

## Occupational Health and Safety Bureau

### Staff Training Program

#### I. Introduction

The training program established in this document is designed to facilitate the acquisition of journeyman's level of competence by a newly hired employee within a one year period of time. This program contains a four phase sequence of instruction which contains self-instruction and On-Job-Training (OJT) components. The plan is designed for flexibility. A newly hired employee with minimal experience and prior knowledge should be able to complete this program within one year. Employees with a greater amount of previous experience and prior knowledge may accelerate the completion of portions of this program. Although the language used in this training program refers to compliance officers, the program will also be used in the consultation section.

The training is supervised by, and the trainee is assisted by, a designated trainer who will have specific tasks assigned by the program manager in accordance with provisions of this document. The trainer will work closely with the trainee and will report progress to the Compliance Officer supervisor and Program Manager. The trainer will be involved in the evaluation of the trainee's progress towards training goals.

An evaluation system is created through which objective measures of performance and knowledge are used to assure that the trainee has acquired the required levels of competence. The evaluation is arranged to provide periodic monitoring of performance as well as to establish acquisition of journeyman status.

#### II. Organization

A. Within the first week of employment, the new employee will have an opening interview with the Program Manager and Compliance Officer supervisor.

The trainee will be given a copy of this training program, and a written agreement will be developed delineating the expected progress towards training goals identified in this document. This interview will be repeated at the conclusion of each phase of training.

B. The Compliance Officer Supervisor will assign a senior Compliance Officer as that employee's designated trainer. In the case of a newly hired Industrial Hygienist trainee, the designated trainer will be the senior Industrial Hygienist. The specific duties of this trainer are outlined in Appendix A. In general, the trainer will assist the trainee through self training and indoctrination. The trainer will be chiefly responsible for training the trainee in inspection procedures (OJT). The trainer will also be directly involved in the evaluation of the trainee's progress towards training goals. Although the trainer will be the trainee's principal resource and advisor, other bureau personnel will have functions as outlined below.

C. Technical Services section personnel will provide training material to the trainee when requested. This material may consist of reading material, training modules, multimedia material, informal presentations, etc, as the need for such material is identified by the trainee and trainer. A partial resources list is attached in Appendix B.

D. Other Compliance Officers will be assigned to specific training tasks, primarily in inspection phases (OJT). By involvement in inspections with all field personnel, the trainee will have a clearer idea of the various styles and methods which have been developed by other inspectors.

E. The Compliance Officer Supervisor and the Program Manager will be available to meet informally with the trainee when requested. An informal discussion between these individuals will be held at least once per month. The purpose of this meeting will be to identify problems and concerns that the trainee is developing as s/he progresses through the training phases.

### III. Sequences and time limits.

The training sequence for new employees is outlined in Section V. This sequence is composed of four three month phases, and possesses both self-instruction and on-job-training components. Although it is clearly recognized that these time frames must be flexible, the intention is that these 3 month periods be maximum time periods in which the trainee will acquire the level of knowledge and experience outlined in Section V. The goal is journeyman competence within a one year period. If a trainee appears to be having difficulties meeting the goals, remedial action should be decided upon in the monthly informal meetings. If, on the other hand, the trainee has previous experience or knowledge which will allow for accelerated completion of any phase of training, completion of the evaluation task will be arranged. Upon the completion of the evaluation task for each phase, the trainee will enter into the next phase of training. The 3 month time frame for each phase is independent and begins upon the completion of the previous phase evaluation task.

### IV. Training Components

Training will normally consist of self instruction and OJT. In cases where additional training is required, classroom instruction may be arranged with the OSHA institute, NIOSH, or other qualified agency. Approval for classroom study will be granted by the program manager upon consideration of individual and bureau needs and bureau resources. This training may require travel.

#### A. Self Instruction Will Be Accomplished Through:

1. Reading of material outlined in Section V for Safety Compliance Officers, or Section VI for Industrial Hygienists.

2. Review of material provided by the designated trainer, supervisor, or technical services personnel.
3. Informal discussions with the trainer and other Compliance Officers pertaining to the material.
4. Use of photographs, slides, films, etc. pertaining to standards.
5. Use of training modules which are designed to instruct employees on standard subparts and safety/health hazards.

#### B. On-Job-Training (OJT)

OJT consists of participation in a series of compliance inspections. During this sequence of inspections, specific tasks will be given to the trainee. As the sequence progresses, these responsibilities will be increased until the trainee has completed all inspection tasks.

#### V. Training sequences—Safety Compliance Officers

A. Training will be directed along the following sequence. Each phase of instruction should take no longer than 3 months to complete. As early as possible during this training sequence, the trainee will attend 3 informal administrative reviews and 1 Occupational Health and Safety Review Commission formal review hearing. Throughout the training, the trainee will review appropriate STDs, CPLs, and OHSB Directives.

