

CANCELLED

ALASKA DEPARTMENT OF LABOR  
DIVISION OF LABOR STANDARDS AND SAFETY

DOSH Program Directive 87-5

November 23, 1987

To: All DOSH Staff

Subject: Training Operations Program for Occupational Safety  
and Health Section Compliance Personnel

- A. Purpose: This Program Directive provides OSH Section administrators and field staff with policy and guidelines for implementation of technical training programs for OSH compliance personnel.
- B. Introduction and Objectives
1. Introduction. In order to meet the continuing need for highly trained Compliance Officers (COs) and Industrial Hygienists (IHs), the Occupational Safety and Health Section has developed a training program for new-hire and experienced compliance personnel. The training program is designed to provide a series of training courses that are supported and interspersed with on-the-job training and self-instructional activities to ensure that compliance personnel are able to apply technical information and skills to their work; however, the elements of the training program are not meant to be prerequisites for advancement.
  2. Development Period. The basic training program for new-hires is to be completed during a developmental period. The developmental period is the time it takes a new-hire CO or IH to complete the formal, self-study and on-the-job training requirements stated in this directive. Because Alaska hires "journeymen" COs and IHs and has no "trainee" positions, this period should not be longer than one year. For an experienced new-hire, the period may be shorter, based on the individual's background and progress. Every effort will be made to get the new-hired CO or IH into the field within six months of his/her employment with OSH.
  3. Objectives. Upon completion of the elements of the developmental training program, the CO or IH will have:
    - a. A working knowledge of the fundamentals of hazard recognition, evaluation and control.
    - b. Adequate knowledge of the implementation of engineering controls, abatement strategies, and the interpretation of data.

- c. A reasonable comprehension of basic industrial processes and the ability to make quantitative observations and measurements.
- d. Field experience in the proper calibration and use of measuring instruments.
- e. The ability to perform solo or team inspections in most types of industries.
- f. Knowledge of regulations and laws that involve safety and health in the work place.
- g. The ability to present inspection data in a legal proceeding efficiently.
- h. The ability to make a referral to other appropriate Industrial Hygienists or Safety Officers.

C. Organization Training Responsibilities

- 1. Deputy Director. The Deputy Director, with the concurrence of the Director, directs the execution of the OSH training and education program through the Chiefs of Safety Compliance and Occupational Health Compliance.
- 2. Chiefs. The Chiefs of Safety Compliance (SC) and Industrial Health Compliance (IHC) have the overall responsibility for ensuring and implementing the development and training of new-hire and experienced compliance staff under his/her supervision. Specifically, the chief will:
  - a. Have the responsibility for ensuring the professional development of COs or IHs under his/her supervision;
  - b. Identify training needs of COs or IHs assigned to his/her supervision and plan and coordinate all training;
  - c. Provide and coordinate instruction, assistance, and guidance for the COs or IHs to meet the training program objectives as outlined in this directive;
  - d. Review and maintain progress records for each CO or IH under his/her supervision to ensure completion of the objectives of this training program; and
  - e. As needed, assign experienced COs or IHs to assist in the on-the-job training of new hires.
- 3. Consultation and Training (C&T) Section. The C&T Section will coordinate the development of training courses for the OSH Section. These duties include:

- a. Work with OSHA Region X's Training, Education and Consultation Section to reserve training slots for OSH Compliance staff at the OSHA Training Institute. The Chiefs of SC and IHC shall send a memorandum to the Chief C&T at the beginning of the federal year (October) informing him/her of which courses to reserve. If there is a change in this plan, the Chief C&T shall be informed immediately.
  - b. Develop, with the assistance of the Deputy Director and Chiefs of SC and IHC, in-house training programs. It is the policy of OSH that an employee who receives out-of-state technical training, share the knowledge gained with others of the staff.
  - c. Arrange, when resources permit, for formal training courses from vendors such as the OSHA Training Institute, to be held in Alaska.
  - d. Coordinate the annual staff meeting and training session for OSH supervisors and field staff. Work with supervisors and staff to assure that appropriate and needed training is included in this annual meeting.
4. CO and IH. The CO and IH have the responsibility of performing to the best of his or her ability in all technical training programs. The CO and IH will participate in planning for developmental activities and complete all designated training sessions, courses and assignments.

