#### ALASKA OCCUPATIONAL SAFETY AND HEALTH

## FFY 2025 ANNUAL 21(d) PERFORMANCE PLAN

# I. <u>21d PROGRAM INFORMATION</u>

## **General Program Overview**

The Alaska Occupational Safety and Health (AKOSH) Consultation and Training (C&T) program entered the 21d program, formerly the 7(c)(1) program in 1984. The program functions as a section of the State of Alaska, Department of Labor and Workforce Development, Division of Labor Standards and Safety. The project maintains offices in Anchorage, Juneau, Palmer, and Fairbanks.

#### **Mission Statement**

Work in partnership with Alaskan workers and employers toward eliminating workplace injuries, illnesses, and deaths.

# **Purpose**

Encourage voluntary compliance of Alaska employers with occupational safety and health standards and recommendations with an emphasis on small employers operating in high hazard industries.

# **AKOSH Strategic Goals**

To achieve its vision, AKOSH has established three strategic goals to guide the development of programs and activities. The successful accomplishment of any one of the strategic goals will not be possible without parallel successes in relation to other goals. For example, a focus on reducing hazard exposures, injuries, illnesses, and deaths in the workplace will be difficult to achieve without realizing the goal to engage workers and employees in this effort.

AKOSH's success in meeting the goals and objectives outlined in the strategic plan will be measured through results, which depend on a concerted effort from each of the agency's programs. For example, when a particular issue is being emphasized as an objective, it is expected that inspections will be targeted to ensure compliance, training workshops will be offered to build necessary knowledge and skills, outreach material will be distributed, and consultation visits will be offered.

AKOSH is committed to three strategic goals for the five-year period of October 1, 2023, through September 30, 2028:

- Improve workplace safety and health in both public and private sectors as evidenced by a reduction in the rate of injuries, illnesses, and fatalities through AKOSH programs and services.
- Promote a safety and health culture (both public and private sectors) in the Alaskan workplace through compliance assistance, cooperative programs, and consultation assistance.
- Secure public confidence through excellence in the development and delivery of AKOSH programs and services.

# Consultation and Training (21d grant) Program

The Alaska Occupational Safety and Health Program is located in the Alaska Department of Labor and Workforce Development (DOLWD), Division of Labor Standards and Safety. A Commissioner, who is appointed by the Governor, heads the department. A Director, who is appointed by the Commissioner, heads the Division of Labor Standards and Safety, and has the authority to perform those duties delegated by the Commissioner and charged by statute (Alaska Statute 18.60.010 - 18.60.105), which include the following elements:

- Encourage Alaskan employers to voluntarily comply with safety and health standards, particularly small businesses in high hazard industries;
- Provide C&T services through on-site consultative activities as described in 29
   CFR 1908 and AS 18.60.030(14) (upon the request of an employer);
- Design educational and other programs to address specific needs of groups or individuals being served. This includes providing statewide classes customized for construction, transportation and warehousing, seafood processing and general industry;
- Dispense information and publications to employers and participate in safetyrelated activities to increase safety and health awareness throughout Alaska;
- Support Alaska's strategic outcome and performance goals as outlined in this strategic plan.

This annual project plan details the specific activities and strategies the C&T program will use in FFY2024 to support AKOSH's strategic goals.

## **AKOSH CONSULTATION PROJECT STAFF AND FTE's 21(d)**

# FY 2025 Staffing Chart (Appendix D-1)

Staff Name	MGT	S/S	S	T/S	H/S	Н	T/H	SEC	T/TE	Total FTE
Gina Agron	-	-	-	-	-	0.65	1	-	-	0.65
Theric Austin	-	-	-	-	-	1	1	0.10	-	0.10
Rodney Bracken	-	-	0.75	-	-	-	-	-	-	0.75
<b>Bradley Buechner</b>	-	-	0.75	-	-	-	-	-	-	0.75
Clint Dallas	-	-	1	-	1	1	1	0.11	-	0.11
Michael Flint	-	-	0.75	-	1	1	1	-	-	0.75
Christian Hendrickson	-	-	0.35	1	1	1	1	-	-	0.35
Connor Hosier	-	-	1	-	1	1	1	0.33	-	0.33
Adante Jones	-	-	0.75	-	1	1	1	-	-	0.75
Tanya Keith	0.20	-	-	-	-	-	-	-	-	0.20
Heather Miley	-	-	1	1	1	0.65	1	-	-	0.65
Yana Rekoun	-	-	1	1	1	ı	ı	0.13	-	0.13
Cleo Sweetman	-	-	1	1	1	ı	ı	0.19	-	0.19
Viki Kelly	-	-	-	-	-	-	-	0.33	-	0.33
J. Mitch Wallace*	0.70	-	-	-	-	1	1	-	-	0.70
Tou Xiong	-	-	-	-	-	0.80	1	-	-	0.80
Tina St. Clair	-	-	-	-	-	1	1	0.11	-	0.11
Laurie Bitz	-	-	0.75	-	-	-	-	-	-	0.75
Elizabeth Hillman								0.11		0.11
Totals	0.90	-	4.10	-	-	2.10	-	1.41	-	8.51

## **Staffed Salaried Positions**

Vacant Positions	MGT	S/S	S	T/S	H/S	Н	T/H	SEC	T/TE	Total FTE
Safety Consultant (ANC)	1	ı	0.75	1	1	1	1	ı	ı	0.75
OHS Analyst (ANC)	-	0.25	-	-	0.25	-	-	-	-	0.50
Totals	-	0.25	0.75	•	0.25	•	•	-	-	1.25

