

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

Raleigh, North Carolina

Field Information System

Operational Procedure Notice 64

Subject: Professional Development Program for Compliance Safety and Health Officers

A. **Purpose.**

Operational Procedure Notice 64 provides Division personnel with a professional development program which identifies the areas of competence required for newly-hired Compliance Officers as well as continuing education for experienced Compliance Officers.

B. **Discussion.**

This program has been developed to prepare Compliance Officers to conduct safety and/or health investigations in a professional manner. The Division has established minimum training requirements during the "Initial Training Program" which when completed will qualify a Compliance Officer to conduct independent inspections. The Compliance Officer will continue to develop professionally after the completion of the "Initial Training Program" by completing the requirements contained in the "Advanced Training Program" of the Professional Development Program.

The success of this training program is dependent on the District Supervisor making an initial assessment of the new hire to determine training needs. After this assessment has been completed, an individual training program can be developed to assure that the Compliance Officer's training needs are met.

The Division is committed to continuing education beyond the requirements contained in the "Initial and Advanced Training Programs." Each Compliance Officer is required to receive at least 40 hours of training annually and to attend a technical course once every three years. Operational Procedure Notice 64 will be reviewed at least annually and amended if necessary.

C. **Action.**

This Professional Development Program is effective statewide on January 1, 1993.

Signed on Original
Charles N. Jeffress
Director

January 15, 1993
Date of Signature

A. **Introduction.**

Well-trained Compliance Safety and Health Officers are crucial to the mission of the Division of Occupational Safety and Health. This professional development program describes the training required for newly-hired Compliance Officers and continuing education for experienced Compliance Officers.

B. **New Employee Evaluation.**

Each Compliance Officer will meet with the District Supervisor as soon as possible after beginning employment with the Division. During this meeting the following will be completed:

- 1 An assessment of the Compliance Safety and Health Officer's past experience in Occupational Safety and Health which will be documented in the Professional Development and Training Plan.
- 2 An evaluation of the past experiences and determination if any requirements of the Initial or Advanced Training Programs have been satisfied.
- 3 A plan for satisfying the requirements for the Initial and Advanced Training programs.

(See Addendum.)

C. **Initial Training Program.**

- 1 **Objective:** To prepare the Compliance Officer to conduct independent inspections through the development of required skills in the following areas.
 - a. The operations of the Department and the Division.
 - b. The North Carolina Occupational Safety and Health Act.
 - c. The Occupational Safety and Health Standards.
 - d. Hazard recognition and inspection techniques.
 - e. The preparation, submittal, and review of an inspection report.
 - f. Adequate knowledge of the implementation of engineering controls and abatement strategies.
 - g. A reasonable comprehension of basic industrial processes and the ability to make relevant observations.
 - h. Field experience in the proper calibration and use of measuring instruments.
 - i. The ability to present inspection data in a legal proceeding.

- j. The ability to make a referral to other Health or Safety Compliance Officers.

2. Requirements: The following elements of the Initial Training Program are required unless they have been satisfied by the Compliance Officer's prior experience as documented on the Professional Development and Training Plan.

- a. Orientation. An orientation program must be provided for all new Compliance Officers within the first month of employment. The program will be administered by Raleigh Officer personnel as designated by the Division Director. This program includes information on Department, Division, and District Office policy and procedures, as well as administration and organization. It will include at a minimum, the following information.
 - i. Overview of the role of federal OSHA and North Carolina Department of Labor as it relates to the Occupational Safety and Health Act of 1970 and the Occupational Safety and Health Act of North Carolina.
 - ii. The Division of Occupational Safety and Health: History, Purpose, Program Mix, Organizational Structure, and Role of OSHA.
 - iii. District Office procedures.
 - iv. Handout materials such as organizational charts, compliance operations manual, standards, directives, personal protective equipment, and technical equipment.
 - v. North Carolina Department of Labor identification card and inspection credentials.
- b. Formal Training:

The following formal training is required unless satisfied by the compliance Officer's previous experience as documented in the Professional Development and Training Plan.

- i. Occupational Safety and Health Training Institute Course 100: Initial Compliance Course for Compliance Safety and Health Officers. This course will be attended in the first three months of employment, preferably within one month of orientation.
- ii. Standards Course: This course will be attended in the first six months of employment, preferably within one month of Course 100.

- A. Occupational Safety and Health Training Institute
Course 105: Introduction to Safety Standards for Safety
Officers; or
- B. Occupational Safety and Health Training Institute
Course 125: Introduction to Industrial Hygiene
Standards for Industrial Hygienists.

c. Informal Training:

Some requirements of the Initial Training Program are best satisfied through supervised study and on-the-job training methods. The District Supervisor will assign and monitor employee study and on-the-job training activity using the Professional Development and Training Plan as a guide.

