BOP #8A

Document Title: Consultant Paperless File Build Instructions (Paperless Report & File Development)

Approval Authority: Bureau Chief

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A. PURPOSE

This procedure outlines the review process for ensuring continuing effectiveness of the OSH Consultation Bureau quality system.

B. SCOPE

This procedure applies to supervisory personnel and management within the Consultative Services Bureau.

C. DEFINITIONS

<u>Mandated Activities Report for Consultation</u> (MARC Report) - A quarterly statistical report of on-site consultation activities.

<u>OE</u> OSHA Express is the software used to create the casefiles.

D. RESPONSIBILITIES AND AUTHORITIES

1. <u>Bureau Chief</u>- Responsible for conducting management reviews and ensuring operating procedures are current.
2. <u>Supervisors</u>- Responsible for attending management reviews.

E. REQUIREMENTS

1. The review process shall be conducted periodically as policies and procedures change.
2. The Bureau Chief schedules a meeting with Supervisors, Bureau Quality Coordinator to review quality status.

F. ACTION STEPS

The Consultative Services Bureau's use of OSHA Express (OE) has continued to evolve since CSB went Paperless on October 1, 2019. The purpose of this procedure is to continue provide current instruction for the process to complete a full Paperless File and print IF required by audit or other need. The 'sister' document is the "Consultant Build (Figures Document)".

Action Step #1. Request is received via Q folder. The Request (Fig 1) has been entered into the system by Administration.

Action Step #2. Route Request to a Sub-Folder such as "Requests Pending".

Action Step #3. Open Request (Fig 2). While in **Draft**, there will be three tabs to review:

-Request -Emphasis/Initiatives -OSHA File. Review for correctness/completeness.

- Establishment Button on the upper right side of Request (Fig 3) – use by selecting the "View" button for Establishment Lookup and verify/modify name, address, etc. You may also look at OSHA 200/300 data (within the Establishment Details) if available. Close out by selecting "OK" or "Cancel" button on Establishment Details. You may similarly close out of the Establishment Lookup with "Cancel", "Select", "Link".

Request Tab – Review for completeness, correct NAICS/SIC, email address, type of Request (Limited and /or Full Service), assigned Consultants, etc.

Emphasis/Initiatives Tab (Fig 8) – Review for accuracy. Limited coding will occur in the Request such as: Program Improvements, Construction SEP.

- Block 10 – Coverage Text – while in Draft, this may be empty. If there is previous history with the Employer, the Consultant may copy the Coverage Text from previous work and may use it to VERIFY with Employer during pre-visit contact or during onsite Visit. Ensure that a detailed description of the Company operations is included along with scope, building description, etc. **Per OSHA EXPRESS Notebook, Revision 1, dated March 2014, page 38: "11. Coverage Text. Information related to the Request and an explanation of the specific items that the employer wants covered. It should also include information on the nature and scope of the service requested. This may include information on the employer's operations, machinery, equipment, and/or products."**

<u>OSHA File Tab</u> – There will be four additional tabs:

-Documents -Pictures -Attachments -Notes

- Documents Tab – will contain the Acknowledgement Letter from the Bureau Chief to Employer (Fig 4). It will be saved as a PDF and maybe opened for review. If 2 pages long, use page down and page up keys to scroll through form. Review for completeness. **The original Request from the Employer is housed here as a separate document.** You may highlight (in blue) either document and open to review. If it is not located here, please contact Admin Staff so they can add it. Please note that some of the older Requests may have the original Request saved under the Attachment Tab discussed further below. The reason that the original Request is now housed in the Documents Tab is due to retention periods.
- Pictures Tab – May or may not contain photos.
- Attachments Tab – This Tab is now left blank. Historically, the original Request (between June and early December of 2019) from the Employer was found here as a PDF (Fig 5). You may highlight (in blue) and open to review. If it is not located here, please check the Documents Tab discussed above. If not located in either Tab, route the request back to Supervisor who will send it back to Administration so the addition can be made. Enter appropriate COMM LOG for this activity. After correction, the assignment will be returned to the Supervisor and then to the Consultant for Employer Contact/Scheduling. Additional COMM LOG entries should be available for review.
- Notes Tab – Will contain two additional tabs: Notes, Communication Log (COMM LOG).
- Notes Tab – May or may not contain notes to the Request.
- Communication Log (COMM LOG) (Fig 6) – This is a printable document and can be used as part of the (old) Case File Summary form that was used for hard copy files. **If an entry needs to be added to the COMM LOG, you may key it in even after the fact and modify the date/time as needed. Once saved, the entries will be ordered according to date/time (from oldest to newest). This can be observed by closing out and reopening the form.**
- Add entries to the COMM LOG each time you contact the Employer for scheduling and anything done prior to the Initial Visit such as verifying Deferrals, adding OSHA 300/300As, Annual SHARP Paperwork, etc. Information fields within Request COMM LOG will include: Contact Name is suggested to be written as Jackie Haley or J Haley but be consistent. Subject entries should be kept short. Comment lines are normally limited to less than three lines (Fig 6) or they will NOT print out properly. If more than two lines are needed, an additional COMM LOG entry should be considered.

