

**North Carolina Department of Labor
Occupational Safety and Health Division**

Raleigh, N. C.

Field Information System

Operational Procedure Notice 64I

Subject: Mandatory Training Program for OSH Compliance Personnel

A. **Purpose.** This operational procedure notice (OPN) provides guidance and direction to the North Carolina Department of Labor Occupational Safety and Health (OSH) Division concerning policies and procedures for training compliance safety and health officers (CSHOs) during the initial three-year period of a CSHO's career, as well as throughout their career. The recommended training shall include topics that will assist the CSHO with preparation for professional certification exams. It is essential that CSHOs have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish the OSH Division's mission of promoting safe and healthful working conditions for employees in the state. This OPN was updated and developed from OSHA Training and Education Directive (TED) 01-00-019—Mandatory Training Program for OSHA Compliance Personnel.

B. **Goals and Objectives of CSHO Training.** The goal of this OPN is to assist CSHOs and their supervisors with direction, guidance, and training options that directly contribute to the CSHO's ability to represent the OSH Division with a high degree of professional expertise. In addition, the CSHO training program identifies a correlation between CSHO competency and achieving respected credentials in occupational safety and health such as Certified Safety Professional (CSP), Certified Industrial Hygienist (CIH) and Construction Health and Safety Technician (CHST®).

1. **Competency-Based Curriculum.**
 - a. The OSH Division and the OSHA Training Institute (OTI) offer 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 federal OSHA's Directorate of Training and Education (DTE) Intranet and Internet web pages. If you need additional information, in addition to this OPN, please contact the Education, Training and Technical Assistance (ETTA) Bureau training supervisor.
 - b. 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 (OJT) training as well as formal training.
2. **Formal Training Program.** The OSH Division and 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, OJT 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 training paths reflect basic requirements and competencies applicable to all CSHOs as well as those intending to gain additional expertise. North Carolina has developed and received matrix

criteria from federal OSHA for the curriculum of most OTI courses. By restructuring the North Carolina curriculum and developing applicable courses that are equivalent to federal OSHA curriculum, North Carolina will be able to meet the requirements of federal directive TED 1-00-019—Mandatory Training Program for OSHA Compliance Personnel, while also achieving more efficient use of our limited resources.

In addition, the OSH Division and OTI flexible, yet structured, approach to the curriculum meets the needs of CSHOs with highly diverse academic backgrounds and experiences. Supervisors and managers are encouraged to incorporate their office's safety and health training priorities into the CSHO's training program. For example, the needs of the district may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. Other needs of the OSH Division may include providing CSHOs with technical training required in OSHA directives (e.g., Process Safety Management (PSM) training for PSM Team Leaders and Members). Phases 1 and 2 of the training program can overlap, allowing the district supervisor to incorporate four technical courses as needed during the CSHO's first five years, provided that the CSHO has completed both the #100—Initial Compliance (or the OTI equivalent #1000) and one of the standards courses, #105—Introduction to Safety Standards for Safety Officers or #125—Introduction to Health Standards for Industrial Hygienists (or the OTI equivalent #1050 or #1250, respectively). Selection of the technical courses to be attended and determination of the sequencing and priority are at the respective compliance bureau chief's discretion.

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

- a. *Phase 1—Initial Courses' Training Requirements:* Each CSHO will be required to complete a minimum of eight initial courses offered by the OSH Division or OTI during the first three years of his/her career as a CSHO. The order and sequence of these courses are as prescribed in this OPN.
- b. *Phase 2—Technical Courses' Training Requirements:* Each CSHO will be required to complete a minimum of six additional technical courses through year 8 of their career. Beginning with year 9, they must complete a minimum of one technical course every three years.

