

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

Raleigh, N. C.

Field Information System

Operational Procedure Notice 64E

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.

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 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 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, on-the-job experiences and formal training has been developed to accommodate the varying levels of experience and competence during the initial three-year period of a CSHO's career. OTI's 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 (or the OTI equivalent #1000) Initial Compliance and one of the standards courses, #105 or #125 (or the OTI equivalent #1050 or #1250). Selection of the technical courses to be attended and determination of the sequencing and priority are at the 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. Correlation of the courses in this OPN to professional certification can be found in Appendix D of this OPN.

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. The specific course taken by any CSHO will be based upon needs of the OSH Division and budget considerations. 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.

1. *Phase 1 – Initial Courses, Year 1:* The following courses must be completed within the first year of a CSHO's career. There is no limit to the number of courses a CSHO may take during any year.
 - #100 or #1000 Initial Compliance
 - **One** of the following courses on OSHA standards based on career path.
 - i. Safety career path - CSHOs will take the following:
 - #105 or #1050 Introduction to Safety Standards for Safety Officers (safety career path/safety specialists).
 - ii. Health career path - CSHOs will take the following:
 - #125 or #1250 Introduction to Health Standards for Industrial Hygienists (health career path/industrial hygienists).
 - iii. Construction career path - CSHOs will take the following:
 - #105 or #1050 Introduction to Safety Standards for Safety Officers (safety career path/safety specialists). **Please note:** The #105 incorporates the #2000 Construction Standards.
2. *Phase 1 – Initial Courses, Through Year 3:* The following courses must be taken during a CSHO's initial two year period to enhance compliance competencies and technical writing skills.
 - #131 or #1310 Investigative Interviewing Techniques. **Please note:** #131 and #123 are blended together.
 - #123 or #1230 Accident Investigation. **Please note:** #131 and #123 are blended together.
 - #141 or #1410 Inspection Techniques and Legal Aspects. **Please note:** The #141 and the #1410 Inspection Techniques and Legal Aspects course is the only course that cannot be waived.
 - #245 or #2450 Evaluation of Safety and Health Management Systems.
 - Technical Writing **Please note:** This is an OSH Division Core Course.

At least **one** of the following courses will be taken during a CSHO's initial three-year period to enhance multi-disciplinary competence and technical writing skills.

 - Safety career path - CSHOs will take at least one of the following:
 - i. #1080 Health Hazard Awareness for Safety Officers

- ii. #125 or the #1250 Introduction to Health Standards for Industrial Hygienists.
- Health career path - CSHOs will take at least one of the following:
 - i. #1280 Safety Hazard Awareness for Industrial Hygienists.
 - ii. #105 or the #1050 Introduction to Safety Standards for Safety Officers.
- Construction career path – CSHOs will take at least one of the following:
 - i. #1080 Health Hazard Awareness for Safety Officers.
 - ii. #125 or the #1250 Introduction to Health Standards for Industrial Hygienists.
 - iii. Any OSH Construction Safety Specialist (OCSS) Module

3. The #8200 Incident Command System (ICS) for CSHO's include the IS 100 (most current version) - Introduction to Incident Command System and IS 700 (most current version) – National Incident Management System (NIMS), an Introduction; 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.

4. Phase 2 – Technical Courses: 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.

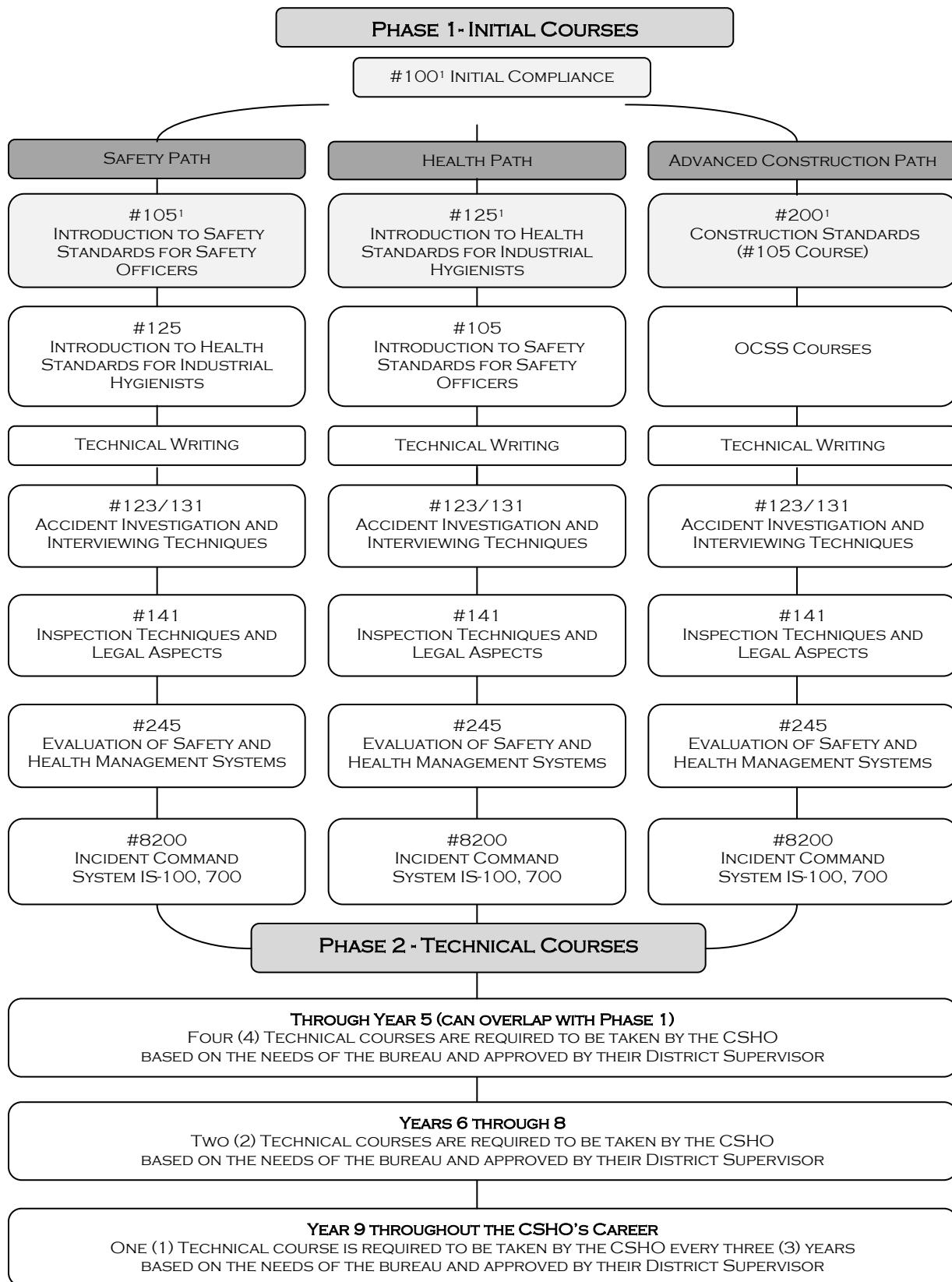
- Four additional technical courses completed by the end of year 5.
- Two additional technical courses completed in years 6 through 8.
- A minimum of one technical course completed every three years, beginning in year 9 and continuing throughout the CSHO's career.

