

CANCELLED

ALASKA DEPARTMENT OF LABOR
DIVISION OF LABOR STANDARDS AND SAFETY

*Deleted
by Compliance
Manual*

DOSH Program Directive 86-6

April 18, 1986

To: All OSH Staff

Subject: Records Review

1. Purpose: This DOSH Program Directive implements a procedure that allows Alaska OSH to conduct a certain number of comprehensive inspections within the "Records Review" concept.
2. Background: The records only inspection procedure was instituted to provide an incentive for establishments in hazardous industries to reduce serious injuries. However, objections have been raised to this policy in that it may tempt some employers to falsify injury records to avoid a comprehensive inspection. Alaska OSH, therefore, is initiating a procedure whereby it will conduct a comprehensive inspection for every tenth programmed high hazard safety inspection irrespective of the calculated LWDI rate for the establishment.
3. Procedures:
 - a. Records Inspections. For high hazard safety manufacturing establishments scheduled for inspection, every tenth programmed inspection shall be a comprehensive inspection irrespective of the calculated LWDI rate for the establishment. The Chief shall be guided by the following procedures:
 - (1) The Inspection Register shall be developed and handled in accordance with the Compliance Manual, Chapter II, E.2.b.(1)(a) through (f). When the Inspection Register has been set for the cycle, the establishments shall be numbered sequentially beginning with 1.
 - (2) Every tenth-numbered establishment on the Inspection Register shall be identified for a comprehensive inspection.
 - (3) An establishment LWDI rate shall be calculated in accordance with the Compliance Manual, Chapter III, D.4. However, the procedures given in the Compliance Manual, Chapter II, E.2.b.(1)(g), shall not be followed for the identified establishments even if their LWDI rates are less than the national average for manufacturing.
 - (4) Instead, the employer representatives shall be informed that their establishments have been selected for a comprehensive safety inspection for the purpose of verifying the validity of

the records only inspection procedures. The Compliance Officer (CO) shall explain the selection procedure and answer any related questions which the employer may raise.

- b. Recording in IMIS. Current instructions for completing the OSHA-1 apply to inspections conducted under the procedures given in this DOSH Program Directive with the following exceptions:

- (1) For low LWDI establishments (which would otherwise be coded as "Records Only Inspections"), current instructions for completing the OSHA-1 shall be followed except that "Comprehensive Inspection" shall be checked in Item 35. In addition enter the following coding under optional information (Item 42):

<u>Type</u>	<u>ID</u>	<u>Value</u>
N	11	RECORDS

NOTE: This optional information shall be used only with those inspections which would have been records only inspections under the procedures given in the Compliance Manual, Chapter II, E.2.b.(1)(g).



Robert J. Bacolas, Director

Reviewed and Approved



Jim Robison, Commissioner