# **Position Designation Key:**

 $MGT-Management \hspace{1.5cm} S-Safety \hspace{0.1cm} Consultant \hspace{1.5cm} H-IH \hspace{0.1cm} Consultant$ 

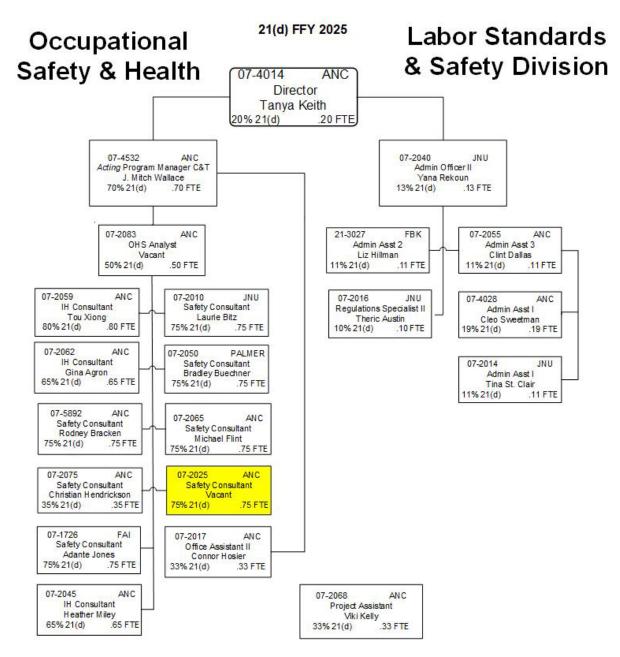
S/S – Safety Supervisor H/S - Industrial Hygiene (IH) Supervisor SEC – Direct Clerical Support

Note: \* - J. Mitch Wallace is Acting Chief of Consultation and Training.

FY 2025 Safety and Health Certifications Chart

Staff Name	Safety and Health Certifications						
Adante Jones	ASP						

FY 2025 Consultation and Training Organizational Chart



#### Notes:

- . PCN 07-2025 planning to fill in FY25
- J. Mitch Wallace, OHS Analyst, is Acting Program Manager C&T

# III. OPERATIONAL DESCRIPTION BY ANNUAL PERFORMANCE GOAL

The C&T program supports the FFY2024 AKOSH Annual performance goals with emphasis on those consultation activities specified in goals: 1.1, 1.2, 1.3, 1.4, 1.5, 2.1.a, 2.1.b, 2.1.c, and 2.1.d; 2.2 - exclusive 21(d) goal, 3.1.a and 3.1.b.

FY2025 Performance Goals 1.1, 1.2, 1.3, 1.4, 1.5, 2.1.a, 2.1.b, 2.1.c, 2.1.d

Federal/State Area of Emphasis Statement	On-Site Consultation Strategy	Description of Planned On-Site Consultation Activities	Anticipated Outcome of On-Site Consultation Activities
<b>GOAL 1.1: Reduce the Number of V</b>		tion	
By the end of FFY 2028 reduce the rate of workplace fatalities under AKOSH jurisdiction (5-year plan).	1.1 Concentrate on the primary causes of fatalities and the industries where fatalities take place to include construction, seafood, transportation and warehousing, and healthcare industries.	1.1. Promotion of AKOSH consultation and training services, industry-specific hazard control systems and safety and health program management improvement.	1.1 By the end of FFY 2025 reduction of the rate of workplace fatalities under AKOSH jurisdiction by at least 10% in comparison to the average annual rate of fatalities from FY 2017 to FY 2021.
	1.1 Influence attitudes about workplace safety and health in Alaska through consultative outreach and training efforts to encourage employers to seek voluntary compliance measures, focusing on employers who have not received Consultation services.	1.1 Providing training classes, training materials and seminars. Evaluations will be distributed to participants at the end of each training session to determine effectiveness.	Baseline: 1.0 fatalities per 100,000 employees. The average annual number of fatalities under AKOSH jurisdiction from January 1, 2017, through December 31,2021, expressed as a rate per 100,000 employees.  Data Source: OIS
	1.1 Make safety and health information and materials easily accessible to employers and workers.	1.1 Participating in conferences and trade shows and/or home shows when possible. Major safety conferences include Alaska Governor's Safety and Health Conference, VPP Conference (national and regional), Associated General Contractor Conference, and American Society of Safety Professional Conference. Attendance at other safety events will be considered.	

Reduce the overall rate of injuries	Workplace Injuries and Illnesses in the Const 1.2 Conduct seminars, workshops, on-site	1.2 Number of seminars,	1.2 Increase the number of consultation and
and illnesses in the construction industry (NAICS 236-238990).	consultation, and special programs target training and consultation. Evaluations will be distributed to participants at the end of each training session to determine effectiveness.  1.2 Target training and consultation visits toward employees and employers in the construction industry those activities most likely to experience "struck by" and "falling" and electrocution and trenching and excavation incidents.	workshops, on-site consultations, and special programs completed in the construction industry.	training visits under the 21d grant by 19% from the baseline effective FFY 2025.  The overall target goal for FFY 2024 to 2028 is to increase consultation visits by 35% from the baseline.  Baseline: 96 average consultation & training visits for FFY 2022.  The FY 2025 goal is to conduct at least 115 visits related to the construction industry.  Note: Annual goal is increased by 4.5% from 2024.
COM 12 D 1 4 N 1 6			Data Source: OIS
Reduce the overall rate of injuries and illnesses in the healthcare industry (NAICS 621-624410).	1.3 Conduct seminars, workshops, on-site consultation, and special programs.  Evaluations will be distributed to participants at the end of each training session to determine effectiveness.  1.3 Target training/education and consultation services toward employers who are most likely to experience workplace injuries in the healthcare industry.	1.3 Number of seminars, workshops, on-site consultations, and special programs completed in the healthcare industry	1.3 Increase the number of consultation and training visits under the 21d grant by 0% fro the baseline effective FFY 2025.  The overall target goal for FFY 2024 to 2025 is to increase consultation visits by 87% from the baseline.  Baseline: 40 average consultation & training visits for FFY 2021.  The FY 2025 goal is to conduct at least 40 visits related to the healthcare industry.  Note: This goal has been reduced from the FFY 2024 goal to better align with projected activity expectations.  Data Source: OIS

