

HIOSH DIRECTIVE

DIRECTIVE NO: TED 01-00-020

**EFFECTIVE DATE: October 1, 2016
(Revised March 1, 2021)**

SUBJECT: Mandatory Training Program for HIOSH Whistleblower Investigators

ABSTRACT

Purpose: This instruction provides State personnel with policy and guidelines for implementing competency-based training programs for HIOSH Discrimination/Whistleblower Investigation personnel.

Scope: This instruction applies 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: None. Revision of October 1, 2016 version.

Action Offices: All compliance branches.

Originating Agency: OSHA Directorate of Training and Education and HIOSH.

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By and Under the Authority of

**Norman Ahu
HIOSH Administrator**

Executive Summary

This instruction provides guidance and direction to the Hawaii Occupational Safety and Health Division (HIOSH) concerning the policies and procedures for training Discrimination/Whistleblower Investigators. It is essential that Discrimination/Whistleblower Investigators have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish HIOSH's mission of promoting workplaces free from retaliation due to whistleblowing for Hawaii's working men and women. In this instruction, HIOSH provides detailed guidance for training required during a Discrimination/Whistleblower Investigator's career, including recommended training that assists the Discrimination/Whistleblower Investigator in preparing for professional certification exams. This instruction identifies training paths that provide assistance to the HIOSH division in managing their training programs.

The goal of this instruction is to assist Whistleblower Investigators and HIOSH management with direction, guidance and training options that directly contribute to the Whistleblower Investigator's ability to represent HIOSH with a high degree of professional expertise. In addition, the Whistleblower Investigator competency and achieving respected credentials in the fields of investigation and mediation such as Professional Certified Investigator (PCI)[®], Certified Mediator, and Certified Fraud Examiner.

Significant Differences with OSHA

Within HIOSH, senior level compliance officers, i.e. Environmental Health Specialists (EHSs) and Occupational Safety and Health Compliance Officers (OSHCs), have primary responsibility for HIOSH compliance inspections, accident/fatality/catastrophe investigations and Discrimination/Whistleblower Investigations. Throughout this Directive, the term "Whistleblower Investigator" will be used to refer to these senior level HIOSH compliance officers.

HIOSH Whistleblower Investigators are assigned by the HIOSH Administrator and SI, using personnel policies and procedures, and are not directly hired as Whistleblower Investigators. In some instances, HIOSH may determine its need for focused personnel and will directly hire individuals as Whistleblower Investigators.

Responsible parties also vary between HIOSH and Federal OSHA. Details on involved parties and their responsibilities can be found in section IX Organizational Responsibilities.

Significant Changes

This instruction describes the revised training program for HIOSH Whistleblower Investigation personnel. The changes included in the March 1, 2021 revision include:

- Inclusion of three additional required training classes and a HIOSH-given legal aspects training class.
- Addition, modification, and correction to assigned parties and required responsibilities.
- Removal of information not relevant and outdated to a training directive instruction for Whistleblower Investigators.

Table of Contents

I.	Purpose.....	1
II.	Scope.....	1
III.	References.....	1
IV.	Cancellations.....	1
V.	Action Offices.....	1
VI.	State Program Change.....	1
VII.	Goals and Objectives of Whistleblower Investigator Training	2
VIII.	Mandatory Whistleblower Investigator Training.....	3
IX.	Organizational Responsibilities.....	4
X.	Courses for Whistleblower Investigators.....	6
XI.	Waiver from Required Training Program.....	7
XII.	Time Extensions.....	8
XIII.	Monitoring the Training Program.....	8
XIV.	Continuation of Whistleblower Investigator Development.....	9
XV.	Evaluation.....	10
Appendix A.	Recommended Whistleblower Investigator Training Activities.....	A-1

I. Purpose

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

II. Scope

III. HIOSH-wide. 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

None. Revision of previous version.

V. Action Offices

- A. Responsible Office. HIOSH Administration and Technical Support Branch.
- B. Action Offices. Hawaii Occupational Safety and Health Division.

