

# HIOSH DIRECTIVE

<b>DIRECTIVE NO: TED 01-00-019</b>	<b>EFFECTIVE DATE: July 1, 2016</b>
<b>SUBJECT: Mandatory Training Program for HIOSH Compliance Personnel</b>	

## ABSTRACT

- Purpose:** This instruction provides State personnel with policy and guidelines for implementing competency-based training programs for HIOSH compliance personnel.
- Scope:** HIOSH-wide
- References:** OSHA Instruction CSP 01-00-004, State Plan Policies and Procedures Manual, September 22, 2015  
29 CFR Part 1902, State Plans for the Development and Enforcement of State Standards
- Cancellations:** HIOSH Directive TED 01-00-018, Initial Training Program for HIOSH Compliance Personnel, April 1, 2011.
- Action Offices:** All compliance branches.
- Originating Agency:** OSHA. States must comply with same or similar.

## Executive Summary

This instruction provides guidance and direction to the Hawaii Occupational Safety and Health Division (HIOSH) concerning the policies and procedures for training of Compliance Safety and Health Officers (CSHOs).

[Note: CSHOs includes both Occupational Safety and Health Compliance Officers (OSHCs) and Environmental Health Specialists (EHSs)]

It is essential that CSHOs have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish HIOSH's mission of promoting safe and healthful working conditions for Hawaii's working men and women. In this instruction, HIOSH has provided detailed guidance for training required during a CSHO's career, including recommended training that assists the CSHO with preparation for professional certification exams. This Instruction identifies training paths that provide assistance to the branch managers in managing their training programs.

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 HIOSH with a high degree of professional expertise. In addition, the CSHO training program identifies a correlation between CSHO competency and achieving respected credentials in the fields of safety, health and construction such as Certified Safety Professional (CSP), Certified Industrial Hygienist (CIH) and Certified Construction Health and Safety Technician (CCHST®).

## Significant Changes

This instruction describes the revised training program for HIOSH compliance personnel and supersedes TED 01-00-018, Initial Training Program for HIOSH Compliance Personnel, dated April 1, 2011. Changes include:

- Instruction title changed from Initial to Mandatory Training Program for HIOSH Compliance Personnel to include CSHO training requirements throughout their career.
- Implementing a two phase approach to reflect additional mandatory training:
  - Phase 1 – Initial Courses: Each CSHO will be required to complete a minimum of eight initial courses, either offered by the OSHA Training Institute (OTI) or an equivalent course, during the first three years of his/her career as a CSHO. The order and sequence of these courses are as prescribed in this instruction.
  - Phase 2 – Technical Courses: Each CSHO will be required to complete a minimum of six additional technical courses through Year 8 of their career. Beginning with Year 9, they must complete a minimum of one technical course every three years.
- Figure 1 has been updated to reflect this instruction.
- This Instruction gives notice that other courses designated as mandatory by OSHA's Assistant Secretary or by the HIOSH Administrator may be added to the CSHO's training program at any time.
- Appendix C has been updated to reflect changes in OSHA policy. The appendix lists OTI courses (or its equivalent) that are required or recommended in OSHA directives as quick reference guide. This reference may be used to assist supervisors and CSHOs in developing Individual Development Plans (IDPs) for continuing professional development.

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## **I. Purpose**

This instruction provides HIOSH personnel with policy and guidelines for implementing competency-based training programs for HIOSH compliance personnel.

## **II. Scope**

All CSHOs (OSHCOS and EHSs)

## **III. References**

- A. OSHA Instruction CSP 01-00-004, State Plan Policies and Procedures Manual, September 22, 2015.
- B. 29 CFR 1902, State Plans for the Development and Enforcement of State Standards.

## **IV. Cancellations**

HIOSH Directive, TED 01-00-018, Initial Training Program for HIOSH Compliance Personnel, April 1, 2011, is cancelled.

## **V. Action Offices**

- A. HIOSH Administrator
- B. Administration and Technical Support Branch
- C. Occupational Health Branch
- D. Occupational Safety Branch

## **VI. State Plan Impact**

Under 29 CFR 1902.3(h) and 1956.10(g), State Plans must have a sufficient number of adequately trained and qualified personnel for the enforcement of standards. State Plans must have a formal documented training program for their compliance personnel which is revised as necessary to reflect current practices. The State Plan training program must be at least as effective as the federal program and must result in adequately trained personnel who can conduct effective inspections. State Plan training programs are not required to utilize OTI for course work, but may operate and implement state-run training courses.

## **VII. Goals and Objectives of CSHO Training.**

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 HIOSH with a high degree of professional expertise

### **A. Competency-Based Curriculum.**

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 training has been developed to accommodate the varying levels of experience and competence during the initial three-year period of a CSHO's career. OTI's safety, health and construction training paths reflect basic requirements and competencies applicable to all CSHOs as well as those intending to gain additional expertise.

In addition, 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 the State may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. Other HIOSH needs may include providing CSHOs with technical training required in OSHA Directives (e.g., Process Safety Management (PSM)) training for PSM Team Leaders and Members). Phases 1 and 2 of the training program can overlap, allowing Branch Managers to incorporate four technical courses as needed during the CSHO's first five years provided the CSHO has completed both the #1000 Initial Compliance and one of the Standards courses. Selection of the technical courses to be attended and determination of the sequencing and priority are at the Branch Manager's discretion.

To provide CSHOs with the requisite knowledge, skills, and abilities to competently perform their job, this Instruction provides a two-phase approach to completing the mandatory training requirements for CSHOs throughout their career: Phase 1 – Initial Courses and Phase 2 – Technical Courses.

1. Phase 1 – Initial Courses Training Requirements: Each CSHO will be required to complete a minimum of eight initial courses offered by the OSHA Training Institute (OTI) or the state equivalent during the first three years of his/her career as a CSHO. The order and sequence of these courses are as prescribed in this Instruction.
  2. Phase 2 – Technical Courses Training Requirements: Each CSHO will be required to complete a minimum of six additional courses through Year 8 of their career. Beginning with Year 9, they must complete a minimum of one technical course every three years.
- C. Assistant Secretary or HIOSH Administrator Training Requirements. This Instruction gives notice that other courses designated as mandatory by OSHA's Assistant Secretary or by the HIOSH Administrator may be added to the CSHO's training program at any time.
- D. Professional Certification. OTI's articulated progression of training requirements for the first three-year period of a CSHO's career supports the pursuit of professional certification and encourages CSHOs to strive for the recognition that such certification provides. Since OTI's courses are designed to support OSHA's/HIOSH's mission, there may not always be a one-to-one correlation between an OTI technical course and the competencies required to achieve certification. Correlation of OTI courses to professional certification can be found in Appendix D of this Instruction.

## VIII. Mandatory CSHO Training.

Figure 1 illustrates a recommended training sequence for the CSHO's first three years.

NOTE: Although this Directive/Instruction may specify a specific OTI course, HIOSH may substitute an equivalent.

- A. Phase 1 – Initial Courses, Year 1: The following two courses must be completed within the first year of a CSHO’s career. 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).
    - c. #2000 Construction Standards (construction career path/construction specialists).

Phase 1 – Initial Courses, Through Year 3: The following courses will be taken after the CSHO has completed one of the Standards courses.

- #1310 Investigative Interviewing Techniques
- #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.*
- #2450 Evaluation of Safety and Health Management Systems.
- #1230 Accident Investigation.

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

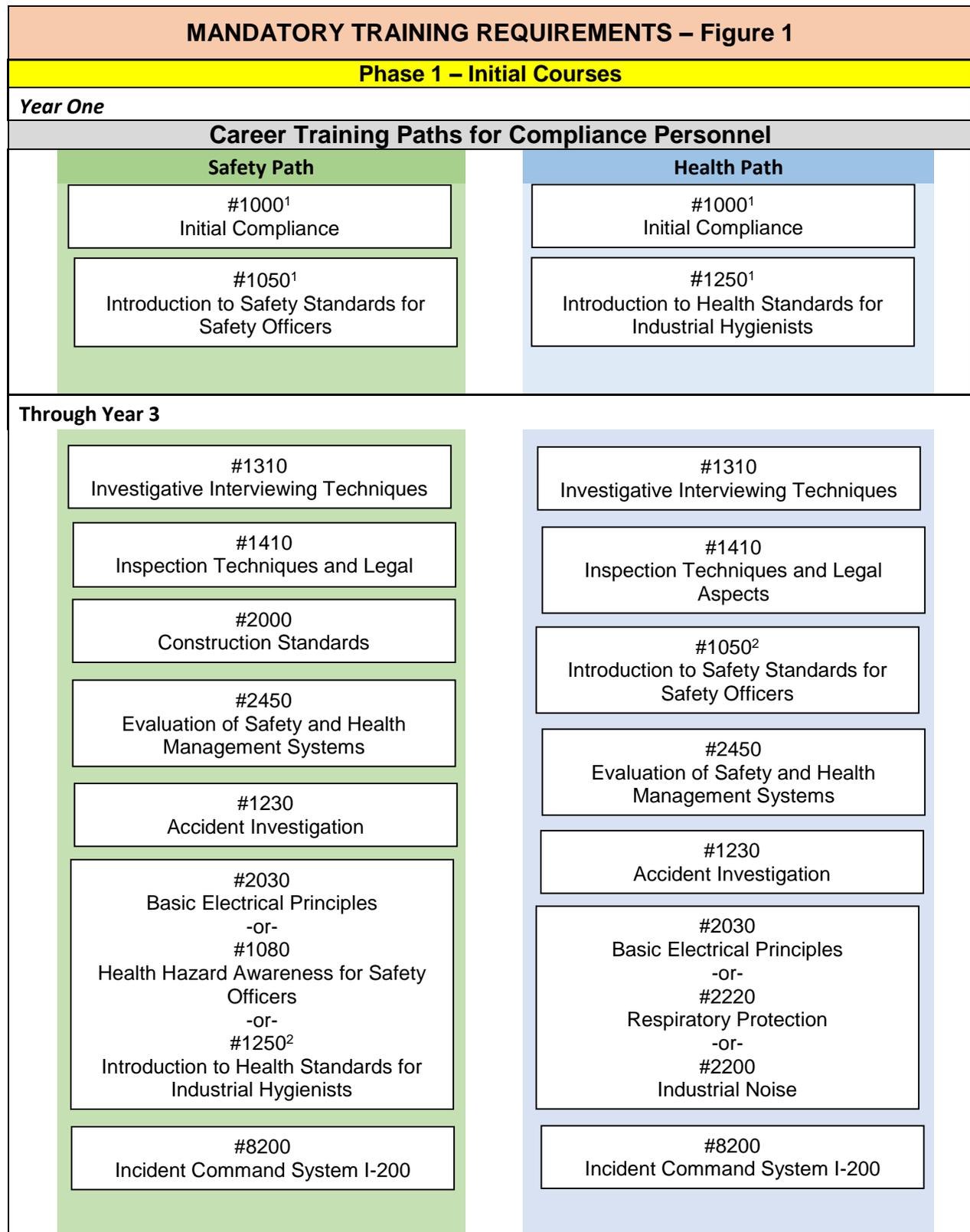
- ✚ Safety career path. CSHOs will take at least one of the following:
  - #1080 Health Hazard Awareness for Safety Officers
  - #1250 Introduction to Health Standards for Industrial Hygienists
  - #2000 Construction Standards
- ✚ Health career path. CSHOs will take at least one of the following:
  -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

Additionally, prior to the end of Year 3, the following course is required:

- 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.

- B. Phase 2 – Technical Courses: Branch Managers will approve technical courses to be taken by CSHOs based on HIOSH needs following the guidelines of this instruction.

- Four technical courses by end of Year 5.
- Two technical courses completed in Years 6 through 8.
- A minimum of one technical course every three years beginning with Year 9 throughout the CSHO's career.



<sup>1</sup> Initial Compliance and one of the Standards courses must be completed during first year.

<sup>2</sup>These courses should only be taken by compliance officers with the appropriate education and/or experience.

<b>Phase 2 – Technical Courses (Figure 1 cont.)</b>
<b>Through Year 5 (can overlap with Phase 1)</b> Four technical courses are required to be taken by the CSHO based on HIOSH needs as approved by the Administrator
<b>Years 6 through 8</b> Two technical courses are required to be taken by the CSHO based on HIOSH needs as approved by the Administrator.
<b>Years 9 throughout the CSHO's career</b> Minimum of one technical course every three years.

## **IX. Organizational Responsibilities.**

### **A. Administrator**

1. Ensure that money is budgeted and available to the Branches for new hires to complete the required training during their first three years as CSHOs and that funds are available for continued professional development of all journey level CSHOs as well.
2. Evaluate and monitor all records of training.
3. Provide assistance to Branch Managers in selecting alternate courses that are equivalent to the OTI courses.
4. Grant waivers and extensions of time in accordance with the procedures explained in Sections XI and XII of this Instruction.

### **B. Compliance Branch Managers. Branch Managers are responsible for ensuring and facilitating the development and training of the CSHOs under his/her supervision in order to meet the needs of the division. Specifically, the Branch Manager shall:**

1. Ensure the professional development of CSHOs under his/her supervision in accordance with the detailed training options outlined in this Instruction and Appendices.
2. Identify and document through an Individual Development Plan (IDP) process the training needs of CSHOs assigned to his/her supervision and plan and coordinate all training.
3. Provide and coordinate instruction, assistance, and guidance that is consistent with the IDP process for CSHOs to meet the training program objectives outlined in this Instruction.
4. Review and discuss training progress with each CSHO under his/her supervision during the mid-year and annual performance reviews.
5. Assign, as needed, experienced personnel to assist in on-the-job training of newly-hired CSHOs.
6. Prepare and maintain a complete training record for all CSHOs under his/her supervision.
7. Assess and document CSHO abilities and send waiver requests per section XI.B. and requests for time extensions per section XII.B. to the Administrator for approval.
8. Conduct post-training evaluations of staff to determine whether training was effective or needs improvement, and continue to reinforce the training through inspection assignments and case file discussions.
9. Assist in developing division training needs by providing feedback on training deficiencies/needs to the ATS Branch or Administrator.

### **C. Compliance Safety and Health Officer (CSHO) (Includes OSHCOs and EHSs)**

The CSHO has the responsibility to perform to the best of his/her ability in all training programs. Specifically, the CSHO shall:

1. Discuss his/her performance and training progress with their supervisors.

2. Participate in the planning of training activities.
3. Fully attend, participate in, and complete all assigned training courses, seminars, and other events.

**D. Administration and Technical Services Branch Manager and Staff**

1. Prepare annual budget to include the cost of required training for new CSHOs and continued professional development for all CSHOs.
2. Assist branch managers in researching alternate courses to meet the requirements of this directive as necessary.
3. Evaluate the effectiveness of the division training program and make recommendations for course improvement and/or additional training.

**X. Professional Development during Phase 1 – Initial Courses.**

- A. Required Training. In the interest of nationwide consistency, OSHA expects that CSHOs will attend the required courses outlined in this instruction offered by the OSHA Training Institute. However, there are scheduling and financial issues with sending CSHOs to the OTI for all required training. Where a course can be brought to Hawaii, or is offered offsite on the West Coast HIOSH will attempt to enroll CSHOs in these courses. The information provided in this section is intended to assist the HIOSH Administrator in determining equivalency when issuing waivers. The Directorate of Training and Education Intranet web page offers up-to-date information on course objectives, whether a course is blended, or has specific prerequisites.
- B. Blended Courses. Blended courses include at least one online, web-based training requirement plus an instructor-led portion. Whenever a course prerequisite includes an online, blended session that web-based training must be completed prior to attending the instructor-led session. There is no waiver process or equivalent to completing the online prerequisite of an OTI course. This strict requirement is due to the close link between the training offered online and the subsequent classroom (i.e., instructor-led) training which are designed specifically to complement one another.
- C. Course Sequence. Both the Initial Compliance course and a Standards course must be completed in year one of the CSHO's training path. It is recommended that courses listed as third through eighth year should be completed in a sequence optimal to attaining professional development goals and at the discretion of the Administrator. Note: Course descriptions are also available through DTE's Intranet web page.
1. #1000 Initial Compliance. This course is designed for newly-hired CSHOs and focuses on the basic elements of conducting inspections in accord 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 who will perform 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 walkaround 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 VIII.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 Investigations. 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 will perform 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). Hawaii CSHOs will use the Federal Emergency Management Agency (FEMA) website to take the FEMA ICS-100 and ICS-200 online courses [<http://www.training.fema.gov/nims/>]. The current title for ICS-100 is *Introduction to the Incident Command System*. The current title for ICS-200 is *ICS for Single Resources and Initial Action Incidents*.

