BOP #8B

Document Title: **Management Paperless File Review**

Approval Authority: **Bureau Chief**

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A. PURPOSE

This procedure outlines the paperless file 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

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

OE OSHA Express, the software used for writing our casefiles.

D. RESPONSIBILITIES AND AUTHORITIES

1. Bureau Chief- Responsible for conducting management reviews and ensuring operating procedures are current.

E. REQUIREMENTS

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

F. ACTION STEPS

As district supervisors, please consider creating a separate subfolder (such as "PAPERLESS RVW") in your Supervisor Workflow User Queue of OSHA Express (OE) for Paperless Reviews. Supervisor Queue Folders can/will become very heavy with paperless files (reports) to review. Separating these entries from those of new requests would be prudent and allow for an easier recognition of outstanding new Requests (to assign).

Consultants will send completed paperless files (discipline closed) to their Supervisor's OE Queue Folder. These files from Consultants should come to supervisors as the Request entry (Type "Q") and/or the Visit entry (Type "V"). The preferred method would be "Q" as this allows Supervisors to see all discipline related work for the Request which may contain more work than just an Initial Visit (or Training & Assistance, Follow-up). It will also allow the supervisor a quicker look at the other discipline, should this be a Request where the Employer has asked for both Safety and Health Visits. Supervisors should move those files to a separate folder (Paperless Review Folder suggested above) until such time as the actual review occurs (Fig 1).

Action Step #1. In Supervisor Queue Subfolder (such as PAPERLESS RVW): Open Request for Paperless File to be reviewed (Fig 1).

- As you receive these files for review, you will need to briefly open each Request and check to make sure that Field 9, "Case Close Date" on the Case Status Tab (Fig 6B), is void of any date.
- **Failure to leave Field 9 blank until all files in the request are reviewed WILL result in file purges from your Queue and everyone else's related to this Request, then it becomes too easy to lose track of files that need reviewing.**

Action Step #2. Review the Request Form (Fig 2) to ensure all fields are completed (related to the discipline Visit(s) you are reviewing). Tabs to review will include:

--Request --Case Status --Emphasis/Initiatives --OSHA File

Request Tab – Open the Request Form by clicking on the Request Info button located on the right side of the page as shown (Fig 3).

- Ensure completion of all required fields. Close Form per arrow (Fig 3).
- Click on the Establishment button located above the Request Info button (Fig 4). Click on OSHA 300 Tab to review required OSHA log information. Another way to view the printable form is to go to "Desktop" on the upper left side of the OE Toolbar and click. Click on OSHA 300 to review the digital document. See Fig 5A/5B. Close form.

<u>Case Status Tab</u> – Open the Case Status (button on the right side) and review all required fields (See Fig 6A). Close form.

- Closure of Request (Fig 6B): Field 9 is the responsibility of the Supervisor or BC to complete. This will show closure of the completed request (both Safety and/or Health). If the review of this discipline visit/s does not result in request completion, this field is left blank. If the review of this visit/s results in request completion, the Supervisor will close by entering the review date in Field 9. If this is Supervisor recommended (for approval) SHARP related activity, Field 9 remains the responsibility of the BC (along with fields 8A & 8C) if "**Satisfied**" (approved). 8A and 8B are used by BC to explain if (SHARP) is **Not Satisfied**. See Fig 6B. **Supervisors: Remember to include a DQ letter and review for tiffing within the Request Documents Tab.** Field 9 will be completed by the BC if the SHARP is "**Not Satisfied**".

<u>Emphasis/Initiatives Tab</u> (Fig 6C) – Review for accuracy. Limited coding will occur in the Request such as: Program Improvements, Construction SEP.

- Block 10 – Coverage Text – 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> (Fig 6D) – There are four tabs for review: Documents, Pictures, Attachments, Notes.

- Documents Tab – Houses acknowledgement letter from Bureau Chief to Employer. The original Request from the Employer is found here as well. You may highlight (in blue) any document found here and open to review. If it is not located here, please contact Admin Staff so they can add it. The reason that the original Request is now housed in the Documents Tab is due to document retention periods. NOTE: Other documents may be housed in this area such as common 300/300A logs, Annual SHARP Paperwork, presurvey emails between parties, etc.
- Pictures Tab – May or may not contain photos.
- Attachments Tab – This Tab will eventually be left blank. The original Request from the Employer was once found here as a PDF. Some of the older Requests (mid-201x) may be located here. 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, please contact Admin Staff so they can add it.