3. Additional Training Requirements. This OPN gives notice that other courses designated as mandatory by OSHA's assistant secretary or NC Department of Labor's OSH deputy commissioner may be added to the CSHO's training program at any time.
4. Professional Certification. Adherence to this OPN articulates a progression of training requirements for the first three-year period of a CSHO's career which supports the pursuit of professional certification and encourages CSHOs to strive for the recognition that such certification provides. Since courses are designed to support the OSH Division's mission, there may not always be a one-to-one correlation between the OPN technical course and the competencies required to

achieve certification. *Note: Correlation of the courses in this OPN to professional certification can be found on the One Stop Shop, under the Training and Education tab, CSHO Progression Notebook (CPN) webpage, “OTI References”.*

C. **Mandatory CSHO Training.** The requirements for the first three years of the CSHO training program will be accomplished by using the OTI Career Path for CSHOs [First Three Years] (see Figure 1), the OSH Division training paths (see Figure 2) or a combination of courses from each sequence that meets the overall intent of the training program. Courses outlined below include both the OSH Division course number (3-digit) and the equivalent OTI course number (4-digit). If there is no OSH Division course equivalent, the OTI course will be the only option to meet the training sequence requirement.

There is no limit to the number of courses a CSHO may take during one year with supervisor approval to include technical courses. The specific course taken by any CSHO will be based upon needs of the OSH Division and budget considerations. *Note: Trainees will follow the same training program as an employee hired as a compliance officer, although it can be expected that the trainee will take a longer time period to progress through the initial and advanced training programs.*

1. *PHASE 1—INITIAL COURSES:*

a. **Year 1:** The following courses must be completed within the first year of a CSHO's career in order to be released.

- i. #100 or #1000—Initial Compliance
- ii. Technical Writing/OSHA Express
- iii. **One** of the following courses on OSHA standards based on career path.

A. Safety career path—CSHOs will take the following:

#105 or #1050—Introduction to Safety Standards for Safety Officers (safety career path/safety specialists). *Note: The #2000—Construction Standards career path #2000 is incorporated into the #105 course as OSH does not offer a formal construction career path.*

B. Health career path—CSHOs will take the following:

#125 or #1250—Introduction to Health Standards for Industrial Hygienists (health career path/industrial hygienists).

b. **Through Year 3:** The following courses must be completed during a CSHO's initial three-year period to enhance compliance competencies and technical writing skills.

- i. #131 or #1310—Investigative Interviewing Techniques. *Note: #131 and #123 are blended together.*

- ii. #123 or #1230—Accident Investigation. *Note: #131 and #123 are blended together.*
- iii. #141 or #1410—Inspection Techniques and Legal Aspects. *Note: The #141 and the #1410 Inspection Techniques and Legal Aspects course is the only course that cannot be waived.*
- iv. #245 or #2450—Evaluation of Safety and Health Management Systems.
- v. Safety career path—CSHOs will take at least one of the following:
 - A. #1080—Health Hazard Awareness for Safety Officers.
 - B. #125 or the #1250—Introduction to Health Standards for Industrial Hygienists.
- vi. Health career path—CSHOs will take at least one of the following:
 - A. #1280—Safety Hazard Awareness for Industrial Hygienists.
 - B. #105 or the #1050—Introduction to Safety Standards for Safety Officers.
- vii. The following incident command system (ICS) courses required for #8200 ICS or equivalent training (i.e., course conducted by other governmental agencies or web-based course) must be taken during the initial three years of training; however, the specific sequence is not critical.
 - A. IS—100 (most current version)—Introduction to Incident Command System.
 - B. IS—700 (most current version)—National Incident Management System (NIMS), an Introduction.

2. *PHASE 2—TECHNICAL COURSES:*

- a. District supervisors, with the approval of the bureau chiefs, will assign additional technical courses to be taken by the CSHOs. These courses will be assigned based on the bureau's needs and will follow the guidelines outlined in this OPN. At a minimum:
 - i. Four technical courses completed by the end of year five. *Note: These courses can overlap Phase One.*
 - ii. Two technical courses completed during years six through eight.
 - iii. One technical course completed every three years, beginning in year nine and continuing throughout the CSHO's career.

