



TOSHA INSTRUCTION

TENNESSEE DEPARTMENT OF LABOR & WORKFORCE DEVELOPMENT
DIVISION OF OCCUPATIONAL SAFETY & HEALTH

DIRECTIVE NUMBER: TED-TN 01-00-018

EFFECTIVE DATE: December 1, 2008

SUBJECT: Initial Training Program for TOSHA Compliance Personnel

ABSTRACT

- Purpose:** This instruction provides TOSHA personnel with policy and guidelines for implementation of competency-based training programs for TOSHA compliance personnel.
- Scope:** This instruction applies TOSHA-wide.
- Action Offices:** TOSHA Central and Area Offices.
- Contact:** Manager of Standards and Procedures
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- Approval:** By and Under the Authority of John Winkler
Administrator of TOSHA

Executive Summary

This instruction provides guidance and direction to the Tennessee Occupational Safety and Health Administration (OSHA) Central and Area Offices concerning TOSHA's policies and procedures for training of Compliance Safety and Health Officers (CSHOs). It is essential that CSHOs have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish TOSHA's mission of promoting safe and healthful working conditions for Tennessee's working men and women. In this instruction, TOSHA has provided detailed guidance for training required during the initial three-year period of a CSHO's career, including recommended training that assists the CSHO with preparation for professional certification exams.

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 TOSHA 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®).

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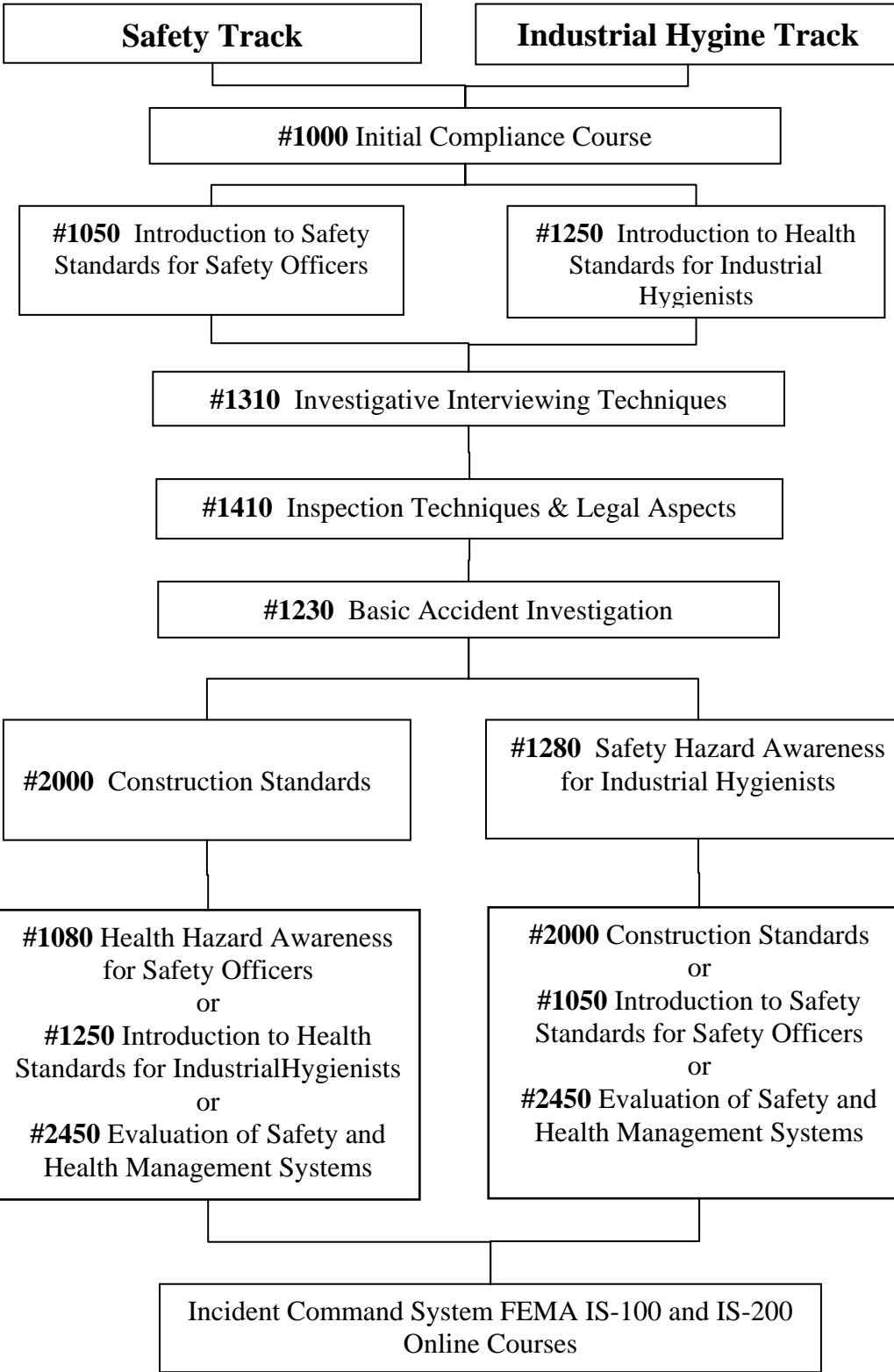
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- I. Purpose. This instruction provides TOSHA personnel with policy and guidelines for implementation of competency-based training programs for TOSHA compliance personnel.
- II. Scope. TOSHA-wide.
- III. Action Offices. TOSHA Central and Area Offices.
- IV. 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 TOSHA 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.
 - C. Technical Training during the First Three Years. 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 Area Office may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. The OTI training program offers supervisors and managers the opportunity to incorporate up to four additional technical courses at any time during the CSHO's initial three year training plan 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 supervisor or manager's discretion.