MANDATORY TRAINING REQUIREMENTS		
Phase 1 - Initial Courses		
Year 1		
Career Training Paths for Compliance Personnel		
Safety Path <ul style="list-style-type: none"> #1000¹ Initial Compliance #1050¹ Introduction to Safety Standards for Safety Officers 	Health Path <ul style="list-style-type: none"> #1000¹ Initial Compliance #1250¹ Introduction to Health Standards for Industrial Hygienists 	Construction Path <ul style="list-style-type: none"> #1000¹ Initial Compliance #2000¹ Construction Standards
Through Year 3		
<ul style="list-style-type: none"> #1310 Investigative Interviewing Techniques #1410 Inspection Techniques and Legal Aspects #2450 Evaluation of Safety and Health Management Systems #1230 Accident Investigation #1080 Health Hazard Awareness for Safety Officers -or- #1250² Introduction to Health Standards for Industrial Hygienists -or- #2000 Construction Standards #8200 Incident Command System I-200 	<ul style="list-style-type: none"> #1310 Investigative Interviewing Techniques #1410 Inspection Techniques and Legal Aspects #2450 Evaluation of Safety and Health Management Systems #1230 Accident Investigation #1280 Safety Hazard Awareness for Industrial Hygienists -or- #1050² Introduction to Safety Standards for Safety Officers -or- #2000 Construction Standards #8200 Incident Command System I-200 	<ul style="list-style-type: none"> #1310 Investigative Interviewing Techniques #1410 Inspection Techniques and Legal Aspects #2450 Evaluation of Safety and Health Management Systems #1230 Accident Investigation #1280 Safety Hazard Awareness for Industrial Hygienists -or- #1050² Introduction to Safety Standards for Safety Officers -or- #1080 Health Hazard Awareness for Safety Officers -or- #1250² Introduction to Health Standards for Industrial Hygienists #8200 Incident Command System I-200
Phase 2 - Technical Courses		
Through Year 5 (can overlap with Phase 1)		
<p>Four technical courses are required to be taken by the CSHO based on Area Office needs as approved by the Regional Administrator.</p>		
Years 6 through 8		
<p>Two technical courses are required to be taken by the CSHO based on Area Office needs as approved by the Regional Administrator.</p>		
Years 9 throughout the CSHO's career		
<p>Minimum of one technical course every three years.</p>		

Figure 1

¹Initial Compliance and one of the Standards courses must be completed during first year²These courses should only be taken by compliance officers with the appropriate education and/or experience

NCDOL OSH Division Training Paths for Compliance Personnel



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

Figure 2

D. **Organizational Responsibilities.**

1. **OSH Administration.** The 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 bureau chief will be responsible for providing programs to educate and train CSHOs in the skills and knowledge required to perform their duties. Responsibilities include:
 - a. Planning, developing and conducting technical and specialized training courses and seminars.
 - b. Conducting needs assessments and gap analyses to identify training needs for CSHOs in accordance with appropriate policies and procedures.
 - c. Developing classroom and technology-enabled training products designed to support the training and development of CSHOs.
 - d. Maintaining and updating competency-based training records to assist CSHOs in selecting training and development opportunities that match their Individual Development Plans (Form DL-80) and other professional development needs.
 - e. Conducting evaluations of training courses and programs designed for CSHOs.
 - f. Annotating the CSHO's training records to reflect waived required training and time extensions for required training.
 - g. Annotating the CSHO's training records to reflect alternative training for required courses.
3. **Compliance Bureau Chiefs.** 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. Approve additional technical courses that are required as a part of a CSHO's training program. This is in addition to the required courses outlined in this OPN.
 - b. Grant waivers and time extensions in accordance with the procedures explained in sections F and G of this OPN.
4. **District Supervisor.** The district supervisor directs the planning and execution of this OPN. The district supervisor 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. The district supervisor will ensure the successful implementation of the training program for compliance personnel as outlined in this OPN. 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 and appendices.
 - b. Through the Individual Development Plan (IDP) process, identify and document the training needs of CSHOs assigned to their supervision. All training should be

planned and coordinated accordingly.

- c. Provide and coordinate OPN, assistance, and guidance that are consistent with the IDP 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 of this OPN to the 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 Appendix A). Initiate process for letter and certificate to be sent to CSHO.
- i. Upon completion of Phase 1 of the CSHO's training, assess and direct the continued career development of CSHO to include but not limited to OTI courses, advanced OSH Division courses (i.e.; Process Safety Management, Logging Camp, OSH Construction Safety Specialist) and other technical courses.

5. **Compliance Safety and Health Officer.** 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.

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 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. Role-play is used to allow CSHOs to practice how to conduct an opening conference. The course ensures that participants have the fundamentals of information gathering to document the *prima facie* elements in a case file. During a mock inspection, participants work in teams to investigate and document the validity of alleged complaint items. At the conclusion of this course, the 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. ***Please note:*** The OSH Division #105 course can serve 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 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. ***Please note:*** The OSH Division #125 course can serve as the equivalent of the federal #1080 Health Hazard Awareness for Safety Officers.
 - iii. **#2000 Construction Standards or #105 - 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. The OSH Division course #105 also addresses safety hazards covered by 29 CFR 1926. 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. ***Please note:*** The #105 incorporates the #2000 Construction Standards.

- 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. ***Please note:*** The #123 and #131 are incorporated 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. ***Please note:*** The #123 and #131 are incorporated 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. CSHOs develop a sample legally defensible case file and potentially participate in a mock hearing as the culminating learning experience. ***Please 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. ***Please note:*** This course is provided through OTI as an online course accessed through the OSH One Stop Shop.
- g. OSH Construction Safety Specialist (OCSS) Modules Course – Advanced Construction Standards. These modules are designed to meet the needs of the experienced CSHOs who 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.
- 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 SOPs 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, hazards 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.
- j. Multi-Disciplinary Courses.
 - i. #1280 Safety 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. ***Please note:*** The OSH Division #105 course can serve 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. ***Please note:*** The OSH Division #125 course can serve 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). Additionally, members of the OSH Division's emergency response/homeland security team must also take IS-200-ICS for Single Resources and Initial Action Incidents, most current version. 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 completed during the first eight years of a CSHO's career. 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 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 district supervisor and assistant 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. 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 preferably after the CSHO has completed both #100 (or #1000) Initial Compliance and one of the standards courses.

- 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 1 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 and assistant 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.

1. The CSHO II will:
 - a. Ensure that each CSHO has completed the necessary prerequisites before attending training courses.
 - b. Review the CSHO's performance on recommended self-study and on-the-job training (OJT) assignments.
 - c. Conduct a review with the CSHO following each recommended self-study and OJT inspection activity. This review provides the Supervisor with information on the progress of the CSHO and can assist in identifying areas requiring further training.
 - d. 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.
2. The district supervisor will monitor implementation of the training program outlined in this OPN through review of the CSHO's training documents and periodic meetings with the CSHO. The district supervisor will also meet periodically with the CSHO II mentoring the training of the CSHO.

I. **Continuation of CSHO Development.**

1. **Professional Standing, Recognition and Professional Certification.** The series of courses required for Phase 1 of the CSHO's first three years provide a foundation for proficiency. 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 continue attending technical courses. While professional certification is an important career milestone, it is not the only path to gaining professional standing or recognition. CSHOs that complete new, complex or difficult assignments expand their capabilities and broaden their role as a safety and health professional inside and outside the OSH Division.
2. **Role of Individual Development Plans.** An IDP is an active plan to help the CSHO achieve organizational and career goals. IDPs must be updated annually during the final annual evaluation and serve as a tool to provide documentation for each CSHO to chart and monitor their own progress toward developmental goals. An IDP can help a CSHO:
 - a. Achieve and enhance the level of knowledge and skills required to achieve the functional competencies of a CSHO.
 - b. Build expertise as an OSH Division safety and health professional.
 - c. Continue professional development throughout their career.
3. **IDPs for the Initial Three-Year Period.** Appendices A and B serve as guidelines for district supervisors to select appropriate training outlined by this OPN during the first

three years. The IDP should reflect:

- a. Mandatory training required during the three-year period as outlined in this OPN.
- b. State training requirements.
- c. Other developmental training as determined by the CSHO's district supervisor.
For example:
 - i. Supplemental training at the state and bureau level that includes formal and/or informal mentoring by higher graded personnel and/or CSHOs with specialized experience.
 - ii. Participation in various classes of inspections and a variety of industries and worksites.