VI. State Program Change

- A. Notice of Intent and Equivalency Required. This instruction describes Hawaii State Plan's response to a Federal OSHA program change which establishes a significantly modified technical training program for HIOSH personnel investigating violations of Section 11(c) of the OSH Act adopted under Hawaii Revised Statutes (HRS) §396-8(e). The requirements of State Plans noted below only relate to enforcement of the whistleblower provisions of the occupational safety and health statutes that states implement under their State Plans. The provisions of this instruction that specifically relate to the enforcement of whistleblower provisions other than Section 11(c) do not apply to State Plans. 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 the State Plan. State Plans must have a formal documented training program for their Whistleblower Investigators 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 the Federal OSHA Directive (TED 01-00-020) and must result in adequately trained personnel who can conduct effective investigations. State Plan training programs are not required to utilize OSHA Training Institute (OTI) for course work, but may operate and implement state-run training courses.
- B. Submission of State Plan Policies and Procedures. Within 60 days of the date of issuance of this instruction, 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 either identical to or different from the Federal program. State adoption, either identically or differently, should be accomplished within six 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 difference policies on its State Plan website and provide a link to OSHA, or provide OSHA with an electronic copy and the contact information for 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 response to this Instruction on its website.

VII. Goals and Objectives of Whistleblower Investigator Training.

The goal of this instruction is to assist Whistleblower Investigators and their management with training options that will directly contribute to the Whistleblower Investigator's professional expertise

A. Competency-Based Curriculum.

1. The OSHA Training Institute offers formal training for Whistleblower Investigators with a competency- based approach to curriculum, using the Whistleblower Investigator Functional Competency Model as the guide.
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.
3. HIOSH and the SI offer training for Whistleblower Investigators using the OSHA Training Institute competency-based approach as well as substitution for course #2710 Legal Concepts for Whistleblower Investigators and HIOSH specific competencies due to state-specific requirements and differences.

B. The Training Program. OTI has developed a flexible program that incorporates technology-enabled learning, self-study packages, on-the-job experiences and formal training to accommodate the varying levels of experience and competence. The training program includes basic requirements as well as advanced competencies to ensure continued career development.

Supervisors and Managers are encouraged to incorporate their training priorities into the training program.

1. Course #1420 Whistleblower Investigation Fundamentals: Each Whistleblower Investigator will be required to complete the #1420 Whistleblower Investigation Fundamentals course offered by OTI during their first year of assignment.
2. Technical Courses: Each Whistleblower Investigator will be required to complete three additional technical courses during the first three years of employment through OTI and one technical course prepared by HIOSH.
3. Federal Webinars: Whistleblower Investigators will be assigned to view webinars as the SI determines a need. These webinars will address various topics provided by OTI and will be available through the Federal training platform.

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 Whistleblower Investigators training program at any time.

VIII. Mandatory Whistleblower Investigator Training.

Figure 1, below, illustrates the recommended training path.

- A. Course #1420 Whistleblower Investigation Fundamentals Course: This course must be completed within the first year of a Whistleblower Investigator's assignment. It is a pre-requisite for all additional courses. During the first year, additional courses can be taken at the HIOSH Administrator's discretion.
- B. Technical Courses: The HIOSH Administrator will approve the chronological order in which technical courses will be taken by the Whistleblower Investigators based on the HIOSH division needs and in accord with this instruction.
 - Course #1610: Interviewing Techniques for Whistleblower Investigators
 - Course #1630: Written Communication and Report Writing for Whistleblower Investigators
 - Course #2720: Whistleblower Complaint Resolution and Settlement Negotiations
 - Legal Concepts for HIOSH Whistleblower Investigators (Prepared for and given by HIOSH staff and/or designees.)