D. Professional Development of Compliance Personnel

1. Introduction. The purpose of the training program is to provide a wide range of training opportunities and learning experiences for COs or IHs to assist them in their successful professional development. A flexible program which facilitates self-paced learning has been developed to accommodate the varying levels of experience and competence expected of new-hires. However, certain basic training requirements for all compliance personnel are specified to provide uniformity in regard to specific skill and knowledge requirements.
  - a. The training program is designed to:
    - (1) Meet the needs of COs or IHs with highly diverse academic and experimental backgrounds.
    - (2) Incorporate essential requirements which will be monitored and evaluated but yet provide flexibility for managers in implementing the program.
    - (3) Provide guidance and appropriate training materials to managers.

- b. The training plan provides a well-articulated progression of training requirements for new-hire personnel. The elements of the plan include formal training at the OSHA Training Institute or other institutions and informal training such as self-study and on-the-job training (OJT). The chart, Figure 1 on page 5, illustrates the developmental training plan for the new-hire.
2. Introductory Training Requirements. The following items of this section are prerequisites to attending the Initial Compliance Courses.
- a. Informational Program. An informational program must be provided to all new COs and IHs within the first month of employment. The program will be administered by the Chief of the Section to which they are assigned. This program will be administered by the Chief of the Section to which they are assigned. This program includes information on State of Alaska--OSH policy and procedures, as well as administration and organization.
- (1) The informational package shall include, at a minimum:
- (a) Information on the State of Alaska, Department of Labor.
  - (b) An introduction to the State of Alaska-- OSH program: history, purpose, program mix, role of compliance officers, etc.
  - (c) Information on the Department of Labor structure, the Labor Standards and Safety procedures and the Anchorage Office library.
  - (d) Information on acronyms commonly used in the agency.
  - (e) IDP development.
  - (f) Handout materials such as organizational charts, compliance manual standards, directives, PPE, and instruments.
- (2) The Chief, SC or IH is responsible for ensuring that the following items of the informational package are developed and/or provided:
- (a) DOL/LS&S organizational chart and overview of sectional functions.
  - (b) OSH section structure and procedures.

- (c) IDP's.
  - (d) Handout materials.
- (3) Information particular to each outlying office may be added as appropriate.

FIGURE 1.

COMPLIANCE OFFICER DEVELOPMENTAL TRAINING PLAN - STATE OF ALASKA

\*1. OSH INFORMATIONAL ORIENTATION PROGRAM

OSHA ACT - ALASKA OSH HISTORY

COMPLIANCE MANUAL - CHAPTER 3

IMIS FORMS 1, 1A, 1B, 1B-1H & ORIENTATION TO IMIS CONCEPT

ANCHORAGE OFFICE - SELF STUDY - OJT - OSH INSTRUCTORS

\*2. Initial Safety Compliance Course

Hazard Recognition

Standards

Inspection Procedures

Compliance Manual

Directives System

IMIS Manual

IH Technical Manual

Other Regulations

Industrial Processes

Instrumentation

Report Writing

\*3. Inspection Techniques and Legal Aspects

\* SEE C - G  
APPENDICES

\*4. OSHA TRAINING INSTITUTE (FORMAL)

Technical Course (at least one)

SAFETY

HEALTH

Machine Guarding

Noise

Electrical

Ventilation

Construction

Respirators

Additional Technical Course  
(at least one every three years)

Crossover Training

Courses in Area of Evaluated Need

\*5. Move to individual growth training plan for safety

\*6. Move to individual growth training plan for health

- b. OSH Act Self-Study. Each compliance officer is required to complete a self-study program on the OSH Act prior to attending the Initial Compliance Course. The purpose is to familiarize the person with the basic requirements of the OSH act.
  - c. Compliance Manual Chapter III (Inspection Procedures) Self-Study. Each CO or IH is required to complete a self-study program on the Compliance Manual, Chapter III, prior to attending the Initial Compliance Course. Chapter III provides necessary information on basic inspection procedures. The purpose of the self-study program is to prepare the CO or IH for the Initial Compliance Course.
  - d. IMIS Forms 1, 1A, 1B, and 1B-IH Self-Study. Each CO or IH is required to complete a self-study program on the most commonly used IMIS forms, OSHA 1, 1A, 1B, and 1B-IH (for Industrial Hygienists only), prior to attending the Initial Compliance Course. The purpose is to familiarize the CO with the IMIS forms in preparation for the Initial Course.
3. OSH Training. The following courses are required during a CO's developmental period:
- a. Initial Compliance Course. Each new-hire CO or IH is required to attend this training course. The purpose of this course is to provide new COs and IHs with an understanding of occupational safety and health programs, a working knowledge of the compliance manual, and a thorough introduction to the organization and content of the standards. (Note: This course may not be waived.)

