requirement for Team Leaders and Level 1 Team Members.
	Level 1 Team Member Courses #3300 & #3400 are required for Level 1 Team Members (#3410 encouraged) plus prior experience in chemical industry safety		
	Level 2 Team Member Courses #3300 & #3400 are required + 2 years of OSHA inspection experience or equivalent		

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
Fatality/Catastrophe Investigation Procedures CPL 02-00-137	OSHA personnel who may be involved in fatality and catastrophe investigations	<ol style="list-style-type: none"> 1. #1000 Initial Compliance 2. #1020 Basic Accident Investigation (<i>Editorial note: will become obsolete when #1230 Accident Investigation is offered</i>) 3. #1410 Inspection Techniques and Legal Aspects 4. #2020 Advanced Accident Investigation (<i>Editorial note: will become obsolete when #1230 Accident Investigation is offered</i>) 5. #3420 Criminal Investigation Training Program 	OSHA personnel who may be involved in such investigations are encouraged to enroll in these classes and demonstrate proficiency in the relevant areas addressed. To the extent practical, only trained and experienced CSHOs will be assigned to investigate such incidents.
Enforcement of the Electric Power Generation, Transmission and Distribution Standard CPL 02-01-038	CSHOs inspecting an electric power generation, transmission and/or distribution facility or other site covered by 1910.269 and who must enter an electrical restricted space	#3109 Electric Power Generation, Transmission and Distribution	Required (or equivalent course) NOTE: Some CSHOs have received electrical safety-related work practice training through utility or other industry work experience and training. This experience and outside training may be used to meet the minimum training requirements. Additionally, CSHOs who have outside training/experience or who have successfully completed the interim 3-day OTI course of 1910.269 may perform such inspections; however, they are encouraged to attend the OTI #3109 course.
Respiratory Protection Program Guidelines CPL 02-02-054	Area Office Respirator Program Administrators	#2220 Respiratory Protection	Required (or equivalent course)

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
<p>Application of the Permit-Required Confined Spaces (PRCS) Standard, 29 CFR 1910.146 CPL 02-00-100</p> <p>Enforcement of the Electric Power Generation, Transmission and Distribution Standard CPL 02-01-038</p>	<p>CSHOs that will be entering permit spaces or enclosed spaces</p>	<p>1. Confined Space Entry 2. Respiratory Protection 3. Introduction to Industrial Hygiene for Safety Personnel <i>(Editorial Note: CPL 02-00-100 and CPL 02-01-038 do not specify course numbers)</i></p>	<p>Required (or equivalent courses)</p>
<p>Exposure Control Plan for OSHA Personnel with Occupational Exposure to Bloodborne Pathogens CPL 02-02-060</p>	<p>One representative from each OSHA Region</p>	<p>Bloodborne Pathogens Training at OTI <i>(Editorial Note: although course name & number are not specified, OTI course #2240, Biohazards, would include BBP training)</i></p> <p>The OTI course is conducted by a combination of health care professionals and non-health care professionals with expertise in the standard. Personnel participating in the OTI training course who will function as solitary trainers at the Regional or Area Offices or other OSHA facilities must have a biological sciences background.</p>	<p>After OTI training, the regional representatives conduct training sessions for other OSHA personnel covered by this Plan in their Regions.</p> <p>Note that training records are to contain all information specified in 1910.1030(h)(2) and will be maintained for 3 years from the date on which the training occurred. Training records will be held by the OSHA Office or location at which training took place (e.g., OTI will maintain records of training at OTI, while Area Offices will maintain records of training at those locations).</p>
<p>FAA Air Traffic Control Tower Monitoring Program (AIRTRAF) FAP 01-00-004</p>	<p>CSHOs selected to conduct FAA ATCT inspections</p>	<p>1. #2070, Fire Protection and Life Safety, or equivalent 2. ATCT Monitoring Program Training Course <i>(Editorial Note: this is OTI course #3170)</i></p>	