4. **IDPs Developed after the Three-Year Period.**

- a. Mandatory training required after year three as outlined in this OPN.
- b. The IDP should follow the guidance outlined in OSHA Instruction PER 05-00-001 (PER 10-1.1) OSHA Training Policy.
- c. An IDP helps the CSHO continue to improve their present performance and prepare them for more responsible work in accordance with their potential and interests, and the needs of the OSH Division.

J. **Evaluation.** An overall evaluation of the training program for OSH Division compliance personnel effectiveness will be conducted by staff from ETTA or through the monitoring process of federal OSHA.

1. Established evaluation processes and criteria 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 OPN. It also serves as a basis for proposing changes to course objectives, course content and presentation methods.
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 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 64D is canceled. This OPN is effective on the date of signature. It will remain in effect until revised or canceled by the director.

Signed on Orginal

Marcy Collyer
ETTA Training Supervisor

Signed on Orginal

Allen McNeely
OSH Director

Signed on Orginal

Kevin Beauregard
Assistant OSH Director

1/06/2015

Date of Signature

Appendix A: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Year 1

Background and Description of Appendix A. This appendix is recommended as a tool for supervisors of first year CSHOs.

ETTA coordinates formalized training for CSHOs through its competency-based approach to curriculum. As a professional, the CSHO will acquire additional knowledge, skills, abilities and behaviors through other sources such as Self-Instruction (SI) and OJT which enhance the formal training a new CSHO receives. This appendix offers recommendations for both SI and OJT activities to be completed along with formal training.

The Appendix A table lists activities that should be completed in the field office prior to and after attending specified formal courses. Items listed in the “Activity” column should be completed by all CSHOs. Activities recommended specifically for safety specialists and industrial hygienists are listed in the last two columns. Each activity and discipline-specific recommendation is provided to complement material covered in the formal training courses.

Time allotted to accomplish SI and OJT assignments should be compatible with the newly-hired CSHO’s current knowledge, skill and experience levels. The district supervisor should verify the CSHO’s ability to successfully complete SI and OJT assignments. Training assignments may also be supplemented by other comparable task assignments deemed appropriate and/or equivalent by the supervisor.

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
PRIOR to Attending OSH Division Course #100 or OSHA Training Institute’s Course #1000 Initial Compliance				
OJT	Work with office administrative support personnel to identify and become familiar with office administrative procedures (both personnel and citation processing).	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	Work with the district supervisor or an assigned CSHO II mentor to review the department and division <i>New Employee Orientation Procedures</i> . This will be scheduled during the first weeks of the CSHO’s employment.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
OJT	<p>Explore the OSH Division One Stop Shop and Internet sites. Begin with the following OSH Division Information Systems:</p> <ul style="list-style-type: none"> * OSHA Express (OE) * OSHA forms (e.g., OSHA-1, -1A, and -1B) * Use of OSHA Integrated Management Information System (IMIS) data * SAVES * Field Information System (FIS) <p>OSH Division public page (Internet):</p> <ul style="list-style-type: none"> * Services offered by NCDOL 	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	OSHA-1B
	<p>Receive training and instructions on use and limitations of PPE (e.g., hard hats, safety glasses, hearing protection, high-visibility clothing and safety shoes).</p> <p>Receive training and instructions on personal use of respirators, according to OSH Division programs and be fit-tested as applicable.</p> <p>With team leader or assigned CSHO II mentor, review clients basic programs such as:</p> <ul style="list-style-type: none"> * Hazard Communication * The Control of Hazardous Energy (Lock-out/Tag out) * Recordkeeping 	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
SI	Read and review North Carolina's OSH Act and become familiar with: 1. NC General Statutes (NCGS) 95 Article 16 2. Which employers and employees are covered and 3. The responsibilities of employers and employees.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	Review the Table of Contents of 29 CFR 1910 and 29 CFR 1926 to become familiar with the types of hazards covered by OSH regulations. Consult with team leader or assigned CSHO II mentor to determine which hazards are more likely to be investigated by safety specialists vs. those more likely to be investigated by industrial hygienists.	__/__/__		
	Review the Table of Contents of NC Administrative Code (NCAC) subchapter 7F and NCAC subchapter 7A to become familiar with the types of hazards covered by NC OSH regulations.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	Review and become familiar with the resources offered on federal OSHA's public (Internet) web page.	__/__/__		
	Review the NCDOL State Emergency Management Plan (SEMP) and Continuity of Operations Plan (COOP) Plans available on the OSH One Stop Shop.	__/__/__		

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
OJT	Accompany a released CSHO on a programmed planned inspection and observe the following: * Inspection preparation * Calibration of instruments * Opening conference * Walkthrough * Use of instruments or other measuring devices * Closing conference * Preparation of citations	__/__/__	Instruments might include Santronics AC sensor, velometer, inclinometer, engineering rod.	Instruments might include air or noise sampling equipment.
	Accompany a fully-qualified CSHO on an unprogrammed inspection.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
Attend Formal Training: Course #100 or Course #1000 Initial Compliance – including web-based segment prior to instructor-led (i.e., classroom) training.		__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
SI	Review the contents of 29 CFR 1915 and 1917 (Maritime Standards), and consult with team leader or assigned CSHO II mentor to determine when the office could make an inspection using these standards.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	Review the contents of 29 CFR 1928 (Agriculture Standards) and consult with team leader or assigned CSHO II mentor to identify inspections under this Part.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
OJT	If the district office conducts inspections under the 29 CFR 1915 and 1917 standards, accompany a released qualified CSHO on an inspection involving these standards (East Compliance Bureau only).	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
	Accompany a released Agriculture Safety and Health (ASH) CSHO on an inspection involving agriculture operations which applies the 29 CFR 1928 standards.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	Identify consensus or other standards referenced in the OSH Division standards, discuss with the district supervisor whether the provisions of the identified standards are incorporated by reference or are advisory in nature, and determine how personnel in your office access copies of needed consensus standards.	__/__/__	All Subparts in Part 1910 (excluding Subpart Z except 1910.1020, 1910.1200, and 1910.1201). Also, refer to 29 CFR 1910.6, 1926.65, 1926.95 thru 1926.102, 1926.104, and 1926.152 (or other standards assigned by the district supervisor).	1910 Subparts I, J and Z. Also, refer to 29 CFR 1910.6, 1926.65, 1926.95 thru 1926.102, 1926.104, and 1926.152 (or other standards assigned by the district supervisor).
	Specific to your career path, accompany a released CSHO on an inspection and discuss related technical information from that inspection.	__/__/__	Example: after an inspection involving storage of flammable and combustible liquids, discuss chemistry related to fire and solvents.	Example: after an inspection involving lead or silica exposures, discuss toxicology and health effects, dose-response relationships, feasible engineering controls.
	With a district supervisor or assigned CSHO II mentor, review calibration and maintenance requirements of equipment used in your discipline (e.g., detector tube pumps, carbon monoxide and/or multiple gas meters, receptacle (three-light) tester, sound level meters, camera, tape measure).	__/__/__	Examples include: Santronics AC sensor, voltage tester, engineering rod, inclinometer.	Examples include: air monitoring instrumentation, noise dosimeters, multi gas meters.