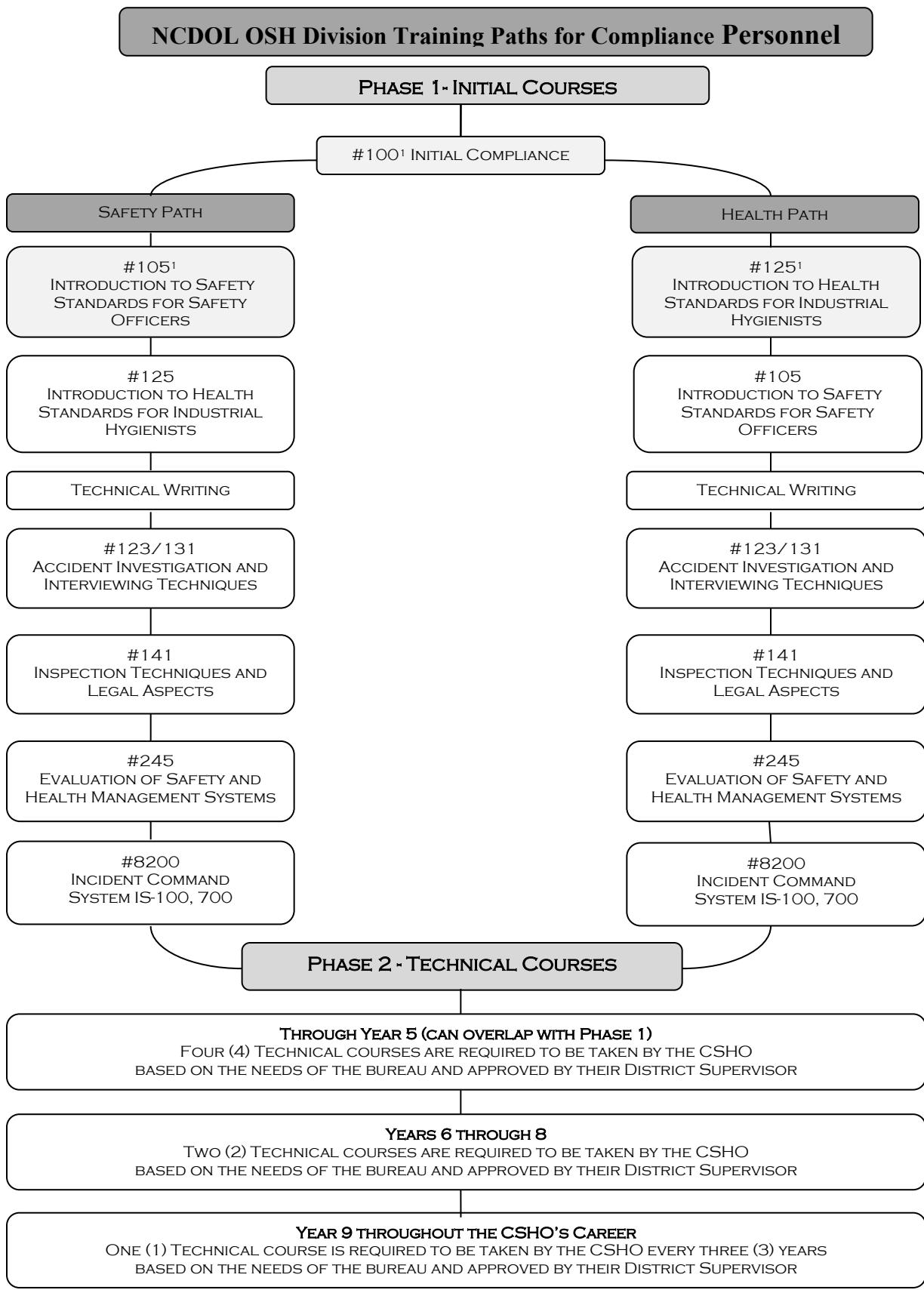


Figure 2

¹ INITIAL COMPLIANCE AND ONE OF THE STANDARDS COURSES
MUST BE COMPLETED DURING THE FIRST YEAR

D. Organizational Responsibilities.

1. OSH Administration.

The **OSH director and assistant director** will support the training program, as appropriate, by providing resources, supplying current information on the status of programs, standards, regulations, and directives and ensuring program consistency and adequacy.