Case Status Tab (Fig 7) – This tab is added to the Request once the Request is saved Final by a consultant. This tab will be discussed at length later in this document.

Action Step #4. Save correspondence from the Employer (pre-visit, visit and post visit) so that it may be tiffed to your visit(s) as time permits. Hint: It is easier to enter comments and tiff as you go versus waiting until just prior to File closeout. Omissions might occur otherwise.

Action Step #5. Print Request paperwork (if necessary) to take with you. **Conduct your visit**. Save correspondence from the Employer (during and post -visit) so that it may be tiffed to your visit as time permits. Again, you are encouraged to tiff and enter comments as you go.

Action Step #6. Update your request post-visit.

- Add any N codes (if common to both disciplines during joint Visits) in Optional Information (Fig 7, block 18). If not common and not during joint Visits, ONLY add to your Visit(s).
- Add Emphasis and Initiative items as required only if common such as Construction SEP, Program Improvements. Complete block 10 Coverage Text (Fig 8). See page 1 discussion on Coverage Text for details.
- Complete OSHA 300 data (Fig 9) by entering 300A information. If applicable, this should be for a 3 complete calendar year period if data is available. If data is not available (don't have or incorrect) or not required (exempt, new business, or new construction less than 1 year on site), please complete those fields by year as well using item 4 or item 5.
- Verify OSHA 300 data as complete (Fig 10A and 10B). Close digital OSHA 300 Data form. Save as final.
- Review Request form (Fig 11) by selecting the Request Info button. You will be able to review the digital Request form. It may be one or two pages. Page Up, Page Down can be used if needed. Close digital form.

Action Step #7. Enter your Visit Form (Fig 12A). There are seven tabs for review: Request, Visit, Details, Emphasis/Initiatives, Health, Hazards, OSHA File. Complete the steps that follow (related to the initial visit). If this is a Training & Assistance Visit and /or Follow-up, you will have to repeat these steps for each.

Request Tab – Review for completeness. Limited or Full Service is a good one to check for alignment -14a, 14b. Several fields may be blank. This screen is identical to the Request Tab of the Request (Fig2).

Visit Tab – Review for completeness. Limited or Full Service is a good one to check for alignment -15a, 15b with the information form the request. Several fields may be blank. If needed, add information under item 22, optional information (such as N-2-Silica, etc).

Details Tab – Under this tab there are actually 3 more tabs (Fig 12B). Train/Assist, Updates, Findings. The Train/Assist Tab should be the focus for review to ensure completeness. Several fields may be blank. Ensure appropriate fields in 17, Training and Assistance Services, are completed as required including Subjects of Training in 17d. **This is only for Initials and Training & Assistance Visits.**

- Updates Tab and Findings Tab – May contain information or they may not depending on the Consultant of record.

Emphasis/Initiatives Tab - Review for completeness (Fig 12C). Make sure that these entries reflect the work of the Consultant of record. **There may be the same number of entries or more in the Visit vs. the Request. If coded, there should be an explanation in the report (such as hazard written, monitoring completed, training items discussed, etc.).**

- Select the Visit Info button (Fig 12D) to reveal the digital Visit Form. If 2 pages long, please use Page Down and Page Up keys to help scroll through the form. Review for completeness. **Signature and Date are not required in paperless format.** Close form.

Health Tab – (Fig 14A & 14B) – This is normally for health files only but safety files contain them from time to time as well. 91s, 92s, 93s, 98s (forms) may be present. Review for completeness. These forms should reflect "Final" with the **Green Circles** beside of each once sampling results have been received (if a 91) Or immediately upon completion of a 92, 93 and/or 98 Form(s). Not all of these forms will print from OE. WORD forms have been built and are available for use. They may be found in the CSB Intranet. These forms must be completed and tiffed into OE.

Hazards Tab (Fig 13A) -Write hazards as normal. All hazards should [eventually] be saved "Final" with the **Green Circles** beside of each. Hazards are only found under Initial Visits. If a Training & Assistance Visit results in additional hazards, they will always be written back to the Initial Visit. Open a digital copy of the Hazard Form by selecting the Hazard Info button (Fig 13B). Review for completeness. Close form. **This will be updated periodically with abatements and work must be verified as complete by reviewing this form.**

FORM 33 (Fig 15) – Safety & Health Program Assessment Worksheet.