## **XI. Waiver from Required Training Program.**

- A. Waiver Conditions. The training program outlined in this instruction is required to be completed during the first three years of a CSHO's career. The Administrator has discretion to waive any of the required courses listed, with the exception of the #1410 Inspection Techniques and Legal Aspects course. Waivers shall be used rarely and shall be granted only in exceptional circumstances.

- B. Assessment and Documentation. Branch Managers 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 Branch Manager to the Administrator. The waiver request will document why the CSHO does not need to attend the specified course. The documentation will include how the CSHO has acquired the levels of knowledge, skills and abilities reflected in the objectives of the course for which the waiver is being requested. Not only must equivalent technical knowledge and skills be documented, but the documentation shall also indicate that the CSHO has institutional understanding of HIOSH specific policies and procedures. For example, criteria may include experience as a former compliance officer with an OSHA State Plan State or as a former 21(d) OSHA consultant.
- C. Waiver Requests. Only the Administrator can grant a waiver. The Administrator shall respond to waiver requests in writing. Such waivers shall become a part of the CSHO's training record.
- D. Training Record Annotated. The Branch manager shall annotate the CSHO's training record to reflect required courses waived by the Administrator.

## **XII. Time Extensions.**

The time requirements for completing Phases 1 and 2 training shown in this Instruction must be met. Only the Administrator can grant a time extension, which must be based on extenuating circumstances. Technical courses may be taken at any time after the CSHO has completed both #1000 Initial Compliance and one of the Standards courses.

- A. Time Extension Conditions. If there are circumstances that prevent the CSHO from completing the eight required courses within Phase 1 or the required technical courses in Phase 2, the Administrator can extend the time for completion of the required courses for a period of up to one year. Time extensions may not exceed twelve months. The use of time extensions could extend the time allowed for a CSHO to complete the eight required courses to a maximum of four years from his/her employment date.
- B. Time Extension Requests. Time extensions shall be submitted in writing by the Branch Manager to the Administrator. Time extension requests must include the reason(s) additional time is needed by the CSHO to complete the required training, the amount of time requests, and the course(s) that will be completed during the requested time extension.
- C. Time Extension Approvals. The Administrator shall respond to the time extension request in writing.
- D. Training Record Annotated. The Branch Manager shall annotate the CSHO's training record to reflect the extension of time.

## **XIII. Monitoring the Training Program.**

Monitoring the CSHO's progress throughout the first eight years is critical to ensure the success of Phases 1 and 2 of the training program. Monitoring provides information regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of the CSHO to achieve training goals and objectives. Both the CSHO's Branch Manager and the ATS Branch play major roles in the monitoring process.

- A. The Branch Manager. The CSHO's Branch Manager shall:
1. Ensure that each CSHO has completed the necessary prerequisites before attending mandatory OSHA training courses.
  2. Review the CSHO's performance of recommended self-study and on-the-job (OJT) assignments.
  3. Conduct a review with the CSHO following each training activity (self-study, OJT or classroom). 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.
  5. If recurring issues arise during the Branch Managers' case file review, determine what additional training is necessary in order to resolve performance issues.
- B. Administration and Technical Services Branch. The assigned OSH Program Specialist shall monitor HIOSH implementation of the training program outlined in this Instruction through review of training documents and special studies as required.

#### **XIV. Continuation of CSHO Development**

- A. Professional Standing, Recognition and Professional Certification. The series of courses required for Phase 1 of the CSHO's first three years provide a foundation for professionalism and proficiency. The Phase 2 required technical courses provide a higher level of knowledge and skill in order for CSHOs to more effectively fulfill HIOSH's mission. While professional certification is an important career milestone, it not the only path to gaining professional standing or recognition. CSHOs that complete new, complex or difficult assignments expand their capabilities and broaden their role as a safety and health professional inside the outside the division.
- B. Role of Individual Development Plans. An Individual Development Plan (IDP) is an active plan to help the CSHO achieve organizational and career goals. IDPs must be updated annually and serve as a tool to provide documentation for each CSHO to chart and monitor his/her own progress toward developmental goals. An IDP can help a CSHO:
1. Achieve and enhance the level of knowledge and skills required to achieve the functional competencies of a CSHO.
  2. Build expertise as a HIOSH safety and health professional.
  3. Continue professional development throughout his/her career.
- C. IDPs for the Initial Three-Year Period. Appendices A and B serve as guidelines for supervisors to select appropriate training outlined by this Instruction during the first three years. The IDP (Form DL-80) should reflect:
1. Mandatory training – required during the three-year period as outlined in this Instruction.
  2. HIOSH, DLIR, or State of Hawaii training requirements.

3. Other developmental training as determined by the CSHO's Branch Manager. For example:
  - a. Supplemental training at the Branch level that includes formal and/or informal mentoring by higher level personnel and/or CSHOs with specialized experience.
  - b. Participation in various classes of inspections and a variety of industries and worksite.

D. IDPs Developed after the Three-Year Period.

1. The IDP should follow the guidance outlined in the attached HIOSH Training Policy.
2. An IDP helps the CSHO continue to improve his/her present performance and prepare him/her for more responsible work in accord with his/her potential and interests, and the needs of the division.

## **XV. Evaluation**

An overall evaluation of the training program for HIOSH compliance personnel effectiveness will be conducted by a team headed by the ATS Branch Manager. The OS and OH Branch Managers and selected CSHOs shall participate as team members.

- A. Annual Evaluations. At least once a year, the evaluation team will assess whether HIOSH compliance staff are meeting professional development goals and whether any improvements or changes are needed. Professional development goals must align with the HIOSH Strategic Plan and mission objectives. A memo to the Administrator will detail the evaluation team findings and recommendations.
- B. Five-Year Evaluations. Every five years, the evaluation team will conduct a more comprehensive review as to whether the training program is meeting HIOSH needs and make recommendations for improvement or changes. The report shall be in writing and submitted to the Administrator. The Administrator has the ultimate responsibility to ensure that the compliance officer training is effective and complies with 29 CFR 1902.3(h).

Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Course, Year 1

Appendix B. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

Appendix C. OTI Courses Required or Recommended in OSHA Directives.

Appendix D. Correlation of OTI Courses to Professional Certification.

Appendix E. List of Recommended Reading for New Compliance Officers.

**Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1**

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

The OSHA Training Institute (OTI)<sup>1</sup> and or State equivalent 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 (SI) and On-the-Job Training (OJT) which enhance the formal training a new CSHO receives at OTI. This Appendix offers recommendations for both SI and OJT activities to be completed along with formal training at OTI.

The Appendix A table lists activities that should be completed in the HIOSH office or Neighbor Island 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 or industrial hygienists 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 SI and OJT 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 SI and OJT 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 & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
<b>PRIOR to Attending OTI’s Course #1000 Initial Compliance</b>				
OJT	Work with Supervisor and Enforcement Secretary to identify and become familiar with office administrative procedures, e.g. Leave taking and G-1s, Equipment procurement, Computer use, library use and OIS citation processing.  Also, review DLIR Policies on DLIR Intranet.		No Additional Discipline-Specific Recommendation	
	Work with Supervisor or assigned mentor to review the HIOSH New Employee Orientation Checklist.		No Additional Discipline-Specific Recommendation	
OJT	Receive training and instruction on use and limitations of PPE (e.g. hard hats, safety glasses, hearing protection, high-visibility clothing and safety shoes).			

<sup>1</sup> For HIOSH, any reference to OTI also includes a State equivalent.

<sup>2</sup> Initials of both supervisor and CSHO required.

Type of Activity	Activity Description	Date Completed & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
OJT	Receive training and instruction on personal use of respirators, according to HIOSH program; be fit-tested		No Additional Discipline-Specific Recommendation	
OJT	Accompany a fully-qualified CSHO on a programmed inspection and observe the following: <ul style="list-style-type: none"> <li>• Inspection preparation</li> <li>• Calibration of Instruments</li> <li>• Opening Conference</li> <li>• Walkthrough</li> <li>• Use of instruments or other measuring devices</li> <li>• Closing conference</li> <li>• Preparation of citations</li> </ul>		No Additional Discipline-Specific Recommendation	
OJT	Explore the OSHA Intranet and Internet sites. Begin with the following: <ul style="list-style-type: none"> <li>• OSHA Intranet                             <ul style="list-style-type: none"> <li>○ Current NCR system or new OSHA Information System, OIS (general application)</li> <li>○ OSHA forms (e.g., OSHA-1, -1A, and 1B)</li> <li>○ Use of OSHA Integrated Management Information System (IMIS) data</li> <li>○ SAVES – Standard Alleged Violation Elements</li> <li>○ 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)</li> </ul> </li> <li>• HIOSH Intranet or Shared Files                             <ul style="list-style-type: none"> <li>○ HIOSH Directives</li> <li>○ Forms</li> <li>○ Inspection Scheduling System list</li> <li>○ Exempt or deferred Establishments list</li> </ul> </li> <li>• OSHA Public Page (Internet):                             <ul style="list-style-type: none"> <li>○ OSHA references – directives, interpretations, CSHO Resource materials</li> <li>○ OSHA Technical Manual (OTM)</li> <li>○ eTools, Videos, etc.</li> </ul> </li> </ul>		No Additional Discipline-Specific Recommendation	

Type of Activity	Activity Description	Date Completed & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
OJT	With supervisor or assigned mentor, review basic programs such as: <ul style="list-style-type: none"> <li>• Hazard Communication</li> <li>• The Control of Hazardous Energy (Lockout/Tagout)</li> <li>• Recordkeeping</li> </ul>		No Additional Discipline-Specific Recommendation	
OJT	Accompany a fully-qualified CSHO on a general schedule follow-up inspection.		No Additional Discipline-Specific Recommendation	
SI	Read and review the OSH Act and the HIOSH Law and become familiar with: <ul style="list-style-type: none"> <li>• Which employers and employees are covered,</li> <li>• The responsibilities of employers and employees, and</li> <li>• The differences between the two laws.</li> </ul>		No Additional Discipline-Specific Recommendation	
<b>Attend OTI Training: Course #1000 Initial Compliance – including web-based segment prior to instructor-led (i.e., classroom) training</b>			No Additional Discipline-Specific Recommendation	
SI	Read and review Fundamentals of Industrial Hygiene, National Safety Council			IHs only
<b>Attend course: Fundamentals of Industrial Hygiene (for EHSs only) Course is offered either by National Safety Council or by AIHA</b>				IHs only
SI	Review the contents of HIOSH Standards, Title 12, Subtitle 8, Parts 1 through 4 and Part 8).		No Additional Discipline-Specific Recommendation	
SI	Review the contents of HIOSH Standards, Chapter 208 (29 CFR 1928), Agriculture  Consult with supervisor or assigned mentor to identify limitations to carrying out inspections under this Part.		No Additional Discipline-Specific Recommendation	
OJT	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 the office access copies of needed consensus standards.		All Subparts in 1910 and only Hazard Communication in Subpart Z Also refer to 29 CFR 1910.3	1910 Subparts I, J, and Z.  Also refer to 29 CFR 1910.6

Type of Activity	Activity Description	Date Completed & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
OJT	Specific to your career path/discipline, accompany a fully qualified CSHO on an inspection and discuss related technical information from that inspection with your supervisor		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.
OJT	With a supervisor or assigned mentor, identify the instruments/equipment used by CSHOs 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 equipment, noise instrumentation, velometers.
OJT	With supervisor or assigned mentor, review the general duty standard process (OSHA's 5(a)(1) for HIOSH (See Chapter 4 of the HIOSH Field Operations Manual)		No Additional Discipline-Specific Recommendation	
<b>Attend OTI Standards Course per Selected Discipline</b>			<b>#1050, Intro to Safety Standards</b>	<b>#1250, Intro to Health Standards</b>
OJT	Work with supervisor or assigned mentor to identify and become familiar with OSHA's Nationally Recognized Testing Laboratory (NRTL) program.		No Additional Discipline-Specific Recommendation	
OJT	With supervisor 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
SI	Review the office library's basic texts, references, and materials related to your discipline's hazards and controls		See Appendix E	See Appendix E

Type of Activity	Activity Description	Date Completed & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
SI	Read and review Accident Prevention Manual, National Safety Council		No Additional Discipline-Specific Recommendation	
SI	Read and review <u>Fundamentals of Building Construction: Materials &amp; Methods</u> , Allen & Iano		Safety only	Recommended but not required
<b>Attend OTI Course #2000, Construction Standards</b>			<b>Safety only</b>	
SI	<p>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.</p> <p>Include:</p> <ul style="list-style-type: none"> <li>• Types of worksites where the hazard may be expected to occur</li> <li>• Work activities that may involve the hazard</li> <li>• Equipment that may be associated with the hazard</li> <li>• Engineering and/or administrative controls and PPE that may be required to control the hazard</li> <li>• Related HIOSH/OSHA standards</li> </ul>		Examples include: Amputations, electrical, Falls, Trenching	Examples include: noise, bloodborne pathogens, lead, chromium VI.
SI/OJT	Read and review HIOSH Field Operations Manual (FOM). Participate in discussion with supervisor or assigned mentor regarding any issues or areas needing clarification.		No Additional Discipline-Specific Recommendation	
OJT	<p>Accompany a fully qualified CSHO and under the direction of supervisor or assigned mentor, prepare the post-inspection case file including all forms – OSHA-1, OSHA-1A, Field 1B, and all 1Bs documenting (A minimum of 2 times within the first year):</p> <ul style="list-style-type: none"> <li>• Hazard</li> <li>• Standard that applies</li> <li>• Employee Exposure</li> <li>• Employer knowledge</li> <li>• Recommended abatement (e.g. engineering, administrative controls, PPE)</li> <li>• Recommended penalties</li> </ul>		No Additional Discipline-Specific Recommendation	

Type of Activity	Activity Description	Date Completed & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
OJT	Participate in a follow-up inspection and perform the following: <ul style="list-style-type: none"> <li>• Review the initial case file to determine equipment necessary to evaluate the implementation of controls</li> <li>• Prepare all equipment for the follow-up inspection</li> <li>• Conduct an opening conference</li> <li>• Set up or operate all equipment for determining compliance</li> <li>• Answer routine questions concerning scope of survey, reasons for taking measurements, and general methods of controlling common hazards</li> <li>• Conduct the closing conference</li> </ul>		No Additional Discipline-Specific Recommendation	
OJT	With supervisor or assigned mentor, discuss how to determine whether an inspection involves multi-employer worksite issues, the 2 step process in determining whether more than one employer is to be cited.		No Additional Discipline-Specific Recommendation	
OJT	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.		No Additional Discipline-Specific Recommendation	
SI/OJT	Review the various HIOSH adopted directives involving special emphasis programs. If such an inspection arises during this phase, participate as a team member and present an oral summary of hazards and violations identified and citations recommended.		No Additional Discipline-Specific Recommendation	
SI	Perform a literature and web search to resolve a problem in hazard identification and control. Develop a written report incorporating the information		No Additional Discipline-Specific Recommendation	
OJT	Review several case files for penalty recommendations by the CSHO. Discuss with supervisor or assigned mentor how the CSHO arrived at the recommended penalty.		No Additional Discipline-Specific Recommendation	
OJT	Attend an informal conference.		No Additional Discipline-Specific Recommendation	

Type of Activity	Activity Description	Date Completed & Initials <sup>2</sup>	Safety Specialists	Industrial Hygienists
SI	For each of three inspection case files assigned by the supervisor, prepare a written report that summarizes: <ul style="list-style-type: none"> <li>• Reason(s) for the inspection</li> <li>• Nature and characteristics of the worksite</li> <li>• Hazards investigated, equipment used, and samples or measurements taken</li> <li>• Violations identified</li> <li>• Abatement methods used by the employer.</li> </ul>			
SI	Review three accident investigation case files assigned by the supervisor.			
SI	Review OSHA's Regional Emergency Management Plan (REMP)			

**Appendix B. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3**

**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 year 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"> <li>• #1310 <i>Investigative Interviewing Techniques</i>, and</li> <li>• #1230 <i>Accident Investigation</i></li> </ul> CSHOs should: <ul style="list-style-type: none"> <li>• Participate in three accident/fatality investigations under the guidance of a team leader and/or an experienced CSHO</li> <li>• Be given the opportunity to demonstrate effective interviewing techniques</li> </ul>	None	This course does not specifically apply technical knowledge related to safety or health.