<b>GOAL 1.4: Reduce the Number of V</b>	<b>Workplace Injuries and Illnesses in the Seafo</b>	od Processing Industry	
Reduce the overall rate of injuries and illnesses in the seafood processing industry (NAICS 31171-311712, 42446-424460, and 445220).	1.4 Focus consultation and outreach efforts on the causes of "falling", "caught in or between", and "pinch-point" (or amputation) incidents. Evaluations will be distributed to participants at the end of each training session to determine effectiveness.  1.4 Target training and consultations toward those activities most likely to experience "falling", "caught in or between", and "pinch point" (or amputation) incidents.	1.4 Number of on-site consultation and training visits, and compliance assistance in the seafood processing industry.	1.4 Increase the number of consultation and training visits under the 21d grant by 50% from the baseline effective FFY 2025.  The overall target goal for FFY 2024 to 2028 is to increase consultation visits by 75% from the baseline.  Baseline: 8 average consultation & training visits for FFY 2022.  The FY 2025 goal is to conduct at least 12 visits related to the seafood processing industry.  Data Source: OIS
COAL 15: Paduce the Number of V	Vorkalege Injuries and Illnesses in the Trans	portation and Warshousing Industr	
Reduce the overall rate of injuries and illnesses in the transportation and warehousing industry (NAICS 481111-493190).	Norkplace Injuries and Illnesses in the Trans  1.5 Focus consultation and outreach efforts on the causes of "struck by", "slips, trips, and falls", and "falling objects". Evaluations will be distributed to participants at the end of each training session to determine effectiveness.  1.5 Target training and consultations toward those activities most likely to experience "struck by", "slips, trips, and falls", and "falling objects" incidents.	1.5 Number of on-site consultation and training visits, and compliance assistance in the transportation and warehousing industry.	1.5 Increase the number of consultation and training visits under the 21d grant by 10% from the baseline effective FFY 2025.  The overall target goal for FFY 2024 to 2028 is to increase consultation visits by 40% from the baseline.  Baseline: 20 average consultation & training visits for FFY 2024.  The FY 2025 goal is to conduct at least 22 visits related to transportation and warehousing.  Date Source: OIS

GOAL 2.1.a: Develop and Deliver T	GOAL 2.1.a: Develop and Deliver Training to Workers and Employers in the Construction Industry								
Develop and deliver training to workers and employers in the construction industry that targets the most likely causes of injuries, illnesses, and fatalities.	2.1.a Develop and deliver training to workers and employers in the construction industry with emphasis on construction to include residential, commercial, and general industry.  2.1.a Target outreach training and consultations towards those activities most likely to cause "struck by" or "falling" injuries or fatalities.	2.1.a Number of formal and informal training events conducted in construction and number of employees trained.	2.1.a The FY 2025 goal is to conduct 30 construction events and to train at least 550 workers in the construction industry included in the total of 1810 employees trained in all industries.  Data Source: OIS						
COAL A11, D. J ID.P T	N								
Develop and deliver training to	raining to Workers and Employers in the He 2.1.b Develop and deliver training to	2.1.b Number of formal and	2.1.b The FY 2025 goal is to conduct 20						
workers and employers in the healthcare industry that targets the most likely causes of injuries, illnesses, and fatalities.	workers and employers in the healthcare industry with emphasis on home healthcare, assistant living homes, nursing homes, hospitals, dentist offices, and all healthrelated industries. Selection of training will be made at the employer's request.  2.1.b Target outreach training and consultations towards those activities most likely to cause "slips, trips, and falls", "overexertion and bodily reaction", "contact with objects", "Covid-19" or "workplace violence" injuries or fatalities. Selection of training will be made at the employer's request.	2.1.6 Number of formal and informal training events conducted in healthcare and number of employees trained.	healthcare events and to train at least 450 workers in the healthcare industry included in the total of 1810 employees trained and 200 compliance assistance activities in all industries.  Data Source: OIS						