- Original FORM 33 for non-SHARP files – It will be contained in either the Safety or Health Initial Visit file if both were conducted within 90 days of the other. If they are NOT opened within 90 days of each other, a FORM 33 will be housed in each Consultant's Initial Visit by clicking on "Form 33" (**in blue**). As the Consultant, please complete form as usual. Include the minimum required entries for each visit plus comments if rated as a 0, 1 or 2.

- Original Form 33 for SHARP files – **Original document must be tiffed IF improvements will be needed in the form prior to SHARP recertification. This must be done when Initial Report is mailed or e-mailed to the Employer and a COMM LOG entry should include this task as being completed.** The Form 33 will be contained in either the Safety or Health Consultant's Initial Visit file but typically not both. Complete as normal. All attributes are to be rated as 2 or 3 in the FINAL version of the Form 33. If there have been improvements made in the Company's Form 33, these comments should show in the updated form. **That means the original FORM 33 must be included as a tiffed document and be available for review under the Documents Tab as previously discussed.**
- Construction files may or may not have a FORM 33 (SHARP GCs, etc.) This form may be blank.

Assemble Your Report. A separate document entitled: "Instructions for Inserting a Report into Digital Letterhead" exists for this (located within the CSB Intranet). You may stop at this point and complete the report document before continuing.

OSHA File Tab (Fig 16) – Tabs to review will include: Documents, Pictures, Attachments, Notes.

- Documents Tab – This is where most documents will be kept. It houses all documents related to this Initial Visit activity. Tiffing individual documents is the same whether it is the report or any other paperwork that needs to become part of the Paperless File. Once tiffed, please verify completion by reviewing this tab. You may highlight (in blue) and open each of these documents. **Make sure the documents are legible.** This section will contain: report, field notes/hazards notes, abatements, etc. It may contain additional documents such as email correspondence, Form 33 (original for SHARPs), OSHA 300/300A forms from Employer if applicable, completed sampling forms with calibration data, monitoring results, etc. Please review each and close. **The Initial Visit Document Tab WILL ONLY house all tiffed documents related to this Initial Visit.** The TA Visit will now contain the TA report and all related documents to the TA such as: field notes (including additional hazard notes if hazards were noted/written during the TA), abatements (related to new hazards noted during the TA), email correspondence, completed sampling forms with calibration data, monitoring results, etc.; OR if a Follow-Up Visit such as: the Follow-Up report and all related documents to the Follow-Up such as field notes, email correspondence, completed sampling forms with calibration data, monitoring results, if performed during the follow-up, etc. **COMM LOG entries are made to the specific Visit of record as appropriate.**

- **There may be documents of interest in the other discipline's Initial Visit such as the joint Form 33 or in the Request such as the OSHA 300/300As and/or Annual SHARP paperwork.**
- **Please note: Prior to this Revision and date, documents and COMM LOG entries for all types of Visit Activity may be located under the Initial Visit.**
- During Consultant review, if there are issues with any of these tiffed documents, please make notes as these will have to be corrected by the Consultant of record and tiffed into this Document Tab a second time. Contact the Supervisor and/or Admin by email and detail what old versions of documents need to be deleted from Request and/or Visit Activity. A request for document deletion may result in a COMM LOG note by Consultant and/or Supervisor (once deletion is completed). **Once all tiffed documents are verified, original hard copies may be deleted. It is recommended that Consultants build individual folders on their computer desktop to house ALL documents for each File they complete thus keeping their documents for future use if changes are required during file review by Supervisor and/or BC.**
- Pictures Tab – May or may not contain photos.
- Attachments Tab – May or may not contain information.
- Notes Tab (Fig 17A) – Contains two additional tabs: Notes, Communication Log (COMM LOG).
- Notes Tab – May or may not contain information.
- Communication Log (COMM LOG) – **This will be a large part of the discipline File's (old) CASEFILE SUMMARY FORM (Fig 17B). The Request COMM LOG will have a limited number of entries but will also be included [should there be a need for a printed file].** The COMM LOG for the Initial Visit will contain all entries related to this Initial Visit. **COMM LOG comments related to TA Visit(s) and/or Follow-Up Visit(s) WILL BE housed in those specific Visit COMM LOGs and NO LONGER in the Initial Visit.**
- Normally the Consultant's last entry in the **Initial Visit COMM LOG** [ONLY] will show that the discipline File Activity has been completed and has been closed. In the Request, Field 6 for Safety or Field 7 for Health will be completed. **Consultants please note: The last entry in this Initial Visit COMM LOG will be by the Supervisor AFTER File Review has been completed and/or after SHARP activity has been completed by the BC.** The exception to this would be future work where additional Visit Activity was performed post-closure of the discipline's File. Please see printer icon to the right side (Fig 17A) to print the Initial Visit COMM LOG if required or directed to do so. COMM LOG comment examples are housed as separate documents to this document and may be found in the CSB Intranet as **Addendum 1**. If there is additional Visit Activity such as T&A(s), Follow-Up(s), those COMM LOGs will also have to be printed (as part of the required printed file).