- 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 B of this instruction.
- V. First Three Years of CSHO Training. TOSHA Career Path for CSHOs [First Three Years] (see Figure 1) illustrates a recommended training sequence for the CSHO's first three years.
- A. 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).
- B. The following courses will be taken after the CSHO has completed one of the Standards courses.
1. #1310 Investigative Interviewing Techniques.
 2. #1410 Inspection Techniques and Legal Aspects.
 3. #2000 Construction Standards—Safety Career Path.
 4. #1280 Safety Hazard Awareness for Industrial Hygienists—Industrial Hygienists Career Path.
 5. #1230 Accident Investigation.
- C. At least one of the following courses will be taken during a CSHO's initial three-year period to enhance multi-disciplinary competence.
1. Safety career path CSHOs will take at least one of the following:
 - a. #1080 Health Hazard Awareness for Safety Officers.
 - b. #1250 Introduction to Health Standards for Industrial Hygienists.

- c. #2450 Evaluation of Safety and Health Management Systems.
 - 2. Health career path CSHOs will take at least one of the following:
 - a. #2000 Construction Standards.
 - b. #1050 Introduction to Safety Standards for Safety Officers.
 - c. #2450 Evaluation of Safety and Health Management Systems.
- D. The FEMA Incident Command System IS-100 and IS-200 courses must be taken during the initial three years of training; however, the specific sequence is not critical.
- E. Four additional technical courses can be assigned by the Supervisor through the Manager during the initial three years of the CSHO's training plan as specified in Section VII.C.