GOAL 2.1.c: Develop and Deliver Training to Workers and Employers in the Seafood Processing Industry								
Develop and deliver training to	2.1.c Develop and deliver training to	2.1.c Number of formal and	2.1.c The FY 2025 goal is to conduct 6					
workers and employers in the	workers and employers in the seafood	informal training events conducted	training events and to train at least 80 workers					
seafood processing industry that	processing industry.	in the seafood processing industry	in the seafood processing industry included in					
targets the most likely causes of		and number of employees trained.	the total of 1810 employees trained and 200					
injuries, illnesses, and fatalities.			compliance assistance activities in all					
	21 T		industries.					
	2.1.c Target outreach training and consultations towards those activities most		Data Samura OIS					
			Data Source: OIS					
	likely to cause "caught in or between", "pinching" and amputation injuries or							
	fatalities.							
	Tatalities.							
<b>GOAL 2.1.d: Develop and Deliver T</b>	raining to Workers and Employers in the Tr	ansportation and Warehousing Indu	istry					
Develop and deliver training to	2.1.d Develop and deliver training to	2.1.d Number of formal and	2.1.d The FY 2025 goal is to conduct 5					
workers and employers in the	workers and employers in the transportation	informal training events conducted	training events and to train at least 50 workers					
transportation and warehousing	and warehousing.	in the transportation and	in the transportation and warehousing industry					
industry that target the most likely		warehousing industry and number	included in the total of 1810 employees trained					
causes of injuries, illnesses, and	2.1.d Target outreach training and	of employees trained.	and 200 compliance assistance activities in all					
fatalities.	consultations towards those activities most		industries.					
	likely to cause "struck by", "slips, trips, and		D . C OIC					
	falls", and "falling objects" incidents.		Data Source: OIS					

# Strategies to achieve goals 1.1, 1.2, 1.3, 1.4, 2.1a, 2.1b, and 2.1c:

Alaska Occupational Safety and Health, Consultation and Training's (AKOSH C&T) goal is to promote and deliver safety and health programs and trainings for preventing injuries, illnesses, and fatalities in Alaska's small to medium-size companies statewide in the public and private sectors.

- AKOSH will continue to integrate its consultation and training efforts, with its enforcement efforts in order to focus on high hazard industries and workplaces. To address particular hazards and issues that cause accidents or represent recognized threats to worker safety and health, AKOSH will continue to promote industry-specific hazard control systems, safety, and health program management improvements.
- Initial consultation visits and training efforts in construction (NAICS industry sector code 23) will concentrate primarily on hazard training associated with "falls", "struck-by", "crystalline silica", trenching, and "caught-in/between".
- Consultation and Training (C&T) will provide promotional activities to include any combination of training, brochure distribution, community outreach, partnerships, and attending safety conferences and conducting safety presentations.
- Initial visits and training efforts in healthcare will concentrate primarily on "slips, trips, and falls", "overexertion and bodily reaction", "contact with objects", "COVID-19", and "workplace violence".

- Initial visits and training efforts in the seafood processing will concentrate primarily on "falls", "struck-by," and "caught-in/between" type hazard training.
- C&T will monitor accidents that result from targeted causes for the duration of the plan, devise, and disseminate prevention strategy information. Monitoring will be conducted when employers notify C&T of work-related accidents. Information will be logged and if necessary, a consultant will be assigned to assist the employer to help design a prevention strategy or devise a safety plan. The action will remain open in the log until the consultant notifies the CPM the activity is closed.
- Consultation and Training Program Manager (CPM) will be responsible to notify employers, employees, and the general public when AKOSH Consultation training events will be held. Notification can be posted via social media, AKOSH website, and other media distribution.
- All consultants will ensure Training Presentation Evaluations are distributed to participants for every formal training presentation. The Training Coordinator will be responsible for collecting evaluations and ensuring evaluations are electronically logged. CPM will review evaluations for training trends and training effectiveness.
- CPM will assign consultants and trainers as needed to fulfill the requirements of the training plan.

#### **Activities**

- Provide training classes for the general public in construction related activities focusing on fall protection, excavation, and personal protective equipment, silica, developing safety and health plan, COVID-19, bloodborne pathogen, and other site-specific training at the request of the employer.
- Conduct at least three (3) OSHA 10-hour in General Industry for the general public with a minimum of 10 or more participants,
- Conduct at least two (2) OSHA 10-hour in Construction for the general public with a minimum of 10 or more participants,
- Conduct 25 formal safety-related training events.
- Conduct 10 safety related presentations.
- Promote C&T Services at Alaska Governor's Safety and Health Conference through outreach, presentations, and networking opportunities,
- Participate in safety related conferences to include Alaska Governor's Safety and Health Conference, Associated General Contractor Conference, American Society of Safety Professional Conference, and other safety-related conferences.
- CPM will attend OSHCON Conference as Alaska's representative.

# **Impact**

This type of intervention strategy will lead to positive changes in employer and employee perceptions and commitments toward maintaining optimal workplace safety and health, which will ultimately produce a significant reduction in serious accidents and improve safety in high hazard industry workplaces.