2. Education, Training and Technical Assistance Bureau.

The **ETTA bureau chief** will be responsible for ensuring that programs are provided to educate and train CSHOs in the skills and knowledge required to perform their duties. Responsibilities include:

- a. Plan, develop and conduct technical and specialized training courses and seminars to meet the training needs of the CSHOs. Secure funding (i.e., lapse salary, supplemental funds) where applicable to meet this requirement.
- b. Conduct needs assessments (i.e., surveys) and/or gap analyses (i.e., internal audits) to identify training needs for CSHOs in accordance with appropriate policies and procedures.
- c. Develop and use classrooms, virtual training platforms, and technology-enabled training products (i.e., tablets, smart phone applications) designed to support the training and development of CSHOs.
- d. Maintain and update competency-based training records to assist CSHOs in selecting training and development opportunities that furthers their professional developmental growth and needs.
- e. Conduct evaluations of training courses and programs designed for CSHOs and taking corrective action when deemed appropriate.
- f. Annotate the CSHO's training records to reflect waived required training and time extensions for required training where applicable.
- g. Annotate in the CSHO's training records to reflect alternative training for required courses where applicable.

3. Compliance Bureau.

The **compliance bureau chiefs** will direct the execution of the training and education program in accordance with OSH Division policy. Specifically, the bureau chiefs may, at their discretion and based on the CSHO's experience level:

- a. Meet with new CSHOs for their six-month training progression review during their first year per the CPN process. *Note: The CPN process can be found on the One Stop Shop, under the Training and Education tab, Training Resources, "CSHO Progression Notebook".*

- b. Grant waivers and time extensions in accordance with the procedures explained in sections F—Waiver From Required Training Program and G—Time Extensions of this OPN.
 - c. Approve additional technical courses during the course of the CSHO's career that are required or needed as a part of a CSHO's training program. This is in addition to the required courses outlined in this OPN.
 - d. Identify and approve conference attendance for CSHOs that have certifications and those seeking certifications per the guidelines and procedures in Administrative Procedure Notice (APN) 26—Professional Conference Attendance Policy.
4. The **district supervisor** directs the planning and execution of this OPN. They will be responsible for ensuring and facilitating the development and training of the CSHOs under their supervision. The district supervisor directs the execution of the training program in accordance with appropriate procedures and protocols. Specifically, the district supervisor will:
 - a. Ensure the professional development of CSHOs under their supervision in accordance with the detailed training options outlined in this OPN.
 - b. Use the CPN process to identify and document the training needs of CSHOs assigned to their supervision. All training should be planned and coordinated accordingly. *Note: The CPN process can be found on the One Stop Shop, under the Training and Education tab, Training Resources, "CSHO Progression Notebook" webpage.*
 - c. Provide and coordinate OPN assistance and guidance that are consistent with the CPN process for CSHOs to meet the training program objectives outlined in this OPN.
 - d. Review and discuss training progress with each CSHO under their supervision during the mid-year and annual performance reviews.
 - e. Assign CSHO IIs to assist in the on-the-job training of newly hired CSHOs through a mentoring system.
 - f. Assess and document CSHO abilities and send waiver requests per section F and requests for time extensions per section G—Time Extensions of this OPN to the compliance bureau chief for approval.
 - g. Accompany the CSHO on at least one inspection prior to release from training.
 - h. Recommend CSHO for release after successful completion of first year training requirements (*Refer to OPN 64 Excel Spreadsheet found on the One Stop Shop, under the Training and Education Tab, Training Resources, Tab 2 – Training Records of the "CSHO Progression Notebook webpage".*). Initiate process for letter and certificate to be sent to CSHO.