- i. Supervised Study: Supervised study is designed to be a work exercise that will contribute to the training of the Compliance Officer. The following segments of informal training will be satisfied through supervised study.
 - A. Occupational Safety and Health Act of North Carolina
 - B. OSHA Standards (General Industry and Construction)
 - C. Compliance Operations Manual
 - D. Integrated Management Information System
 - E. North Carolina Field Information System
 - F. Technical Manual
 - G. Standard Alleged Violation Elements Manuals (General Industry and Construction)
 - H. Equipment Operation
 - I. Report Writing
 - J. Inspection Forms
- ii. On-The-Job Training: The Compliance Officer will complete the following general requirements for on-the-job training while in the initial training period. Specific on-the-job training requirements will be addressed in the Compliance Officer's Professional Development and Training Plan.

- A. Inspection Activity: The in training Compliance Officer must experience a variety of inspection activities representing both the safety and health discipline while accompanying an experienced Compliance Officer in the field.
- B. Compliance Bureau Office Activity: The Compliance Officer will work in the Raleigh Office participating in the work process of the Review Section.
- C. On Site Consultation: The Compliance Officer will accompany a division consultant, preferably in their discipline (safety or health) on at least one on-site survey.
- D. Technical Support: The Compliance Officer will spend at least one week in the Education, Training, and Technical Assistance Bureau office in Raleigh. The purpose of the assignment will be to answer specific technical questions from the public, as well as assist bureau personnel.

- iii. Duration: The initial Training Program will normally be completed within four to twelve months from the date of employment.
- iv. Documentation of the Initial Training Program Progress: The District supervisor will communicate with the Bureau Chief of Health or Safety as the Compliance Officer progresses through the Initial Training Program. he Chief will review the employee's Professional Development and Training Plan and concur that the program has been successfully completed.

D. **Advanced Training Program.**

- 1. Objective: To provide for professional development beyond the basic training requirements described in the Initial Training Program.
- 2. Requirements: The following elements of the Advanced Training Program are required unless they have been satisfied by prior experience as documented in the Professional Development and Training Plan.
 - a. Formal Training: The following courses may be provided by the OSHA Training Institute or another source as directed by the Bureau of Education, Training, and Technical Assistance. Under certain circumstances, this training may be completed during the Initial Training Program.
 - i. Occupational Safety and Health Training Institute Course 141: Inspection Techniques and Legal Aspects.

ii. Crossover Courses:

- A. Occupational Safety and Health Training Institute
Course 101: Safety Hazard recognition for Industrial Hygienists; or
- B. Occupational Safety and Health Training Institute
Course 121: Introduction to Industrial Hygiene for Safety Officers.

iii. Technical Courses: Two basic technical courses within the Compliance Officer's discipline will be attended during the advanced training period. The courses will be selected by a District Supervisor, based on district and individual needs, from the following lists.

<u>Safety</u>	<u>Health</u>
Construction Standards	Industrial Ventilation
Industrial Noise	Industrial Noise
Accident Investigation	Accident Investigation
Electrical Standards	Respiratory Protection
Machine Guarding	

- b. On-The-Job Training: The District Supervisor will assign inspections based on the Compliance Officer's competence and further training requirements. In addition, the District Supervisor will occasionally assign the Compliance Officer to accompany more experienced personnel on complex or unfamiliar types of inspections.
 - c. In-Service Training Program: The Compliance Officer will develop an area of special interest in a particular industry, hazard or standard. An in-service training session on this subject will be presented as outlined in Section G to at least two District Offices before the end of the Advanced Training Program.
3. Duration: The Advanced Training Program will normally be completed within two years from the date of employment.
4. Documentation of Advanced Training Program Completion: The District Supervisor will communicate with the Bureau Chief of Health or Safety as the Compliance Officer progresses through the Advanced Training Program. The Chief will review the Professional Development and Training Plan documentation and concur that the program has been successfully completed.

E. **Continuing Education.**

Each Compliance Officer is required to receive at least 40 hours of training annually and to attend a technical course once every three years. The employee's Professional Development and Training Plan should be used as a guide in planning continuing education. Training received should be documented in the employee's plan.

F. **Trainee and Apprenticeship Programs.**

Compliance Officers hired as 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 period of time to progress through the Initial and Advanced Training Programs. Training for division employees enrolled in the Apprenticeship program is addressed by that program. When the employee is promoted to Compliance Officer, the employee's training will be reviewed by the District Supervisor and any deficiencies from the requirements of the Initial or Advanced Training Programs must be corrected. Under normal conditions, once promoted the Compliance Officer will be covered by the Continuing Education portion of the Professional Development Program.