# FY2025 Performance Goals 2.2, 3.1.a and 3.1.b

State Area of Emphasis Statement	On-Site Consultation Strategy	Description of Planned On-Site Consultation Activities	Anticipated Outcome of On-Site Consultation Activities
GOAL 2.2: Promote Cooperative/Pa	artnership Agreements and Recognition Pro	grams	
Promote cooperative/partnership agreements and recognition programs as a means of lowering accident/fatalities rates.  (21d Annual Plan exclusive goal)	2.2 Encourage the growth of SHARP participation through press releases, speaking engagements, community outreach, brochure distribution, and word-of-mouth.	2.2 Promote SHARP at every consultation visit for employers who meet the criteria for Pre-SHARP/SHARP eligibility.	2.2 By the end of FY 2025, AKOSH projects to gain two new SHARP sites, seven SHARP renewals, and one Pre-SHARP site.  The FY2025 goal is a total of 17 SHARP sites and one pre-SHARP site.
			Baseline: 13 SHARP sites in 2023
	2.2 Maintain current SHARP/Pre-SHARP related sites while striving for additional sites.	2.2 Distribute SHARP brochures or handouts to all Business Connection locations in Alaska	2.2 Injuries and illnesses will be reduced and/or maintained at SHARP/Pre-SHARP related sites.
		2.2 Encourage more SHARP/Pre-SHARP related sites and get public recognition in the communities that the sites are located.	2.2 Promotion of success of SHARP/Pre-SHARP sites and mentorship encouragement and networking opportunities will encourage other businesses to focus resources toward reducing workplace injuries, illnesses, and fatalities.
		2.2 Host a recognition ceremony for every employer who is awarded SHARP status. Provide an opportunity for the Commissioner of the Department of Labor to attend SHARP ceremony and present an award.	
		2.2 Attend seminars and conferences to promote the SHARP program.	
		2.2 Promote SHARP through trade shows with the AKOSH informational booth.	
		2.2 Encourage employers to create safety committees at every opportunity.	

# GOAL 3.1.a AKOSH staff is Well Trained and Knowledgeable

Work with the OSHA Training Institute, Region X staff and other sources to access training for consultation staff in standards and specialized subjects necessary to effectively carry out strategic and annual goals.

3.1.a Continue to identify and schedule training of all existing and new AKOSH personnel

3.1.a Schedule OTI equivalent training and other training for 21d consultants according to the training plan.

3.1.a Improved knowledge of consultation personnel that consequently will reduce employee turnover, increase employee retention, and improve safety and health conditions at workplace visited.

3.1.a AKOSH will strive to ensure AKOSH staff members receive OTI additional training beyond the standard OSHA 1500 On-Site Consultation to further their knowledge, skills, and abilities as consultants. Such training is needed to increase staff retention and ensure staff are highly trained and capable of performing their duties as trained professionals. Additional OTI courses include, but are not limited to:

3.1.a Maintain training plan for 21d personnel.

3.1.a All new hires will attend OSHA #1500 in-person or OSHA #1501 virtual. Experienced safety consultants will attend at least one safety course per year offered via OTI or the OSHA Continuing Education Center from the University of Washington.

In addition to OSHA 1500, all Health Consultants will attend the following courses within year 1:

- OSHA 521 OSHA Guide to Industrial Hygiene
- Asbestos Abatement Certification
- Asbestos Inspector Certification
- Hazardous Paint Certification
- EPA/AHERA Inspector Certification
- HAZWOPER 40-hour (for new-hires)
- HAZWOPER Refresher for renewals

#### Safety:

OSHA 2000 Construction Standards OSHA 2450 Evaluation of Safety & Health Systems

OSHA 2050 Cranes in Construction OSHA 2010 Hazardous Material Industrial Hygiene:

OSHA 1250 Introduction to Health Standards for Industrial Hygienists OSHA 2200 Industrial Noise OSHA 2220 Respiratory Protection

	<ul> <li>3.1.a Continue discussion and promotion of local Region X training events and conferences to minimize negative impacts of training level on other performance goals.</li> <li>3.1.a Support staff members who are interested in obtaining their outreach trainer's certification to become outreach trainers to teach 10-hour and 30-hour Construction and/or General Industry courses.</li> <li>3.1.a Update and implement annual training plan for FY 2025.</li> <li>3.1.a Develop individual training plans for all consultants and track until completion.</li> </ul>	3.1.a Pursue OTI equivalent courses scheduled in Alaska and one in another Region X state for FFY 2025.	
GOAL 3.1.b Conducting Annual Re	eviews of Consultation Case Files		
AKOSH will conduct quarterly reviews of consultation case files to evaluate effectiveness and consistency of services	3.1.b AKOSH will strive to maintain adequate and accurate consultation documentation and procedures.	3.1.b Conduct annual case files review for each consultant. CPM will review 20% of the consultants' case files in a consultant's evaluation year. An evaluation year is 52 weeks after the hire date.	3.1.b Improved knowledge and competency of consultation personnel that consequently will improve safety and health conditions at the workplace visited.
	3.1.b AKOSH will train staff on documentation issues to avoid future occurrences.	3.1.b CPM will conduct yearly onsite evaluations as needed to ensure adequate consultant performance, in accordance with IQAP <i>On-the-Job Evaluation</i> section.	

# Projected Program Activities – 21(d) consultation Alaska: FFY 2025 OPERATING PLAN

This table is for On-Site Consultation programs in State Plans that have not adopted federal measures and goals. Replace the Emphasis Industries, Emphasis Hazards, and Measures as appropriate to your program.

ACTIVITY AND AREAS OF EMPHASIS	Safety	Health	Both	Total		
1. Total Visits (Initial, Training/Education, and Follow-up)	192	65	0	257		
a. Agriculture	0	0	0	0		
b. Construction	85	30	0	115		
c. General Industry	95	35	0	130		
d. Maritime	12	0	0	12		
2. Visits Related to Emphasis Industries	To	otal				
a. Construction	1	15				
b. Seafood Processing		12				
c. Warehousing and Transportation	,	22				
d. Healthcare		35				
Total Visits Related to Emphasis Industries	184					
3. Visits Related to Emphasis Safety and Health Hazards	Total					
a. Fall Prevention	40					
b. Manufacturing Amputations	,	10				
c. Respirable Crystalline Silica	,	25				
d. Trenching and Excavation	,	10				
Total Visits Related to Emphasis Safety and Health Hazards		35				
4. SHARP and Pre-SHARP Projections	Total					
a. Total Current SHARP sites (at time of application)		15				
b. Projected New SHARP sites in FY 2025		2				
c. Projected SHARP Renewals in FY 2025	7					
d. Projected Total SHARP sites at the end of FY 2025	17					
e. Total projected pre-SHARP sites in FY 2025	1					
f. Projected SHARP Pilot sites in FY 2025	1					
5. Total Projected Compliance Assistance Activities	2	00				