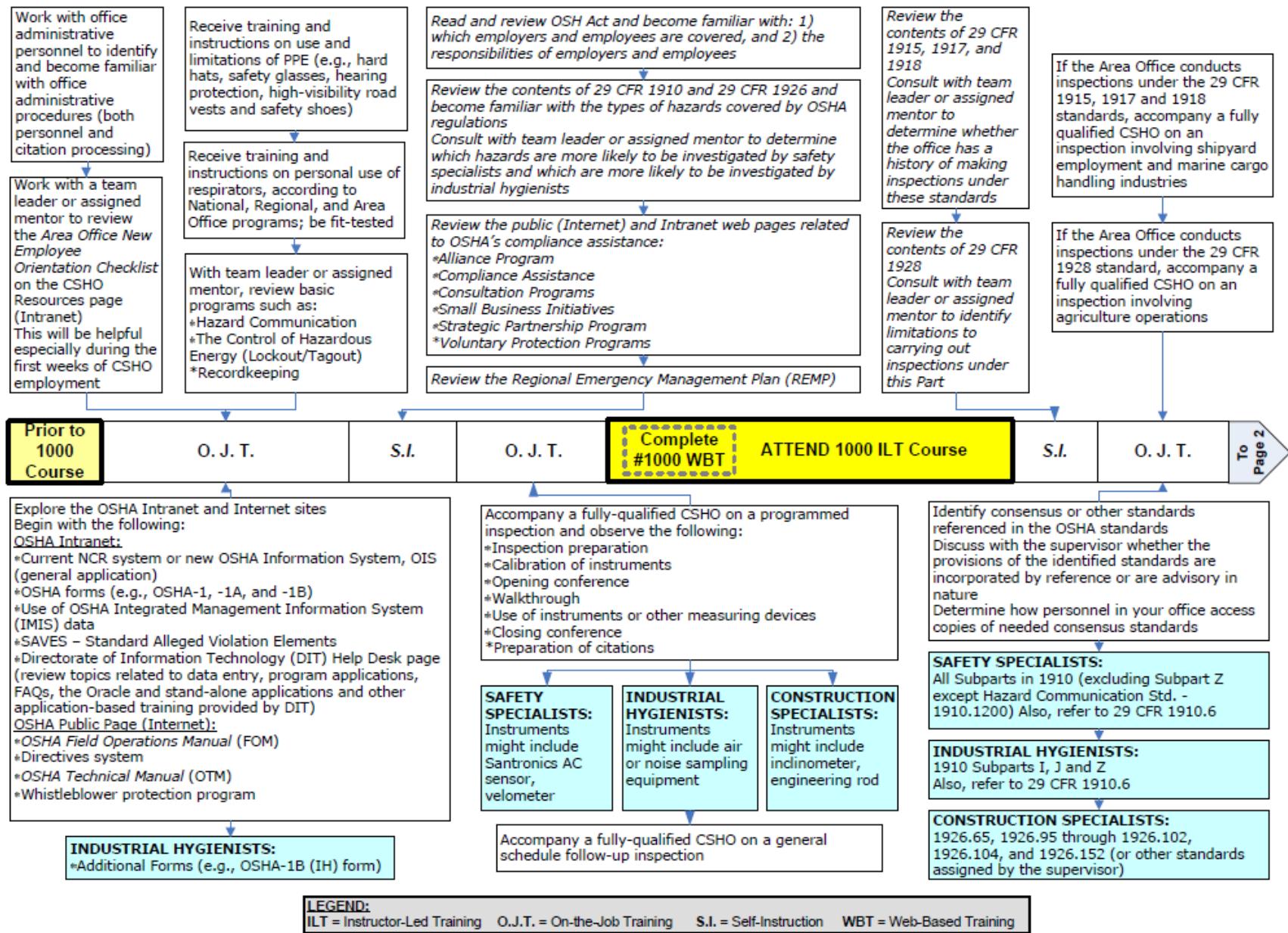
Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
	With a district supervisor or assigned CSHO II mentor, identify the instruments used by personnel in your specific discipline that are maintained in the field office (e.g., detector tube pumps, carbon monoxide and/or multiple gas meters, receptacle (three-light) tester, sound level meters, camera, tape measure).	__/__/__	Examples include: Santronics AC sensor, voltage tester, engineering rod, inclinometer.	Examples include: air monitoring equipment, noise instrumentation, velometers, heat stress monitors.
	Work with a district supervisor or assigned CSHO II mentor to identify and become familiar with OSHA's Nationally Recognized Testing Laboratory (NRTL) program.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	With a district supervisor or assigned CSHO II mentor, review the NCGS 95-129(1) process.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
Attend Formal Standards Course per CSHO Discipline		__/__/__	Course #105 or #1050 Introduction to Safety Standards	Course #125 or #1250 Introduction to Health Standards
SI	Review the NCDOL library's basic texts, references, and materials related to your discipline's hazards and controls.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
	<p>Prepare a written technical report or PowerPoint presentation for a district meeting for a specific type of hazard related to your discipline.</p> <p>Include:</p> <ul style="list-style-type: none"> * Types of worksites where the hazard may be expected to occur * Work activities that may involve the hazard * Equipment that may be associated with the hazard * Engineering and/or administrative controls and PPE that may be required to control the hazard * Related OSHA standards 	__/__/__	Examples include: amputations, electrical, fall from heights, trenching.	Examples include: noise, temperature stress, exposure to toxic air contaminants.
OJT	<p>Post-inspection and under the direction of a district supervisor or assigned CSHO II mentor, prepare a mock OSHA-1B for a specific type of hazard documenting:</p> <ul style="list-style-type: none"> * Which standard applies * Which standard is violated * Employees exposed * Employer knowledge * Recommended abatement (e.g., engineering, administrative controls, PPE) * Recommended penalties 	__/__/__	<p><i>No Additional Discipline-Specific Recommendations</i></p>	