Training Paths for Compliance Personnel



VI. Organizational Responsibilities.

- A. Central Office. The TOSHA Central Office 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.
- B. TOSHA Administrator. The TOSHA Administrator shall direct the execution of the state-wide TOSHA training and education program in accordance with TOSHA policy, through the Manager of Training and Education. The TOSHA Administrator may grant waivers and time extensions in accordance with the procedures explained in Sections VIII and IX of this instruction.
- C. Manager of Training and Education. The Manager of Training and Education shall direct the planning and execution of the training and education program and serve as a focal point in coordinating and managing the program. Specifically, the Manager of Training and Education shall:
 - 1. Provide guidance and assistance to supervisors and CSHOs concerning information contained in this instruction.
 - 2. Implement the TOSHA training and education program.
 - 3. Assist in providing resource material and current training information to managers and supervisors concerning the implementation of the objectives of the training program.
 - 4. Evaluate and monitor all records of training.
 - 5. Enroll students in the appropriate courses using the Learning Link system.
 - 6. Maintain the data base of TOSHA training records.
 - 7. Process technical training requests, and provide training registration information to managers, supervisors and CSHOs.
 - 8. Provide to the Director of the Directorate of Training and Education a copy of the alternative training completion for the FEMA IS-100 and IS-200 Incident Command System courses.
- D. Managers. The TOSHA Managers shall be responsible for facilitating, and monitoring the development and training of the CSHOs in his/her section through the appropriate Supervisors.
- E. Supervisors. Supervisors shall ensure the successful implementation of the training program for compliance personnel as outlined in this instruction. Specifically, the Supervisors 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 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 interim and annual performance reviews.
 5. Assign, as needed, experienced personnel to assist in the on-the-job training of newly-hired CSHOs.
 6. Assess and document CSHO abilities and if appropriate send waiver and/or time extension requests to the TOSHA Administrator through the appropriate Manager.
 7. Assign up to four additional technical courses during the initial three year period of a CSHO's training program. This is in addition to the required OTI courses outlined in this instruction.
- F. 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.

VII. Professional Development during the CSHO's First Three Years.

- A. Required Training. In the interest of 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 the TOSHA Administrator in determining equivalency when issuing waivers. The Directorate of Training and Education Intranet 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 is 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 should be completed in a sequence optimal to attaining professional development goals and at the discretion of the TOSHA Administrator.

1. #1000 Initial Compliance. This course is designed for newly hired CSHOs and focuses on the basic elements of conducting inspections in accordance 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.

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.
5. #2000 Construction Standards--Safety Track. This course is specifically designed for safety specialists and industrial hygienists who will conduct 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.
6. #1280 Safety Hazard Awareness for Industrial Hygienists—Industrial Hygiene Track. 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.
7. #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.
8. Multi-Disciplinary Courses.
 - a. #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. The safety professional who desires a high level of industrial hygiene proficiency and has the appropriate background may attend this course.

- b. #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. The industrial hygienist who desires a high level of safety proficiency and has the appropriate background may attend this course.
 - c. #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.
 - d. #2000 Construction Standards. This course is specifically designed for safety specialists and industrial hygienists who conduct 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.
9. FEMA IS-100 and IS-200 Online Courses. When responding to an identified incident, the CSHO will be able to operate efficiently within the parameters of an Incident Command System (ICS).
- a. FEMA IS-100 and IS-200 online courses. These NIMS courses are

located on FEMA's Emergency Management Institute Independent Study Program Internet website. The current title for IS-100 is, *Introduction to Incident Command System I-100* and the current title for IS-200 is, *ICS for Single Resources and Initial Action Incidents*.

- b. The Supervisors will furnish to the Manager of Training and Education a copy of the IS-100 and IS-200 completion certificates for inclusion in the CHSO's training record.

VIII. 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 TOSHA Administrator has discretion to waive any of the required courses listed; Waivers shall be used rarely and shall be granted only when necessary.
- B. Assessment and Documentation. The appropriate Manager 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 Section Manager to the TOSHA Administrator and to the Manager of Training and Education. 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 State, Federal OSHA, or as a former 21(d) OSHA consultant.
- C. Waiver Requests. Only the TOSHA Administrator can grant a waiver. The TOSHA Administrator shall respond to waiver requests in writing. Copies of responses approving waiver requests shall be provided to the Manager of Training and Education.
- D. Training Record Annotated. The Manager of Training and Education shall annotate the CSHO's training record to reflect required courses waived by the TOSHA Administrator.