## IV. PROGRAM IMPACT FACTORS

A few potential factors could negatively impact the program, interfering with the ability to meet goals. These factors include:

- Due to the very short seafood season combined with the remoteness of several seafood site, only a small window of opportunities exists to conduct seafood visits.
- Staff turnover has been significantly reduced. All positions are expected to be filled by the beginning of FY 2025.
- Pending funding, a lack of adequate funding to cover increased costs such as airfare and accommodations, could result in reduced services, which in turn will have a negative impact on workplace accident rates.

# V. CHANGES TO INTERNAL QUALITY ASSURANCE PROGRAM

• Internal Quality Assurance program had been revised; see in the Attachment 1.

# APPENDIX I ANNUAL TRAINING PLAN - FY 2025

List Personnel by Name, and	Percent of Time on	Training Activity and Location	Percent of Cost	Cost of Training	Training Cost Charged to Agreement <sup>1</sup>			Competency Area that	
Position (i.e., MGT, S/S, H/S,	the 21(d) Agreement		Allowable for	(Include Per Diem,	100% Fed Eligible <sup>2</sup>	90% Fed Allowable <sup>3</sup>	10% State Allowable <sup>4</sup>	Total Charged to Agreement <sup>5</sup>	Training will Address*
S, H, TS, TH,	rigi cement		Federal	Airfare,	Eligible	Allowable	Allowable	to Agreement	
or SPT)			funding	Registration					
				Fee, Misc.,					
				etc.)					
PCN 07-4532 J.	70%	OSHCON Conference,	100%	2,042.00	2,042.00			2,042.00	a,c,d,e,f,g,h
Mitch Wallace,		Location TBD, 5 days							
MGT,		including travel							
Anchorage									
PCN 07-2083,	50%	OSHCON Conference,	100%	2,042.00	2,042.00			2,042.00	a,c,b,c,d,f,h
Vacant, S/S,		Location TBD, 5 days							
Anchorage, AK		including travel							

PCN 07-2025, New Hire, S Anchorage, AK	75%	OTI 1500, Introduction to On-Site Consultation, Arlington Heights, IL, Dates: TBD, 11 days - virtual course	100%	3,508.00	3,508.00			3,508.00	a,b,c,d,f,h
PCN 07-4532, J. M. Wallace, MGT, Anchorage	70%	VPP National Conference, VPPPA, Location TBD; 5 days including travel	100%	1,755.00	1,228.50			1,228.50	a,c,d,e,f,g,h
PCN 07-2075, C. Hendrickson, S, Anchorage	35%	VPP National Conference, VPPPA, Location TBD, Dates TBD; 5 days including travel	100%	1,755.00	614.25			614.25	a,b,c,d,f,h
PCN 07-2065, M. Flint, S. Anchorage	75%	OTI 2000 or OTI 3090, Construction standards or Electrical Safety training, Arlington Heights, IL, Dates TBD, 10 days including travel	100%	3,230.00	2,422.50			2,422.50	a,b,c,d,f,h
PCN 07-2050 B. Buechner, Anchorage, AK	75%	OTI 2000 or OTI 3090, Construction Standards or Excavation training, Arlington, Heights, IL, Dates TBD, 10 days including travel	100%	3,230.00	2,422.50			2,422.50	a,b,c,d,f,h
PCN 07-2045 H. Miley, H, Anchorage	65%	OTI 3430, PSM Course Level III, Salt Lake City, UT, Dates TBD, 10 days including travel	100%	3,230.00	2,099.50			2,099.50	a,b,c,d,f,h
PCN 07-2062 G. Agron, H, Anchorage	65%	OTI 3300, PSM Course Level I, Salt Lake City, Dates TBD, 11 days including travel	100%	3,230.00	2,099.50			2,099.50	a,b,c,d,f,h
PCN 07-1726 A. Jones, S, Fairbanks	75%	Annual Governor's Safety & Health Conference (GSHC), Anchorage, AK, Dates TBD; 4 days, travel to Anchorage	90%	1,740.00		1,174.50	130.50	1,305.00	a,b,c,d,f,h

