

CANCELLED

ALASKA DEPARTMENT OF LABOR
DIVISION OF LABOR STANDARDS AND SAFETY

AKOSH Program Directive 92-7

October, 1992

To: All AKOSH Staff

Subject: Training Program for AKOSH Compliance Personnel

- A. Purpose. This Program Directive (PD) provides the policy and guidelines for implementation of technical training programs for AKOSH compliance personnel.
- B. Cancellation. DOSH Program Directive 87-5, "Training Operations Program for Occupational Safety and Health Section Compliance Personnel" issued on November 23, 1987, is canceled.
- C. Significant Changes. This PD describes the revised training program for new-hire AKOSH compliance personnel. Significant changes are summarized below.
 1. During the developmental period, new-hire compliance personnel will follow one of the tracks represented by the following three disciplines: safety, health, or construction.
 2. All new-hire compliance personnel will be required to receive a three-week orientation course, given by his or her supervisor, the Chief of Compliance, and the training officer in the Consultation and Training unit that will be equivalent to the OSHA #100 Initial Compliance Course provided by the OSHA Institute. If this cannot be accomplished because of scheduling and work load, the Chief may elect to send the newly hired AKOSH compliance person to the #100 Initial Compliance Course. This option should only be used, however, when the newly hired compliance personnel can be scheduled for this course within three months of initial hire.
 3. After completing the initial compliance course, each new-hire safety compliance officer will be given a two-week introduction to safety standards and each new-hire health compliance officer will be given a two-week introduction to health standards. Both safety and health officers will also be given a two week course on construction standards. This training will be given by the immediate supervisor of the new-hire. Much of it may be self-study but the supervisor should make sure that the new-hire is comprehending the material by giving periodic quizzes. Again, the Chief has the option, if a course can be scheduled within 6 months of the initial hire date, to send the new-hire to an appropriate OSHA Institute Course (#105, Introduction to Safety Standards for Safety

Officers, #125 Introduction to Health Standards for Industrial Hygienists, or #200 Construction Standards.)

4. Each new-hire will track his/her progress during the developmental period. A sample format is provided in Appendix A of this instruction.

D. Introduction and Objectives.

1. Introduction. In order to meet the continuing need for highly trained compliance safety and health officers (CSHOs), the Alaska Occupational Safety and Health (AKOSH) 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 self-instructional activities and on-the-job training to ensure that compliance personnel are able to apply technical information and skills to their work. The elements of the training program outlined in this instruction are not meant to be prerequisites for advancement. To ensure consistent, high-quality training, it is important that all of the activities associated with this training program be administered in a uniform manner.

2. Developmental Period.

- a. 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 CSHO to complete the formal, self-study, and on-the-job training requirements outlined in this PD. This developmental period will be approximately two years in length.
- b. The following basic courses shall be completed within the first year of the developmental period:
 - (1) Initial Compliance Course;
 - (2) Either introduction to safety standards for safety officers, or introduction to industrial hygiene standards for industrial hygienists, and construction standards; and
 - (3) Inspection techniques and legal aspects. If the OSHA Institute course #141 can be scheduled, this will be the preferable method to meet this requirement. If it cannot, an equivalent course will be scheduled.
- c. The developmental period for an experienced new-hire may be shorter, based on the individual's background and progress.

3. Objectives. Upon completion of the elements of the developmental training program the CSHO will demonstrate:
 - 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. The ability to properly calibrate and use measuring instruments.
 - e. The ability to perform solo inspections or participate as a member in team inspections in most types of industries.
 - f. Knowledge of regulations and laws that involve safety and health in the workplace.
 - g. The ability to present inspection data efficiently in a legal proceeding.
 - h. The ability to make a referral to other appropriate industrial hygienists or safety officers.

E. Organizational Training Responsibilities.

Note: Budget restrictions must be taken into consideration in the development of training for both newly hired and experienced CSHOs. Every effort will be made to assure adequate resources are committed for training but the ability of AKOSH to carry out the training policy outlined in this PD is dependent on the monies that both the State and OSHA provide for the program.