G. **In-Service Training.**

1. **Description:** An in-service training program has the following elements:
 - a. Presented by a Compliance Officer for other Compliance Officers in a District Office.
 - b. Duration of thirty minutes to an absolute maximum of two hours.
 - c. Focus on a specific industry, hazard, or standard.
 - d. Compliance-oriented with emphasis on hazard recognition, evaluation, and citation paperwork.
 - e. Designed to be presented at a staff meeting and is not expected to be an exhaustive study of the subject.
 - f. Generally consists of a short introduction, illustrations of the hazard (photographs, slides, film, video), evaluation methods (instruments, air sampling), applicable standards and proper report and citation preparation.
 - g. Examples include: grinding operations, spray finishing, lead-acid battery manufacturing.
2. **Requirements:** Each District Office will present at least six in-service training programs each year. Each Compliance Officer will present a program to at least two District Offices before completing the Advanced Training Program.

H. **Professional Certification:**

The Division encourages Compliance Officers to attain professional certification; either Certified Industrial Hygienist or Certified Safety Professional. The Division supports these efforts through the following:

1. Reimburse the application or registration fee for exams successfully completed which lead to the previously mentioned certificates.
2. Reimburse travel costs at state allowed rates for exams. The exam must be taken at the location closest to the employee's District Office.
3. Allow the employee to use continuing education training time to attend meetings as required to maintain the certification.

Addendum

Professional Development and Training Plan

A. Introduction:

This Professional Development and Training Plan is the permanent record of educational, experience, and job-related training which:

1. Has been completed successfully by the Compliance Officer, or
2. Is planned for satisfactory job skill development.

B. Function:

1. Used at the onset of employment to record the Compliance Officer's formal education, experience, and job-related training in order to plan for required training during the Initial Training Program.
2. Used during the Initial Training Program to record the training activities.
3. Used at the completion of the Initial Training Program as part of the documentation for progression to the Advanced Training Program and approval to perform independent inspections.
4. Used during the Advanced Training Program to plan for and record training activities.
5. Used at the completion of the Advanced Training Program as documentation for progression to the continuing education program.
6. Used during the continuing education program to plan for and record training activities.

C. Responsibilities:

1. Supervisor: The Supervisor will:
 - a. Introduce the Compliance Officer to the plan and assist in its initial completion.
 - b. Periodically review the plan with the Compliance Officer.
 - c. Acknowledge completion of training activities on the plan.
 - d. Maintain the plan in the District Office.

- e. Assure that the entries in the record are accurate, verifiable, and job-related.

2. Compliance Officer: The Compliance Officer will:

- a. Perform the initial completion of the plan with the guidance of the Supervisor.
- b. Record training activities in a timely manner.
- c. Periodically review the plan with the Supervisor.

D. Instructions:

1. The Professional Development and Training Plan has seven parts, including:

- a. Model Notification of completion of the Initial Training Program.
- b. Model Notification of completion of the Advanced Training Program.
- c. Initial Training Program requirements.
- d. Advanced Training Program requirements.
- e. Continuing education record.
- f. General industry standards.
- g. Construction standards.

2. Items (c) - (g) are organized into the following groups and should be completed as noted:

- a. **Areas of Competence or Training:** This field lists the required training courses or on-the-job training in the initial, advanced, and continuing education programs and the subparts and individual standards in general industry and construction. Fields not already completed should show the course name.
- b. **Assessment:** If the Compliance Officer demonstrates expertise in this area above that normally associated with the general knowledge of an experienced Compliance Officer, enter 1.

If the Compliance Officer's training and abilities in this area are adequate, enter 2.

If further training is necessary, enter 3.

All areas noted as requirements must show a 1 or 2 in this field before advancement to the next level of training.

Note: An assessment of 3 in an area not specifically required by the program should not prohibit the Compliance Officer from progression to the next level of training so long as a plan for further training is documented.

c. Training Planned or Completed:

- i. Formal training courses planned for this area should list the course name and projected date. Completed courses should include name, training agency or sponsor, and date.
- ii. Informal training planned for this area should list the type (on-the-job, supervised study, etc.) and a projected completion date. Completed informal training should indicate the type of training, name of lead compliance officer (if appropriate), and the employer's name from the OSHA 1.

d. Hours: The number of hours spent in training in this area should be entered in this field.

e. Acknowledgement: The Supervisor and the Compliance Officer should sign their names (not initials) in this field to indicate that the area has been satisfactorily addressed.

3. Notification of Training Completion:

Models for notification of completion of the Initial and Advanced Training Programs are included in the plan. The notification memorandum along with the Compliance Officer's Professional Development and Training Plan will be sent to the Bureau Chief of Health or Safety upon the completion of each training program. The Bureau Chief will review and sign the plan, and return it to the District Supervisor.

4. Inspection Activity Report for Accompanied Inspection:

This report will be completed by the Compliance Officer for all inspections during the Initial Training Program. They will be included in the plan sent to the Chief at the completion of the Initial Training Program.