PCN 07-2059 T. Xiong, H, Anchorage	80%	Asbestos Abatement Refresher for Constructors and Supervisor 40-hr, EMI, Anchorage, AK, no travel	90%	155.00	111.60	12.40	124.00	a,b,c,d,f,h
PCN 07-2045 H. Miley H, Anchorage	65%	Asbestos Abatement Refresher for Constructors and Supervisor 40-hr, EMI, Anchorage, AK, no travel	90%	155.00	90.68	10.08	100.75	a,b,c,d,f,h
PCN 07-2062 G. Agron, H, Anchorage	65%	Asbestos Abatement Refresher for Constructors and Supervisor 40-hr, EMI, Anchorage, AK, no travel	90%	155.00	90.68	10.08	100.75	a,b,c,d,f,h
PCN 07-2059 T. Xiong, H, Anchorage	80%	EPA/AHERA Inspector Certification, EMI, Anchorage, AK, no travel	90%	155.00	111.60	12.40	124.00	a,b,c,d,f,h
PCN 07-2045 M. Heather, H, Anchorage	65%	EPA/AHERA Inspector Refresher, EMI, Anchorage, AK, no travel	90%	155.00	90.68	10.08	100.75	a,b,c,d,f,h
PCN 07-2062 G. Agron, H, Anchorage	65%	EPA/AHERA Inspector Refresher, EMI, Anchorage, AK, no travel	90%	155.00	90.68	10.08	100.75	a,b,c,d,f,h
PCN 07-2059 T. Xiong, H, Anchorage	80%	HAZWOPER Refresher, EMI, Anchorage, AK, no travel	90%	155.00	111.60	12.40	124.00	a,b,c,d,f,h
PCN 07-2062 G. Agron, H, Anchorage	65%	HAZWOPER Refresher, EMI, Anchorage, AK, no travel	90%	155.00	90.68	10.08	100.75	a,b,c,d,f,h
PCN 07-2045 H. Miley, H, Anchorage	65%	HAZWOPER Refresher, EMI, Anchorage, AK, no travel	90%	155.00	90.68	10.08	100.75	a,b,c,d,f,h

PCN 07-2065 M. Flint, S, Anchorage	75%	OSHA 2255 Principles of Ergonomics, or OSHA 521 OSHA Guide to Industrial Hygiene/OSHA# 2045 Machinery & Machine Guarding Standards University of WA, Anchorage, AK, no travel	90%	815.00	550.13	61.13	611.25	a,b,c,d,f,h
PCN 07-5892 S. R. Bracken, S, Anchorage	75%	OSHA 2255 Principles of Ergonomics, or OSHA 521 OSHA Guide to Industrial Hygiene, or OSHA 2045 Machinery & Machine Guarding Standards University of WA, Anchorage, AK, no travel	90%	815.00	550.13	61.13	611.25	a,b,c,d,f,h
PCN 07-1726 A. Jones, S, Fairbanks	75%	OSHA 500 Trainer Course in OSH Standards in Construction or OSHA 2045 Machinery & Machine Guarding Standards, or OSHA 521 OSHA Guide to Industrial Hygiene, University of Washington, Anchorage, AK, 5 days including in- state travel.	90%	2,120.00	1,431.00	159.00	1,590.00	a,b,c,d,e,f,h
PCN 07-2075 C. Hendrickson, S, Palmer	35%	OSHA 5400 Trainer Course in Occupational Safety and Health Standards for the Maritime Industry, or OSHA 2255 Principles of Ergonomics, or OSHA 521 OSHA Guide to Industrial Hygiene, University of	90%	815.00	256.73	28.53	285.25	a,b,c,d,f,h

		WA, Anchorage, AK no travel						
PCN 07-2050 B. Buechner, S, Anchorage	75%	OSHA 2255 Principles of Ergonomics, or OSHA 521 OSHA Guide to Industrial Hygiene, or OSHA 2045 Machinery & Machine Guarding Standards University of WA, Anchorage, AK, no travel	90%	815.00	550.13	61.13	611.25	a,b,c,d,f,h
PCN 07-2010, L. Bitz, S Juneau, AK	75%	OSHA 2255 Principles of Ergonomics, or OSHA 521 OSHA Guide to Industrial Hygiene, or OSHA 2045 Machinery & Machine Guarding Standards University of WA, Anchorage, AK, no travel	90%	2,120.00	1,431.00	159.00	1,590.00	a,b,c,d,f,h
PCN 07-2010, New Hire, S Juneau, AK	75%	OSHA 511 Occupational Safety and Health Standards for General Industry, University of WA, Anchorage, AK, no travel	90%	775.00	523.13	58.13	581.25	a,b,c,d,f,h
PCN 07-2059, T. Xiong, H, Anchorage	80%	OSHA 510 Occupational Safety and Health Standards for the Construction Industry or OSHA 2255 Principles of Ergonomics, University of WA, Anchorage, AK, no travel	90%	650.00	468.00	52.00	520.00	a,b,c,d,f,h

			TOTAL	42,662.00	18,478.75	11,821.88	1,313.62	31,614.25	
, and the second		5 days including out-of- state travel							
PCN 07-2062 G. Agron, H, Anchorage	65%	AIHA National Conference, Kansas City, MO, 5/19-21/2025,	90%	2,000.00		1,170.00	130.00	1,300.00	a,b,c,d,f,h
PCN 07-1726 A. Jones, S, Fairbanks	75%	Training in-house AKOSH, Anchorage, AK, 5 days including in- state travel	90%	1,495.00		1,009.13	112.13	1,121.25	a,b,c,d,f,h
PCN 07-2010, L. Bitz, S Juneau, AK	75%	Training in-house AKOSH, Anchorage, AK, 5 days including in- state travel	90%	1,495.00		1,009.13	112.13	1,121.25	a,b,c,d,f,h
PCN 07-2083, Vacant, Anchorage, AK	50%	OSHA 503 Update for General Industry Outreach Trainers, or OSHA 521 OSHA Guide to Industrial Hygiene, University of WA, Anchorage, AK, no travel	90%	815.00		366.75	40.75	407.50	a,b,c,d,f,h
PCN 07-2062 G. Agron, H, Anchorage	65%	OSHA 511 Occupational Safety and Health Standards for General Industry, OSHA 521 Guide to Industrial Hygiene, University of WA, Anchorage, AK, no travel	90%	775.00		453.38	50.38	503.75	a,b,c,d,f,h

#### \*Competency Areas:

- a. Recognition and Evaluation of Occupational Hazards
- b. Evaluate Safety and Health Management Systemsc. Provide Occupational Safety and Health Training
- d. Provide Hazard Prevention & Control Assistance
- e. Manage Program Processes and Reports
- a. Provide Off-Site Technical Support

- g. Promote OSHA Consultation Services h. OSHA Consultant Professionalism
- i. Other (specify)

# Alaska Occupational Safety and Health Consultation Internal Quality Assurance Program (IQAP) for C&T Program Manager

Developed by
Occupational Safety and Health
Chief of Consultation and Training
October 1, 2024 – September 30, 2025

The information in this guide describes the framework of service delivery and philosophy of the Consultation Services Section of the Alaska Occupational Safety and Health section of AKOSH.