IX. Time Extensions. The time requirements for completing the training shown in this instruction must be met. Only the TOSHA Administrator can grant a time extension, which must be based on extenuating circumstances. The time allowed to complete the eight required courses should also allow insertion of technical courses throughout the three-year period. Technical courses may be taken at any time during the three-year period 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 required courses within the three-year period, the TOSHA 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 Section Manager to the TOSHA Administrator and to the Manager of Training and Education. 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 TOSHA Administrator shall respond to the time extension request in writing. Copies of the responses approving time extension requests shall be provided to the Manager of Training and Education.
 - D. Training Record Annotated. The Manager of Training and Education shall annotate the CSHO's training record to reflect the extension of time.
- X. Monitoring the Training Program. Monitoring the CSHO's progress through the first three-year period is critical to ensure the success 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 Supervisor and Manager play major roles in the monitoring process.
- A. Supervisors. The CSHO's Supervisor 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. Manager. The appropriate Section Manager shall monitor Area Office implementation of the training program outlined in this instruction through review of training documents and discussions with CSHOs and Supervisors.
- XI. Continuation of CSHO Development.

- A. Professional Standing, Recognition and Professional Certification. The series of courses listed for the CSHO's first three years provide a foundation for proficiency. Those CSHOs who choose to work toward a high level of knowledge and skill are encouraged to continue to attend technical courses at the OTI and equivalent sources. 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 of TOSHA.
- 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 TOSHA safety and health professional.
 3. Continue professional development throughout his/her career.
- C. IDPs for the Initial Three-Year Period The CSHO's First Year Orientation and Training Plan administered by the appropriate supervisor and the CSHO's Training Path (Figure 1) serve as the CSHO's IDP during the first three years. The IDP reflects:
1. Mandatory training required during the three-year period as outlined in this document.
 2. Area office and central office training and orientation procedures outlined in the CSHO's First Year Orientation and Training Plan. This document includes, for example:
 - a. Personnel procedures required by the Tennessee Department of Labor and Workforce Development.
 - b. Procedures for becoming familiar with the OSHA and TOSHA Acts, the OSHA and TOSHA internet and intranet, and other appropriate document and Web sites.
 - c. Schedule for on-the-job training and mentoring.
 - d. Schedule for review, study, and discussion of standards and other documents (CPL's, etc.) adopted by TOSHA.
 - e. Familiarization with appropriate technical equipment and instruments.

3. Other developmental training as determined by the CSHO's Supervisor. For example:
 - a. Supplemental training at the Central and Area Office levels 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. An IDP helps the CSHO continue to improve his/her present performance and prepare him/her for more responsible work in accordance with his/her potential and interests, and the needs of TOSHA.
2. At a minimum, each CSHO is required to attend a safety and health related course once every three years. Appendices A and B are provided to assist supervisors and CSHOs in preparing IDPs for continuing development.

XII. Evaluation. An overall evaluation of the training program for TOSHA compliance personnel effectiveness will be conducted by management team of TOSHA.

A. Established evaluation processes and criteria include:

1. OTI is accredited 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. Maintaining effective management of human capital through an annual review by the TOSHA management team of the progress of the training plan for each CSHO.

Appendix A. OTI Courses Required or Recommended in OSHA Directives

Appendix A. 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	OTI Course	Comments
<u>Petroleum Refinery Process Safety Management NEP CPL 03-00-004</u>	Team Leaders Courses #3300, #3400 and #3410 are required for Team Leaders plus prior experience in chemical industry safety and experience leading OSHA teams on large inspections	1. #3300 Safety & Health in the Chemical Processing Industry 2. #3400 Hazard Analysis in the Chemical Processing Industries 3. #3410 Advanced Process Safety Management	Completion of Course #330 prior to FY91 does not meet this requirement for Team Leaders and Level 1 Team Members.
	Level 1 Team Member Courses #3300 & #3400 are required for Level 1 Team Members (#3410 encouraged) plus prior experience in chemical industry safety		
	Level 2 Team Member Courses #3300 & #3400 are required + 2 years of OSHA inspection experience or equivalent		