- Notes Tab (Fig 6E) – Contains three additional tabs: Notes, Communication Log (COMM LOG), Audit Log.
- Notes Tab – May or may not contain notes to the Request.
- Communication Log (COMM LOG) – This Request COMM LOG will need to be included as part of the Paperless Case File Summary Form. It will contain entries of the Consultant(s), Supervisor(s), BC, and/or Admin such as when assigned. It will also contain entries where Consultants have attempted to contact Employer, modified the Request, etc. Deferral status will also be stated in this section by Admin, Supervisor(s) and/or Consultant(s). The last entry made by the Consultant(s) will normally be the visit schedule date(s) and time(s). A printer icon (right side of this form) may be used to print this log (Fig 6E). Printing Files is discussed in separate document. Information fields within Request COMM LOG will include: Contact Name format is suggested to be written as Jackie Haley or J Haley. Subject entries should be kept short. Comment lines are normally limited to less than three lines (Fig 6E) or they will NOT print out properly. If more than two lines are needed, an additional COMM LOG entry should be considered. Additional COMM LOG entries for the Request will be discussed under the Visit section.
- Audit Log Tab – shows who has done what and when to this Request (more discussion in Visit section of this document). Consultants cannot 'see' this tab. Admin, BC and Supervisors can.

Action Step #3. Review the discipline specific Initial Visit [who placed File in Supervisor Queue]. This is done by accessing the Case Status Tab and making the proper selection (Fig 8). Do NOT review other Consultant related activity at this time. There are seven tabs for review: Request, Visit, Details, Emphasis/Initiatives, Health, Hazards, OSHA File (Fig 7). Complete the following steps related to the Initial Visit. If there is a Training & Assistance Visit and/or Follow-up, you will have to repeat these steps for each.

Request Tab – Completed from above. Ensure block 14a and b matches15a and b of Visit Tab.

Visit Tab – Review for completeness. Several fields may be blank. **Ensure that 18d (Fig 7) has a date entered that matches the Request Case Status Tab written report date for that discipline specific visit (Field 3 or Field 4). Common mistake: 18d is completed yet 3 or 4 [in Request is omitted].**

Details Tab – Under this tab there are 3 more tabs (Fig 8). Train/Assist, Updates, Findings. The Train/Assist Tab should be the focus for review for 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 Initial Visits and Training & Assistance Visits (TA). **17a & 17b are used for Initial Visits. 17b is used for TAs.**

- Updates Tab and Findings Tab – may or may not contain information.

Emphasis/Initiatives Tab – Review for completeness (Fig 9). Make sure that these entries (for Local Emphasis, National Emphasis and/or Strategic Plan Activity) reflect the work of the consultant of record. **If coded, there should be an explanation in the report such as in Appendix A for Hazards Written, Appendix D for Training and 17d of Visit Form, and/or Appendix E (in Health Visits normally but Safety Visits may as well) related to monitoring performed. There may also be some required codes under the Visit Tab (Fig 7) listed under "22. Optional Information" such as N 2 Silica, N 16 COVID-19.**

- Click the Visit Info button (Fig 10). It should reflect a digital copy of the Initial Visit Form. If 2 pages long, use "page down" and "page up" keys (and/or cursor) to scroll through form. Review for completeness. **Signature and Date are not required in the paperless format.** Close form.

Health Tab – Review if it is a Health File (although Safety could have limited use as well). 91s, 92s, 93s, 98s forms may be present. Review for completeness. Should reflect "Final" with the **Green Circles** beside of each. **Note: There will also be tiffed copies of these forms to review (under Documents Tab with Visit being reviewed). Some fields must be handwritten (added) to the printed forms. They cannot be completed otherwise. Those forms are available on the CSB Intranet.**

Hazards Tab – (Fig 11A) – All hazards should reflect "Final" with the Green Circles beside of each. Hazards are only found under initial visits. (This will change in the near future). An empty Hazards Tab implies no hazards or file is incomplete. Open a digital copy (Fig11B) of the Hazard Form by selecting the Hazard Info button. Review for completeness. Close form.

OSHA File Tab (Fig 12A) – Tabs to review will include: Documents, Pictures, Attachments, Notes.