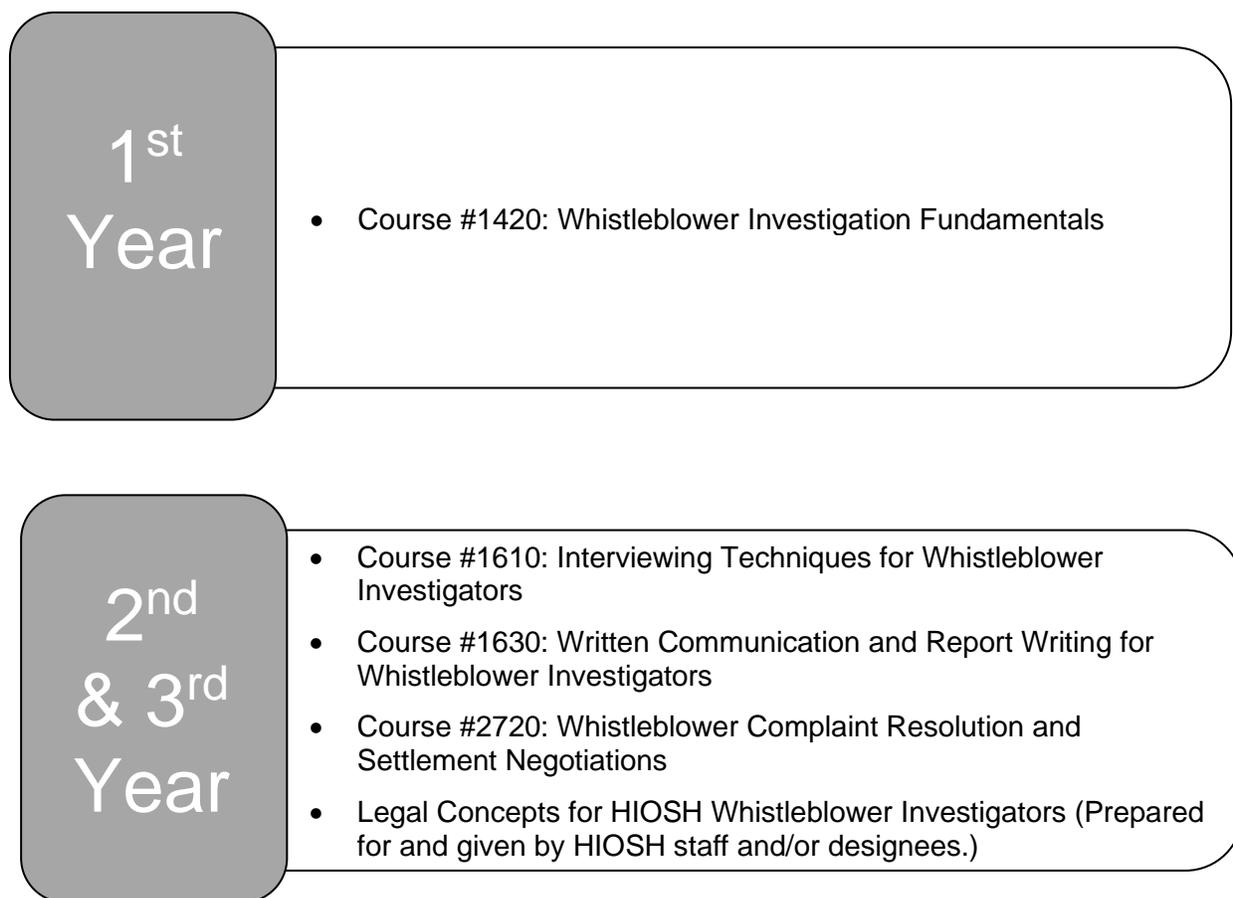


Figure 1: Recommended Training Path

IX. Organizational Responsibilities.

- A. Department of Labor & Industrial Relations, HIOSH Division. DLIR-HIOSH shall support the training program, as appropriate, by providing resources, supplying current information on the status of HIOSH programs, statutes, regulations, and directives, ensuring program consistency, and auditing the HIOSH training programs.
- B. The HIOSH Administrator. The HIOSH Administrator will ensure to the extent possible that funding is budgeted and available for Whistleblower Investigator personnel to complete all mandatory training. Note that other courses designated as mandatory by the HIOSH Administrator will be included in the Whistleblower Investigator's training program, thus requiring additional funding support.

The HIOSH Administrator shall direct the execution of the HIOSH training and education program in accord with HIOSH policy.