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

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>Safety Specialists. After the Safety Specialist has completed the #1080 Health Hazard Awareness for Safety Officers course, they should participate in a minimum of three health inspections under the guidance of an experienced industrial hygienist (EHS) and assist in preparation of citations.</p> <p>Industrial Hygienists: After the Industrial Hygienist has completed the #1280 Safety Hazard Awareness for Industrial Hygienists 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>Research and read new and applicable Letters of Interpretation, directives, memoranda of understanding and other OSHA/HIOSH policy documents related to course content</p>	<p>These courses apply basic technical knowledge related to safety and health</p>
<p>#8200 Incident Command System, I-200</p>	<p>After completion of the #8200, 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.. The CSHO should participate in inspections adapted to the ICS model.</p>	<p>Research and read new and applicable Letters of Interpretation, directives, memoranda of understanding and other OSHA/HIOSH policy documents related to course content</p>	<p>This course does not specifically apply technical knowledge related to safety or health.</p>
<p><b>Technical Courses</b></p>			
<p><b>Safety Specialists</b> Build on skills and experience in a related technical area such as machine guarding, lockout/tagout, trench, or scaffolding.</p>	<p>After the Safety Specialist has completed a technical course such as the #2030 Basic Electrical Principles, #2040 Machinery and Machine Guarding Standards, #3010 Excavation and Trenching and Soil Mechanics, or #3080 Principles of Scaffolding, the Safety Specialist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> <li>• Concern the type of hazard that was the subject of the technical course</li> <li>• Prepare and operate equipment appropriate for an inspection related to the technical area.</li> <li>• Document violations and prepare citations for inspections related to the technical area.</li> </ul>	<p>Research and read new and applicable Letters of Interpretation, directives, memoranda of understanding and other OSHA/HIOSH policy documents related to course content</p>	<p>These courses apply basic technical knowledge related to safety and health</p>

Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
<p><b>Industrial Hygienists:</b></p> <p>Build on skills and experience in a related technical area such as noise sampling or air contaminant sampling.</p>	<p>After the Industrial Hygienist has completed a technical course such as the #2200 Industrial Noise or the #2210 Principles of Ventilation, the Industrial Hygienist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> <li>• Concern the type of hazard that was the subject of the technical course</li> <li>• Prepare and operate equipment appropriate for an inspection related to the technical area</li> <li>• Document violations and prepare citations for inspections related to the technical area.</li> </ul>	<p>Research and read new and applicable Letters of Interpretation, directives, memoranda of understanding and other OSHA/HIOSH policy documents related to course content</p>	<p>These courses apply basic technical knowledge related to safety and health</p>

**Appendix C. OTI Courses Required or Recommended in OSHA/HIOSH Directives**

This appendix is recommended as a tool for supervisors to help determine additional training specifically required or recommended by OSHA/HIOSH 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, #2000 Construction Standards, and #1250 Introduction to Health Standards for Industrial Hygienists).

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 02-00-100</b> Application of the Permit-Required Confined Spaces (PRCS) Standard, 29 CFR 1910.146, [5/5/1995], (HIOSH date 6/16/1995)</p>	<p>CSHOs that will be entering a confined space</p>	<p><i>“Minimum training for a CSHO who will be entering a permit space is:</i></p> <ul style="list-style-type: none"> <li><i>a. The Confined Space entry course offered by OTI or equal,</i></li> <li><i>b. Respiratory Protection course (9-day) offered by OTI or equal</i></li> <li><i>c. Introduction to Industrial Hygiene for Safety Personnel course offered by OTI or equal.”</i></li> </ul>	<ul style="list-style-type: none"> <li>a. #2260 Permit Required Confined Space Entry</li> <li>b. #2220 Respiratory Protection, now a blended course, with 12 hr. web-based component prior to attending a 3-1/2 day instructor-led class</li> <li>c. #1080 Health Hazard Awareness for Safety Officers (replaced Introduction to Industrial Hygiene for Safety Personnel.</li> </ul>		
<p><b>CPL 02-00-157</b> Shipyards Employment “Tool Bag” [4/1/2014] (HIOSH date 7/14/2014)</p> <p><b>AND</b></p> <p><b>CPL 02-00-159,</b> Field Operations Manual (FOM) Chapter 10, page 11</p>	<p>CSHOs that will participate in any shipyard employment interventions or inspections</p>	<p><i>“OTE offers a course that is specific to the shipyard employment industry titled, “Shipyards Processes and Standards”, course number 2090. . . To conduct an effective shipyard employment inspection, the CSHO must spend an adequate amount of time preparing. Supervisors are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in shipyard employment establishments.”</i></p>		<p>#2090 Shipyard Employment</p>	

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 02-00-147</b>                      The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures [2/11/2008] (HIOSH date 5/7/2008)</p>	<p>CSHOs that inspect energy control practices and procedures</p>	<p><i>“Only CSHOs who are trained in energy control practices and procedures may evaluate machines and equipment to determine that they are properly locked and/or tagged out in accordance with §§1910.147 and 1910.333.</i></p> <p><i>NOTE: The OTI currently integrates many important energy control principles and CSHO safety practices in various coursework, such as is the case with OTI Initial Compliance Course (#1000). Additionally, other OTI courses (e.g. Courses #1010, #1050, #2030, #3090, #3094, #3095, #3190) also include electrical energy control and LOTO requirements in this general safety curriculum. Experienced OSHA staff may already have many OTI courses (or other training with equivalent curriculum) that cover the LOTO and electrical safety-related energy control practices; therefore, employment records and training certificates may be used to certify that training has been accomplished.”</i></p>	<ul style="list-style-type: none"> <li>• #1280 Safety Hazard Awareness for Industrial Hygienists has replaced #1010 Safety Hazard Recognition for Industrial Hygienists.</li> <li>• #1050, Introduction to Safety Standards for Safety Officers</li> <li>• #3090, Electrical Standards</li> <li>• #3190, Electrical Power Generation, Transmission, and Distribution</li> </ul>		<p>Although the directive recommends the #1000, Initial Compliance Course, energy control principles are not covered in this course. Also OTI no longer offers courses #2030, #3094, and #3095.</p>

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 02-00-153</b>                      Communicating OSHA Fatality Inspection Procedures to a Victim's Family [41/17/2012] (HIOSH date 10/1/2012)</p>	<p>HIOSH personnel who may be involved in fatality investigations</p>	<p><i>“OSHA personnel involved in fatality inspections and in communicating with the next of kin must complete training in accordance with TED 01-00-018, Initial Training Program for HIOSH Compliance Personnel in addition to receiving on-the-job training under the guidance of a supervisor and/or experienced compliance officer.”</i></p>	<p>#1000, Initial Compliance                      #1050, Introduction to Safety Standards                      #1080, Health Hazard Awareness for Safety Officers                      #1250, Introduction to Health Standards for Industrial Hygienists                      \$1280, Safety Hazard Awareness for Industrial Hygienists.                      #2000, Construction Standards                      #1230, Accident Investigation                      #1310, Investigative Interviewing Techniques                      #1410, Inspection Techniques and Legal Aspects                      #2450, Evaluation of Safety and Health Management Systems                      #8200, Incident Command Systems I-200</p>		<p>ISC courses are offered on-line by FEMA. Many of the course names and numbers have changed.</p>

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 02-00-154</b>                      Longshoring and Marine Terminals "Tool Shed" Directive [7/31/2012] (HIOSH date 8/31/2012)</p> <p>AND</p> <p><b>CPL 02-00-159</b>                      Field Operations Manual (FOM), Chapter 10, Page 16</p>	<p>HIOSH personnel who conduct inspections in longshoring or marine terminals</p>	<p><i>"Training consists of both internal training for OSHA consultation and enforcement staff, and external training for marine cargo handling industry employers and employees... The OTI provides training and education in occupational safety and health for federal and state compliance officers, State consultants, other federal agency personnel, and the private sector.</i></p> <p><i>CSHO Training. Supervisors or team leaders are responsible for ensuring that CSHOs are qualified to inspect/intervene in marine cargo handling establishments. CSHOs should have completed the OTI Course #2060, Longshoring and Marine Terminal Processes and Standards, or have received equivalent training and/or experience prior to conducting marine cargo handling industry inspections."</i></p>		<p>#2060, Longshoring and Marine Terminal Processes and Standards</p>	

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<b>CPL 02-01-038</b> Enforcement of the Electric Power Generation, Transmission and Distribution Standard [6/18/2003] (HIOSH date 1/23/2003)	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	<p><i>“All CSHOs must, at a minimum, have received basic electrical safety training (OSHA Training Institute Course #309 or equivalent) to enter an electric power generation facility.... The minimum training requirements for any CSHO who will be 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 as defined in X.A, are:</i></p> <p><i>1. Completion of the Electric Power Generation, Transmission, and Distribution OSHA Technical Institute (OTI) course #319 or its equivalent.”</i></p>	<ul style="list-style-type: none"> <li>• #3090 Electrical Standards formerly numbered 309</li> <li>• #3190 Electric Power Generation, Transmission, and Distribution, formerly numbered 319</li> </ul>		<p><i>Electrical safety-related work practice training through utility or other industry work experience and training and additional outside training may be used to meet the minimum training requirements. CSHOs who have outside training/experience or who have successfully completed the interim 3-day OTI course on 1910.269 may perform such inspections; however, they are encouraged to attend the OTI #319 course.”</i></p>
	CSHOs that may enter enclosed or confined spaces.	<p><i>“Furthermore, CSHOs may enter enclosed spaces or confined spaces only if they have successfully completed the minimum OTI training courses, or their equivalent, for: (1) Confined Space Entry, (2) Respiratory Protection, and (3) Introduction to Industrial Hygiene for Safety Personnel.”</i></p>	<ol style="list-style-type: none"> <li>1. #2260 Permit-Required Confined Space Entry</li> <li>2. #2220 Respiratory Protection</li> <li>3. #1080 Health Hazard Awareness for Safety Officers has replaced Introduction to Industrial Hygiene for Safety Personnel</li> </ol>		

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 02-01-052</b> Enforcement Procedures for Investigating Workplace Violence Incidents [9/8/2011] (HIOSH date 9/26/2011)</p>	<p>CSHOs performing workplace violence inspections</p>	<p><i>“Area Directors and Regional Training Coordinators shall ensure that Compliance Officers performing workplace violence inspections are familiar with the most recent guidelines on the subject and are adequately trained on workplace violence prevention, recognition of high-risk situations, and ways to defuse hostile situations.”</i></p>			<p>OTI’s web-based #1000 Initial Compliance course provides workplace violence training.</p>
<p><b>CPL-02-01-054</b> Inspection and Citation Guidance for Roadway and Highway Construction Zones [10/16/2012] (HIOSH date 11/2/2015)</p>	<p>CSHOs inspection high speed work zones (above 45 mph)</p>	<p><i>“Before performing any inspection of a highway or roadway construction work zone with speed limits above 45 mph, the CSHO must successfully complete a course for road work zone inspections approved by the OSHA Training Institute (OTI) in accordance with OSHA’s Policy for Local Occupational Safety and Health Training Courses (TED 01-00-017) This requirement goes into effect six months after OTI approves a course.”</i></p> <p><b>Fairfax Memo:</b> <i>“CSHOs inspecting high speed work zones (above 45 mph) will be required to take 1.5 – 2 hours webinars provided by DTE.”</i></p>	<ul style="list-style-type: none"> <li>• Webinar #0065 CSHO Safety In Highway Work Zones</li> <li>• Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections</li> </ul>		

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 02-01-054</b> Inspection and Citation Guidance for Roadway and Highway Construction Zones [10/16/2012] (HIOSH date 11/2/2015)</p>	<p>CSHOs inspecting work zones (at or below 45 mph)</p>	<p><i>Recommended CSHO Training. "Before performing any inspection at a work zone with speed limits at or below 45 mph, the CSHO should successfully complete a course approved by the OSHA Training Institute for work zone inspections."</i></p>		<ul style="list-style-type: none"> <li>• Webinar #0065 CSHO Safety in Highway Work Zones</li> <li>• Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections</li> </ul>	
<p><b>CPL 02-02-054</b> Respiratory Protection Program Guidelines [7/14/2000] (Not adopted by HIOSH, reference only)</p>	<p>HIOSH OH Branch Manager acting as Respirator Program Administrator</p>	<p><i>"All program administrators must attend the OSHA Training Institute (OTI) course on respiratory protection or an equivalent course. The program administrator or other qualified individual will provide the necessary training to all CSHOs who may be assigned to wear respirators. Additional training may also be provided through completion of an OTI course in respiratory protection or other training source."</i></p>	<p>#2200 Respiratory Protection</p>		
<p><b>CPL 02-00-073</b> Inspection Procedures for 29 CFR 1910.120 and 1926.65 Paragraph (q): Emergency Response to Hazardous Substance Releases [8/27/2007] (HIOSH date 12/11.2007)</p>	<p>HIOSH personnel responding to an emergency that involves hazardous substances</p>	<p><i>OSHA personnel must: "Have the appropriate training required by 29 CFR 1910.120 before entering danger areas, and any applicable annual refresher training."</i></p>		<p>OTI offers #3315, EPA's Health and Safety 40-Hour (HAZWOPER) course.</p>	<p>Enhanced 40-hour Health and Safety Course for CSHOs to meet training requirements of 1910.120 and 1926.65.</p> <p>DTE is developing Course #3380, Enhanced 40-hour H&amp;S course</p>

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 03-00-008</b>                      Combustible Dust National Emphasis Program (Reissued) [3/11/2008] (HIOSH date 4/4/2008)</p>	<p>CSHOs conducting combustible dust inspections</p>	<p><i>“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). The Regional Administrators will ensure that an appropriate number of CSHOs trained in combustible dust hazard recognition are available for inspections under this NEP.”</i></p>		<p>#3320                      Combustible Dust Hazards and Controls</p>	

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<b>CPL 03-00-010</b> Petroleum Refinery Process Safety Management NEP [8/18/2009] (HIOSH date 10/1/2009)	Team Leaders	<i>"All OSHA personnel who will serve as team leaders must have attended OTI Course 3410, Advanced Process Safety Management to receive training specific to leading team inspections under this instruction."</i>	#3410 Advanced Process Safety Management		This NEP has not been officially closed; however; all required inspections have been completed
	Level 1 Team Member	<i>"As a minimum, Level 1 training must include the OSHA Training Institute's (OTI) Course 3300, Safety and Health in the Chemical Processing Industries, and Course 3400, Hazard Analysis in the Chemical Processing Industries. Additionally, Level 1 Team Members should have additional advanced training such as OTI Course 3410, Advanced Process Safety Management or other equivalent specialized seminars in process safety management."</i>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> </ul>		
	Level 2 Team Member	<i>"...they have completed OTI Course 3300, "Safety and Health in the Chemical Processing Industries" (including offerings of this course prior to Fiscal Year 1991) and OTI Course 3400, "Hazard Analysis in the Chemical Processing Industries."</i>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> </ul>		

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 03-00-014</b>                      PSM Covered Chemical Facilities National Emphasis Program [11/29/2011]                      (HIOSH date 12/8/2011)</p>	<p>Level 1 Team Leader</p>	<p><i>“Option 1: They have completed OSHA Training Institute’s (OTI) Course 3300, Safety and Health in the Chemical Processing Industries, # 3400, Hazard Analysis in the Chemical Processing Industries, and advanced training including either OTI Course 3430, Advanced PSM in the Chemical Industries or Course 3410, Advanced Process Safety Management and they have prior experience (OSHA, other government agency, or industry) with chemical industry safety;</i>  <i>Option 2: They have completed OSHA Training Institute’s (OTI) Course 3430, Advanced PSM in the Chemical Industries or Course 3410, Advanced Process Safety Management and, they have 3 years’ experience working in PSM-covered manufacturing;</i>  <i>Option 3: They have completed OSHA Training Institute’s (OTI) Course 3430, Advanced PSM in the Chemical Industries or Course 3410, Advanced Process Safety Management and have 7 years Federal or State OSHA experience and have participated in greater than 20 PSM and/or chemical plant inspections where they were the team leader equivalent in at least two of these inspections.”</i></p>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> <li>• #3410 Advanced Process Safety Management</li> </ul> <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> <li>• #3430 Advanced PSM in the Chemical Industries</li> </ul>		<p>“Completion of Course #330 prior to Fiscal year 1991 does not meet the requirements for Level 1 team members.”</p>