##### Phase I

##### Self Instruction

OHS Act

OHS Regulations

Field Operations Manual

Recordkeeping Requirements

SIC Manual

29CFR1910—subparts C,D,E,F,G,H, S

29CFR1926—subparts C,D,E,F

~~National Electric Code—Chapter 1~~

Review Case files

OJT

Within the first month, the trainee will accompany the designated trainer on a fixed site inspection. Prior to that inspection, the trainee will assist in the preparation of inspection material. During that inspection, the trainee will observe as the Compliance Officer conducts the inspection. After the inspection, the Compliance Officer will discuss the inspection results with the trainee. During the next two months, the trainee will accompany a senior Compliance Officer (preferably the designated trainer) on 4 more inspections. At least two of these inspections will be on multi-employer worksites.

Phase II

Self Instruction

29CFR1910—subparts I,J,K,L,M, S

29CFR1926—subparts G,H I J K

National Electric Code--Chapters 4,5

OJT

During this phase the trainee will accompany the Compliance Officer on 10 inspections, at least 3 of which will be multi-employer sites. During this time, the trainee will be given increased responsibilities.

## Phase IV

### Self Instruction

29CFR1910—subparts R,T

29CFR1926—Subparts S,T,U,V,W

### OJT

Trainee will conduct 10 solo inspections, at least 3 of which will be multi-employer worksites. The designated trainer will be available for consultation. The Compliance Officer supervisor will accompany the trainee on at least two inspections during this phase and make an evaluation of the trainee's performance.

B. When the program manager determines that classroom training is necessary to fill a trainee's or the Bureau's needs, that training will be arranged with the OSHA Training Institute, NIOSH, or other qualified agency. The types of classes which may be thus arranged include:

Interviewing techniques

Accident Investigation

Respirator Training

Industrial Hygiene Measurement

Oil and Gas Well Drilling

Construction Standards

General Industry Standards

Cross Training in Hazard Recognition

Safety Hazard Recognition for Industrial Hygienists

Health Hazard Recognition for Safety Compliance Officers

Under the direction of the Compliance Officer, the trainee will take photographs to document hazards, will complete field worksheets, will take employee interviews, and will assist in case file preparation. Before completion of this phase, the trainee will conduct an opening conference in a fixed site. Also, during this phase, the trainee will accompany a senior Industrial Hygiene Compliance Officer on two inspections in order to gain experience in industrial hygiene hazard recognition. During these inspections, the trainee will learn how to use basic IH screening equipment such as the sound level meter and drager pump.

### Phase III

#### Self Instruction

29CFR1910—subparts O, P, Q, Z, S

29CFR1926—subparts L, M, N, O, P, Q, R

29CFR1928—entire

~~National Electric Code—entire~~

Oil and Gas Well Drilling

#### OJT

Trainee will conduct a complete fixed site inspection under the supervision of a Compliance Officer within the first month of this phase. Thereafter, the trainee will conduct 10 inspections, 3 of which will be multi-employer worksites. The trainee will complete all case file work and discuss the files with the designated trainer before turning them in for review. Some of these inspections may be solo, as the supervisor deems appropriate.

These Classes will be arranged to assure the most efficient use of Bureau resources. The arrangements may require that the trainee travel to the site of the training, or the instructor may be brought into the state to conduct classes. Training classes may be arranged to allow for continued professional development as well as to supplement Self-instruction and OJT during initial training.

#### VI. Training Sequence—Industrial Hygienist

A. Newly hired Industrial Hygienists will have varying levels of previous experience and knowledge. In general, an Industrial Hygienist trainee, when hired, will have already completed educational programs in mathematics and basic sciences, such as chemistry, biology, anatomy, physiology, toxicology and epidemiology. Deficiencies in these areas of knowledge will be remedied through classroom work arranged by the Program Manager within the first two phases of training. As early as possible during the training, the trainee will attend three informal administrative reviews, and one Occupational Health and Safety Review Commission Hearing.

B. The sequence of training for the Industrial Hygienist will be as follows:

##### Phase I

##### Self Instruction

1. OHS Act
2. OHS Regulations
3. Field Operations Manual
4. Review of IH case files
5. IH FOM
6. 29CFR1910—Chapters C,G,H,J,Z
7. Families of Chemicals and their toxic effects

8. Dose Response Relationships ?

9. Specific Industry Processes ?

#### OJT

During this phase of training, the trainee will be introduced to basic inspection procedures. The training will begin with an introduction to the technical equipment used during inspections, including air sampling pumps, sound level meters, and noise dosimeters. Supervised training on this equipment will include maintenance, calibration and operation of the equipment. Also, during this phase the trainee will accompany the senior Industrial Hygienist on a walkthrough inspection and assist in sampling.

#### Phase II

##### Self Instruction

IH FOM (continued)

Specific Industry Processes ?