Specifically, the HIOSH Administrator will:

1. Approve courses in the Whistleblower Investigator's training path, including travel and any additional approval requirements.
 2. Grant waivers and extensions in accord with the procedures explained in Sections XI and XII of this instruction.
 3. Determine with the SI, in accordance with personnel policy, the assignment of CSHOs to the Whistleblower Investigator position to initiate training requirements within this instruction.
- C. The Administration and Technical Support Branch (ATS). The ATS Manager will support the training program as appropriate, by providing policy guidance, subject matter expertise through Federal and State staff, or Whistleblower Investigator field personnel, and current information on the status of the HIOSH programs, statutes, regulations and directive. Additionally, the ATS Manager will assist in assuring program consistency and in the auditing of the HIOSH training programs, if requested.

The ATS Manager shall serve as a focal point for HIOSH, assisting the HIOSH Administrator and SI in coordinating and managing HIOSH's training and education program. The ATS Manager shall assist the HIOSH Administrator and SI to ensure the successful implementation of the training program with Whistleblower Investigators as outlined in this instruction. Specifically, the ATS Manager shall:

1. Provide guidance and assistance to Whistleblower Investigators concerning information contained in this instruction as well as Department of Labor & Industrial Relations (DLIR) and HIOSH training policies and procedures.
 2. Implement the HIOSH training and education program.
 3. Process training requests, maintain training records as back-up for the SI, and provide registration information to Managers, the SI, and Whistleblower Investigators.
 4. Evaluate and monitor all records of training.
- D. The HIOSH Supervisory Investigator (SI). The SI shall be responsible for educating and training HIOSH personnel in the skills and knowledge required to perform their duties. The SI shall also be responsible for ensuring the professional development of the Whistleblower Investigators they supervise.
- Responsibilities Include:

1. Planning, developing and conducting HIOSH technical and specialized training courses and seminars.
 2. Conducting needs assessments and gap analyses to identify training needs.
 3. Maintaining and updating competency-based training information on the HIOSH share drives.
 4. Communicating new and updated OTI course catalog information to Whistleblower Investigators.
 5. Conducting evaluations of training courses and programs, including HIOSH specific training courses and programs and assessing the applicability of OTI applicable courses.
 6. Annotating the Whistleblower Investigator training records to reflect waived required training and time extensions for required training.
 7. Communicating the need for changes in HIOSH directives, laws and standards and communicating granted waivers and time extensions to the ATS Manager.
 8. Preparing reports and responses to requests for the HIOSH Administrator when requested and for quarterly status meetings on courses that have been waived and time extensions granted.
 9. Ensure the professional development of Whistleblower Investigators in accord with this instruction and Appendix A.
 10. Identify and document through an Individual Development Plan (IDP) the training needs of Whistleblower Investigators.
 11. Provide guidance consistent with the IDP process to meet the objectives outlines in this instruction.
 12. Review training progress with each Whistleblower Investigator during the annual performance reviews.
 13. Assign, as needed, experienced personnel to assist in the on-the-job training of newly hired Whistleblower Investigators.
 14. Assess and document Whistleblower Investigator's abilities, send waiver requests as per section X.C. and requests for time extensions as per section XI.B. to the HIOSH Administrator for approval.
- E. The OSHA Training Institute. The OSHA Training Institute Director shall be responsible for the scheduling and delivery of OTI Whistleblower Investigator training. Specific responsibilities include:
1. Overseeing and conducting courses and seminars for Federal and State Whistleblower Investigators, 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.
- F. Whistleblower Investigator: The Whistleblower Investigator has the responsibility to perform to the best of their ability in all training programs. Specifically, the Whistleblower Investigator shall:
1. Discuss performance and training progress with the SI.
 2. Participate in the planning of training activities.
 3. Fully attend, participate in, and complete all assigned training courses, seminars and other events.