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CPL 03-00-014</b>                      PSM Covered                      Chemical Facilities                      National Emphasis                      Program                      [11/29/2011]                      (HIOSH date                      12/8/2011)</p>	<p>Level 2                      Team                      Member</p>	<p><i>“Level 2. OSHA personnel may be assigned as inspection team members under this notice, if:</i>                      • <b>Option 1:</b> <i>They have completed OTI Course 3300, Safety and Health in the Chemical Processing Industries (including offerings of this course prior to fiscal year 1991) and OTI Course 3400, Hazard Analysis in the Chemical Processing Industries, and,</i>                      – <i>They have two years of OSHA inspection experience or the equivalent, such as State OSHA experience, EPA RMP experience, U.S. Chemical Safety Board experience.</i>                      • <b>Option 2:</b> <i>They have 3 years’ experience working in a PSM-covered manufacturing facility (chemical, petrochemical, refining) in a process engineering, operations, safety, or maintenance position.</i>                      • <b>Option 3:</b> <i>7 years of Federal or State OSHA experience and they have participated in more than 20 PSM and/or chemical plant inspections where they were the team leader equivalent in at least two of these inspections.”</i></p>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>CSP 02-00-003</b>                      Consultation Policies and Procedures Manual [11/19/2015] (HIOSH date 3/1/2016)</p>	<p>Consultant Trainers</p>	<p><i>“Trainers’ Qualifications. A. Informal Training. To be qualified to provide informal training the consultant must have:                      i. Completed the Introduction to On-site Consultation Course (OSHA Course 1500);                      and                      ii. Have subject matter knowledge in the area of the training being offered.”</i></p>	<p>#1500 Introduction to On-site Consultation</p>		
<p><b>CSP 03-01-003</b>                      Voluntary Protection Programs (VPP) Policies and Procedures Manual [4/18/2008] (HIOSH date 12/27/2014)</p>	<p>On-site Evaluation Team</p>	<p><i>“All team members must have at least the following: OSHA Course 2450, Evaluation of Safety and Health Management Systems or other formal classroom training in evaluating safety and health management systems (for OSHA personnel only).”</i></p>	<p>#2450 Evaluation of Safety and Health Management Systems</p>		
	<p>PSM “Level 1” Auditor</p>	<p><i>“Specific requirements for a PSM “Level 1” Auditor include:                      a. The OSHA Training Institute’s (OTI) Courses 3300, Safety and Health in the Chemical Processing Industries, and 3400, Hazard Analysis in the Chemical Processing Industries.                      b. Advanced training such as OTI Course 3410, Advanced Process Safety Management, or other equivalent specialized seminars in PSM.”</i></p>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> <li>• #3410 Advanced Process Safety Management</li> </ul>		

Directive	HIOSH Personnel	Directive Language	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p><b>HSO 01-00-001</b> National Emergency Management Plan (NEMP) [12/18/2003] (Not adopted by HIOSH, reference only)</p>	<p>HIOSH Staff who have been assigned a role or function relating to the NEMP or REMP</p>	<p>“All OSHA personnel assigned a role or function related to implementing either the NEMP or REMP will complete OTI 345: Basic Incident Command System [Emergency Management Institute (FEMA) Independent Study Course IS 195] and the ISC Level 200 course, to ensure their familiarity with ICS concepts and nomenclature.”</p>			<p>ISC courses are offered on-line by FEMA. Many of the course names and numbers have changed.</p>

## **Appendix D. Correlation of OTI Courses to Professional Certification**

**Professional Certification.** Credentialing organizations such as the American Board of Industrial Hygiene and the Board of Certified Safety Professionals have spent many years developing a specific process for determining certification exam questions and the overall requirements that meet the level of achievement of a certified professional in a given field. Passing a certification exam means an individual has gained a high level of competence in their chosen profession, and the recognition accorded such an individual is commensurate with the achievement.

CSHOs are also encouraged to pursue other available professional certifications that may be appropriate for their current circumstances. For example, the certification of Associate Safety Professional (ASP) may be obtained by CSHOs who lack the required years of experience to qualify to become a Certified Safety Professional.

**Relationship of OTI Courses to Professional Certification.** Supervisors and CSHOs should be aware that OTI courses alone are not sufficient preparation for passing certification exams. This is due to the specific emphasis that OTI courses place on job functions and related on-the-job competencies that a CSHO must use every day. Certification exams are offered to the general public, not just OSHA compliance safety and health officers; they are designed to apply to a broad range of job functions and job competencies. It is recommended that regions consider in addition to OTI technical course attendance, other methods to supplement certification preparation study, such as use of certification preparation software, and mentoring by other certified regional staff.

This Appendix highlights OTI courses that may provide information or assistance with preparation for professional certification exams offered by the Council on Certification of Health, Environmental and Safety Technologists (CCHST), the American Board of Industrial Hygiene (ABIH) and the Board of Certified Safety Professionals (BCSP). Three certifications are addressed in this Appendix: Certified Construction Health and Safety Technician (CCHST®), Certified Industrial Hygienist (CIH) and Certified Safety Professional (CSP).

<b>Certified Construction Health and Safety Technician®</b>	<b>Certified Industrial Hygienist</b>	<b>Certified Safety Professional</b>
2050 Cranes and Rigging 2260 Permit-Required Confined Spaces 3010 Excavation, Trenching and Soil Mechanics 3020 Tunneling and Underground Operations 3030 Concrete, Forms and Shoring 3080 Principles of Scaffolding 3090 Electrical Standards 3110 Fall Arrest Systems 3160 Steel Erection 3500 Demolition	2200 Industrial Noise 2210 Principles of Ventilation 2220 Respiratory Protection 2230 Industrial Toxicology 2240 Biohazards 2250 Ergonomics Applied to MSDs and Nerve Disorders 2260 Permit-Required Confined Spaces 2330 Indoor Air Quality 2610 Ionizing Radiation 3220 Applied Welding Principles 3280 Industrial Hygiene Chemistry 3350 Comprehensive Review of Emergency Response Under 1910.120(q) 4530 Certified Industrial Hygienist Examination Preparation	2010 Hazardous Materials 2030 Basic Electrical Principles 2050 Cranes and Rigging for Construction 2070 Fire Protection and Life Safety 2210 Principles of Ventilation 2250 Ergonomics Applies to MSDs and Nerve Disorders 2610 Ionizing Radiation 3090 Electrical Standards 3400 Hazard Analysis in the Chemical Processing Industries 4520 Certified Safety Professional Examination Preparation

**Appendix E. List of Recommended Reading for New Compliance Officers**

The following are some suggested texts, located in the HIOSH Library, to enhance the compliance officers' understanding of hazards, hazards associated with certain industries or processes, and methods of abatement.

Safety	Health
<ul style="list-style-type: none"> <li>• Accident Prevention Manual, National Safety Council</li> <li>• Principles and Practices of Heavy Construction</li> <li>• Fall Protection and Scaffolding Safety, Gagnet</li> <li>• Fire Protection Handbook, NFPA</li> <li>• An Illustrated Guide to Electrical Safety</li> <li>• Introduction to Fall Protection, Ellis</li> <li>• Warehouse Safety, Swartz</li> <li>• Flammable and Combustible Liquids Code Handbook, NFPA</li> <li>• Crane Hazards and Their Prevention, MacCollum</li> <li>• Modern Welding, Goodheart-Wilcox</li> <li>• Welding Health and Safety, AIHA</li> <li>• Elevated Work Platforms and Scaffolding</li> </ul>	<ul style="list-style-type: none"> <li>• Fundamentals of Industrial Hygiene, National Safety Council</li> <li>• The Occupational Environment: It's Evaluation, Control, and Management, Dinardi, AIHA</li> <li>• Health Hazards in Industry, Burgess</li> <li>• Industrial Ventilation, ACGIH</li> <li>• Application and Computational Elements of Industrial Hygiene, Stern and Mansdorf</li> <li>• A Strategy for Assessing and Managing Occupational Exposures, AIHA</li> <li>• Casarett &amp; Doull's Toxicology</li> <li>• Hunter's Diseases of Occupations, Raffle/Adam</li> <li>• The Noise Manual, AIHA</li> <li>• Guidelines for Hazard Evaluation Procedures, CCPS</li> <li>• Chemical Protective Clothing, AIHA</li> <li>• Welding Health and Safety, AIHA</li> </ul>



# OSHA INSTRUCTION

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

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**DIRECTIVE NUMBER:** TED 01-00-019

**EFFECTIVE DATE:** 07/21/2014

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**SUBJECT:** Mandatory Training Program for OSHA Compliance Personnel

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## ABSTRACT

- Purpose:** This Instruction provides National, Regional, and Area Office personnel with policy and guidelines for implementing competency-based training programs for OSHA compliance personnel.
- Scope:** This Instruction applies OSHA-wide.
- References:** (1) OSHA Instruction CSP 01-00-002 (STP 2-0.22B), State Plan Policies and Procedures Manual, March 21, 2001; (2) OSHA Instruction CSP 01-00-003 (STP 2.22A, CH-3) Changes to the State Plan Policies and Procedures Manual, February 27, 1990; (3) OSHA Instruction EAA 01-00-004, Management Accountability Program, September 15, 2010; (4) OSHA Instruction PER 05-00-001 (PER 10-1.1), OSHA Training Policy, December 14, 1979; (5) OSHA Instruction TED 01-00-017, OSHA's Policy for Local Occupational Safety and Health Training, August 22, 2007; (6) 29 CFR 1902, State Plans for the Development and Enforcement of State Standards; (7) 29 CFR 1956, Plans for State and Local Government Employees Without Approved Plans.
- Cancellations:** OSHA Instruction TED 01-00-018, Initial Training Program for OSHA Compliance Personnel, August 6, 2008.
- State Impact:** This Instruction describes a federal program change that affects state programs. Notice of intent and equivalency are required. See paragraph VI.
- Action Offices:** National, Regional and Area Offices.
- Originating Office:** OSHA Directorate of Training and Education.

**Contact:** Director, OSHA Directorate of Training and Education.

By and Under the Authority of

David Michaels, PhD, MPH  
Assistant Secretary

## Executive Summary

This Instruction provides guidance and direction to the Occupational Safety and Health Administration (OSHA) National, Regional, and Area Offices concerning OSHA's policies and procedures for training Compliance Safety and Health Officers (CSHOs). It is essential that CSHOs have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish OSHA's mission of promoting safe and healthful working conditions for America's working men and women. In this Instruction, OSHA has provided detailed guidance for training required during a CSHO's career, including recommended training that assists the CSHO with preparing for professional certification exams. This Instruction identifies training paths that provide assistance to the regions in managing their training programs.

The goal of this Instruction is to assist CSHOs and their supervisors with direction, guidance and training options that directly contribute to the CSHO's ability to represent OSHA with a high degree of professional expertise. In addition, the CSHO training program identifies a correlation between CSHO competency and achieving respected credentials in the fields of safety, health and construction such as Certified Safety Professional (CSP), Certified Industrial Hygienist (CIH) and Certified Construction Health and Safety Technician (CCHST<sup>®</sup>).

## Significant Changes

This Instruction describes the revised training program for OSHA compliance personnel and supersedes TED 01-00-018, Training Program for OSHA Compliance Personnel, dated August 6, 2008. Changes include:

- Instruction title changed from Initial to Mandatory Training Program for OSHA Compliance Personnel to include CSHO training requirements throughout their career.
- Implementing a two-phase approach to reflect additional mandatory training:
  - Phase 1 - Initial Courses: Each CSHO will be required to complete a minimum of eight initial courses offered by the OSHA Training Institute (OTI) during the first three years of his/her career as a CSHO. The order and sequence of these courses are as prescribed in this instruction.
  - Phase 2 - Technical Courses: Each CSHO will be required to complete a minimum of six additional technical courses through Year 8 of their career. Beginning with Year 9, they must complete a minimum of one technical course every three years.
- Figure 1 has been updated to reflect this instruction.
- This Instruction gives notice that other courses designated as mandatory by OSHA's Assistant Secretary may be added to the CSHO's training program at any time.
- [Appendix C](#) has been updated to reflect changes in OSHA policy. The appendix 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 Individual Development Plans (IDPs) for continuing professional development.

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- I. Purpose. This Instruction provides National, Regional, and Area Office personnel with policy and guidelines for implementing competency-based training programs for OSHA compliance personnel.
- II. Scope. OSHA-wide.
- III. References.
  - A. [OSHA Instruction CSP 01-00-002 \(STEP 2-0.22B\)](#), State Plan Policies and Procedures Manual, March 21, 2001.
  - B. [OSHA Instruction CSP 01-00-003 \(STP 2.22A, CH-3\)](#), Changes to the State Plan Policies and Procedures Manual, February 27, 1990.
  - C. [OSHA Instruction EAA 01-00-004](#), Management Accountability Program, September 15, 2010.
  - D. [OSHA Instruction PER 05-00-001 \(PER 10-1.1\)](#), OSHA Training Policy, December 14, 1979.
  - E. [OSHA Instruction TED 01-00-017](#), OSHA's Policy for Local Occupational Safety and Health Training, August 22, 2007.
  - F. [29 CFR 1902](#), State Plans for the Development and Enforcement of State Standards.
  - G. [29 CFR 1956](#), Plans for State and Local Government Employees Without Approved Plans.
- IV. Cancellations. OSHA Instruction TED 01-00-018, Initial Training Program for OSHA Compliance Personnel, is cancelled.
- V. Action Offices.
  - A. Responsible Office. Directorate of Training and Education.
  - B. Action Offices. All OSHA National Office Directorates and Free-standing Offices; Regional, Area and District Offices; and State Designees.
  - C. Information Offices. Consultation Project Managers.
- VI. State Plan Impact.
  - A. Notice of Intent and Equivalency Required. This Instruction describes a Federal OSHA program change which establishes a significantly modified technical training program for OSHA compliance personnel. Under 29 CFR 1902.3(h) and 1956.10(g), State Plans must have a sufficient number of adequately trained and qualified personnel for the enforcement of standards. State Plans must have a

formal documented training program for their compliance personnel which is revised as necessary to reflect current practices. The State Plan training program must be at least as effective as the federal program outlined in this Instruction and must result in adequately trained personnel who can conduct effective inspections. State Plan training programs are not required to utilize OTI for course work, but may operate and implement state-run training courses.

- B. Within 60 days of the date of issuance of this directive, State Plans must submit a notice of intent indicating if the State Plan will adopt or already has in place a training program that is identical to or different from the federal program. State adoption, either identically or different, should be accomplished within 6 months. If adopting identically, the State Plan must provide the date of adoption to OSHA, due within 60 days of adoption. If the State Plan adopts or maintains a training program that differs from the federal program, the State Plan must either post its different policies on its State Plan website and provide a link to OSHA, or provide OSHA with an electronic copy and the name and contact information of someone within the State Plan who can assist the public with obtaining a copy. This action must occur within 60 days of the date of adoption. OSHA will post summary information of the State Plan responses to this Instruction on its website.

VII. Goals and Objectives of CSHO Training. The goal of this Instruction is to assist CSHOs and their supervisors with direction, guidance, and training options that directly contribute to the CSHO's ability to represent OSHA with a high degree of professional expertise.

A. Competency-Based Curriculum.

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 (DTE) 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 training has been developed to accommodate the varying levels of experience and competence during the initial three-year period of a CSHO's career. OTI's safety, health and construction training paths reflect basic requirements and competencies applicable to all CSHOs as well as those intending to gain additional expertise.

In addition, 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 safety and health technical training priorities into the CSHO's training program. For example, the needs of the Area Office may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. Other Area Office needs may include providing CSHOs with technical training required in OSHA Directives (e.g., Process Safety Management (PSM) training for PSM Team Leaders and Members). Phases 1 and 2 of the training program can overlap, allowing Regional Administrators to incorporate four technical courses as needed during the CSHO's first five years provided the CSHO has completed both the #1000 Initial Compliance and one of the Standards courses. Selection of the technical courses to be attended and determination of the sequencing and priority are at the Regional Administrator's discretion.

To provide CSHOs with the requisite knowledge, skills, and abilities to competently perform their job, this Instruction provides a two-phase approach to completing the mandatory training requirements for CSHOs throughout their career: Phase 1 - Initial Courses and Phase 2 - Technical Courses.

1. Phase 1 – Initial Courses Training Requirements: Each CSHO will be required to complete a minimum of eight initial courses offered by the OSHA Training Institute (OTI) during the first three years of his/her career as a CSHO. The order and sequence of these courses are as prescribed in this Instruction.
  2. Phase 2 – Technical Courses Training Requirements: Each CSHO will be required to complete a minimum of six additional technical courses through Year 8 of their career. Beginning with Year 9, they must complete a minimum of one technical course every three years.
- C. Assistant Secretary Training Requirements. This Instruction gives notice that other courses designated as mandatory by OSHA's Assistant Secretary may be added to the CSHO's training program at any time.
- D. Professional Certification. OTI's articulated progression of training requirements for the first three-year period of a CSHO's career supports the pursuit of professional certification and encourages CSHOs to strive for the recognition that such certification provides. Since OTI's courses are designed to support OSHA's mission, there may not always be a one-to-one correlation between an OTI technical course and the competencies required to achieve certification. Correlation of OTI courses to professional certification can be found in [Appendix D](#) of this Instruction.

VIII. Mandatory CSHO Training. Figure 1 illustrates a recommended training sequence for the CSHO's first three years.

A. Phase 1 - Initial Courses, Year 1: The following two courses must be completed within the first year of a CSHO's career. 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).
  - c. #2000 Construction Standards (construction career path/construction specialists).