- i. Ensure completion of Phase 1 of the CSHO training. Then assess and direct the continued career development into Phase 2 which includes OTI courses, advanced OSH Division courses (i.e.; Process Safety Management, Logging Camp, OCSS Course Modules) and other technical courses (i.e., conferences, safety schools).
4. The **CSHO** has the responsibility to perform to the best of their ability in all training programs. Specifically, the CSHO will:
 - a. Discuss their performance and training progress with their supervisor.
 - b. Participate in the planning of training activities.
 - c. Fully attend, participate in, and complete all assigned training courses, seminars and other events.
 - d. CSHOs are to follow the CPN process to track progression of their training using the OPN 64 Excel Spreadsheet during their first year until released. The CSHO can continue to use the OPN 64 Excel Spreadsheet to track Phase 1 and 2 of their training to coincide with the Training Records maintained by ETTA if they choose to do so. This will help ensure the CSHO stays in line with OPN 64. *Note: The OPN 64 Excel spreadsheet can be found on the One Stop Shop, under the Training and Education tab, Training Resources, Tab 2 – Training Records, of the “CSHO Progression Notebook” webpage.*
 - i. After release, send a copy of the Excel spreadsheet(s) to ETTA for their filing in their training records.
 - e. Keep their training records current by sending training certificates and certification copies to ETTA. *Note: Internal courses are automatically updated via the sign-in roster used for internal courses.*

E. Professional Development during Phase 1—Initial Courses of the CSHO’s Training.

1. Required Training. In the interest of statewide consistency, it is expected that CSHOs will attend the required courses outlined in this OPN. The information provided in this section is intended to assist bureau chiefs in determining equivalency when issuing waivers. ETTA offers up-to-date information on course objectives, whether a course is blended, or has specific prerequisites.
2. 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. This 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.
3. Course Sequence. Both the initial compliance course and a standards course (a. and

b. below) must be completed in year one of the CSHO's training path. It is recommended that courses be completed in a sequence optimal to attaining professional development goals and as resources permit. Course descriptions outlined below include both the OSH Division course number (3-digit) and the equivalent OTI course number (4-digit). If there is no OSH Division equivalent, the OTI course will be the option to meet the training sequence requirement. The specific course to be taken by any CSHO will be based upon needs of the division and budget considerations.

- a. #100 or #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. The course ensures that participants have the fundamentals of information gathering to document the *prima facie* elements in a case file. At the conclusion of this course, the CSHO will be able to identify CSHO responsibilities related to conducting an inspection as well as promoting, assessing and enforcing workplace safety and health compliance.
- b. 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.
 - i. #105 or #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 (General Industry) and 29 CFR 1926 (Construction). During the course, CSHOs observe hazardous conditions where they will evaluate, document, select and apply standards and recommend corrective actions. At the conclusion of the course, the CSHO will be able to apply inspection techniques, basic safety hazards recognition and abatement for inspections where general industry standards apply. *Note: The OSH Division #105 course serves as the equivalent of the federal #1280—Safety Hazard Awareness for Industrial Hygienists.*
 - ii. #125 or #1250—Introduction to Health Standards for Industrial Hygienists. This course is designed specifically for industrial hygienists (health officers) 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. At the conclusion of this course, the CSHO will be able to employ basic health hazard recognition; apply inspection sampling and instrumentation techniques and related OSH Division policies; and, identify abatement methods. *Note: The OSH Division #125 course serves as the equivalent of the federal #1080—Health Hazard Awareness for Safety Officers.*
- c. #131 or #1310—Investigative Interviewing Techniques. This course is intended to serve as a practical interviewing guide for the CSHO. A major component of this course includes role-play using scenarios that provide the

opportunity for CSHOs 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. *Note: The #123 and #131 are blended together.*