X. Courses for Whistleblower Investigators.

- A. Required Training. In the interest of nationwide consistency, Whistleblower Investigators will attend all of the required courses outlined in this instruction offered by the OSHA Training Institute. The information provided in this section is intended to assist the HIOSH Administrator in determining equivalency when issuing waivers. The ATS Manager will offer up-to-date information on course descriptions and prerequisites to the HIOSH Administrator and SI.
- B. Blended Courses. Blended courses include at least one web-based training requirement plus an instructor-led training requirement. The 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. The strict requirement is due to the close link between the training offered online and the subsequent classroom (i.e., instructor-led) training.
- C. Course Sequence. The #1420 Whistleblower Investigator Fundamental course must be completed in year one of the Whistleblower Investigator training program. It is recommended that the courses listed below should be completed in a sequence optimal to attaining professional development goals and at the discretion of the HIOSH Administrator, or designee.
1. Course #1420: Whistleblower Investigation Fundamentals Course. This blended course covers the fundamental of conducting whistleblower investigations, with an emphasis on Section 11(c) of the *Occupational Safety and Health Act* (OSH Act). Whistleblower Investigators will learn to conduct intakes and screenings, plan and prepare for investigations, conduct opening conferences, collect evidence, analyze information, conduct closing conferences, and prepare basic memoranda, letters and reports.
 2. Course #1610: Interviewing Techniques for Whistleblower Investigators. The goal of this course is to provide a practical guide for interviewing. The specific topics include interview preparation, nonverbal communication, types of interviewees, multi-cultural interviewing, empathy, and active listening. This course requires role playing and students will be assessed on the application of techniques learned. The role playing will focus on one-on-one controlled interviewing situations.
 3. Course #1630: Written Communication and Report Writing for Whistleblower Investigators. This course is designed to cover business writing, evidentiary documentation, and written analysis. Students will learn to effectively communicate complex concepts and ideas in writing and in a manner that is appropriate for the intended audience. Students will be coached to produce documents that require minimal editing and are technically sound, accurate, thorough, logical, concise, and completed in a timely manner.
 4. Course #2720: Whistleblower Complaint Resolution and Settlement Negotiations. This course covers complaint resolution policies,

programs, and techniques related to whistleblower statute enforcement. An emphasis will be placed on strategies to successfully resolve complaints throughout the investigative process, including the Alternative Dispute Resolution (ADR) process, Complainant's right to withdraw, and kick-out provisions. Students will learn to negotiate and prepare OSHA settlement agreements to include preserving public policy, including calculation of appropriate damages, and review and evaluate third-party agreements in accord with established guidelines.

5. Course #2710: Legal Concepts for Whistleblower Investigators. The course introduces the student to frequently encountered federal statutes (e.g. Occupational Safety and Health Act adopted under HRS 396). The instruction includes the essential elements of conducting investigations, including interviewing, analyzing information related to investigations, legal and regulatory sufficiency, and organizing and documenting information.
6. Federal Statute Webinars. The webinars on the statutes enforced by the OSHA Whistleblower Protection Programs will emphasize unique attributes of the statutes with respect to Whistleblower investigations. The Federal Statute webinars are non-mandatory and can be assigned by the SI or accessed by the Whistleblower Investigator to review or learn about particular statutes. The webinars will be reviewed periodically to maintain accurate content. The webinars will present statutes in the categories of:
 - a. Transportation Statutes Webinar
 - b. Environmental Statutes Webinar
 - c. Product-Related Statutes Webinar
 - d. Financial Statutes Webinar
 - e. Energy Statutes Webinar

* Additional webinars will be created when new whistleblower statutes authorizing DOL enforcement are enacted.

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 Whistleblower Investigator's career. The SI is responsible for submitting a request in writing for waiver from requirements listed within the training directive. Waivers shall be used rarely and shall be granted only in exceptional circumstances.
- B. Assessment and Documentation. The SI must assess and document that the Whistleblower Investigator has demonstrated mastery of the tasks listed in the course objectives for the course being waived. After an assessment has been made, waiver requests shall be submitted by the SI to the HIOSH Administrator. The waiver request will document why the Whistleblower Investigator does not need to attend the specified course. The documentation will include how the Investigator has acquired the levels of knowledge, skills and abilities taught in the

course for which the waiver is being requested. The documentation shall also indicate that the Investigator has institutional understanding of HIOSH-specific policies and procedures. For example, criteria may include experience as a Whistleblower Investigator with an OSHA Federal or other State Plan agency.

- C. Waiver Requests. Only the HIOSH Administrator can grant a waiver. The HIOSH Administrator shall respond to waiver requests in writing. Copies of responses approving waiver requests shall be provided to the ATS Manager.
- D. Training Record Annotated. The SI and ATS Manager shall annotate the Whistleblower Investigator's training record to reflect courses waived by the HIOSH Administrator.