1. Director. The Director directs the execution of the AKOSH training and education program through the Deputy Director for AKOSH.
2. Deputy Director. The Deputy Director will prepare, based on input from the Chief of Compliance, a training plan as the State budget is being prepared. This training plan will be based on the requirements of this PD.
3. Chief of Compliance. The Chief, Compliance has the overall responsibility for ensuring and facilitating the development and training of new-hire and experienced CSHOs. The Chief will assist the Deputy Director in preparing a

training plan so that the monies required to carry it out can be requested in the budget.

4. Assistant Chiefs. The Assistant Chiefs serve as the focal point for ensuring the successful implementation of the training program for compliance personnel as outlined in this PD. They have the following tasks:
 - (1) Ensure the professional development of CSHOs under his/her supervision.
 - (2) Identify, through the Individual Development Plan (IDP) process, 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 as 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, senior CSHOs to assist in the on-the-job training of new-hires.
5. Compliance Safety and Health Officer (CSHO). The CSHO has the responsibility to perform to the best of his/her ability in all technical training programs. Specifically, the CSHO shall:
 - (1) Participate in the planning of developmental activities.
 - (2) Complete all designated training sessions, courses, and assignments.

Each new-hire CSHO shall maintain a progress record or list of training progress. A sample format is provided in Appendix A for guidance.

F. Professional Development of New-Hire Compliance Personnel.

1. Introduction. The purpose of the training program is to provide a wide range of training opportunities and learning experiences to assist CSHOs in their successful professional development. A flexible program that incorporates self-paced learning has been developed to accommodate the varying levels of experience and competence encountered in 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 CSHOs with highly diverse academic backgrounds and experience.
 - (2) Incorporate essential requirements that 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 program provides a well articulated progression of training requirements for new-hire personnel. The elements of the program include formal training at the OSHA Training Institute or other equivalent training institution and informal training such as self-study and on-the-job training. (OJT)
2. Introductory Training Requirements. The following items are prerequisites for the initial compliance course.
- a. Informational Program. An informational program must be provided to all new-hire CSHOs within the first month of employment. The program shall be administered by Chief and the newly hired CSHO's Assistant Chief supervisor.
 - (1) The informational package shall include, at a minimum:
 - (a) Information on the Alaska Department of Labor.
 - b. An introduction to the AKOSH program including history, purpose, program mix, role of CSHO, etc.
 - c. Information on the ADOL and LS&S organizational structure, AKOSH procedures, and the Anchorage AKOSH.
 - d. Information on acronyms commonly used in the LS&S and AKOSH.
 - e. Handout materials such as organizational chart, Compliance Manual, standards, directives, personal protective equipment, and instruments.
2. The Chief is responsible for ensuring that the following items of the informational package are developed and provided:

- a. LS&S and AKOSH organizational chart and overview of sectional functions.
 - b. Information on AKOSH structure and procedures.
 - c. Copies of IDPs.
 - d. Handout materials.
3. The consultation/training and education unit shall provide the remainder of the informational package materials.
- b. Occupational Safety and Health Statutes Self-Study. Each CSHO is required to complete a self-study on the AKOSH statutes prior to attending #100 Initial Compliance Course. The purpose is to familiarize the CSHO with the basic requirements of the AKOSH statutes.
 - c. Compliance Manual Self-study. Each CSHO is required to complete a self-study program on the Compliance Manual (CM) prior to attending initial compliance course. The CM provides necessary information on basic inspection procedures. The purpose is to prepare the CSHO for the initial compliance course.
 - d. IMIS Forms, AK OSHA-1, OSHA-1A, OSHA-1B, and OSHA-1B (IH) Self Study. Each CSHO is required to complete a self-study program on the most commonly used IMIS forms, AK OSHA-1A, OSHA-1B, and OSHA-1B(IH) (for industrial hygienists only), prior to attending initial compliance course. The purpose is to familiarize the CSHO with the IMIS forms in preparation for the initial compliance course.
3. Formal Training Courses. New-hire CSHOs shall follow one of three tracks during the development period: safety, health, or construction. For purposes of illustrating how this track will be carried out, OSHA Institute Training course #s are used in Figure 1; however, AKOSH may substitute equivalent in-house or outside training courses depending on the availability of OSHA Institute Training courses to AKOSH. The following courses are required during a CSHO's developmental period.
- a. Initial Compliance Course. Each new-hire CSHO is required to attend this training course. Attendance is permitted only after having completed the prerequisite self-study programs. The purpose of this course is to provide new CSHOs with a working knowledge of AKOSH policies, programs, and procedures; the Compliance Manual and an understanding

of occupational safety and health programs. New CSHOs must complete this course prior to attending any other formal training courses.