- d. #123 or #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, providing periodic updates, 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, CSHOs work in teams to gather and analyze evidence to develop facts, findings and conclusions. *Note: The #123 and #131 are blended together.*
- e. #141 or #1410—Inspection Techniques and Legal Aspects. This course introduces the CSHO to inspection techniques related to OSH Division 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 walk around inspections and interviews, and analyzing, organizing and documenting information related to inspections and investigations. *Note: This course cannot be waived.*
- f. #245 or #2450—Evaluation of Safety and Health Management Systems. This course emphasizes applying the principles of Safety and Health Management Systems (SHMSs) using OSH Division guidelines and policies. Upon completion, the CSHOs 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, CSHOs are guided to promote the value of an effective program that contributes to reducing illness and injury. *Note: This is an online interactive course accessed on the One Stop Shop under the Training and Education tab, Internal Training Core Courses.*
- g. OSH Construction Safety Specialist (OCSS) Modules—Advanced Construction Standards. These modules are designed to meet the needs of experienced CSHOs that will spend a significant amount of time on construction work sites. Many of the modules will include a classroom portion as well as a field portion. Specific topics include but not limited to excavation and trenching, confined spaces, cranes and derricks, work zone safety, steel erection, fall protection and scaffolding. *Note: Employees that complete six OCSS modules and all their required core classes can receive the OCSS designation. Reference APN 21—OSH Construction Safety Specialist Program.*
- h. Technical Writing. The purpose of the technical writing course is to develop specialized report/document skills, develop consistency among reports and to ensure that Division policies and procedures are followed. The course material covers proper completion of OSHA-1, accurate inspection process narratives, composing/formatting standard alleged violation elements

(SAVES), develop correct alleged violation description (AVDs) and write comprehensive and descriptive OSHA 1Bs/2Bs Form. The objective is to provide the compliance officer with the knowledge and tools necessary to write accurate, consistent and complete technical documents and reports.

- i. **HAZWOPER—40 hour/8 Hour Refresher** - The purpose of the hazardous waste operations and emergency response (HAZWOPER) course is to refresh knowledge and understanding of HAZWOPER requirements. The objective of this course is to ensure students meet the requirements specified in 29 CFR 1910.120 in order to conduct inspections pertaining to chemical incidents. The topics covered include hazardous substance properties, hazard recognition, incident prevention, proper personal protective equipment selection/use/care, site safety/health responsibilities, procedures, emergency response planning, spill containment, decontamination methods and safe work practices. Students are provided with training on respirators, monitoring equipment and protective clothing. ***Note: This course is only required for emergency response/homeland security (ER/HLS) team members.***
- j. **Multi-Disciplinary Courses**
 - i. **#1280—Hazard Awareness for Industrial Hygienists**. This course provides industrial hygienists with the knowledge and skills to become aware of selected safety hazards related to common worksite processes. By the end of the course, CSHOs will be able to decide if a referral is appropriate in accordance with OSH Division's occupational safety standards and guidelines. ***Note: The OSH Division #105 course serves as the equivalent of the federal #1280—Safety Hazard Awareness for Industrial Hygienists.***
 - ii. **#1080—Health Hazard Awareness for Safety Officers**. This course equips safety specialists with the skills to recognize health hazards while conducting workplace inspections and investigations. During the course, CSHOs participate in laboratories where they use detector tube pumps to screen for potential air contaminants and sound level meters to screen for noise hazards. By the end of the course, CSHOs will be able to decide if a referral is appropriate in accordance with OSH Division's occupational health standards and guidelines. ***Note: The OSH Division #125 course serves as the equivalent of the federal #1080—Health Hazard Awareness for Safety Officers.***
- k. **Incident Command System (ICS) Courses**. When responding to an identified incident, the CSHO must be able to operate efficiently within the parameters of an Incident Command System. All CSHOs are required to complete the most current versions of Federal Emergency Management Agency's (FEMA) courses IS-700—National Incident Management System (NIMS)—An Introduction and IS-100—Introduction to ICS. ***Note: Members of the OSH Division's ER/HLS team must also take the most current version of IS-200—ICS for Single Resources and Initial Action Incidents.*** Bureau chiefs may approve one of two options for taking these

courses:

- i. FEMA IS-700 and IS-100 may be taken online. These NIMS courses are located on FEMA's Emergency Management Institute Independent Study Program Internet website. While the IS-200 course is available online, it is recommended that this course be taken in a classroom setting so the students can learn to use the various forms.
- ii. An equivalent ICS training sponsored by a government agency (federal, state, or local). Such a course must follow the guidelines developed by the National Integration Center provided in the National Standard Curriculum Training Development Guidance document. The most current version of this document can be found on FEMA's NIMS Training Internet web pages. Additionally, instructors must have qualifications specified on these web pages.

F. Waiver From Required Training Program.

1. **Waiver Conditions.** The training program outlined in this OPN is required to be followed during the CSHO's career, in particular, during the CSHO's first eight years. Bureau chiefs have discretion to waive any of the required courses listed, with the exception of the #141 or #1410—Inspection Techniques and Legal Aspects course. Waivers will be used rarely and will be granted only in exceptional circumstances.
2. **Assessment and Documentation.** The district supervisor must assess and document that the CSHO has demonstrated the tasks listed in the course objectives for the course being waived. After an assessment has been made, waiver requests will be submitted in writing by the district supervisor to the bureau chief. 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, the documentation will also indicate that the CSHO has institutional understanding of OSH Division-specific policies and procedures. For example, criteria may include experience as a CSHO with another OSHA State Plan State or as a federal OSHA CSHO.
3. **Waiver Requests.** Only the compliance bureau chief can grant a waiver and will respond to waiver requests in writing. Copies of responses approving waiver requests will be provided to the applicable district supervisor, ETTA bureau chief, and assistant OSH director. The district supervisor will annotate the CSHO's training record to reflect required courses that have been waived by the bureau chief.

G. **Time Extensions.** The time requirements for completing Phase 1 and Phase 2 of the training shown in this OPN must be met, in particular, during the first eight years. Only the CSHO's bureau chief can grant a time extension, which must be based on extenuating circumstances.

Technical courses may be taken at any time during the three-year period but preferably after the CSHO has completed both #100 or #1000—Initial Compliance and one of the standards

courses (#105 or #125).

1. **Time Extension Conditions.** If there are circumstances that prevent the CSHO from completing the required courses for Phase 1 of their training within the first three-year period, or the required technical courses for Phase 2 of their training within the eight-year period, the bureau chief can extend the time for completion of the required courses for a period of up to one year. The use of time extensions could extend the time allowed for a CSHO to complete the required courses to a maximum of four years from their employment date for Phase 1, or nine years from their employment date for Phase 2.
2. **Time Extension Requests.** Time extensions will be submitted in writing by the district supervisor to the bureau chief. 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.
3. **Time Extension Approvals.** The bureau chief will respond to the time extension request in writing. Copies of the responses approving time extension requests will be provided to the district supervisor, ETTA bureau chief, and assistant OSH director. The district supervisor will annotate the CSHO's training record to reflect the extension of time.

H. **Monitoring the Training Program.** Monitoring the CSHO's progress through the first eight-year period is critical to ensure the success of Phase 1 and Phase 2 of the training program. Monitoring provides information regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of the CSHO to achieve training goals and objectives. The district supervisor and CSHO II both play major roles in the monitoring process especially during the first year.