XII. Time Extensions.

The time requirements for completing required courses specified in this instruction must be met. Only the HIOSH Administrator can grant a time extension based on extenuation circumstances.

- A. Time Extension Conditions. If there are circumstances that prevent the Whistleblower Investigator from completing the required courses, the HIOSH Administrator can extend the time for completion. Time extensions may not exceed 12 months.
- B. Time Extension Requests. Time extensions shall be submitted in writing by the SI to the HIOSH Administrator. Time extension requests shall include the reason(s) additional time is needed, the amount of time requested and the course(s) that will be completed during the requested time extension.
- C. Time Extension Approvals. The HIOSH Administrator shall respond to the time extension request in writing. Copies of the response(s) approving time extension requests shall be provided to the ATS Manager.
- D. Training Record Annotated. The SI and ATS Manager shall annotate the Whistleblower Investigator's training record to reflect the extension of time.

XIII. Monitoring the Training Program.

Monitoring the Whistleblower Investigator's progress is critical to ensure the success of the training program. Monitoring determines the benefits and effectiveness of the training received and evaluates the ability of the Whistleblower Investigator to achieve training goals and objectives.

- A. The HIOSH Administrator . The HIOSH Administrator, or their designee shall:
 - 1. Ensure that each Whistleblower Investigator has completed the necessary prerequisites before attending mandatory HIOSH training courses.
 - 2. Review the Whistleblower Investigator's performance of recommended self-instruction (SI) and on-the-job training (OJT) assignments, such as those listed in Appendix A.
 - 3. Conduct a review with the Whistleblower Investigator following each recommended SI and OJT activity This review identifies areas requiring

further training.

4. Determine when the Whistleblower Investigator has sufficient experience to participate fully in complaint investigation; the OJT review may be discontinued when this has been effectively accomplished.

XIV. Continuation of Whistleblower Investigator Development

- A. Continuing Education. Non-mandatory. After year three the Whistleblower Investigators should continue to develop the knowledge and skills necessary to conduct investigations. There are many training opportunities outside traditional OSHA Training Institute courses, including but not limited to:
 1. Local community college and university courses related to grammar, writing, and financial, business and environmental sectors report writing and business operations.
 2. Online courses offered through Learning Link and private sector training groups.
 3. Technical training sessions at conferences related to whistleblower protection.
 4. Public sector training institutes that offer courses related to whistleblower investigation.
 5. Independent study on topics related to whistleblower investigation.

The Whistleblower Investigator should be provided time to attend training sessions and/or conduct independent study on materials related to investigations as identified in their Individual Development Plan (IDP).
- B. Role of Individual Development Plans. Mandatory. An Individual Development Plan (IDP) is a dynamic plan that helps the Whistleblower Investigator achieve organizational and career goals by identifying progress. IDPs are required and must be updated annually. An IDP can help a Whistleblower Investigator:
 1. Acquire knowledge and skills required to achieve the functional competencies of a Whistleblower Investigator.
 2. Build expertise as a HIOSH Whistleblower Investigator.
 3. Continue professional development throughout their career.
- C. IDPs for the First Three-Year Period. The IDP should reflect:
 1. Mandatory training required during the first three-year period as outlined in this instruction.
 2. HIOSH training requirements.
 3. Other developmental training as determined by the HIOSH Administrator. For example:
 - a. Supplemental training that includes formal and/or informal mentoring by senior personnel and/or Whistleblower Investigators with specialized experience.
 - b. Participating in investigations involving various statutes or legal complexity in a variety of business sectors.
- D. IDPs Developed after the Three-Year Period.
 1. The IDP should follow the guidance outlined in the Hawaii Government Employee Association (HGEA) contract for Unit 13, Article 15 Training

Opportunities.