Appendix A. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
<p><u>Fatality/Catastrophe Investigation Procedures</u> CPL 02-00-137</p>	<p>OSHA personnel who may be involved in fatality and catastrophe investigations</p>	<ol style="list-style-type: none"> 1. #1000 Initial Compliance 2. #1020 Basic Accident Investigation (<i>Editorial note: will become obsolete when #1230 Accident Investigation is offered</i>) 3. #1410 Inspection Techniques and Legal Aspects 4. #2020 Advanced Accident Investigation (<i>Editorial note: will become obsolete when #1230 Accident Investigation is offered</i>) 5. #3420 Criminal Investigation Training Program 	<p>OSHA personnel who may be involved in such investigations are encouraged to enroll in these classes and demonstrate proficiency in the relevant areas addressed.</p> <p>To the extent practical, only trained and experienced CSHOs will be assigned to investigate such incidents.</p>
<p><u>Enforcement of the Electric Power Generation, Transmission and Distribution Standard</u> CPL 02-01-038</p>	<p>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>	<p>#3109 Electric Power Generation, Transmission and Distribution</p>	<p>Required (or equivalent course) NOTE: 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 of 1910.269 may perform such inspections; however, they are encouraged to attend the OTI #3109 course.</p>
<p><u>Respiratory Protection Program Guidelines</u> CPL 02-02-054</p>	<p>Area Office Respirator Program Administrators</p>	<p>#2220 Respiratory Protection</p>	<p>Required (or equivalent course)</p>

Appendix A. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
<p><u>Application of the Permit-Required Confined Spaces (PRCS) Standard, 29 CFR 1910.146</u> <u>CPL 02-00-100</u></p> <p><u>Enforcement of the Electric Power Generation, Transmission and Distribution Standard</u> <u>CPL 02-01-038</u></p>	<p>CSHOs that will be entering permit spaces or enclosed spaces</p>	<p>1. Confined Space Entry 2. Respiratory Protection 3. Introduction to Industrial Hygiene for Safety Personnel <i>(Editorial Note: CPL 02-00-100 and CPL 02-01-038 do not specify course numbers)</i></p>	<p>Required (or equivalent courses)</p>
<p><u>Exposure Control Plan for OSHA Personnel with Occupational Exposure to Bloodborne Pathogens</u> <u>CPL 02-02-060</u></p>	<p>One representative from each OSHA Region</p>	<p>Bloodborne Pathogens Training at OTI <i>(Editorial Note: although course name & number are not specified, OTI course #2240, Biohazards, would include BBP training)</i></p> <p>The OTI course is conducted by a combination of health care professionals and non-health care professionals with expertise in the standard. Personnel participating in the OTI training course who will function as solitary trainers at the Regional or Area Offices or other OSHA facilities must have a biological sciences background.</p>	<p>After OTI training, the regional representatives conduct training sessions for other OSHA personnel covered by this Plan in their Regions.</p> <p>Note that training records are to contain all information specified in 1910.1030(h)(2) and will be maintained for 3 years from the date on which the training occurred. Training records will be held by the OSHA Office or location at which training took place (e.g., OTI will maintain records of training at OTI, while Area Offices will maintain records of training at those locations).</p>
<p><u>FAA Air Traffic Control Tower Monitoring Program (AIRTRAF)</u> <u>FAP 01-00-004</u></p>	<p>CSHOs selected to conduct FAA ATCT inspections</p>	<p>1. #2070, Fire Protection and Life Safety, or equivalent 2. ATCT Monitoring Program Training Course <i>(Editorial Note: this is OTI course #3170)</i></p>	