Sampling Strategies and Techniques

Safety Hazard Recognition

29CFR1910—subparts D,E,F,I,K,L

National Electric Code—Chapter 1

#### OJT

During this phase the trainee will assist the Senior Industrial Hygienist on 3 inspections, 2 of which will be primarily air contaminants and one of which will be physical agents. The trainee will assist in all phases of preparation, including sampling strategy. During the inspection, the trainee will be given specific tasks by the Senior IH. The trainee will assist in the preparation of the case file and in writing

the technical reports. Also, during this phase, the trainee will accompany a senior Safety Compliance Officer on two inspections in order to gain experience in safety hazard recognition.

### Phase III

#### Self Instruction

IH FOM (continued)

Specific industry processes

Safety hazard recognition

29CFR1910—subparts N,M,O,P,Q

National Electric Code—Chapters 4,5

#### OJT

During this phase, the trainee will conduct 5 inspections under the supervision of the Senior Industrial Hygienist. Two of these inspections will be primarily covering physical agents. The inspections will be assigned to be of increasing complexity (such as sampling for several airborne contaminants simultaneously). The trainee will complete all case files and prepare technical reports. These files will be discussed with the Senior Industrial Hygienist before they are turned in for review. Some of these inspections may be solo. The trainee will also accompany a senior Safety Compliance Officer on 3 safety inspections.

### Phase IV

#### Self Instruction

IH FOM (continued)

Specific industry processes

## Safety hazard recognition

29CFR1910--subparts R,T

National Electric Code--Entire

### OJT

During this phase, the trainee will conduct at least 6 inspections of varying complexity. Some of these inspections may be accompanied by the Senior Industrial Hygienist. The trainee will complete all aspects of the case file and will write the technical report. Prior to turning these files in for review, the trainee will discuss them with the Senior Industrial Hygienist. The Program Manager or Compliance Officer Supervisor will accompany the trainee on at least two inspections and make an evaluation of the trainee's performance.

C. Evaluation of the training of an Industrial Hygienist trainee will be principally the same as for the Safety Compliance Officer trainee (see Section VII). However, in the case of an Industrial Hygienist trainee, the visual task described in Section VII (A) will be omitted. However, a written examination will be administered under the supervision of the Program Manager.

### VII. Evaluation

A. The evaluation of training will be accomplished through a system of written and verbal tasks. Upon completion of required study material, the trainee will undergo a visual task on hazard recognition. Photographs and slides will be presented to the trainee which show conditions which may contain violations of the health or safety standards. The trainee will also have a written text giving additional information which may not be visually apparent. The trainee will take notes on these slides and photographs and will submit a report describing the

conditions on each photograph, what safety or health hazards are associated with the condition, and discuss the pertinent standard requirements. This report will be submitted to the designated trainer who will review it with the trainee. Upon satisfactory completion of this task, the trainee will use his report and complete violation worksheets, write model citations, and compute relevant penalties. These worksheets will be submitted to the designated trainer who will review them with the Compliance Officer Supervisor. Upon completion of this exercise, a written examination will be given to address elements of the standards which are not readily identifiable through analysis of photographs.

B. The trainee's OJT performance and progress will be evaluated by each Compliance Officer who is in charge of or is observing the trainee's inspection. The Compliance Officer will complete the monitoring report attached in Appendix C, and will turn the form in to the trainee's designated trainer. Prior to turning in this form, the Compliance Officer will show the trainee a copy of the completed form and will discuss any reported deficiencies.

C. OJT performance will also be evaluated by the Program Manager or Compliance Officer Supervisor through the review of case files submitted from OJT inspections. The supervisor or the program manager will maintain a record of these deficiencies. This record will be kept in the trainee's training file. Items which may be considered as deficiencies include excessive "turn around time", inadequate documentation of alleged hazards, and improper completion of records and forms. Journeyman status will not be granted until it is clear that case file deficiencies have been kept to a minimum.

D. This evaluation will be completed following each phase of self instruction/OJT before the employee continues to the next phase. After the conclusion of the fourth phase, a comprehensive exercise will be completed.

## **VIII. Training Completion Records**

A. All training assignments of the trainee will be verified by the designated trainer and recorded on the employee's Training Log (Appendix D). A copy of this log will be maintained by the Compliance Officer supervisor. This record will contain the completion date for each phase of the trainee's program. When a phase of training has been satisfactorily completed, a memo will be written verifying the trainee's performance in meeting the training requirements. This memo will be signed by the supervisor and maintained in the employee's training file. The trainee will receive a copy of this memo. An example of this memo is attached in Appendix E.

B. The Compliance Officer supervisor will maintain a record of training classes attended by the employee during all phases of initial training and during continued professional study. This record will be maintained in the employee's training file. An example of this Training History Log is attached in Appendix F.

## **IX. Continuing Professional Development**

It is not the intention of this program to assert that acquisition of journeyman status means that training is no longer needed. Although continued professional training will not be as structured as the initial training, it is important for both the individual employee and the Bureau that training continue as needed. This training may be arranged to satisfy deficiencies in background or knowledge, to maintain levels of skill and knowledge, or to develop specialization and expertise in one or more fields. The employee must keep the supervisor and program manager aware of particular interests or needs which may be addressed through additional training.