2. An IDP helps the Whistleblower Investigator improve performance and prepare for more responsible work in accord with their abilities, interests and needs of the HIOSH Division.
- E. Professional Certification. Non-Mandatory. The course required for Whistleblower Investigator's first year provides a foundation for professionalism and proficiency. The required technical courses provide a higher level of knowledge and skill. Professional certification can further enhance the Whistleblower Investigator's knowledge in the technical areas of whistleblower investigations.
- The Professional Certified Investigator (PCI)[®] credential provides demonstrable proof of an individual's knowledge and experience in case management, evidence collection, and preparation of reports and testimony to substantiate findings. Those who earn the PCI are ASIS International board-certified investigators (www.asisonline.org).
- The National Association of Certified Mediators provides certification for individuals who want to focus on fundamental and practical techniques of dispute resolution, arbitration and mediation (www.mediatorcertification.org).
- The Association of Certified Fraud Examiners offers the Certified Fraud Examiners (CFE) Program. The CFE denotes expertise in fraud prevention, detection and deterrence (www.acfe.com).

XV. Evaluation

Staff from the Administration & Technical Support Branch (ATS), along with the SI, evaluates the effectiveness of the training program for HIOSH personnel.

- A. Established evaluation criteria include:
1. Maintaining this training directive if it is determined that the current training program for Whistleblower Investigators needs to be altered to be more effective.
 2. Maintaining this training directive if a revised directive is released by Federal OSHA that requires review and change.
 3. Meeting or exceeding HIOSH's grant goals that include providing training for staff throughout the grant year. Including the annual Performance Appraisal System (PAS)

Appendix A. Recommended Whistleblower Investigator Training Activities

Background and Description of Appendix A. This Appendix is recommended as a guideline for the Supervisory Investigator.

The OSHA Training Institute (OTI) offers formalized training for Whistleblower Investigators through its competency-based approach to curriculum. As a professional, the Whistleblower Investigator will acquire additional knowledge, skills, abilities and behaviors through other sources such as Self-Instruction (SI), On-the-Job Training (OJT) and HIOSH conducted training which enhance the formal training a newly-assigned Whistleblower Investigator receives at OTI and HIOSH. This Appendix offers recommendations for both SI and OJT.

Time allotted to accomplish SI and OJT assignments should be compatible with the newly-assigned Whistleblower Investigator's current knowledge, skill, and experience. The Supervisory Investigator should verify the Whistleblower Investigator's successful completion of SI and OJT assignments. Training assignments may also be supplemented by other comparable task assignments deemed appropriate and/or equivalent by the Supervisory Investigator.

Type of Activity	Activity Description	Date Completed & Initials ¹
OJT	Identify office administrative procedures	
SI	Review Section 396-8(e), Hawaii Revised Statutes – the HIOSH Discrimination/Whistleblower Law Review Chapter 12-57, Hawaii Administrative Rules, “Discrimination Against Employees Exercising Rights Under Chapter 396, Hawaii Revised Statutes.” Review State of Hawaii ethics rule/regulations and complete ethics training course.	
SI	Review the Whistleblower Investigator Training and Education Directive.	
SI/OJT	Review and become familiar with the HIOSH Discrimination Investigation Manual.	
OJT	Describe and apply the elements of a <i>prima facie</i> case and understand the law on timeliness of complaints.	
SI	Review past whistleblower case files	
OJT	Investigate Resources and Tools <ul style="list-style-type: none"> The DWPP website, www.whistleblowers.gov – for statutes, regulations, instructions and cases relevant to OSHA's 11(c) whistleblower cases 	

¹ Initials of both supervisor and CSHO required.

Type of Activity	Activity Description	Date Completed & Initials ¹
OJT	Accompany Senior level CSHO (EHS IV or OSHCO IV) on a discrimination/whistleblower investigation to learn: <ul style="list-style-type: none"> • Complaint intake and screening • Opening with the complainant • Docketing/preparation and sending letters • Preparation for investigation • Opening with Respondent • Interviews • Request for data/documents • Reviewing Respondent's position statement • Complainant's rebuttal • Determining damages in order to determine appropriate relief • Compose Report of Investigation (ROI) • Closing with Respondent and Complainant • Drafting Administrator's Determination Notice and Order (DNO) • Creating, organizing, and maintaining a case file • Settlement and negotiation • Redacting documents prior to sending case to contest and for requests for information. 	
OJT	Conduct intake and screening of complaints	
OJT	Accompany Senior Level Whistleblower Investigator at least one more time, taking on greater responsibility with the case	
OJT	Conduct a whistleblower investigation independently.	

¹ Initials of both supervisor and CSHO required.