Alaska OSH does not plan to use the OSHA Institute for this training because it uses a different numbering system than OSHA for its regulations and because there are some differences in requirements. The training outlined in Appendix D for Safety Compliance Officers and in Appendix E for Industrial Health Compliance Officers is, in the State's opinion, equivalent to the OSHA Institute's Initial Compliance Course. These courses will be taught using a combination of self-study and instructions from supervisors and experienced field staff.

- b. Inspection Techniques and Legal Aspects. Each new-hire CO and IH is required to attend this training course during the developmental period, after having completed the Initial Compliance Course for COs and IHs. The purpose of this course is to provide new COs and IHs with an understanding of basic communication skills, formal requirements and processes of the legal system, and investigative techniques related to OSH compliance activity. The course will be taught by supervisors and the Section's legal counsel (see Appendix F).
  
- c. Technical Courses. Each new-hire CO or IH is required to attend courses particular to his/her discipline during the developmental period. The purpose of these training courses is to provide the CO or IH with technical knowledge, skills, and information on hazard recognition as related to OSH requirements. The specific courses will be determined by the supervisor based on individual need. At least one of the courses shall be selected from the following basic core courses. (Resources permitting, COs and IHs will receive this training at the OSHA Training Institute.)

Safety

- 200 - Construction Standards
- 203 - Electrical Standards
- 204 - Machinery and Machine Guarding Standards

Health

- 220 - Industrial Noise
- 221 - Principles of Industrial Ventilation
- 222 - Respiratory Protection

- d. Crossover Training. Recognizing the need for COs and IHs to be familiar with general concepts of both safety and health, each CO and IH is required to complete crossover training during the developmental period.
4. Anchorage Office - Self-Study and On-The-Job Training. The training plan incorporates alternative modes of instruction including self-instructional techniques and OJT assignments with supervision. The OJT and self-study programs are designed to reinforce formal training.



- a. All new-hire COs and IHs require training to perform their jobs effectively. In this regard, self-study and OJT are essential supplements to formal classroom and laboratory instruction. Both methods of instruction are needed to equip COs and IHs to carry out their duties and responsibilities effectively. The following definitions apply:
- (1) Self-Study. Training that involves independently gained knowledge in the Anchorage office that will aid in preparation for formal training and course work.
  - (2) On-The-Job Training (OJT). Training that relates principles and theories to work skills which are then taught and applied in the field and office environment.
- b. OJT and self-study assignments will be provided concurrently with formal training to emphasize and complement material covered in formal training courses. Time allowed to accomplish OJT and self-study assignments should be compatible with the new-hire CO's and IH's current knowledge, skill, and experience levels. Verification of a CO's or IH's ability to successfully complete OJT and self-study assignments must be documented by the supervisor.
- c. The expertise and judgment of the supervisor will be required when assessing a CO's or IH's progress during the training program. The supervisor must make certain that the CO is ready to perform an assigned task on an individual basis. The program is flexible enough to also afford the CO or IH time for proper sequencing of training. Training assignments may also be supplemented by other task assignments as deemed necessary by the supervisor.

Training in the following subject areas, at a minimum, is to be accomplished through both OJT and self-study assignments:

- o Hazard Recognition Overview
- o Inspection Procedures
- o Standards:
  - General Industry
  - Construction
  - American National Standards Institute (ANSI)
  - National Fire Protection Association (NFPA)
  - American Conference of Governmental  
Industrial Hygienists (ACGIH)
  - Industrial Agency for Research on Cancer  
(IARC)
  - National Toxicology Program (NTP)
- o Compliance Manual
- o IMIS Forms Manual
- o OSH Directives System
- o IH Technical Manual (Safety personnel should have basic familiarity, while Industrial Hygienists will have more in-depth knowledge.)
- o Other Regulations and Procedures
- o Common Industrial Processes
- o Instrumentation
- o Report Writing