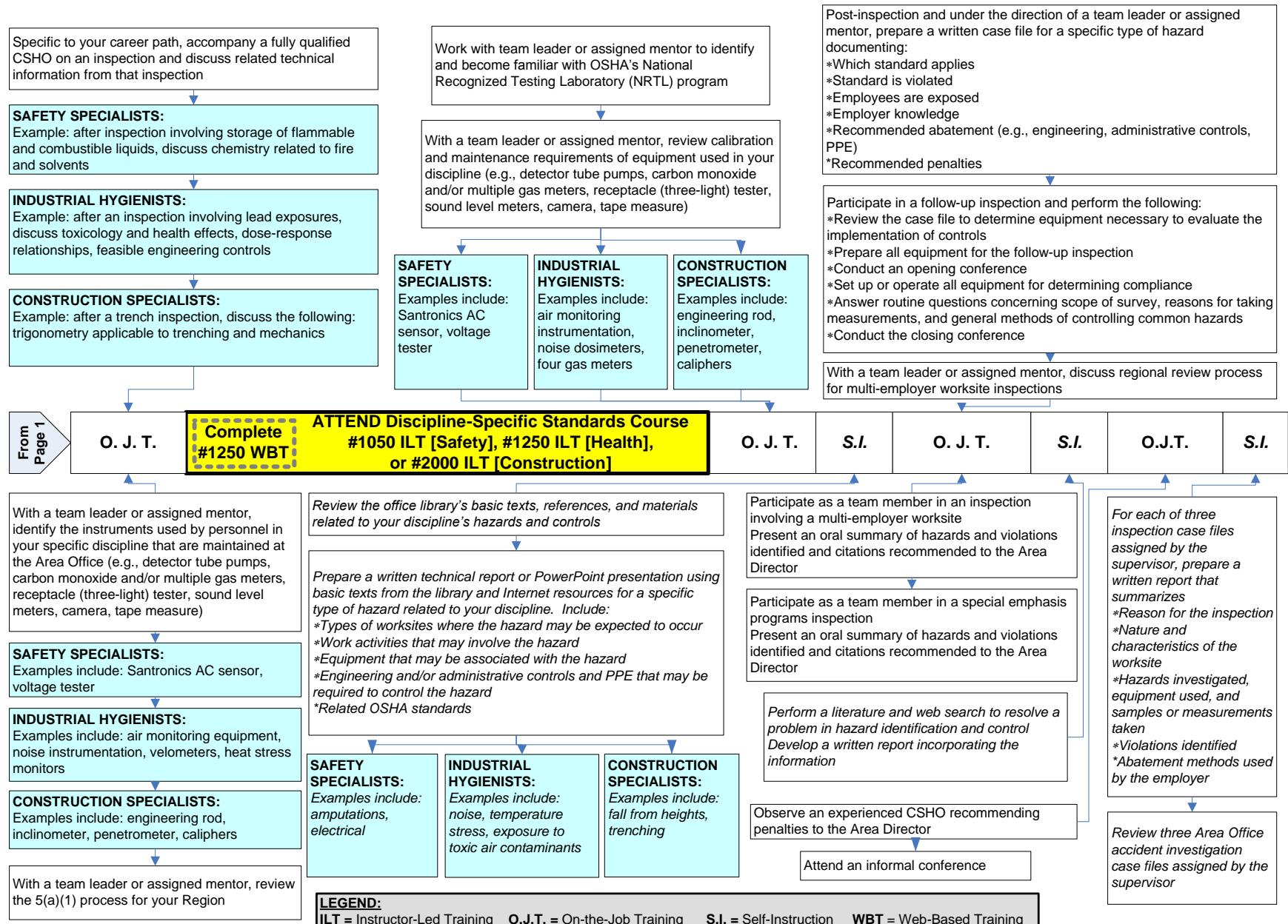
Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
	<p>Participate in a follow-up inspection and perform the following:</p> <ul style="list-style-type: none"> * Review the case file to determine equipment necessary to evaluate the implementation of controls * Prepare all equipment for the follow-up inspection * Conduct an opening conference * Set up or operate all equipment for determining compliance * Answer routine questions concerning scope of survey, reasons for taking measurements, and general methods of controlling common hazards * Conduct the closing conference 	__/__/__		
	With a district supervisor or assigned CSHO II mentor, discuss the division's citation authorization review process.	__/__/__		
	<p>Participate as a team member in an inspection involving a multi-employer worksite.</p> <p>Present an oral summary of hazards and violations identified and citations recommended to the district supervisor or assigned CSHO II mentor.</p>	__/__/__		
	<p>Participate as a team member in a special emphasis program inspection.</p> <p>Present an oral summary of hazards and violations identified and citations recommended to the district supervisor or assigned CSHO II mentor.</p>	__/__/__		

No Additional Discipline-Specific Recommendations

Type of Activity	Activity Description	Date Completed	Safety Specialists	Industrial Hygienists
SI	Perform a literature and web search to resolve a problem in hazard identification and control then develop a written report incorporating the information.	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
OJT	Attend an informal conference	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
SI	For each of three inspection case files assigned by the district supervisor or assigned CSHO II mentor, prepare a written report that summarizes: <ul style="list-style-type: none"> * Reason for the inspection * Nature and characteristics of the worksite * Hazards investigated, equipment used, and samples or measurements taken * Violations identified * Abatement methods used by the employer 	__/__/__	<i>No Additional Discipline-Specific Recommendations</i>	
	Review three field office accident investigation case files.	__/__/__		



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Appendix B: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

Background and Description of Appendix B. This appendix is a tool for district supervisors of CSHOs to use to plan training during the CSHO's second and third years of employment. Ideally, the courses would be taken in the order listed. The proposed sequence assists CSHOs with building professional expertise by setting incremental, achievable goals.

Some of the initial courses recommended for years two and three include an application of technical knowledge; however, the initial courses are not intended to provide an in-depth perspective in any specific technical area. ETTA can coordinate additional courses that deal specifically with skills and knowledge in several technical areas related to safety and health. Refer to Appendix D *Correlation of OTI Courses to Professional Certification* for more detailed information about courses that relate to professional certification.

After completion of each of the required courses and optional recommended technical courses, District Supervisors should assign CSHOs inspections which further reinforce the retention and transfer of the course learning objectives.

Years two and three offer the CSHO opportunities to reach professional development goals by:

- Completing the required courses
- Selecting optional technical courses to support professional development
- Self-Instruction
- On-the-Job Training
- Completing any training required by various standards or directives as assigned by the District Supervisor. (Refer to Appendix C for more information).

Required OSH Division/OTI Courses	Follow-up On-the-Job Training	Self-Instruction	Applies Technical Knowledge
#131 or #1310 Investigative Interviewing Techniques	After completion of: <ul style="list-style-type: none">○ #131 or #1310 <i>Investigative Interviewing Techniques and</i>○ #123 or #1230 <i>Accident Investigation</i> CSHOs should: <ul style="list-style-type: none">○ Participate in three accident/fatality investigations under the guidance of a team leader and/or a released CSHO.○ Be given the opportunity to demonstrate effective investigative interviewing techniques.	None	This course does not specifically apply technical knowledge.

Appendix B: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

Required OSH Division/OTI Courses	Follow-up On-the-Job Training	Self-Instruction	Applies Technical Knowledge
#141 or #1410 Inspection Techniques and Legal Aspects	<p>After completion of:</p> <ul style="list-style-type: none"> ○ #141 or #1410 <i>Inspection Techniques and Legal Aspects and</i> ○ Three inspections <p>The CSHO should discuss with their district supervisor or assigned CSHO II mentor:</p> <ul style="list-style-type: none"> ○ Whether each case has adequate documentation to defend the case during legal proceedings. ○ What additional documentation might have strengthened the case. 	Research and read new and applicable court cases, settlement cases and other OSH Division policy documents related to course content.	This course does not specifically apply technical knowledge.
#245 or #2450 Evaluation of Safety and Health Management Systems	<p>After completion of #245 or #2450 <i>Evaluation of Safety and Health Management System</i>, the CSHO should:</p> <ul style="list-style-type: none"> ○ Participate in a minimum of three inspections of establishments that have a written safety and health program. ○ For each inspection, the CSHO should: <ul style="list-style-type: none"> ● Evaluate the effectiveness of the safety and health program ● Document their reasoning ● Discuss the evaluation with their district supervisor 	Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSH Division policy documents related to course content.	This course applies basic technical knowledge.
#123 or #1230 Accident Investigation	<p>After completion of:</p> <ul style="list-style-type: none"> ○ #131 or #1310 <i>Investigative Interviewing Techniques; and</i> ○ #123 or #1230 <i>Accident Investigation</i> <p>CSHOs should:</p> <ul style="list-style-type: none"> ○ Participate in three accident/fatality investigations under the guidance of a district supervisor or assigned CSHO II mentor. ○ Be given the opportunity to demonstrate effective investigative interviewing techniques. 	Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSH Division policy documents related to course content.	This course applies basic technical knowledge.