Phase 1 - Initial Courses, Through Year 3: The following courses will be taken after the CSHO has completed one of the Standards courses.

- #1310 Investigative Interviewing Techniques.
- #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.*
- #2450 Evaluation of Safety and Health Management Systems.
- #1230 Accident Investigation.

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

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

Additionally, prior to the end of Year 3, the following course is required:

- 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.

- B. Phase 2 - Technical Courses: Regional Administrators will approve technical courses to be taken by CSHOs based on Area Office needs following the guidelines of this instruction.
- Four technical courses by the end of Year 5.
  - Two technical courses completed in Years 6 through 8.
  - A minimum of one technical course every three years beginning with Year 9 throughout the CSHO's career.

## MANDATORY TRAINING REQUIREMENTS

Phase 1 - Initial Courses		
<b>Year 1</b>		
Career Training Paths for Compliance Personnel		
Safety Path	Health Path	Construction Path
<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1000<sup>1</sup> Initial Compliance</div> <div style="border: 1px solid black; padding: 2px;">#1050<sup>1</sup> Introduction to Safety Standards for Safety Officers</div>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1000<sup>1</sup> Initial Compliance</div> <div style="border: 1px solid black; padding: 2px;">#1250<sup>1</sup> Introduction to Health Standards for Industrial Hygienists</div>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1000<sup>1</sup> Initial Compliance</div> <div style="border: 1px solid black; padding: 2px;">#2000<sup>1</sup> Construction Standards</div>
<b>Through Year 3</b>		
<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1310 Investigative Interviewing Techniques</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1410 Inspection Techniques and Legal Aspects</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#2450 Evaluation of Safety and Health Management Systems</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1230 Accident Investigation</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1080 Health Hazard Awareness for Safety Officers -or- #1250<sup>2</sup> Introduction to Health Standards for Industrial Hygienists -or- #2000 Construction Standards</div> <div style="border: 1px solid black; padding: 2px;">#8200 Incident Command System I-200</div>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1310 Investigative Interviewing Techniques</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1410 Inspection Techniques and Legal Aspects</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#2450 Evaluation of Safety and Health Management Systems</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1230 Accident Investigation</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1280 Safety Hazard Awareness for Industrial Hygienists -or- #1050<sup>2</sup> Introduction to Safety Standards for Safety Officers -or- #2000 Construction Standards</div> <div style="border: 1px solid black; padding: 2px;">#8200 Incident Command System I-200</div>	<div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1310 Investigative Interviewing Techniques</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1410 Inspection Techniques and Legal Aspects</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#2450 Evaluation of Safety and Health Management Systems</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1230 Accident Investigation</div> <div style="border: 1px solid black; padding: 2px; margin-bottom: 5px;">#1280 Safety Hazard Awareness for Industrial Hygienists -or- #1050<sup>2</sup> Introduction to Safety Standards for Safety Officers -or- #1080 Health Hazard Awareness for Safety Officers -or- #1250<sup>2</sup> Introduction to Health Standards for Industrial Hygienists</div> <div style="border: 1px solid black; padding: 2px;">#8200 Incident Command System I-200</div>
Phase 2 - Technical Courses		
<b>Through Year 5 (can overlap with Phase 1)</b>		
Four technical courses are required to be taken by the CSHO based on Area Office needs as approved by the Regional Administrator.		
<b>Years 6 through 8</b>		
Two technical courses are required to be taken by the CSHO based on Area Office needs as approved by the Regional Administrator.		
<b>Years 9 throughout the CSHO's career</b>		
Minimum of one technical course every three years.		

Figure 1

<sup>1</sup>Initial Compliance and one of the Standards courses must be completed during first year

<sup>2</sup>These courses should only be taken by compliance officers with the appropriate education and/or experience

IX. Organizational Responsibilities.

- A. National Office. National Office Directors shall support the training program, as appropriate, by providing resources, supplying current information on the status of agency programs, standards, regulations, and directives, ensuring program consistency, and auditing Regional Office training programs.
- B. The Directorate of Administrative Programs. The Director, Directorate of Administrative Programs will ensure to the extent possible that money is budgeted and available to Regions for OSHA compliance personnel to complete all mandatory training. Note that other courses designated as mandatory by OSHA's Assistant Secretary will be included in the CSHO's training program, thus requiring additional funding support.
- C. The Directorate of Training and Education. The Director, Directorate of Training and Education shall be responsible for providing programs to educate and train OSHA compliance personnel in the skills and knowledge required to perform their duties. Responsibilities include:
1. Planning, developing and conducting Agency technical and specialized training courses and seminars.
  2. Conducting needs assessments and gap analyses to identify training needs for compliance personnel.
  3. Developing classroom and technology-enabled training products designed to support the training and development of CSHOs.
  4. Maintaining and updating competency-based training information on the OSHA Intranet to assist CSHOs in selecting OSHA Training Institute courses and other training and development opportunities that match his/her Individual Development Plans (IDPs) and other professional development needs.
  5. Maintaining and updating the technology-enabled OTI course catalog on the OSHA Intranet.
  6. Conducting evaluations of training courses and programs designed for compliance personnel.
  7. Annotating the CSHO's training records to reflect waived required training and time extensions for required training.
  8. Annotating the CSHO's training records to reflect alternative training for the #8200 Incident Command System I-200 course.
  9. Preparing a courtesy report for the Regions, the Assistant Secretary, the Deputy Assistant Secretary, the Director of the Directorate of Enforcement

Programs, and the Director of the Directorate of Construction listing the courses that have been waived and time extensions granted by the Regional Administrator within the past twelve months. The report will be made available once per fiscal year and will reflect data from the previous twelve months only.

- D. The OSHA Training Institute. The OSHA Training Institute Director shall be responsible for the scheduling and delivery of occupational safety and health training. Specific responsibilities include:
1. Overseeing and conducting courses and seminars for federal and state compliance officers, consultants, compliance assistance specialists, regional and national office staff and other federal agency personnel.
  2. Participating in the design and development of technical and specialized courses, including development of course materials, detailed lesson plans, and other educational aids necessary to carry out Institute training programs.
- E. Regional Administrators. The Regional Administrator (RA) shall direct the execution of the region-wide training and education program in accord with OSHA policy, through the designated Assistant Regional Administrator (ARA). Specifically, in addition to Phase 1 requirements, the RA will:
1. Approve six additional technical courses: Four technical courses during the initial five-year period, and two technical courses in Years 6 through 8 of a CSHO's training program.
  2. Approve at least one technical course every three years beginning in Year 9 throughout the CSHO's career.
  3. Grant waivers and time extensions in accord with the procedures explained in Sections XI and XII of this Instruction.
- F. Assistant Regional Administrators. The Assistant Regional Administrator (ARA) designated by the Regional Administrator directs the planning and execution of the Region's training and education program through the Regional Training Officer/Training Designee.
- G. Regional Training Officers/Training Designees. The Regional Training Officer/Training Designee (RTO/TD) shall serve as a focal point for each region, assisting the Assistant Regional Administrator (ARA) in coordinating and managing the Region's training and education programs. For regions that do not have a designated Regional Training Officer, the Regional Administrator will determine the appropriate designee. The RTO/TD shall assist the ARA to ensure the successful implementation of the training program for regional compliance personnel as outlined in this instruction. Specifically, the RTO/TD shall:

1. Provide guidance and assistance to supervisors and CSHOs concerning information contained in this instruction as well as Department of Labor (DOL) and OSHA training policies and procedures.
2. Implement the Regional training and education program.
3. Assist in providing resource material and current training information to Area Directors concerning the implementation of the objectives of the training program.
4. Process training requests, maintain training records, and provide training registration information to managers, supervisors and CSHOs.
5. Provide the Director of the Directorate of Training and Education with a copy of the alternative training completion for the #8200 Incident Command System I-200 course.
6. Evaluate and monitor all records of training.

H. Area Directors. The Area Director (AD) shall be responsible for ensuring and facilitating the development and training of the CSHOs under his/her supervision. The AD directs the execution of the training program in accord with regional procedures and protocols. The AD shall ensure the successful implementation of the training program for compliance personnel as outlined in this Instruction. Specifically, the AD shall:

1. Ensure the professional development of CSHOs under his/her supervision in accord with the detailed training options outlined in this Instruction and Appendices.
2. Identify and document through an Individual Development Plan (IDP) process the training needs of CSHOs assigned to his/her supervision, and plan and coordinate all training.
3. Provide and coordinate instruction, assistance, and guidance that is consistent with the IDP process for CSHOs to meet the training program objectives outlined in this Instruction.
4. Review and discuss training progress with each CSHO under his/her supervision during the mid-year and annual performance reviews.
5. Assign, as needed, experienced personnel to assist in the on-the-job training of newly-hired CSHOs.
6. Access and document CSHO abilities and send waiver requests per section XI.B. and requests for time extensions per section XII.B. to the Regional Administrator for approval.

- I. Compliance Safety and Health Officer (CSHO). The CSHO has the responsibility to perform to the best of his/her ability in all training programs. Specifically, the CSHO shall:
  1. Discuss his/her performance and training progress with their supervisors.
  2. Participate in the planning of training activities.
  3. Fully attend, participate in, and complete all assigned training courses, seminars and other events.
  
- X. Professional Development during Phase 1 - Initial Courses.
  - A. Required Training. In the interest of nationwide consistency, it is expected that CSHOs will attend the required courses outlined in this instruction offered by the OSHA Training Institute. The information provided in this section is intended to assist Regional Administrators in determining equivalency when issuing waivers. The Directorate of Training and Education Intranet web page offers up-to-date information on course objectives, whether a course is blended, or has specific prerequisites.
  
  - B. Blended Courses. Blended courses include at least one online, web-based training requirement plus an instructor-led portion. Whenever a course prerequisite includes an online, blended session that web-based training must be completed prior to attending the instructor-led session. There is no waiver process or equivalent to completing the online prerequisite of an OTI course. This strict requirement is due to the close link between the training offered online and the subsequent classroom (i.e., instructor-led) training which are designed specifically to complement one another.
  
  - C. Course Sequence. Both the Initial Compliance course and a Standards course must be completed in year one of the CSHO's training path. It is recommended that courses listed as third through eighth year should be completed in a sequence optimal to attaining professional development goals and at the discretion of the RA. Note: Course descriptions are also available through DTE's Intranet web page.
    1. #1000 Initial Compliance. This course is designed for newly-hired CSHOs and focuses on the basic elements of conducting inspections in accord 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 walkaround 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 Federal Emergency Management Agency (FEMA).
    - An equivalent ICS training sponsored by another government agency (federal, state, or local); such a course must follow the guidelines in the National Incident Management System (NIMS) Training Program, September, 2011. Additionally, instructors must have qualifications specified in the Training Program.
    - 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 *Introduction to Incident Command System ICS-100* (course code IS-100.b); *Introduction to Incident Command System (ICS-100)* for Federal Workers (course code IS-100.FWa) may be substituted. The current title for ICS-200 is *IS-200, ICS for Single Resources and Initial Action Incidents* (course code IS-200.b).
  - 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.

XI. Waiver from Required Training Program.

- A. Waiver Conditions. The training program outlined in this instruction is required to be completed during the first eight years of a CSHO's career. Regional Administrators have discretion to waive any of the required courses listed, with the exception of the #1410 Inspection Techniques and Legal Aspects course. Waivers shall be used rarely and shall be granted only in exceptional circumstances.
- B. Assessment and Documentation. The Area Director must assess and document that

the CSHO has demonstrated that he/she can perform the tasks listed in the course objectives for the course being waived. After an assessment has been made, waiver requests shall be submitted in writing by the Area Director to the Regional Administrator. The waiver request will document why the CSHO does not need to attend the specified course. The documentation will include how the CSHO has acquired the levels of knowledge, skills and abilities reflected in the objectives of the course for which the waiver is being requested. Not only must equivalent technical knowledge and skills be documented, but the documentation shall also indicate that the CSHO has institutional understanding of OSHA-specific policies and procedures. For example, criteria may include experience as a former compliance officer with an OSHA State Plan or as a former 21(d) OSHA consultant.

- C. Waiver Requests. Only the Regional Administrator can grant a waiver. The Regional Administrator shall respond to waiver requests in writing. Copies of responses approving waiver requests shall be provided to the Director of the Directorate of Training and Education and to the Assistant Secretary.
- D. Training Record Annotated. The Director of the Directorate of Training and Education shall annotate the CSHO's training record to reflect required courses waived by the Regional Administrator.

XII. Time Extensions. The time requirements for completing Phases 1 and 2 training shown in this instruction must be met. Only the Regional Administrator can grant a time extension, which must be based on extenuating circumstances. Technical courses may be taken at any time after the CSHO has completed both #1000 Initial Compliance and one of the Standards courses.

- A. Time Extension Conditions. If there are circumstances that prevent the CSHO from completing the eight required courses within Phase 1 or the required technical courses in Phase 2, the Regional Administrator can extend the time for completion of the required courses for a period of up to one year. Time extensions may not exceed twelve months. The use of time extensions could extend the time allowed for a CSHO to complete the eight required courses to a maximum of four years from his/her employment date.
- B. Time Extension Requests. Time extensions shall be submitted in writing by the Area Director to the Regional Administrator. Time extension requests include the reason(s) additional time is needed by the CSHO to complete the required training, the amount of time requested and the course(s) that will be completed during the requested time extension.
- C. Time Extension Approvals. The Regional Administrator shall respond to the time extension request in writing. Copies of the responses approving time extension requests shall be provided to the Director of the 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.

XIII. Monitoring the Training Program. Monitoring the CSHO's progress throughout the first eight years is critical to ensure the success of Phases 1 and 2 of the training program. Monitoring provides information regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of the CSHO to achieve training goals and objectives. Both the CSHO's Area Director and the Regional Training Officer/Training Designee play major roles in the monitoring process.

- A. The Area Director. The CSHO's Area Director shall:

1. Ensure that each CSHO has completed the necessary prerequisites before attending mandatory OSHA training courses.
2. Review the CSHO's performance of recommended self-study and on-the-job training (OJT) assignments.
3. Conduct a review with the CSHO following each recommended self-study and OJT inspection activity. This review provides the supervisor with information on the progress of the CSHO and can assist in identifying areas requiring further training.
4. Determine when the CSHO has sufficient experience to participate fully in developing the actual case file; the OJT review may be discontinued when this has been effectively accomplished.

- B. Regional Training Officer/Training Designee. The Regional Training Officer/Training Designee shall monitor Area Office implementation of the training program outlined in this Instruction through review of training documents. For regions that do not have a designated Regional Training Officer, the Regional Administrator will determine the appropriate designee.

XIV. Continuation of CSHO Development.

- A. Professional Standing, Recognition and Professional Certification. The series of courses required for Phase 1 of the CSHO's first three years provide a foundation for professionalism and proficiency. The Phase 2 required technical courses provide a higher level of knowledge and skill in order for CSHOs to more effectively fulfill OSHA's mission. While professional certification is an important career milestone, it is not the only path to gaining professional standing or recognition. CSHOs that complete new, complex or difficult assignments expand their capabilities and broaden their role as a safety and health professional inside and outside the Agency.
- B. Role of Individual Development Plans. An Individual Development Plan (IDP) is an active plan to help the CSHO achieve organizational and career goals. IDPs

must be updated annually and serve as a tool to provide documentation for each CSHO to chart and monitor his/her own progress toward developmental goals. An IDP can help a CSHO:

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.

C. IDPs for the Initial Three-Year Period. Appendices A and B serve as guidelines for supervisors to select appropriate training outlined by this instruction during the first three years. The IDP (Form DL-80) should reflect:

1. Mandatory training - required during the three-year period as outlined in this Instruction.
2. Regional or Area Office training requirements.
3. Other developmental training as determined by the CSHO's Area Director. For example:
  - a. Supplemental training at the Regional and Area Office level that includes formal and/or informal mentoring by higher graded personnel and/or CSHO's with specialized experience.
  - b. Participation in various classes of inspections and a variety of industries and worksites.

D. IDPs Developed after the Three-Year Period.

1. The IDP should follow the guidance outlined in [OSHA Instruction PER 05-00-001 \(PER 10-1.1\)](#) OSHA Training Policy.
2. An IDP helps the CSHO continue to improve his/her present performance and prepare him/her for more responsible work in accord with his/her potential and interests, and the needs of the Agency.

XV. 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.

A. Established evaluation processes and criteria include:

1. Maintaining accreditation through third-party evaluations such as the International Association of Continuing Education and Training (IACET). OTI and DTE have been accredited by IACET since 2002. Retaining

accreditation requires periodic internal reviews and reaccreditation not less than every five years.