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures CPL 02-00-147	CSHOs evaluating machines and equipment to determine that they are properly locked and/or tagged out in accordance with 1910.147 and 1910.333	Recommended OTI courses include: #1010, Introduction to Safety Standards for Industrial Hygienists #1050, Introduction to Safety Standards for the Safety Officer #2030, Basic Electrical Principles #3090, Electrical Standards #3094, refer to note below #3095, refer to note below #3190, Electric Power Generation, Transmission & Distribution <i>Editorial Note: Although the directive recommends the #1000, Initial Compliance course, energy control principles are not covered in this course. Also, OTI no longer offers the shortened Electrical Standards courses (#3094 and #3095)</i>	Experienced OSHA staff may already have many OTI courses (or other training with equivalent curriculum) that cover LOTO and electrical safety-related energy control practices; therefore, employment records and training certificates may be used to certify that training has been accomplished.
National Emergency Management Plan (NEMP) HSO 01-00-001 and Inspection Procedures for 29 CFR 1910.120 and 1926.65 Paragraph (q): Emergency Response to Hazardous Substance Releases CPL 02-02-073	OSHA personnel assigned a role or function related to implementing the NEMP or REMP	1. ISC Level 200 Course <i>(Editorial note: this is OTI Course #8200)</i>	Required
	Regional OSHA On-site Leaders/Coordinators	1. ISC Level 200 Course 2. ICS for Executives (Training Module 17 of the ICS training program) 3. #3600 OSHA Technical Assistance for Emergencies 4. #3610 OSHA On-site Leaders/Coordinators	Required “ICS for Executives” is required for RAs and their designees, the A.S., the D.A.S., National Office Executive Staff and other designated Senior Management staff

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
Shipyard Employment "Tool Bag" CPL 02-00-142	CSHOs that will participate in any shipyard employment interventions or inspections	DTE offers a course that is specific to shipyard employment industry entitled "Shipyard Processes and Standards", course #2090	Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in shipyard employment establishments
Longshoring and Marine Terminals "Tool Shed" CPL 02-00-139	CSHOs that will participate in any marine cargo handling industry intervention or inspection	DTE offers a course that is specific to the marine cargo handling industry titled <i>Longshoring and Marine Terminal Processes and Standards</i> , course #2060	Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in marine cargo establishments
Combustible Dust National Emphasis Program (Reissued) CPL 03-00-008	When possible, only CSHOs trained in recognizing the hazards associated with combustible dust shall be assigned to conduct inspections under this NEP	A training course offered by the OSHA Training Institute (OTI) in recognizing combustible dust explosion hazards may be one source of such training. The training at OTI covers various topics, including engineering controls and methodologies in preventing combustible dust deflagration, other fire, and explosion hazards. In addition the training covers several NFPA documents referenced in Section III of this directive, including NFPA 654, NFPA 68, and NFPA 69 (Note: CSHOs knowledgeable in recognition and control of combustible dust hazards and familiar with NFPA provisions need not undergo the training at OTI). <i>[Editorial Note: This is OTI course #3320, Combustible Dust Hazards and Controls]</i>	The Regional Administrators will ensure that an appropriate number of CSHOs trained in combustible dust hazard recognition are available for inspections under this NEP.

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
Voluntary Protection Programs (VPP): Policies and Procedures Manual CSP 03-01-003	Onsite Evaluation Team	#2450, Evaluation of Safety and Health Management Systems (SHMS), or other formal classroom training in evaluating safety and health management systems (for OSHA personnel only) plus working knowledge and understanding of SHMSs	Compliance Officers. OSHA personnel whose current duties include enforcement responsibilities in the Area Office having jurisdiction over the worksite may be assigned to a VPP onsite team. However, as a general rule, such personnel may not subsequently engage in enforcement activity at the worksite for 2 years or until the worksite is no longer a VPP participant, whichever comes first. The Regional Administrator, on a case-by-case basis, may choose to override this 2-year requirement.
	PSM "Level 1" Auditor	<ol style="list-style-type: none"> 1. #3300 Safety and Health in the Chemical Processing Industries 2. #3400, Hazard Analysis in the Chemical Processing Industries 3. #3410, Advanced Process Safety Management, or other equivalent specialized seminars in PSM Plus prior experience in chemical industry safety	The team leader must meet the same qualifications as "Level 1" auditor plus have experience in onsite evaluations, including once as a team member, once as a backup team leader, and once as a team leader in training (with a qualified team leader as backup team leader).