Appendix B: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

Required OSH Division/OTI Courses	Follow-up On-the-Job Training	Self-Instruction	Applies Technical Knowledge
<u>Safety Specialists</u> #1080 Health Hazard Awareness for Safety Officers or the first four days of #125 course	Safety Specialists. After the safety specialist has completed the #1080 <i>Health Hazard Awareness for Safety Officers</i> course or #125 course, they should participate in a minimum of three health inspections under the guidance of an experienced industrial hygienist and assist in preparation of citations.	Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSH Division policy documents related to course content.	These courses apply basic technical knowledge.
<u>Industrial Hygienists</u> #1280 Safety Hazard Awareness for Industrial Hygienists or the first three days of #105 course	Industrial Hygienists. After the industrial hygienist has completed the #1280 <i>Safety Hazard Awareness for Industrial Hygienists</i> course or the #105 course, they should participate in a minimum of three safety inspections under the guidance of an experienced safety specialist and assist in preparation of citations.		
<u>Construction Specialists</u> #1080 Health Hazard Awareness for Safety Officers or the first four days of #125 course	Construction Specialists. After construction specialists have completed the #1080 <i>Health Hazard Awareness for Safety Officers</i> course or the #125 course, they should participate in a minimum of three health inspections under the guidance of an experienced safety specialist and assist in preparation of citations.		
HAZWOPER	The 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, hazards 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.		These courses apply basic technical knowledge.

Appendix B: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

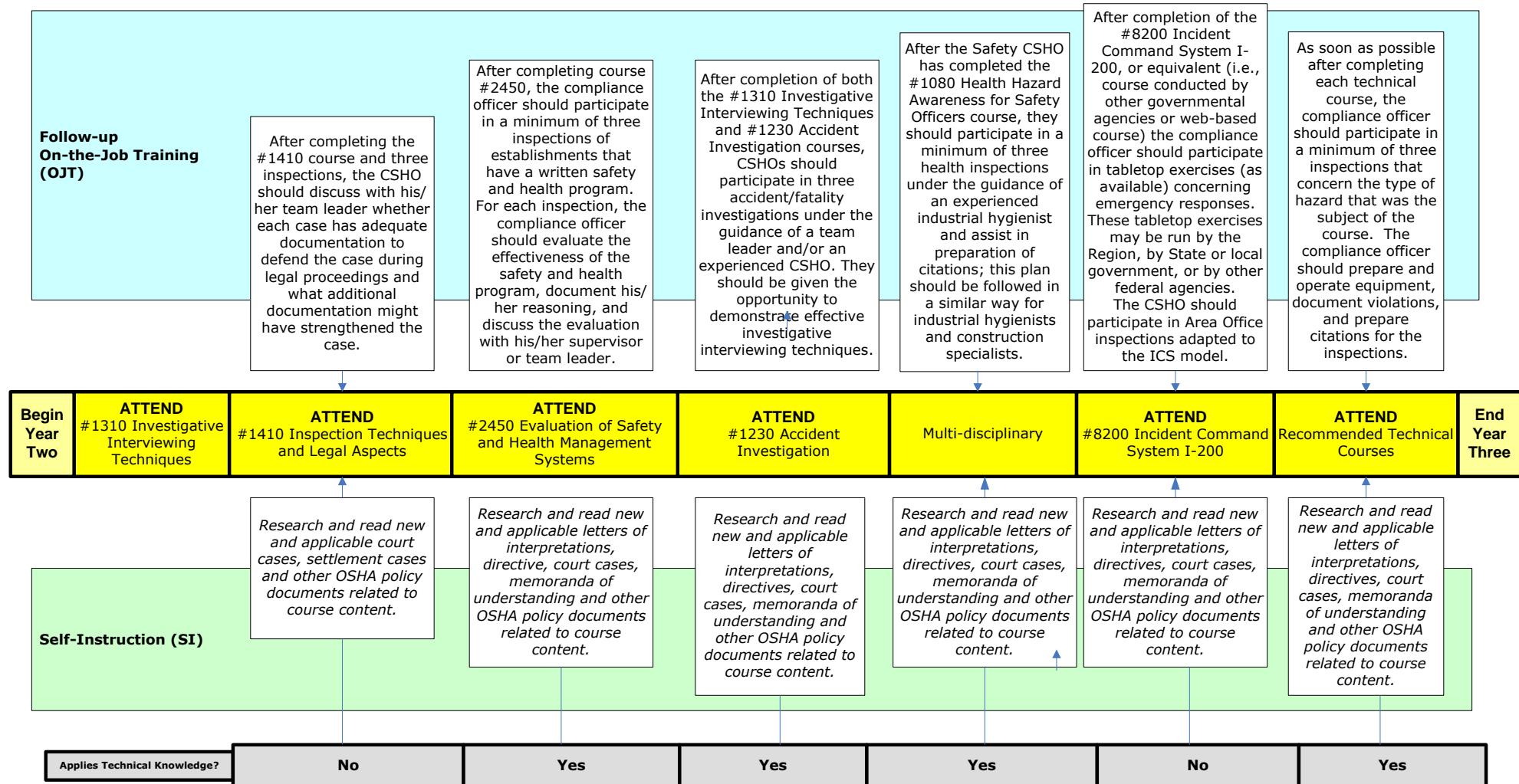
Required OSH Division/OTI Courses	Follow-up On-the-Job Training	Self-Instruction	Applies Technical Knowledge
Technical Writing	<p>The technical writing course is to develop specialized report/document skills, develop consistency among reports and to ensure that SOPs are followed. The course material covers proper completion of OSHA-1, accurate inspection process narratives, composing/formatting SAVEs, develop correct AVDs and write comprehensive and descriptive 1Bs/2Bs. The objective is to provide the compliance officer with the knowledge and tools necessary to write accurate, consistent and complete technical documents and reports.</p>		These courses apply basic technical knowledge.
Incident Command System IS-100 and IS 700 (most current versions)	<p>After completion of the <i>Incident Command System and NIMS</i> or equivalent (e.g., web-based course), the CSHO should participate in tabletop exercises (as available) concerning emergency responses. These tabletop exercises may be run by OSH, by state or local government, or by other federal agencies. The CSHO should participate in field office inspections adapted to the ICS model.</p>	<p>Research and read new and applicable letters of interpretations, directives, court cases, memoranda of understanding and other OSH Division policy documents related to course content.</p>	This course does not specifically apply technical knowledge.

Appendix B: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

Required OSH Division/OTI Courses	Follow-up On-the-Job Training	Self-Instruction	Applies Technical Knowledge
Technical Courses Safety Specialists Build on skills and experience in a related technical area such as machine guarding or lock-out/tagout	<p>Safety Specialists. After the safety specialist has completed a technical course such as the #2030 <i>Basic Electrical Principles</i> or the #2040 <i>Machinery and Machine Guarding Standards</i>, the safety specialist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> ○ Concern the type of hazard that was the subject of the technical course ○ Prepare and operate equipment appropriate for an inspection related to the technical area. ○ Document violations and prepare citations for inspections related to the technical area. <p>After the safety specialist has completed a technical course such as the #3010 <i>Excavation, Trenching and Soil Mechanics</i> or the #3080 <i>Principles of Scaffolding</i>, the safety specialist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> ○ Concern the type of hazard that was the subject of the technical course. ○ Prepare and operate equipment appropriate for an inspection related to the technical area. ○ Document violations and prepare citations for inspections related to the technical area. <p>Industrial Hygienists. After the industrial hygienist has completed a technical course such as the #2200 <i>Industrial Noise</i> or the #2210 <i>Principles of Ventilation</i>, the industrial hygienist should participate in a minimum of three inspections that:</p> <ul style="list-style-type: none"> ○ Concern the type of hazard that was the subject of the technical course. ○ Prepare and operate equipment appropriate for an inspection related to the technical area. <p>Document violations and prepare citations for inspections related to the technical area.</p>	Research and read new and applicable letters of interpretation, directives, court cases, memoranda of understanding and other OSH Division policy documents related to technical course content.	These courses apply technical knowledge that is beyond the basic level.