- Documents Tab – **The Initial Visit Document Tab WILL [now] house all tiffed documents related to the Initial Visit.** Documents related to other types of Visits will be housed under that respective Visit Activity. **Please note: Prior to this Revision, documents for all types of Visit Activity may be located under the Initial Visit (only).** You may highlight (in blue) and open any/each of these document forms. The section will contain Initial report, field notes, abatements, updated OSHA 300/300A forms if applicable, email correspondence, Form 33 (original for SHARPs must be in one discipline's files), completed sampling forms with calibration data, monitoring results [if done during the

Initial Visit], etc. Please review each document and close. If there are issues with any of these forms, please make notes as these will have to be corrected by the Consultant of record and tiffed into the respective Document Tab a second time. At some point, the Supervisor (and/or Admin) will delete the older versions of documents (mistakes, duplicates, not legible, etc.). IF the Consultant needs a document deleted or after completion (of document deletion) a COMM LOG note may be entered by Consultant and/or Supervisor of record.

- Pictures Tab – May or may not contain photos.
- Attachments Tab – May or may not contain information.
- Notes Tab (Fig 13A) – Contains three additional tabs: Notes, Communication Log (COMM LOG), Audit Log.
- Notes Tab – May or may not contain information.
- Communication Log (COMM LOG) – **This is part of the Digital Report's CASEFILE SUMMARY FORM.** Remember there is one in the Request as well. The Initial Visit COMM LOG will contain all entries related to this Initial visit. COMM LOG comment examples may be found as separate documents [**Addendum 1**] to this document. **COMM LOG comments related to a TA Visit and/or a Follow-Up Visit WILL BE housed in those specific Visit COMM LOGs and NO LONGER in the 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.
- If corrections are needed, please place a comment for correction(s) in the Visit Comm Log of record. One or two entries in the COMM LOG may be needed due to spacing limitations. Route the WORK back to Consultant's Q. You will have to enter a brief sentence in the Route Notes before sending it back for correction. Follow up with an email and/or telephone call to Consultant on corrections as needed.
- **A printed file could include several COMM LOGs [Request, Initial, TA, Follow-Up]. IF there are additional Visits beyond these (such as extra TAs and/or Follow-Ups), those COMM LOGs would also need inclusion.**
- **The last Visit COMM LOG [put in the Initial Visit COMM LOG] entry by the Consultant will (usually) match the closed date that was entered in field 6 or 7 under the Case Status Tab of the Request.**
- If Non-SHARP: The last entry in the Initial Visit COMM LOG will be the Supervisor closing the Visit AFTER the ENTIRE discipline's file (Safety or Health) review has been

completed/approved. Printer Icon is circled on Fig 13A for additional guidance. For a Joint Request, first discipline Review - An example Initial Visit COMM LOG entry for the Supervisor: "Safety Review is completed. All good. Safety is closed. Health not completed. Safety purged from Q." If a Joint Request, second discipline Review – An example Initial Visit COMM LOG entry for the Supervisor: "Health Review is completed. All good. Health is closed. Safety previously closed. Purged from Q." If it is a single discipline Request - An example Initial Visit COMM LOG entry for the Supervisor: "File Review is completed. All good. File is closed. Request is closed. Purged from Q." The actual Purging of the discipline's file (from Supervisor Q) will occur in item 7 below.

- Audit Log Tab (Fig 13B) – shows who has done what and when to this visit. Consultants cannot 'see' this tab. Admin, BC and Supervisors can.

Action Step #4. -FORM 33 (Fig14) – 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 in the Form 33 button. But there could be a tiffed document found within the Initial Visit of either discipline's file. However; if there is more than a 90 day gap between disciplines' Initial Visit opening dates, an original Form 33 will be in each discipline's Initial Visit found in the Form 33 button. As the reviewer, you may have to open the other discipline Initial Visit to review the Form 33 of record. Look for the minimum required entries for each visit plus comments if rated as a 0, 1 or 2.
- Final Form 33 for SHARP files – It will be contained in either the Safety or Health Initial Visit file but typically not both although a copy may be tiffed into the Documents Tab. So as the reviewer, you may have to open the other discipline visit to review this form. All attributes are to be rated as 2 or 3 in this final version. If there have been improvements made in the Company's Form 33, these comments should show in the form. **That means the original FORM 33 must be included as a tiffed file in one of the discipline's File(s) and be available for review under the Documents Tab.**
- Construction files may or may not have a FORM 33. There is no requirement unless SHARP (for GCs). This form may be blank.

Action Step #5. SHARP Documentation including BLS/Public Sector Survey Results (PSIM).