Action Step #8. Closing out your discipline activity. Close out **all** forms **except** the Request Form. Go to the Case Status Tab (Fig 18A). Enter field 6 or 7 depending on discipline (unless further activity for this request will occur such as TA and /or Follow-up). Save final. To review the digital Case Status Form, select the Case Status button to the right side of your request screen. **Informational Only**: Field 8a-8c will be completed by the BC for SHARP related Files (Fig 18B). Only Supervisors (non-SHARP or withdrawn Requests) or Bureau Chief (SHARP related) will enter a date in field 9. Consultants do not complete field 9.

Action Step #9. SHARP Paperwork Approval documentation is completed in accordance with Consultative Services' Bureau Operation Procedures (BOPs). This paperwork is to be emailed to the Supervisor by one Consultant once both disciplines have completed their sections. Consultants, please review each other's work. There should be COMM LOG entries for each discipline's Visit showing Consultant (email) of this paperwork (between Consultants and to Supervisor). **DO NOT TIFF SHARP Paperwork into OE**. It must be emailed to Supervisor for completion. Informational Only: **A Request COMM LOG entry by Supervisor will be made to show the transition of SHARP Paperwork and Request from Supervisor to BC. The BC reviews all Request and Visit survey information for both Safety and Health disciplines' Activity as well as the SHARP paperwork. The BC signed SHARP paperwork will be tiffed into the Initial Visit (where Form 33 is found via Form 33 Button) by Admin satisfying the SHARP (or not). The BC will make a final COMM LOG in the Request and in both Initial Visits. As a check and balance: Consultants, if you view your reports after the fact and any of this is missing, please contact your Supervisor.**

Action Step #10. If the discipline file has been returned to the Consultant for corrections (via Q), please place a comment for the receipt in the initial Visit COMM LOG. Once corrections have been made, please place a comment in the initial Visit COMM LOG and route visit back to Supervisor's Q. THIS COMM LOG comment for "return to Supervisor for review" is a common oversight.

Other considerations

Requests that may be Withdrawn – Consultant(s) may have a Request that is withdrawn without one or both Consultants' activities or Visits being performed. Complete the required fields by entering dates in fields: 20a/b and/or 21a/b of the Request Tab (Fig 2) **AND** fields 6 and/or 7 of the Case Status Tab (Fig 17A). **You must save the Request Final to see the Case Status Tab. IF the Request is withdrawn without any Visit Activity on site by Consultants, Consultants do not complete field 9.** If one discipline is withdrawn but the second continues, please enter required fields just for the specific discipline. **E-mail Admin, other Consultant, and Supervisor to advise status of request withdrawal. Ask that deferral be removed by Admin IF a discipline(s) is/are withdrawn. Enter the Request COMM LOG and place a comment regarding those actions.** If the Request has been withdrawn for Safety AND Health Activity, Consultant who made contacted the Employer will complete fields 20 and 21 of the Request Tab as well as fields 6 and 7 of the Case Status Tab. **E-mail Admin, other Consultant, and Supervisor to advice status of full Request withdrawal. Ask that deferrals be removed by Admin IF applicable. Enter the Request COMM LOG and place a comment regarding**

those actions. Route the Request to the Supervisor via Q. You may alert the Supervisor (via email) that the Request is being routed to them although the Q entry should be sufficient.

Informational Only: The Supervisor will be responsible for final review, entering date in Field 9 of the Request and /or purging of the Request.

Go to the next Request/Visit in your list and repeat as time permits.

G. QUALITY RECORDS

1. Bureau Management Review minutes
2. Action Request form

H. DOCUMENT CONTROL

1. The content of this BOP is the responsibility of the Bureau Chief.
2. Requests for interpretation of the provisions of this procedure and suggestions for changes should be addressed to the Bureau Quality Coordinator.
3. This procedure is maintained electronically.

I. REVISIONS

Rev 1 10/01/2022