Appendix B: Recommended CSHO Training Activities for Phase 1 – Initial Courses, Through Year 3

CSHO Years Two & Three Training Plan [TED Appendix B] Summary Page



Appendix C. OTI Courses Required or Recommended in OSHA Directives

This Appendix is recommended as a tool for district supervisors to help determine additional training specifically required or recommended by OSH Division directives. The training listed in this appendix may be taken at any time after completion of the two required courses: #100 or #1000 Initial Compliance course and the appropriate standards course (#105 or #1050 Introduction to Safety Standards for Safety Officers or #125 or #1250 Introduction to Health Standards for Industrial Hygienists).

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
FOM Chapter VIII – Fatality and Catastrophe Investigations	OSH Division personnel who may be involved in fatality and catastrophe investigations.	<ol style="list-style-type: none">1. #100 or #1000 Initial Compliance2. #123 or #1230 Accident Investigation3. #131 or #1310 Investigative Interviewing Techniques4. #141 or #1410 Inspection Techniques and Legal Aspects5. #3420 Criminal Investigation Training Program	<p>OSHA personnel who may be involved in such investigations are encouraged to enroll in these classes and demonstrate proficiency in the relevant areas addressed.</p> <p>To the extent practical, only trained and experienced CSHOs will be assigned to investigate such incidents.</p>

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
Enforcement of the Electric Power Generation, Transmission and Distribution Standard CPL 02-01-038	CSHOs inspecting an electric power generation, transmission and/or distribution facility or other site covered by 29 CFR 1910.269 and who must enter an electrical restricted space.	#3090 Electrical Standards #3109 Electric Power Generation, Transmission and Distribution	Required (or equivalent course) NOTE: Some CSHOs have received electrical safety-related work practice training through utility or other industry work experience and training. This experience and outside training may be used to meet the minimum training requirements. Additionally, CSHOs who have outside training/experience or who have successfully completed the interim 3-day OTI course of 29 CFR 1910.269 may perform such inspections; however, they are encouraged to attend the OTI #3109 course.
	CSHOs that may enter enclosed spaces or confined spaces.	1. #2260 Permit-Required Confined Space Entry 2. #2220 Respiratory Protection 3. #1080 Health Hazard Awareness for Safety Officers	
Respiratory Protection Program Guidelines CPL 02-00-158	Respirator Program Administrators	#2220 Respiratory Protection	Required (or equivalent course)
Application of the Permit-Required Confined Spaces (PRCS) Standard, 29 CFR 1910.146 - CPL 02-00-100	CSHOs that will be entering permit spaces or enclosed spaces.	1. Confined Space Entry 2. Respiratory Protection 3. Introduction to Industrial Hygiene for Safety Personnel <i>(Please note: CPL 02-00-100 and CPL 02-01-038 do not specify course numbers)</i>	Required (or equivalent courses)

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
Exposure Control Plan for OSHA Personnel with Occupational Exposure to Bloodborne Pathogens - CPL 02-02-077	One representative from each district	<p>Bloodborne Pathogens Training at OTI (<i>Please note: although course name & number are not specified, OTI course #2240, Biohazards, would include BBP training.</i></p> <p>The OTI course is conducted by a combination of health care professionals and non-health care professionals with expertise in the standard.</p>	<p>After OTI training, the OSH Division personnel conduct training sessions for other OSH personnel covered by this plan in their districts.</p> <p>Note that training records are to contain all information specified in 1910.1030(h)(2) and will be maintained for 3 years from the date on which the training occurred. Training records will be held by ETTA.</p>

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
The Control of Hazardous Energy – Enforcement Policy and Inspection Procedures - CPL 02-00-147	CSHOs evaluating machines and equipment to determine that they are properly locked and/or tagged out in accordance with 29 CFR 1910.147 and 29 CFR 1910.333.	<p>Recommended OTI courses include:</p> <p>#1280 Safety Hazard Awareness for Industrial Hygienists has replaced #1010 Safety Hazard Recognition for Industrial Hygienists;</p> <p>#1050, Introduction to Safety Standards for the Safety Officer;</p> <p>#3090, Electrical Standards; #3190, Electric Power Generation, Transmission & Distribution.</p>	Experienced OSH Division staff may already have many OTI courses (or other training with equivalent curriculum) that cover LOTO and electrical safety-related energy control practices; therefore, employment records and training certificates may be used to certify that training has been accomplished.
SEMP; and Inspection Procedures for 29 CFR 1910.120 and 1926.65 Paragraph (q): Emergency Response to Hazardous Substance Releases - CPL 02-02-073	OSH Division personnel assigned a role or function related to implementing the SEMP.	<ol style="list-style-type: none"> 1. ICS Level 200 Course – most current version (<i>Please note: this is OTI Course #8200</i>) 2. #3315 EPA's Health and Safety 40-Hour (HAZWOPER) 	Required.

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
	OSH Division On-site Leaders/Coordinators	<ol style="list-style-type: none"> 1. ICS level 200 Course 2. ICS for Executives (Training Module 17 of the ICS training program) 3. #3600 OSHA Technical Assistance for Emergencies 4. #3610 OSHA On-site Leaders/Coordinators 	<p>Required.</p> <p>“ICS for Executives” is required for directors and their designees, the assistant director, the state office executive staff and other designated senior management staff.</p>
Shipyard Employment “Tool - Bag” CPL 02-00-157	CSHOs who will participate in any shipyard employment interventions or inspections.	DTE offers a course that is specific to shipyard employment industry entitled “Shipyard Processes and Standards”, course #2090.	Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in shipyard employment establishments.
Longshoring and Marine - Terminals “Tool Shed” CPL 02-00-154	CSHOs that will participate in any marine cargo handling industry intervention or inspection.	DTE offers a course that is specific to the marine cargo handling industry titled <i>Longshoring and Marine Terminal Processes and Standards</i> , course #2060.	Supervisors or team leaders are responsible for ensuring that CSHOs are qualified by either training or experience to inspect/intervene in marine cargo establishments.
CPL 02-02-073 Inspection Procedures for 29 CFR 1910.120 and 1926.65 paragraph (q): Emergency Response to Hazardous Substance Releases (08/27/2007)	NC OSH Division personnel responding to an emergency that involves hazardous substances	#3315 HAZWOPER course	<p>Course #3380 Enhanced 40-hour Health and Safety Course for CSHOs is being developed to meet training requirements of 29 CFR 1910.120 and 1926.65, including the 40-hour training under paragraph (e).</p> <p>ISC courses are offered on-line by FEMA. Many of the course names and numbers have changed.</p>