2. Meeting or exceeding the Department of Labor's goals for effective management of human capital. One of the Department's goals requires not less than an annual review of the relationship between OTI training programs and the level of CSHO competency at various points in the CSHO's career.
- B. OTI and DTE distribute course evaluation surveys at the end of each instructor-led class. This information provides valuable feedback from the student's perspective to determine the perceived value and impact of instruction. It also serves as a basis for proposing changes to course objectives, course content and presentation methods.

[Appendix A.](#) Recommended CSHO Training Activities for Phase 1 – Initial Course, Year 1

[Appendix B.](#) Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

[Appendix C.](#) OTI Courses Required or Recommended in OSHA Directives

[Appendix D.](#) Correlation of OTI Courses to Professional Certification

## Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1

### Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1

**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 (SI) and On-the-Job Training (OJT) which enhance the formal training a new CSHO receives at OTI. This Appendix offers recommendations for both SI and OJT 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 SI and OJT 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 SI and OJT 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
<b>PRIOR to Attending OSHA Training Institute’s Course #1000 Initial Compliance</b>					
<b>OJT</b>	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 Phase 1 – Initial Courses, Year 1**

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
OJT	<p>Explore the OSHA Intranet and Internet sites Begin with the following.</p> <p>OSHA Intranet:</p> <ul style="list-style-type: none"> <li>* Current NCR system or new OSHA Information System, OIS (general application)</li> <li>* OSHA forms (e.g., OSHA-1, -1A, and -1B)</li> <li>* Use of OSHA Integrated Management Information System (IMIS) data</li> <li>* SAVES – Standard Alleged Violation Elements</li> <li>* 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)</li> </ul> <p>OSHA Public Page (Internet):</p> <ul style="list-style-type: none"> <li>* <i>OSHA Field Operations Manual (FOM)</i></li> <li>* Directives system</li> <li>* <i>OSHA Technical Manual (OTM)</i></li> <li>* Whistleblower protection program</li> </ul>	<p>___/___/____</p>	<p><i>No Additional Discipline-Specific Recommendations</i></p>	<p>OSHA-1B (IH) form</p>	<p><i>No Additional Discipline-Specific Recommendations</i></p>
	<p>Receive training and instructions on use and limitations of PPE (e.g., hard hats, safety glasses, hearing protection, high-visibility clothing and safety shoes).</p>	<p>___/___/____</p>	<p><i>No Additional Discipline-Specific Recommendations</i></p>		
	<p>Receive training and instructions on personal use of respirators, according to National, Regional, and Area Office programs; be fit-tested.</p>				
<p>With team leader or assigned mentor, review basic programs such as:</p> <ul style="list-style-type: none"> <li>* Hazard Communication</li> <li>* The Control of Hazardous Energy (Lock-out/Tagout)</li> <li>* Recordkeeping</li> </ul>					

**Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1**

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
<b>SI</b>	Read and review OSH Act and become familiar with: <ol style="list-style-type: none"> <li>1. which employers and employees are covered and</li> <li>2. the responsibilities of employers and employees</li> </ol>	__/__/____	<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"> <li>* Alliance Program</li> <li>* Compliance Assistance</li> <li>* Consultation Programs</li> <li>* Small Business Initiatives</li> <li>* Strategic Partnership Program</li> <li>* Voluntary Protection Programs</li> </ul>	__/__/____			
	Review the Regional Emergency Management Plan (REMP).	__/__/____			
<b>OJT</b>	Accompany a fully-qualified CSHO on a programmed inspection and observe the following: <ul style="list-style-type: none"> <li>* Inspection preparation</li> <li>* Calibration of instruments</li> <li>* Opening conference</li> <li>* Walkthrough</li> <li>* Use of instruments or other measuring devices</li> <li>* Closing conference</li> <li>* Preparation of citations</li> </ul>	__/__/____	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 Phase 1 – Initial Courses, Year 1**

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
<b>Attend OTI Training: Course #1000 Initial Compliance - including web-based segment prior to instructor-led (i.e., classroom) training</b>		__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
<b>SI</b>	Review the contents of 29 CFR 1915, 1917, and 1918.	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		
	Consult with team leader or assigned mentor to determine whether the office has a history of making inspections under these standards.	__/__/____			
	Review the contents of 29 CFR 1928.	__/__/____			
<b>OJT</b>	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 Phase 1 – Initial Courses, Year 1**

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
OJT	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>		
<b>Attend OTI Standards Course per Selected Discipline</b>		__/__/____	<b>Course #1050 Introduction to Safety Standards</b>	<b>Course #1250 Introduction to Health Standards</b>	<b>Course #2000 Introduction to Construction Standards</b>
OJT	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>		
OJT	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

**Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1**

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
<b>SI</b>	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"> <li>* Types of worksites where the hazard may be expected to occur</li> <li>* Work activities that may involve the hazard</li> <li>* Equipment that may be associated with the hazard</li> <li>* Engineering and/or administrative controls and PPE that may be required to control the hazard</li> <li>* Related OSHA standards</li> </ul>	__/__/____	Examples include: amputations, electrical	Examples include: noise, temperature stress, exposure to toxic air contaminants	Examples include: fall from heights, trenching
<b>OJT</b>	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"> <li>* Which standard applies</li> <li>* Standard is violated</li> <li>* Employees are exposed</li> <li>* Employer knowledge</li> <li>* Recommended abatement (e.g., engineering, administrative controls, PPE)</li> <li>* Recommended penalties</li> </ul>	__/__/____	<i>No Additional Discipline-Specific Recommendations</i>		

**Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1**

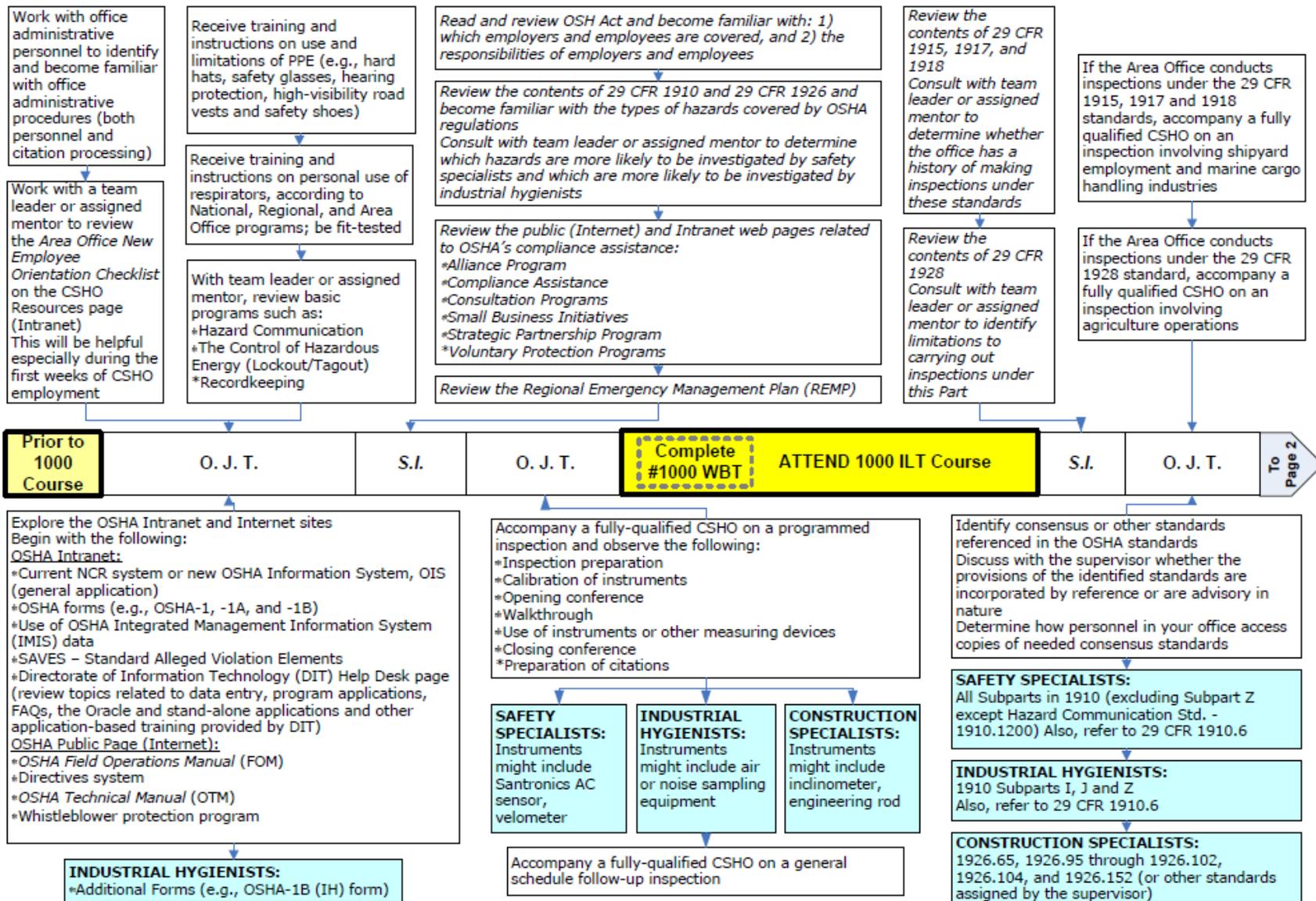
Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
OJT	Participate in a follow-up inspection and perform the following: * Review the case file to determine equipment necessary to evaluate the implementation of controls * Prepare all 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	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	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.	__/__/__			
SI	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>		
OJT	Observe an experienced CSHO recommending penalties to the Area Director.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>		
	Attend an informal conference.	__/__/__			

**Appendix A. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1**

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists	Construction Specialists
SI	For each of three inspection case files assigned by the supervisor, prepare a written report that summarizes: <ul style="list-style-type: none"> <li>* Reason(s) for the inspection</li> <li>* Nature and characteristics of the worksite</li> <li>* Hazards investigated, equipment used, and samples or measurements taken</li> <li>* Violations identified</li> <li>* Abatement methods used by the employer</li> </ul>	___/___/____	<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 Phase 1 – Initial Courses, Year 1

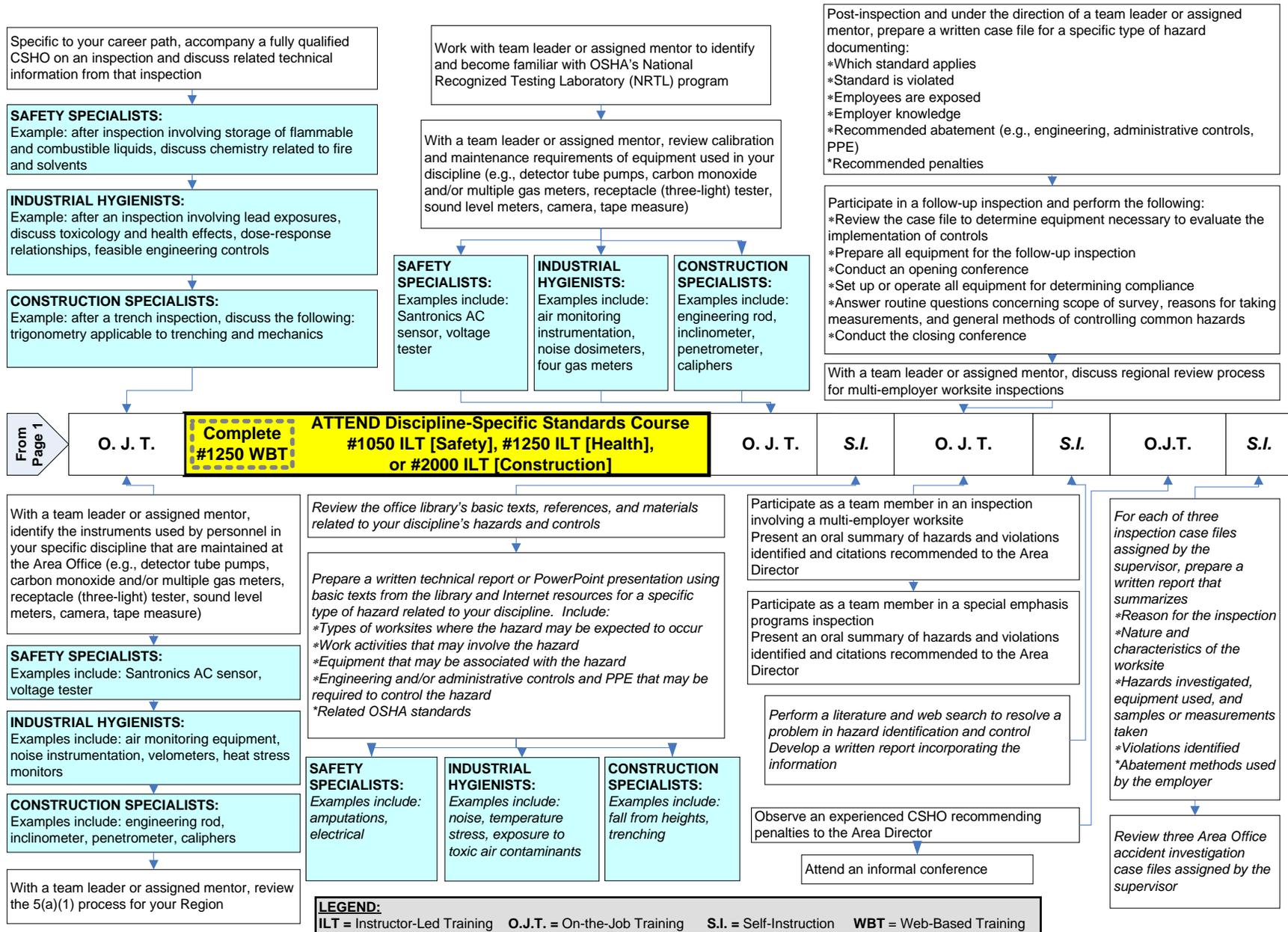
## CSHO First Year Training Plan [TED Appendix A] Summary - Page 1 of 2



**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 Phase 1 – Initial Courses, Year 1

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



## Appendix B. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

### Appendix B. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

**Background and Description of Appendix B.** This Appendix is a tool for supervisors of CSHOs to use to plan training during the CSHOs' second and third year 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"> <li>○ #1310 <i>Investigative Interviewing Techniques</i> and</li> <li>○ #1230 <i>Accident Investigation</i></li> </ul> CSHOs should: <ul style="list-style-type: none"> <li>○ Participate in three accident/fatality investigations under the guidance of a team leader and/or an experienced CSHO</li> <li>○ Be given the opportunity to demonstrate effective investigative interviewing techniques</li> </ul>	None	This course does not specifically apply technical knowledge related to safety, health or construction.