NOTE: This course may not be waived.

- b. Standards Course. After having completed the initial compliance course, each new-hire CSHO is required to attend either introduction to safety standards for safety officers, introduction to health standards for industrial hygienists, or construction standards during the developmental period. The purpose of these courses is to provide new-hire CSHOs with a thorough introduction to the organization and content of the standards and to hazard recognition and documentation.

NOTE: Attendance at one of the standards courses may not be waived.

- c. Inspection Techniques and Legal Aspects. Each new-hire CSHO is required to attend this training course during the developmental period. The purpose of this course is to provide new CSHOs with an understanding of basic communication skills, formal requirements and processes of the legal system, and investigative techniques related to AKOSH compliance activity.

NOTE: This course may not be waived.

- d. Crossover Training. Recognizing the need for CSHOs to be familiar with general concepts of both safety and health, each new-hire is required to complete training in another discipline during the developmental period. The decision on which crossover course to take shall be made by the CSHOs supervisor based on the CSHOs safety or health discipline and educational needs as well as Area Office requirements.

CSHOs on the safety or construction track are encouraged to attend the introduction to health course; whereas industrial hygienists are encouraged to attend the introduction to safety course. New-hire CSHOs must attend one of the following during the developmental period. However, if resources permit, the completion of both courses prior to enrollment in other, more specific technical courses is recommended.

Safety

Introduction to Industrial Hygiene for Safety Personnel, or
Construction Standards

Health

Safety Hazard Recognition for Industrial Hygienists, or
Construction Standards

Construction

Introduction to Industrial Hygiene for Safety Personnel, or
Introduction to Safety Standards for Safety Officers

- e. Technical Courses. Each new-hire CSHO is required to attend at least two courses specific to his/her discipline during the developmental period. The purpose of these training courses is to provide the CSHO with technical knowledge, skills, and information on hazard recognition as related to OSHA requirements. The specific courses will be determined by the CSHO's supervisor based on individual need during the IDP process. these courses shall be selected from the following basic core courses. (Again, OSHA Institute Course #s are used but AKOSH may substitute with an equivalent formal course).

Safety

#102 Basic Accident Investigation for CSHOs
#201 Hazardous Materials
#203 Basic Electrical Principles
#204 Machinery and Machine Guarding Standards
#207 Fire Protection and Life Safety
#208 Cranes and Material Handling for General Industry
#309 Electrical Standards

Health

#102 Basic Accident Investigation for CSHOs
#220 Industrial Noise
#221 Principles of Industrial Ventilation
#222 Respiratory Protection
#223 Industrial Toxicology
#225 Principles of Ergonomics

Construction

#102 Basic Accident Investigation for CSHOs
#205 Cranes and Material Handling for Construction
#301 Excavation, Trenching and Soil Mechanics

- #302 Tunneling and Underground Operations
- #308 Principles of Scaffolding
- #311 Fall Arrest Systems

4. Self-Study and On-the-Job Training (OJT).

This training program 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 classroom training.

- a. All new-hire CSHOs 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 CSHOs to carry out their duties and responsibilities effectively.
 - (1) Self-study. Self-study involves training that will aid in preparation for formal training and course work.
 - (2) On-the-Job Training. On-the-job (OJT) training relates principles and theories to work skills that are then taught and applied in the field and office environment.
- b. Self-study and OJT assignments shall be provided concurrently with formal training courses. Time allotted to accomplish self-study and OJT assignments should be compatible with the new-hire CSHO's current knowledge, skill, and experience levels. The employee's supervisor shall verify the CSHO's ability to successfully complete self-study and OJT assignments.
- c. The expertise and judgment of the employee's supervisor is required when assessing a CSHO's progress during this training program and the IDP process. The supervisor must ensure that the CSHO is ready to perform an assigned task. This program is flexible enough to afford the CSHO time for proper sequencing of training. Training assignments may also be supplemented by other task assignments as deemed necessary by the supervisor.
- d. Training in the following subject areas, at a minimum, is to be accomplished through both self-study and OJT assignments.
 - (1) Hazard recognition overview.
 - (2) Inspection procedures.