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
CPL 02-01-054 Inspection and Citation Guidance for Roadway and Highway Construction Zones (10/16/2012)	Regional Traffic Control Coordinator	<ul style="list-style-type: none"> • Webinar #0065 CSHO Safety in Highway Work Zones • Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections • American Traffic Safety Services Association (ATSSA) Course: Traffic Control Technician • ATSSA Course: Traffic Control Supervisor 	
	CSHOs inspecting high speed work zones (above 45 mph)	<ul style="list-style-type: none"> • Webinar #0065 CSHO Safety in Highway Work Zones • Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections 	
	CSHOs inspecting work zones (at or below 45 mph)	<ul style="list-style-type: none"> • Webinar #0065 CSHO Safety in Highway Work Zones • Webinar #0066 Standards and Citation Policy for Roadway and Work Zone Inspections 	

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
Combustible Dust National Emphasis Program (NEP) (Reissued) -CPL 03-00-008	When possible, only CSHOs trained in recognizing the hazards associated with combustible dust will be assigned to conduct inspections under this NEP.	<p>A training course offered by OTI in recognizing combustible dust explosion hazards may be one source of such training. The training at OTI covers various topics, including engineering controls and methodologies in preventing combustible dust deflagration, other fire, and explosion hazards. In addition the training covers several NFPA documents referenced in Section III of this directive, including NFPA 654, NFPA 68, and NFPA 69.</p> <p><i>Please note: CSHOs knowledgeable in recognition and control of combustible dust hazards and familiar with NFPA provisions need not undergo the training at OTI.</i></p> <p><i>Please note: This is an OTI course #3320, Combustible Dust Hazards and Controls.</i></p>	The director will ensure that an appropriate number of CSHOs trained in combustible dust hazard recognition are available for inspections under this NEP.

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
CPL 03-00-014 PSM Covered Chemical Facilities National Emphasis Program (11/29/	Level 1 Team Leader	<ul style="list-style-type: none"> • #3300 Safety and Health in the Chemical Processing Industries • #3400 Hazard Analysis in the Chemical Processing Industries • #3410 Advanced Process Safety Management OR • #3430 Advanced PSM in the Chemical Industries 	<p><i>Please note: Completion of Course #330 prior to Fiscal Year 1991 does not meet the requirements for Level 1 team members.</i></p>
	Level 2 Team Members	<ul style="list-style-type: none"> • #3300 Safety and Health in the Chemical Processing Industries • #3400 Hazard Analysis in the Chemical Processing Industries 	
HSO 01-00-001 NEMP (12/18/2003)	OSHA Personnel assigned a role or function related to implementing the NEMP or Regional Emergency Management Plan (REMP)	<ul style="list-style-type: none"> • #3600 OSHA Technical Assistance for Emergencies • #3610 OSHA On-Site Leaders/Coordinators 	<p><i>Please note: ICS courses are offered on-line by FEMA. Many of the course names and number have changed.</i></p> <p><i>Please note: Some courses may not be offered every year.</i></p>

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
	Members of Specialized Response Team	<ul style="list-style-type: none"> • #3600 OSHA Technical Assistance for Emergencies • #3610 OSHA On-Site Leaders/Coordinators • #2200 Respiratory Protection, formerly numbered 222 • #331 Hazardous Waste Site Inspections* 	<p>*OTI offers #3315, EPA's Health and Safety 40-Hour course, which is equivalent to OTI course #331.</p> <p>OTI course #345 and #346 are online courses offered by FEMA.</p> <p><i>Please note: OSHA Directorate of Training and Education (DTE) is developing course #3380, Enhanced 40-hour Health and Safety Course for CSHOs to meet training requirements of 29 CFR 1910.120 and 1926.65.</i></p> <p>Specialized Response Team training is coordinated by the Directorate of Technical Support and Emergency Management (DTSEM) Health Response Team per Appendix J of the Directive.</p>

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Directive	OSH Division Personnel	OSH Division/OTI Course	Comments
Carolina Star Program	Onsite Evaluation Team	#2450 or OSH Division equivalent (#245), Evaluation of Safety and Health Management Systems (SHMS), or other formal classroom training in evaluating safety and health management systems (for OSH Division personnel only) plus working knowledge and understanding of SHMSs.	CSHOs whose current duties include enforcement responsibilities in the region having jurisdiction over the worksite may be assigned to a Star onsite team. However, as a general rule, such personnel may not subsequently engage in enforcement activity at the worksite for 2 years or until the worksite is no longer a Star participant, whichever comes first. <i>Please note: The OSH director, on a case-by-case basis, may choose to override this 2-year requirement.</i>

Appendix D. Correlation of OTI Courses to Professional Certification

Appendix D. Correlation of Formal Courses to Professional Certification

Professional Certification. Credentialing organizations such as the American Board of Industrial Hygiene (ABIH) and the Board of Certified Safety Professionals (BCSP) have spent many years developing a specific process for determining certification exam questions and the overall requirements that meet the level of achievement of a certified professional in a given field. Passing a certification exam means an individual has gained a high level of competence in their chosen profession, and the recognition accorded such an individual is commensurate with the achievement.

CSHOs are also encouraged to pursue other available professional certifications that may be appropriate for their current circumstances. For example, the certification of Associate Safety Professional (ASP) may be obtained by CSHOs who lack the required years of experience to qualify to become a CSP.

Relationship of Formal Courses to Professional Certification. District supervisors and CSHOs should be aware that OSH Division and/or OTI courses alone are not sufficient preparation for passing certification exams. This is due to the specific emphasis that formal OSH Division courses place upon the job functions and related on-the-job competencies that a CSHO must use every day. Certification exams are offered to the general public, not just CSHOs; they are designed to apply to a broad range of job functions and job competencies. It is recommended that district supervisors consider, in addition to technical course attendance, other methods to supplement certification preparation study, such as certification preparation software, and mentoring by other certified staff.

This following table in this appendix highlights OTI courses that may provide information or assistance with preparation for professional certification exams offered by the Council on Certification of Health, Environmental and Safety Technologists (CCHEST), the American ABIH and the BCSP. Three certifications are addressed in this Appendix: Construction Health and Safety Technician (CHST[®]), CIH, and CSP.

Appendix D. Correlation of OTI Courses to Professional Certification

Construction Health & Safety Technician®	Certified Industrial Hygienist	Certified Safety Professional
#2050 Cranes and Rigging	#2200 Industrial Noise	#2010 Hazardous Materials
#2260 Permit-Required Confined Spaces	#2210 Principles of Ventilation	#2030 Basic Electrical Principles
#3010 Excavation, Trenching and Soil Mechanics	#2220 Respiratory Protection	#2050 Cranes and Rigging for Construction
#3020 Tunneling and Underground Operations	#2230 Industrial Toxicology	#2070 Fire Protection and Life Safety
#3030 Concrete, Forms and Shoring	#2240 Biohazards	#2210 Principles of Ventilation
#3080 Principles of Scaffolding	#2250 Ergonomics Applied to Musculoskeletal Disorders and Nerve Disorders	#2250 Ergonomics Applied to MSDs and Nerve Disorders
#3090 Electrical Standards	#2260 Permit-Required Confined Spaces	#2610 Ionizing Radiation
#3110 Fall Arrest Systems	#2330 Indoor Air Quality	#3090 Electrical Standards
#3160 Steel Erection	#2610 Ionizing Radiation	#3400 Hazard Analysis in the Chemical Processing Industries
#3500 Demolition	#3220 Applied Welding Principles	#4520 Certified Safety Professional Examination Preparation
	#3280 Industrial Hygiene Chemistry	
	#3350 Comprehensive Review of Emergency Response Under 1910.120(q)	
	#4530 Certified Industrial Hygienist Examination Preparation	