- This SHARP paperwork is to be emailed to the Supervisor by one of the Consultants of record once one or both disciplines have completed their files. The Supervisor will complete the paperwork, scan, and email it to the BC. Tiffing of the email (sent to the BC) into the Request of record is not required. But a COMM LOG entry is required. **Do NOT tiff in the SHARP Paperwork as that is done by Admin once BC signs the Paperwork.**

- There should be one Comm Log entry in the SHARP Request from Supervisor to BC showing review completion of all Request and Visit activity including the SHARP Paperwork.
- The SHARP Request is then sent by Route Notes to the Bureau Chief Queue found under "Status Queues" as is shown is Fig 12B.
- After the BC reviews all Request and Visit information for both Safety and Health entries as well as the SHARP paperwork, the BC will complete required OE entries.
- **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.**
- The BC will make a final COMM LOG in the Request and in both Initial Visits. The BC may then purge the SHARP Request from BC Q by highlighting (in blue) the Request of choice and clicking on the "File" button.

Action Step #6. For non-SHARP files- Enter Final comment(s) in the discipline specific Initial Visit Comm Log as discussed on previous page.

- Save if prompted to do so.

Action Step #7. Close out all Visit related forms (save changes) and return to the Request Form.

- Go to the Case Status Tab (Fig 6B). If it is a single discipline Request – ensure that the correct date is entered in the discipline close date (fields 6 OR 7).
- If it is a Joint Request (first discipline Review) – ensure that the correct date is entered in that discipline's close date (fields 6 OR 7). **DO NOT ENTER Field 9 at this time.**
- If it is a Joint Request (second discipline Review) – ensure that the correct dates are entered in BOTH close date fields (6 AND 7).
- After the last discipline's Visit file(s) [or single discipline's Visit file(s)] have/has been reviewed; go back to the COMM LOG of the associated Request. Enter a COMM LOG comment closing out the Request such as: "Safety & Health Visit Files have been reviewed and are closed. Closed Request. Purged from Q."
- If both disciplines' files have been reviewed and close dates entered in fields 6 AND 7, you will close the Request out by entering the review date of record in field 9 of the Request.
- Close out of form. Save the entry.

Action Step #8. All forms should be closed (Fig 15).

- The digital file of record should be highlighted in blue. Go to "Route Notes". See arrow to the right bottom of page. Enter review date and then a comment such as "RVW CMPLTD. ALL GOOD. CLSD & PURGED." **Abbreviations are necessary to keep comments**

to one line in the Route Notes block. Click File button (circled lower right of Fig 15). This removes the file from the Supervisor Queue.

Action Step #9 – Request Withdrawals (partial or total).

- One or both disciplines may be withdrawn for various reasons (discussed within the OE as choices). If either discipline is withdrawn, the Consultant of record will enter dates and Reason Withdrawn found in fields 20a-21b of the Request Tab (Fig 2) as well as key dates in fields 6 and/or 7 of the Case Status Tab (Fig 6B). **Consultants will have to save the Request final to be able to see and/or enter dates in fields 6 and/or 7.**
- Emails discussing details of withdrawals may be included as a tiff if desired. [Supervisor checks for completeness during review.]
- Consultant will email Supervisor (and other discipline if a joint Request) discussing the withdrawn Request. Request COMM LOG date and comment are entered by Consultant and the Request is sent to Supervisor by Queue for final review.
- Supervisor will open the Request. Supervisor will verify proper data entry (including dates, reasons, COMM LOG entries and Doc additions, if any). Please note: One discipline may be withdrawn while the other may remain active. If so, field 6 or 7 may be left open until the second discipline's file has been reviewed OR a second withdrawal comes through.
- If both disciplines have been withdrawn, the Supervisor will place a date in field 9, Case Close Date (Fig 6B). **IT IS THE RESPONSIBILITY OF THE SUPERVISOR TO ENTER A DATE IN FIELD 9 UNLESS IT IS A SHARP RECERTIFICATION. If a date is entered in this box by mistake or prematurely, the files could be purged without review.**
- Supervisor will contact Admin and have them remove one or both deferrals; depending on the situation.
- Supervisor will place a comment in the Request COMM LOG stating that the Request is withdrawn for the discipline(s). "Contacted Admin (JH) to remove deferral for Safety, Health, or Both" (as applicable). "Purged from Q." Or other similar wording.
- Supervisor will purge discipline's Request from Queue. The digital Request record should be highlighted in blue. Go to "Route Notes". See arrow to the right bottom of page. Enter review date and then enter a comment such as "SFTY (OR HLTH or BOTH) W/DRAWN. REQ CLSD & PURGED." Click File button (circled lower right of Fig 15). This removes the file from the Supervisor Queue.

Action Step #10 – OE File Printing Guidance is contained in a separate document entitled "OE File Printing".

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