**Appendix B. Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3**

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"> <li>o #1410 <i>Inspection Techniques and Legal Aspects</i></li> <li>and</li> <li>o Three inspections</li> </ul> <p>The CSHO should discuss with his/her team leader:</p> <ul style="list-style-type: none"> <li>o Whether each case has adequate documentation to defend the case during legal proceedings</li> <li>o What additional documentation might have strengthened the case</li> </ul>	<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 Systems</i>, the CSHO should:</p> <ul style="list-style-type: none"> <li>o Participate in a minimum of three inspections of establishments that have a written safety and health program</li> <li>o For each inspection, the compliance officer should               <ul style="list-style-type: none"> <li>• Evaluate the effectiveness of the safety and health program</li> <li>• Document his/her reasoning</li> <li>• Discuss the evaluation with his/her supervisor</li> </ul> </li> </ul>	<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"> <li>o #1310 <i>Investigative Interviewing Techniques</i></li> <li>and</li> <li>o #1230 <i>Accident Investigation</i></li> </ul> <p>CSHOs should:</p> <ul style="list-style-type: none"> <li>o Participate in three accident/fatality investigations under the guidance of a team leader and/or an experienced CSHO</li> <li>o Be given the opportunity to demonstrate effective investigative interviewing techniques</li> </ul>	<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 Phase 1 – Initial Courses, Through Year 3**

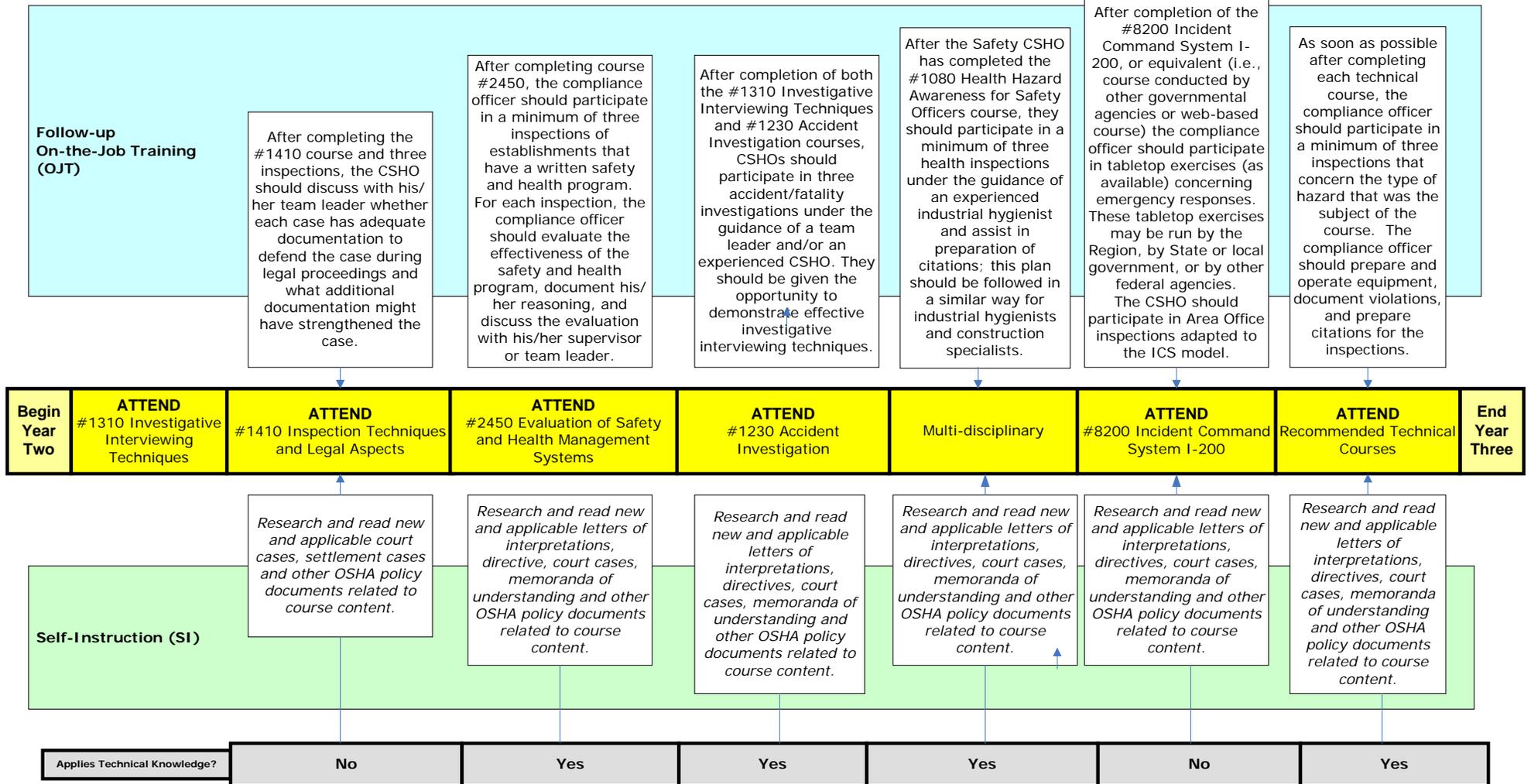
Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
<p>Safety Specialists #1080 Health Hazard Awareness for Safety Officers</p> <p>Industrial Hygienists #1280 Safety Hazard Awareness for Industrial Hygienists</p> <p>Construction Specialists #1080 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 industrial hygienist 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.</p> <p>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 Phase 1 – Initial Courses, Through Year 3**

Required OTI Courses	Follow-up On-the-Job Training (OJT)	Self-Instruction (SI)	Applies Technical Knowledge
<p><b>Technical Courses</b></p> <p><b>Safety Specialists</b> Build on skills and experience in a related technical area such as machine guarding or lock-out/tagout.</p> <p><b>Industrial Hygienists</b> Build on skills and experience in a related technical area such as noise sampling or air contaminant sampling.</p> <p><b>Construction Specialists</b> Build on skills and experience in a related technical area such as conducting a trench or scaffolding inspection.</p>	<p><b>Safety Specialists.</b> 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"> <li>o Concern the type of hazard that was the subject of the technical course</li> <li>o Prepare and operate equipment appropriate for an inspection related to the technical area</li> <li>o Document violations and prepare citations for inspections related to the technical area</li> </ul> <p><b>Industrial Hygienists.</b> 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"> <li>o Concern the type of hazard that was the subject of the technical course</li> <li>o Prepare and operate equipment appropriate for an inspection related to the technical area</li> <li>o Document violations and prepare citations for inspections related to the technical area</li> </ul> <p><b>Construction Specialists.</b> 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"> <li>o Concern the type of hazard that was the subject of the technical course</li> <li>o Prepare and operate equipment appropriate for an inspection related to the technical area</li> <li>o Document violations and prepare citations for inspections related to the technical area</li> </ul>	<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 Phase 1 – Initial Courses, Through Year 3

### 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	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
ADM 04-00-001 <a href="#">Safety and Health Management System</a> (05/23/2011) Chapter 14 “Permit-Required Confined Spaces”	CSHOs that will be entering a permit space	<p><i>“Minimum training for employees who will be entering a permit space and the attendant is:</i></p> <ul style="list-style-type: none"> <li>• <i><u>The Confined Space Entry course offered by OSHA's Training Institute or equivalent</u></i></li> <li>• <i><u>Respiratory Protection course offered by OSHA's Training Institute or equivalent</u></i></li> </ul> <p><i>Training in the use of any personal protective equipment required for confined space entry.”</i></p> <p><i><u>“Introduction to Industrial Hygiene for Safety Personnel” course offered by OSHA's Training Institute or equivalent training and/or experience.</u></i></p>	<ul style="list-style-type: none"> <li>• #2260 Permit-Required Confined Space Entry</li> <li>• #2220 Respiratory Protection</li> <li>• #1280 Safety Hazard Awareness for Industrial Hygienists formerly titled Safety Hazard Recognition for Industrial Hygienists</li> </ul>		
ADM 04-00-001 <a href="#">Safety and Health Management System</a> (05/23/2011) Chapter 18 “Respiratory Protection”	Regional Respirator Program Administrator	<p><i>“The Program Administrator must have attended the OSHA Training Institute course on respiratory protection and will be responsible for providing the necessary training to all OSHA employees who use respirators unless another qualified individual is assigned the responsibility.”</i></p>	#2220 Respiratory Protection		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p>CPL 02-00-100  <a href="#">Application of the Permit-Required Confined Spaces (PRCS) Standard, 29 CFR 1910.146 (05/05/1995)</a></p>	<p>CSHOs that will be entering a permit space</p>	<p><i>“Minimum training for a CSHO who will be entering a permit space is:</i></p> <p><i>a. <u>The Confined Space entry course offered by OSHA's Training Institute or equal.</u></i></p> <p><i>b. <u>Respiratory Protection course (9-day) offered by OSHA's Training Institute or equal.</u></i></p> <p><i>c. <u>Introduction to Industrial Hygiene for Safety Personnel course offered by OSHA's Training Institute or equal”.</u></i></p>	<p>a. #2260 Permit-Required Confined Space Entry</p> <p>b. #2220 Respiratory Protection, now a blended course, with 12 hr. web-based component prior to attending a 3½ day instructor-led class</p> <p>c. #1080 Health Hazard Awareness for Safety Officers has replaced Introduction to Industrial Hygiene for Safety Personnel</p>		
<p>CPL 02-00-142  <a href="#">Shipyard Employment “Tool Bag” (08/03/2006)</a></p> <p align="center"><b>And</b></p>	<p>CSHOs that will participate in any shipyard employment interventions or inspections</p>	<p><i>“OTE offers a course that is specific to the shipyard employment industry titled, <u>“Shipyard Processes and Standards”</u>, course number 2090...To conduct an effective shipyard employment inspection the CSHO must spend an adequate amount of time preparing. Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/ intervene in shipyard employment establishments.”</i></p>		#2090 Shipyard Employment	

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<a href="#">CPL 02-00-150</a> <a href="#">Field Operations</a> <a href="#">Manual (FOM)</a> Chapter 10, page <a href="#">20</a>		<i>CSHO Training.</i> <i>Supervisors or team leaders are responsible for ensuring that CSHOs are qualified to inspect/intervene in shipyard employment establishments. CSHOs should have completed the OTI Course #2090, Shipyard Processes and Standards, or have received equivalent training and/or experience prior to conducting shipyard inspections.</i>			

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p>CPL 02-00-147  <a href="#">The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures</a>                      (02/11/2008)</p>	<p>CSHOs that inspect energy control practices and procedures</p>	<p><i>“Only CSHOs who are trained in energy control practices and procedures may evaluate machines and equipment to determine that they are properly locked and/or tagged out in accordance with §§ 1910.147 and 1910.333.</i></p> <p><i>NOTE: The OSHA Training Institute (OTI) currently integrates many important energy control principles and CSHO safety practices in various coursework, such as is the case with the <u>OTI Initial Compliance Course (#1000)</u>. Additionally, other OTI courses (e.g., <u>Courses #1010, #1050, #2030, #3090, #3094, 3095, #3190</u>) also include electrical energy control and LOTO requirements in this general safety curriculum. Experienced OSHA staff may already have many OTI courses (or other training with equivalent curriculum) that cover the LOTO and electrical safety-related energy control practices; therefore, employment records and training certificates may be used to certify that training has been accomplished.”</i></p>	<ul style="list-style-type: none"> <li>• #1280 Safety Hazard Awareness for Industrial Hygienists has replaced #1010 Safety Hazard Recognition for Industrial Hygienists</li> <li>• #1050, Introduction to Safety Standards for Safety Officers</li> <li>• #3090, Electrical Standards</li> <li>• #3190, Electrical Power Generation, Transmission, and Distribution</li> </ul>		<p>Although the directive recommends the #1000, Initial Compliance course, energy control principles are not covered in this course. Also, OTI no longer offers courses #2030, #3094 and #3095.</p>

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<a href="#">CPL 02-00-153 Communicating OSHA Fatality Inspection Procedures to a Victim's Family (04/17/2012)</a>	OSHA personnel who may be involved in fatality investigations	<i>“OSHA personnel involved in fatality inspections and in communicating with the next of kin must complete training in accordance with <a href="#">TED 01-00-018, Initial Training Program for OSHA Compliance Personnel</a> in addition to receiving on-the-job field training under the guidance of a supervisor and/or an experienced compliance officer.”</i>	#1000, Initial Compliance #1050, Introduction to Safety Standards #1080, Health Hazard Awareness for Safety Officers #1250, Introduction to Health Standards for Industrial Hygienists #1280, Safety Hazard Awareness for Industrial Hygienists #2000, Construction Standards #1230, Accident Investigation #1310, Investigative Interviewing Techniques #1410, Inspection Techniques and Legal Aspects #2450, Evaluation of Safety and Health Management Systems #8200, Incident Command Systems I-200		ISC courses are offered on-line by FEMA. Many of the course names and numbers have changed.

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p>CPL 02-00-154 <a href="#">Longshoring and Marine Terminals "Tool Shed" Directive (07/31/2012)</a></p> <p align="center"><b>And</b></p> <p>CPL 02-00-150 <a href="#">Field Operations Manual (FOM) Chapter 10, Page 30</a></p>	OSHA personnel who conduct inspections in longshoring or marine terminals	<p><i>“Training consists of both internal training for OSHA consultation and enforcement staff, and external training for marine cargo handling industry employers and employees.... The OTI provides training and education in occupational safety and health for federal and State compliance officers, State consultants, other federal agency personnel, and the private sector.”</i></p>		#2060, Longshoring and Marine Terminal Processes and Standards	
		<p><i>“CSHO Training.</i> <i>Supervisors or team leaders are responsible for ensuring that CSHOs are qualified to inspect/intervene in marine cargo handling establishments. <u>CSHOs should have completed the OTI Course #2060, Longshoring and Marine Terminal Processes and Standards</u>, or have received equivalent training and/or experience prior to conducting marine cargo handling industry inspections.”</i></p>			

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<a href="#">CPL 02-01-038 Enforcement of the Electric Power Generation, Transmission and Distribution Standard (06/18/2003)</a>	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	<p><i>“All CSHOs must, at a minimum, have received basic electrical safety training (OSHA Training Institute Course #309 or equivalent) to enter an electric power generation facility.... The minimum training requirements for any CSHO who will be 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 as defined in X.A, are:</i></p> <p><i>1. Completion of the Electric Power Generation, Transmission, and Distribution OSHA Technical Institute (OTI) course #319 or its equivalent.”</i></p>	<ul style="list-style-type: none"> <li>• #3090 Electrical Standards formerly numbered 309</li> <li>• #3190 Electric Power Generation, Transmission, and Distribution, formerly numbered 319</li> </ul>		<p><i>“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 on 1910.269 may perform such inspections; however, they are encouraged to attend the OTI #319 course.”</i></p>
	CSHOs that may enter enclosed spaces or confined spaces	<p><i>“Furthermore, CSHOs may enter enclosed spaces or confined spaces only if they have successfully completed the minimum OTI training courses, or their equivalent, for: (1) Confined Space Entry, (2) Respiratory Protection, and (3) Introduction to Industrial Hygiene for Safety Personnel.”</i></p>	<ol style="list-style-type: none"> <li>1. #2260 Permit-Required Confined Space Entry</li> <li>2. #2220 Respiratory Protection</li> <li>3. #1080 Health Hazard Awareness for Safety Officers has replaced Introduction to Industrial Hygiene for Safety Personnel</li> </ol>		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<a href="#">CPL 02-01-052 Enforcement Procedures for Investigating Workplace Violence Incidents (09/08/2011)</a>	CSHOs performing workplace violence inspections	<p><i>“Area Directors and Regional Training Coordinators shall ensure that Compliance Officers performing workplace violence inspections are familiar with the most recent guidelines on the subject and are adequately trained on workplace violence prevention, recognition of high-risk situations, and ways to defuse hostile situations.”</i></p>			OTI’s web-based #1000 “Initial Compliance” course provides workplace violence training.
<a href="#">CPL 02-01-054 Inspection and Citation Guidance for Roadway and Highway Construction Zones (10/16/2012)</a>  <p align="center"><b>And</b></p> <p>1/14/13 Fairfax Memo to RAs Subject: Work Zone Training Directive</p>	Regional Traffic Control Coordinator (TCC)	<p><i>“The TCC should have at least 40 hours of classroom training or equivalent to equip the TCC with knowledge of typical temporary traffic control application and design, the standards applicable to roadway and highway construction work (including the standards in Part VI of the MUTCD)”</i></p> <p><b>Fairfax memo</b> <i>“The combination of the two ATSSA courses and the two DTE webinars will meet the required training...”</i></p>	<ul style="list-style-type: none"> <li>• Webinar #0065 CSHO Safety in Highway Work Zones</li> <li>• Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections</li> <li>• American Traffic Safety Services Association (ATSSA) Course: Traffic Control Technician</li> <li>• American Traffic Safety Services Association (ATSSA) Course: Traffic Control Supervisor</li> </ul>		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
	CSHOs inspecting high speed work zones ( <u>above</u> 45 mph)	<p><i>“Before performing any inspection at a highway or roadway construction work zone with speed limits above 45 mph, the CSHO must successfully complete a course for road work zone inspections approved by the OSHA Training Institute (OTI) in accordance with OSHA’s Policy for Local Occupational Safety and Health Training Courses (TED 01-00-017) This requirement goes into effect six months after OTI approves a course.”</i></p> <p><b>Fairfax Memo:</b> <u>“CSHOs inspecting high speed work zones (above 45 mph) will be required to take 1.5 – 2 hours webinars provided by DTE.”</u></p>	<ul style="list-style-type: none"> <li>• Webinar #0065 CSHO Safety In Highway Work Zones</li> <li>• Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections</li> </ul>		
	CSHOs inspecting work zones (at or <u>below</u> 45 mph)	<p><i>Recommended CSHO Training. “Before performing any inspection at a work zone with speed limits at or below 45 mph, the CSHO should successfully complete a course approved by the OSHA Training Institute for work zone inspections.”</i></p>		<ul style="list-style-type: none"> <li>• Webinar #0065 CSHO Safety in Highway Work Zones</li> <li>• Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections</li> </ul>	

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<a href="#">CPL 02-02-054 Respiratory Protection Program Guidelines (07/14/2000)</a>	Regional and Area Office Respirator Program Administrators	<i>“All program administrators must attend the OSHA Training Institute (OTI) course on respiratory protection or an equivalent course. The program administrator or other qualified individual will provide the necessary training to all CSHOs who may be assigned to wear respirators. Additional training may also be provided through completion of an OTI course in respiratory protection or other training source.”</i>	#2220 Respiratory Protection		
<a href="#">CPL 02-02-073 Inspection Procedures for 29 CFR 1910.120 and 1926.65 Paragraph (q): Emergency</a>	OSHA personnel responding to an emergency that involves hazardous substances	<i>OSHA personnel must: “Have the appropriate training required by 29 CFR 1910.120 before entering danger areas, and any applicable annual refresher training.”</i>		OTI offers #3315, EPA’s Health and Safety 40-Hour (HAZWOPER) course.	Enhanced 40-Hour Health and Safety Course for CSHOs to meet training requirements of 1910.120 and 1926.65. DTE is developing

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<a href="#">Response to Hazardous Substance Releases</a> (08/27/2007)	All OSHA personnel assigned a role or function related to implementing either the NEMP or REMP	<p><i>“...will complete the ICS Level 200 course, to ensure their familiarity with ICS concepts and nomenclature. In addition, Regional Administrators and their designees, the Assistant Secretary, the Deputy Assistant Secretaries, National Office executive staff, and other designated senior management staff will complete <u>ICS for Executives</u>.</i></p> <p><i>Regional OSHA On-site Leaders/ Coordinators will participate in the initial training identified for all OSHA personnel above and in OSHA's Risk Management training program, which includes <u>OTI 3600: OSHA Technical Assistance for Emergencies and OTI 3610: OSHA On-site Leaders/Coordinators Course.</u>”</i></p>	#3600 OSHA Technical Assistance for Emergencies  #3610 OSHA On-site Leaders/Coordinators  OTI Courses #3600 and #3610 are not offered in FY 2014.		course #3380, Enhanced 40-Hour Health and Safety Course for CSHOs to meet training requirements of 1910.120 and 1926.65, including the 40-hour training under paragraph (e).  ISC courses are offered on-line by FEMA. Many of the course names and numbers have changed.
<a href="#">CPL 02-02-077 Bloodborne Pathogens Exposure Control Plan and Guidance on Post-Exposure Evaluations for Federal OSHA Personnel</a> (09/27/2010)	Bloodborne Pathogens Trainer	<p><i>“Training will be given in accordance with 29 CFR 1910.1030 with one exception. OSHA field personnel will be given bloodborne pathogens training at the time of initial assignment to field duties and annually on the elements included in 29 CFR 1910.1030(g)(2) except for 29 CFR 1910.1030(g)(2) (vii)(I). The trainer must be knowledgeable in the subject matter contained in the training program as it relates to the workplace the training will address. The trainer must be familiar with the Bloodborne Pathogens standard and this directive.”</i></p>		#2340 Biohazards	Bloodborne pathogens training is offered at the Area Office level. The trainer must be knowledgeable in the subject matter.