- (3) Standards:
 - General Industry
 - Construction
 - Electrical
 - Hazard Communication
 - Other Regulations and Procedures
- (4) Compliance Manual
- (5) IMIS Forms Manual
- (6) AKOSH Directives
- (7) AKOSH Technical Manual
- (8) Common industrial processes
- (9) Basic elements of a good safety and health/accident prevention program.
- (10) Instrumentation
- (11) OSHA Computerized Information System (OCIS)
- (12) Report Writing
- (13) Standards from other sources.
 - American National Standards Institute
 - National Electrical Code
 - National Fire Protection Association
 - American Conference of Governmental
Industrial Hygienists
 - National Toxicology Program

- e. 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.
- f. Instructional methods such as the use of audiovisual aids, reading materials, case file review, staff meetings, and inspection activity may be

used by the employee's supervisor to assign the required topics. Appendix B of this instruction lists resource materials that may be used by the supervisor to assign self-study programs to CSHOs.

- g. It is recommended that CSHOs be allowed to experience a variety of inspection activities in manufacturing, construction, and local emphasis when accompanying a senior level CSHO in the field.

Each new-hire CSHO should also have experience in establishments with different Standard Industrial Classification (SIV) codes and should be assigned to both safety officers and industrial hygienists.

5. Waiver Conditions. The training program outlined in this PD is mandatory during a CSHO's developmental period.

- a. Specifically, all prerequisites must be successfully completed before attendance at the initial compliance course. In addition, one of the designated standards courses and inspection techniques and legal aspects are to be completed during the first year of the CSHO's developmental period. At least two technical courses and one crossover training course must be completed before the CSHO is considered to have completed the developmental period.
- b. If a new-hire CSHO has substantial prior safety or health experience and the required formal training program does not meet his/her needs, the employee's supervisor shall design a developmental plan of formal training, in conjunction with the IDP process, that is consistent with the CSHO's background. Any revised formal training plan developed for an individual CSHO shall be approved in accordance with the waiver procedure outlined below in Paragraph J.5.c. When a revised formal training plan is developed and approved, additional requests for waivers from specific mandatory courses are not required.
- c. Any waivers from the mandatory program can be granted only by the Director after consultation with the Director and the Chief. Waiver requests shall be submitted in writing by the Chief to the Director and shall take into consideration how the CSHO has acquired the levels of knowledge, skills, and abilities to perform his/her duties. The Director's response to the waiver request shall also be in writing.

G. Monitoring the Training Program. Monitoring the CSHO's progress through the developmental period is critical to ensure success of the training program. Monitoring provides information to the CSHO's supervisor 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 employee's supervisor and the Regional Training Officer play major roles in the monitoring process.

1. The employee's supervisor shall ensure that each CSHO has completed the necessary prerequisites before attending mandatory training courses.
2. The employee's supervisor shall review the CSHO's performance of required self-study and OJT assignments.
3. The employee's supervisor shall conduct a review with the new-hire CSHO following each required 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. When the employee's supervisor determines that the new-hire CSHO has sufficient experience to participate fully in developing the actual case file, the OJT review may be discontinued.
5. The Course Evaluation section of Training Received Form (DOSH 44) is used to document course completion. The DOSH 44 will be completed by the CSHO upon completion of a course. A copy of DOSH 44 will be retained in the CSHO's personnel file.
6. The Deputy Director shall monitor implementation of the training program outlined in this PD through review of training documents. The Deputy Director may request the assistance of the Department's training officer in conducting this evaluation.

H. Maintenance of knowledge and Skills of CSHOs Beyond the Developmental Period.

1. AKOSH recognizes that CSHOs require additional training each year to enable them to keep abreast of current occupational safety and health issues and developments.
2. At a minimum, each CSHO is required to attend a safety and health related course once every three years. If a Training Institute course has changed significantly during the years, a CSHO is permitted to repeat the course. This requirement may be satisfied if the CSHO attends a course that is equivalent to an OSHA Institute Technical course.
3. Participation in training courses or programs shall be consistent with the CSHO's IDP.

4. CSHOs are encouraged to pursue other training opportunities that are available within the Department of Labor and elsewhere.

J. Evaluation. An evaluation of the effectiveness of this revised training program shall be conducted at the end of the second year from the effective date of the PD. The Director shall request that the Department's Personnel section conduct this evaluation. Based on the results of this evaluation, further studies may be developed.