- d. This training must be completed within the developmental period. Although expertise in areas such as hazard recognition and industrial processes requires long-term continuing education, it is expected that a solid foundation of information related to these topics will be presented during this time.
  - e. Methods such as audio-visual aids, reading materials, case file review, staff meetings and inspection activity may be used by the supervisor to supplement the topics outlined in D.3 and D.4. Appendix A lists resource materials which may be used by the supervisor.
  - f. It is recommended that COs and IHs be allowed to experience a variety of inspection activity in the area of construction and manufacturing, when accompanying an experienced CO in the field. Each CO or IH should also have experience in establishments with different SIC codes. Each CO should be assigned to both Safety and Health Specialists.
5. Continuing Maintenance of Skills and Knowledge.
- a. COs typically require additional training each year to enable them to keep abreast of safety and health.
  - b. COs are encouraged to pursue other training opportunities that are available within the Department of Labor and elsewhere.
  - c. Journeymen Compliance Officers and Industrial Hygienists will attend a technical course at least once every three years. Chiefs will inform the Deputy Director of their training needs before the State budget is prepared so that any travel monies related to such training can be budgeted.
6. Waiver Conditions. During a CO's and IH's developmental period, the training plan, as stated, is mandatory.

- a. If a new-hire CO or IH has substantial prior safety and/or health experience and the required formal training plan does not meet his or her needs, the supervisor shall design a developmental plan of formal training which is consistent with the CO's background. Any revised formal training plan developed for an individual CO or IH shall be approved in accordance with the waiver procedure in D.6.b., below. When a revised formal training plan is developed and approved, additional requests for waiver from specific mandatory courses are not required.
  - b. Any waivers from this mandatory plan can be granted only by the Deputy Director after consultation with the Director. Waiver requests shall be in writing, from the Chief, the SC or the IH, to the Deputy Director and should take into consideration whether the CO or IH has acquired a level of knowledge, skills and abilities to perform his or her duties. The Deputy Director's response to the waiver request shall also be in writing and will be kept in the employee's training file.
- E. Monitoring the Training Plan. Monitoring the CO's or IH's progress through the training is critical for success. Monitoring provides information to the supervisor about the benefits and effectiveness of the training received. In addition, it provides information on the ability of the CO or IH to achieve training goals and objectives.

1. The supervisor must ensure that each CO has completed the necessary prerequisites before attending training courses.
2. The supervisor is also responsible for reviewing the CO's and IH's performance on self-study and OJT assignments. A copy of the "Supervisor's Training Plan Progress Report," which is included in Appendix B, must be completed for each new-hire CO or IH. This report monitors a CO's or IH's progression through the training plan during the developmental period. (See Appendix B for additional information concerning this report.)
3. Following each OJT inspection activity, the new-hire CO shall develop a brief written summary of the inspection.
  - a. At a minimum, the OJT summary shall include:
    - o New-hire CO or IH
    - o Inspecting CO or IH
    - o Company name
    - o Inspection date and type
    - o Inspection number
    - o Major areas covered on inspection
    - o Questions or comments
  - b. This summary is reviewed by the supervisor and discussed with the new-hire CO or IH following each OJT inspection. The summary provides the supervisor with information on the progress of the CO or IH and can assist in identifying areas requiring further training.
  - c. Copies of the OJT summaries for each new-hire CO or IH shall be maintained by the supervisor and be available for review. When the supervisor determines that the new-hire CO or IH has sufficient experience to participate fully in writing up the actual case file, the OJT summary may be discontinued.

F. Evaluation. In keeping with agency policy, an evaluation of the effectiveness of this revised training program shall be completed at the end of the first year from the effective date of this instruction. Staff from the Deputy Director's office will interview supervisors and new-hire COs or IHs who have participated in the program to determine if this instruction provides a feasible and effective technical training plan for new-hires and to obtain suggestions for program improvement. Based on the results of the interviews, additional evaluation studies may be developed.

Figure 2

EXAMPLE


DATE:

MEMORANDUM TO: Deputy Director

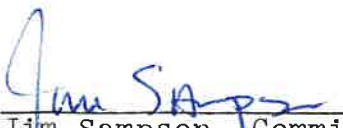
FROM: Chief

SUBJECT: Training Completion Verification

This is to verify that (name of new-hire CO or IH) has completed the following: Informational Program; OSH Act self-study; CM self-study; and IMIS forms self-study and can meet the training expectations of the (designated compliance course)scheduled for (date).

  
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Tom Stuart, Director

REVIEWED AND APPROVED

  
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Jim Sampson, Commissioner