Appendix A. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
<p><u>The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures</u> CPL 02-00-147</p>	<p>CSHOs evaluating machines and equipment to determine that they are properly locked and/or tagged out in accordance with 1910.147 and 1910.333</p>	<p>Recommended OTI courses include: #1010, Introduction to Safety Standards for Industrial Hygienists #1050, Introduction to Safety Standards for the Safety Officer #2030, Basic Electrical Principles #3090, Electrical Standards #3094, refer to note below #3095, refer to note below #3190, Electric Power Generation, Transmission & Distribution</p> <p><i>Editorial Note: Although the directive recommends the #1000, Initial Compliance course, energy control principles are not covered in this course. Also, OTI no longer offers the shortened Electrical Standards courses (#3094 and #3095)</i></p>	<p>Experienced OSHA staff may already have many OTI courses (or other training with equivalent curriculum) that cover LOTO and electrical safety-related energy control practices; therefore, employment records and training certificates may be used to certify that training has been accomplished.</p>
<p><u>National Emergency Management Plan (NEMP)</u> HSO 01-00-001</p> <p align="center">and</p> <p><u>Inspection Procedures for 29 CFR 1910.120 and 1926.65 Paragraph (q): Emergency Response to Hazardous Substance Releases</u> CPL 02-02-073</p>	<p>OSHA personnel assigned a role or function related to implementing the NEMP or REMP</p> <p>Regional OSHA On-site Leaders/Coordinators</p>	<p>1. ISC Level 200 Course <i>(Editorial note: this is OTI Course #8200)</i></p> <p>1. ISC Level 200 Course 2. ICS for Executives (Training Module 17 of the ICS training program) 3. #3600 OSHA Technical Assistance for Emergencies 4. #3610 OSHA On-site Leaders/Coordinators</p>	<p>Required</p> <p>Required</p> <p>“ICS for Executives” is required for RAs and their designees, the A.S., the D.A.S., National Office Executive Staff and other designated Senior Management staff</p>

Appendix A. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
<p><u>Shipyard Employment "Tool Bag"</u> CPL 02-00-142</p>	<p>CSHOs that will participate in any shipyard employment interventions or inspections</p>	<p>DTE offers a course that is specific to shipyard employment industry entitled "Shipyard Processes and Standards", course #2090</p>	<p>Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in shipyard employment establishments</p>
<p><u>Longshoring and Marine Terminals "Tool Shed"</u> CPL 02-00-139</p>	<p>CSHOs that will participate in any marine cargo handling industry intervention or inspection</p>	<p>DTE offers a course that is specific to the marine cargo handling industry titled <i>Longshoring and Marine Terminal Processes and Standards</i>, course #2060</p>	<p>Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in marine cargo establishments</p>
<p><u>Combustible Dust National Emphasis Program (Reissued)</u> CPL 03-00-008</p>	<p>When possible, only CSHOs trained in recognizing the hazards associated with combustible dust shall be assigned to conduct inspections under this NEP</p>	<p>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). [Editorial Note: This is OTI course #3320, <i>Combustible Dust Hazards and Controls</i>]</p>	<p>The Regional Administrators will ensure that an appropriate number of CSHOs trained in combustible dust hazard recognition are available for inspections under this NEP.</p>

Appendix A. OTI Courses Required or Recommended in OSHA Directives

Directive	OSHA Personnel	OTI Course	Comments
<u>Voluntary Protection Programs (VPP): Policies and Procedures Manual</u> <u>CSP 03-01-003</u>	Onsite Evaluation Team	#2450, Evaluation of Safety and Health Management Systems (SHMS), or other formal classroom training in evaluating safety and health management systems (for OSHA personnel only) plus working knowledge and understanding of SHMSs	Compliance Officers. OSHA personnel whose current duties include enforcement responsibilities in the Area Office having jurisdiction over the worksite may be assigned to a VPP onsite team. However, as a general rule, such personnel may not subsequently engage in enforcement activity at the worksite for 2 years or until the worksite is no longer a VPP participant, whichever comes first. The Regional Administrator, on a case-by-case basis, may choose to override this 2-year requirement.
	PSM "Level 1" Auditor	1. #3300 Safety and Health in the Chemical Processing Industries 2. #3400, Hazard Analysis in the Chemical Processing Industries 3. #3410, Advanced Process Safety Management, or other equivalent specialized seminars in PSM Plus prior experience in chemical industry safety	The team leader must meet the same qualifications as "Level 1" auditor plus have experience in onsite evaluations, including once as a team member, once as a backup team leader, and once as a team leader in training (with a qualified team leader as backup team leader).

Appendix B. Correlation of OTI Courses to Professional Certification

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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 upon the 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 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).

Appendix B. Correlation of OTI Courses to Professional Certification

Certified Construction Health & Safety Technician®	Certified Industrial Hygienist	Certified Safety Professional
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	2330 Indoor Air Quality	2610 Ionizing Radiation
3110 Fall Arrest Systems	2260 Permit-Required Confined Spaces	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	