1. The **district supervisor** will:
 - a. Monitor the implementation of the training program, reviewing the CSHO's Progression Notebook and meeting periodically with the CSHO to ensure they are on track with their training with regard to this OPN during their first year of Phase 1. ***Note: The district supervisor will use the standardized CPN process to ensure training consistency within the compliance bureaus.***
 - i. Meet periodically with the CSHO II mentoring the training of the CSHO to get feedback on the CSHO's training progression during their first year. They will also ensure the CSHO II is following this OPN and the CPN process while providing adequate mentoring for the new CSHO. ***Note: Additional guidelines can be found on the CPN webpage.***
 - b. Continue monitoring the implementation of the training program and meeting periodically with the CSHO to ensure they are on track with their training with regard to this OPN for the rest of Phase 1 and continuing into Phase 2. ***Note: The district supervisor may want to encourage the CSHO to continue to use the OPN 64 Excel Spreadsheet to track their training progress with regard to this OPN after they are released.***

- i. After release, remind CSHO to send a copy of the Excel spreadsheet(s) to ETTA for their filing in their training records.
2. The **CSHO II** will:
 - a. Follow the CPN process detailed under the Training and Education tab, Training Resources, CPN webpage on the One Stop Shop.
 - b. Ensure that each CSHO has completed the necessary prerequisites (i.e., self-study, OJT) before attending training courses.
 - c. Review the CSHO's performance on recommended self-study and OJT assignments.
 - d. Conduct a documented and verbal review with the CSHO following each recommended self-study and OJT inspection activity. This review provides the district supervisor with information on the progress of the CSHO and can assist in identifying areas requiring further training and instruction.
Note: Additional guidelines can be found on the CPN webpage.
 - e. 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.

I. **Continuation of CSHO Development**

1. **Professional Development**.
 - a. The series of courses required for Phase 1 of the CSHO's first three years provide a foundation for proficiency. The CSHO and district supervisor will use the CPN process to track the first three years.
 - b. The Phase 2 required technical courses provide a higher level of knowledge and skill in order for the CSHOs to more effectively fulfill OSHA's mission. Those CSHOs who choose to work toward a higher level of knowledge and skill are encouraged to attend additional technical courses. CSHOs that complete new, complex or difficult assignments expand their capabilities and broaden their role as a safety and health professional inside and outside the OSH Division. *Note: Training records maintained by ETTA will also reflect the courses the CSHO has completed during their career. These records are maintained additionally to the courses that the CSHO tracks on the CPN Excel Spreadsheet.*
2. **Professional Certification**. The OSH Division supports professional certification and recognizes it as an important career milestone. APN 3—Professional Certification provides the procedures for obtaining professional certifications within the OSH Division. *Note: Reference "Correlation of OTI Courses to Professional Certifications" located on the CPN webpage under "OTI References".*

J. **Evaluation**. An overall evaluation of the training program for OSH Division compliance personnel effectiveness will be conducted by ETTA, through internal OSH audits, or

through the monitoring process conducted by federal OSHA.

1. Established evaluation processes and criteria may include:
 - a. Maintaining accreditation through third party evaluations such as the International Association of Continuing Education and Training (IACET). OTI and the Directorate of Training and Education have been accredited by IACET since 2002. Retaining accreditation requires periodic internal reviews and reaccreditation not less than every five years.
 - b. Meeting or exceeding federal OSHA's goals for effective management of training for each CSHO's competency at various points in their career.
2. ETTA will distribute course evaluation surveys at the end of each class. This information provides valuable feedback from the perspective of the CSHO to determine the perceived value and impact of the OPN. It also serves as a basis for proposing changes to course objectives, course content and presentation methods.
 - a. Evaluation summaries and comments will be sent to the instructor along with OSH Administration, bureau chiefs, training supervisor, and state plan coordinator for review and comment.
3. Course and training materials are reviewed and updated by the instructor prior to each course to ensure accuracy and currency in the materials be presented. The materials are maintained by ETTA on the OSH One Stop Shop for CSHO review and self-study.
4. When applicable, a committee will be set up to develop and/or review new material and training content for core courses. To ensure course material meets the CSHO's needs, the committee will be made up of experienced OSH staff from compliance, consultation services and ETTA.

K. **Expiration.** OPN 64H is canceled. This OPN is effective on the date of signature. It will remain in effect until revised or canceled by the director.



Wanda Lagoe
ETTA Bureau Chief



Jennifer Haigwood
OSH Director

2/14/2023
Date