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
CPL 03-00-008 <a href="#">Combustible Dust National Emphasis Program (Reissued)</a> (03/11/2008)	CSHOs conducting combustible dust inspections	<i>“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). The Regional Administrators will ensure that an appropriate number of CSHOs trained in combustible dust hazard recognition are available for inspections under this NEP.”</i>		#3320 Combustible Dust Hazards and Controls	
CPL 03-00-010 <a href="#">Petroleum Refinery Process Safety Management NEP</a> (08/18/2009)	Team Leaders	<i>“All OSHA personnel who will serve as team leaders must have attended <u>OTI Course 3410, Advanced Process Safety Management</u> to receive training specific to leading team inspections under this instruction.”</i>	#3410 Advanced Process Safety Management		This NEP has not been officially closed; however, all required inspections have been completed.

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
	Level 1 Team Member	<p><i>“As a minimum, Level 1 training must include the OSHA Training Institute's (OTI) <u>Course 3300, Safety and Health in the Chemical Processing Industries</u>, and <u>Course 3400, Hazard Analysis in the Chemical Processing Industries</u>. Additionally, Level 1 Team Members should have additional advanced training such as <u>OTI Course 3410, Advanced Process Safety Management</u> or other equivalent specialized seminars in process safety management.”</i></p>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> </ul> <p>OTI Course #3410 is not offered in FY 2014.</p>		
	Level 2 Team Member	<p><i>“...they have completed <u>OTI Course 3300, "Safety and Health in the Chemical Processing Industries"</u> (including offerings of this course prior to Fiscal Year 1991) and <u>OTI Course 3400, "Hazard Analysis in the Chemical Processing Industries."</u></i></p>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> </ul>		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
CPL 03-00-014 <a href="#">PSM Covered Chemical Facilities National Emphasis Program (11/29/2011)</a>	Level 1 Team Leader	<p><b><i>Option 1:</i></b> They have completed <u>OSHA Training Institute’s (OTI) Course 3300, Safety and Health in the Chemical Processing Industries, Course 3400, Hazard Analysis in the Chemical Processing Industries, and advanced training including either OTI Course 3430, Advanced PSM in the Chemical Industries or Course 3410, Advanced Process Safety Management</u> and they have prior experience (OSHA, other government agency, or industry) with chemical industry safety;</p> <p><b><i>Option 2:</i></b> They have completed <u>OSHA Training Institute’s (OTI) Course 3430, Advanced PSM in the Chemical Industries or Course 3410, Advanced Process Safety Management</u> and, they have 3 years’ experience working in PSM-covered manufacturing;</p> <p><b><i>Option 3:</i></b> They have completed <u>OSHA Training Institute’s (OTI) Course 3430, Advanced PSM in the Chemical Industries or Course 3410, Advanced Process Safety Management</u> and have 7 years Federal or State OSHA experience and have participated in greater than 20 PSM and/or chemical plant inspections where they were the team leader equivalent in at least two of these inspections.”</p>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> <li>• #3410 Advanced Process Safety Management</li> </ul> <p align="center"><b>OR</b></p> <ul style="list-style-type: none"> <li>• #3430 Advanced PSM in the Chemical Industries</li> </ul> <p>OTI Course #3410 is not offered in FY 2014.</p>		<p>“Completion of Course #330 prior to Fiscal Year 1991 does not meet the requirements for Level 1 team members.”</p>

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
	Level 2 Team Member	<p><i>“Level 2. OSHA personnel may be assigned as inspection team members under this notice, if:</i></p> <ul style="list-style-type: none"> <li>• <b>Option 1:</b> <i>They have completed <u>OTI Course 3300, Safety and Health in the Chemical Processing Industries</u> (including offerings of this course prior to fiscal year 1991) and <u>OTI Course 3400, Hazard Analysis in the Chemical Processing Industries</u>, and,</i></li> <li>– <i>They have two years of OSHA inspection experience or the equivalent, such as State OSHA experience, EPA RMP experience, U.S. Chemical Safety Board experience.</i></li> <li>• <b>Option 2:</b> <i>They have 3 years’ experience working in a PSM-covered manufacturing facility (chemical, petrochemical, refining) in a process engineering, operations, safety, or maintenance position.</i></li> <li>• <b>Option 3:</b> <i>7 years of Federal or State OSHA experience and they have participated in more than 20 PSM and/or chemical plant inspections where they were the team leader equivalent in at least two of these inspections.”</i></li> </ul>	<ul style="list-style-type: none"> <li>• #3300 Safety and Health in the Chemical Processing Industries</li> <li>• #3400 Hazard Analysis in the Chemical Processing Industries</li> </ul>		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
CSP 02-00-002 <a href="#">Consultation Policies and Procedures Manual</a> (01/18/2008)	Consultant Trainers	<p><i>“Trainers’ Qualifications.</i></p> <p>A. <i>Informal Training. To be qualified to provide informal training the consultant must have:</i></p> <p>i. <i>Completed the Introduction to On-site Consultation Course (OSHA Course 1500);</i></p> <p>ii. <i>Completed the Evaluation of Safety and Health Management Systems Course (OSHA Course 2450); and</i></p> <p>iii. <i>Have subject matter knowledge in the area of the training being offered.”</i></p>	A.i #1500 Introduction to On-site Consultation  A.ii #2450 Evaluation of Safety and Health Management Systems		
CSP 03-01-003 <a href="#">Voluntary Protection Programs (VPP): Policies and Procedures Manual</a>	On-site Evaluation Team	<p><i>“All team members must have at least the following: OSHA Course 2450, Evaluation of Safety and Health Management Systems or other formal classroom training in evaluating safety and health management systems (for OSHA personnel only).</i></p>	#2450 Evaluation of Safety and Health Management Systems		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
(04/18/2008)	PSM "Level 1" Auditor	<p><i>"Specific requirements for a PSM "Level 1" Auditor include:</i></p> <p><i>a. <u>The OSHA Training Institute's (OTI) Courses 3300, Safety and Health in the Chemical Processing Industries, and 3400, Hazard Analysis in the Chemical Processing Industries.</u></i></p> <p><i>b. <u>Advanced training such as OTI Course 3410, Advanced Process Safety Management, or other equivalent specialized seminars in PSM.</u></i></p>	<p>a. #3300 Safety and Health in the Chemical Processing Industries</p> <p>#3400 Hazard Analysis in the Chemical Processing Industries</p> <p>b. #3410 Advanced Process Safety Management</p> <p>OTI Course #3410 is not offered in FY 2014.</p>		

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
HSO 01-00-001 <a href="#">National Emergency Management Plan (NEMP)</a> (12/18/2003)	OSHA personnel assigned a role or function related to implementing the NEMP or REMP	<i>“All OSHA personnel assigned a role or function related to implementing either the NEMP or REMP will complete <u>OTI 345: Basic Incident Command System [Emergency Management Institute (FEMA) Independent Study Course IS-195]</u> and the <u>ISC Level 200 course</u>, to ensure their familiarity with ICS concepts and nomenclature. In addition, Regional Administrators and their designees, the Assistant Secretary, the Deputy Assistant Secretaries, National Office Executive Staff, and other designated Senior Management staff will complete <u>ICS for Executives (Training Module 17 of the ICS training program)</u>. Regional OSHA On-site Leaders/Coordinators will participate in the initial training identified above and in OSHA’s Risk Management training program, which includes <u>OTI 3600: OSHA Technical Assistance for Emergencies (Course A)</u> and <u>OTI 3610: OSHA On-site Leaders/Coordinators Course (Course B)</u>, currently under development”.</i>	<ul style="list-style-type: none"> <li>• #3600: OSHA Technical Assistance for Emergencies</li> <li>• #3610: OSHA On-site Leaders/Coordinators</li> </ul> <p>OTI Courses #3600 and #3610 are not offered in FY 2014.</p>		ISC courses are offered on-line by FEMA. Many of the course names and numbers have changed.

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
<p>HSO 01-00-001  <a href="#">National Emergency Management Plan (NEMP)</a>                      (12/18/2003)</p> <p><b>APPENDIX J</b></p>	<p>Members of Specialized Response Team</p>	<p><b>“Member Qualifications</b>  <i>All OSHA personnel appointed to a Specialized Response Team must meet the general prerequisites below:</i></p> <ul style="list-style-type: none"> <li>- <i><u>OTI 3600: OSHA Technical Assistance for Emergencies</u></i></li> <li>- <i><u>OTI 3610: OSHA On-site Leaders/Coordinators Course</u></i></li> <li>- <i><u>OTI 222: Respiratory Protection OR equivalent</u></i></li> <li>- <i><u>OTI 331: Hazardous Waste Site Inspections OR OTI 335: Emergency Response to Hazardous Substance Release OR OTI 312: Hazardous Waste Site Inspection and Emergency Response for Construction OR equivalent experience.</u></i></li> <li>- <i><u>OTI 345: Basic Incident Command System (Emergency Management Institute (FEMA) Independent Study Course IS-195)</u></i></li> <li>- <i><u>OTI 346: Emergency Response to Terrorism (National Fire Academy (FEMA) Self-Study ERT: SS Q534).</u></i>” </li></ul>	<ul style="list-style-type: none"> <li>• #3600: OSHA Technical Assistance for Emergencies</li> <li>• #OTI 3610: OSHA On-site Leaders/Coordinators Course</li> <li>• #2220 Respiratory Protection, formerly numbered 222</li> <li>• #331 Hazardous Waste Site Inspections*</li> </ul> <p>OTI Courses #3600 and #3610 are not offered in FY 2014.</p>		<p>*OTI offers #3315, EPA’s Health and Safety 40-Hour (HAZWOPER) course, which is equivalent to OTI course 331.</p> <p>OTI Course #345 and #346 are on-line courses offered by FEMA.</p> <p>DTE is developing course #3380, Enhanced 40-Hour Health and Safety Course for CSHOs to meet training requirements of 1910.120 and 1926.65.</p> <p>Courses #335 and #312 are no longer offered.</p> <p>Specialized Response Team training is coordinated by the DTSEM Health Response Team per Appendix J of the Directive.</p>

**Appendix C. OTI Courses Required or Recommended in OSHA Directives**

Directive	OSHA Personnel	Directive Language on OTI Training	Corresponding OTI Training Course(s)		NOTES
			Required	Recommended	
12/10/12 Fairfax Memo to RAs, Subject: "OTI Course #1412, Misclassification of Workers and Advanced Legal Aspects"	ADs and AADs	<i>"In order to ensure a consistent approach to our enforcement and litigation efforts, I am making <u>OTI Course #1412, Misclassification of Workers and Advanced Legal Aspects for Managers</u>, part of the required training curriculum for all Area Directors and Assistant Area Directors."</i>	#1412 Misclassification of Workers and Advanced Legal Aspects for Managers		
11/7/12 Fairfax E-Mail to RAs	ADs and AADs	<i>"I would like to reiterate my support for the Directorate of Training and Education (DTE) initiative that improves the value of our CSHO training program. In June 2012, the Directorate offered a seminar <u>#9500 Coaching CSHOs – Leading Your Staff Through Job Performance Training</u>. ... We have a FY 13 Operating Plan Goal to develop training effectiveness measures. Your support for this initiative will help support that Agency milestone, and I encourage your participation."</i>		#9500 Coaching CSHOs	Recommended to increase training effectiveness.

## **Appendix D. Correlation of OTI Courses to Professional Certification**

**Professional Certification.** Credentialing organizations such as the American Board of Industrial Hygiene and the Board of Certified Safety Professionals have spent many years developing a specific process for determining certification exam questions and the overall requirements that meet the level of achievement of a certified professional in a given field. Passing a certification exam means an individual has gained a high level of competence in their chosen profession, and the recognition accorded such an individual is commensurate with the achievement.

CSHOs are also encouraged to pursue other available professional certifications that may be appropriate for their current circumstances. For example, the certification of Associate Safety Professional (ASP) may be obtained by CSHOs who lack the required years of experience to qualify to become a Certified Safety Professional.

**Relationship of OTI Courses to Professional Certification.** Supervisors and CSHOs should be aware that OTI courses alone are not sufficient preparation for passing certification exams. This is due to the specific emphasis that OTI courses place on job functions and related on-the-job competencies that a CSHO must use every day. Certification exams are offered to the general public, not just OSHA compliance safety and health officers; they are designed to apply to a broad range of job functions and job competencies. It is recommended that regions consider in addition to OTI technical course attendance, other methods to supplement certification preparation study, such as use of certification preparation software, and mentoring by other certified regional staff.

This Appendix highlights OTI courses that may provide information or assistance with preparation for professional certification exams offered by the Council on Certification of Health, Environmental and Safety Technologists (CCHST), the American Board of Industrial Hygiene (ABIH) and the Board of Certified Safety Professionals (BCSP). Three certifications are addressed in this Appendix: Certified Construction Health and Safety Technician (CCHST<sup>®</sup>), Certified Industrial Hygienist (CIH) and Certified Safety Professional (CSP).

<b>Certified Construction Health &amp; Safety Technician®</b>	<b>Certified Industrial Hygienist</b>	<b>Certified Safety Professional</b>
2050 Cranes and Rigging	2200 Industrial Noise	2010 Hazardous Materials
2260 Permit-Required Confined Spaces	2210 Principles of Ventilation	2030 Basic Electrical Principles
3010 Excavation, Trenching and Soil Mechanics	2220 Respiratory Protection	2050 Cranes and Rigging for Construction
3020 Tunneling and Underground Operations	2230 Industrial Toxicology	2070 Fire Protection and Life Safety
3030 Concrete, Forms and Shoring	2240 Biohazards	2210 Principles of Ventilation
3080 Principles of Scaffolding	2250 Ergonomics Applied to Musculoskeletal Disorders and Nerve Disorders	2250 Ergonomics Applied to MSDs and Nerve Disorders
3090 Electrical Standards	2260 Permit-Required Confined Spaces	2610 Ionizing Radiation
3110 Fall Arrest Systems	2330 Indoor Air Quality	3090 Electrical Standards
3160 Steel Erection	2610 Ionizing Radiation	3400 Hazard Analysis in the Chemical Processing Industries
3500 Demolition	3220 Applied Welding Principles	4520 Certified Safety Professional Examination Preparation
	3280 Industrial Hygiene Chemistry	
	3350 Comprehensive Review of Emergency Response Under 1910.120(q)	
	4530 Certified Industrial Hygienist Examination Preparation	