# **Table of Contents**

Section A: Introduction IQAP	4
Required Elements of an Internal Quality Assurance Program (IQAP)	4
Section B. Consultation and Training Staffing, Duties, and Responsibilities	5
I. Staffing	5
a. Alaska Consultation Consultants	5
b. Office Assistant	5
d. Consultation Supervisor/Assistant Chief of Consultation	5
e. Consultation Program Manager/Chief of Consultation	5
II. Duties and Responsibilities	5
a. Alaska Consultation Safety and Health consultants	5
b. Office Assistant	6
c. Assistant Chief/Consultation Supervisor	7
d. Consultation Program Manager	10
Section C: Program, state, or other policies and procedures	13
I. Calendar Year	13
a. Federal Fiscal Year	13
b. State Fiscal Year	13
c. Calendar Fiscal Year	13
II. Technical links found on the OSHA website:	13
III. The Consultation Function Competency Statement	14
a. Hiring Process	14
b. Approval	14
c. Individual Development Plan	14
IV. Relationship of Consultation Programs to Enforcement	14
a. Under Enforcement	14
b. Follow-up	14
V. Programmatic counterparts	15
VI. Hazard corrections	15
a. Hazard Identification	15
b. Employer Responsibility	15
c. Failure to Comply	15

VII. Referral to Enforcement	15
a. Imminent Danger	15
b. Referrals	15
VIII. NAICS Codes for AKOSH Local Emphasis	16
a. High hazard employers	16
b. Small business employers	16
c. Local emphasis employers	16
Section D. Reports	17
I. MARC Report	17
II. Consultation Annual Program Plan (CAPP) Report	17
III. Consultation Annual Program (CAPR) Report	17
IV. Regional Annual Consultation Evaluation Report RACER	19
Section E. Promoting and marketing of Consultation Services	20
I. Brochures	
II. Special engagements	20
III. Promotional items	20
Section F. Special Programs	20
I. VPP Coordinator	20
II. SHARP Coordinator	20
III. CHASE Coordinator	20
APPENDIX A CPM Ride Along and Accompanied Compliance Assistance	21
APPENDIX B Case File Review	22
APPENDIX C New Hire Training Plan	23
APPENDIX D Performance Evaluation Safety Matrix	
APPENDIX E Performance Evaluation Health Matrix	25
APPENDIX F Letter Templates Under Enforcement Review Letter	26
APPENDIX F-2 Withdrawing/Deleting Requests	28
APPENDIX F-3 Low Priority Letter	29
APPENDIX F-4 Approval into 21d	30

# Section A: Introduction IQAP

# Required Elements of an Internal Quality Assurance Program (IQAP)

In accordance Directive CSP 02-00-004 Consultation Policies and procedures Manual, Consultation Projects must operate internal quality assurance programs to ensure the maintenance of program requirements that are covered by assurances in the Project's On-site Consultation Cooperative Agreement. A comprehensive quality assurance program must include systems to ensure:

#### Goal

The overall goal of the Consultation and Training Program is to assist Alaska employers in implementing and maintaining an effective safety and health program and to ultimately become self-sufficient in managing their safety and health program.

#### **Purpose**

The purpose of the Alaska Consultation Program is to work with small businesses defined as employers with fewer than 250 employees at a fixed worksite and no more than 500 employees corporation-wide to help them achieve a safe and healthy worksite.

# Section B. Consultation and Training Staffing, Duties, and Responsibilities

# I. Staffing

The Alaska Consultation and Training Program has a total of 10 consultants—3 Health Consultants and 7 Safety Consultants. 4 Safety Consultants are staffed in Anchorage, 1 in Juneau, 1 in Fairbanks, and 1 in Palmer. 1 Office Assistant is staffed in Anchorage along with 1 Consultation Supervisor, and 1 Consultation Program Manager.

#### a. Alaska Consultation Consultants

Consultants report directly to the Consultation supervisor. Consultants are encouraged to be leaders with positive attitudes. They are trained and qualified to provide safety and health recommendations to Alaska employers. They function as a team and a statewide resource where staff and management work together for the common goal of helping employers solve problems and identify potential hazards at their worksites to improve their self-sufficiency.

#### **b.** Office Assistant

The office assistant provides administrative support to the program manager, who is the direct supervisor. The office assistant provides clerical support to the consultation supervisor and consultation staff.

### d. Consultation Supervisor/Assistant Chief of Consultation

The Assistant Chief of Consultation and Training/Consultation supervisor, also referred to as the OSH Analyst, (all 3 titles are used interchangeably) reports directly to the Program Manager. The Consultation Supervisor supervises all safety and health consultation in the Consultation and Training program.

#### e. Consultation Program Manager/Chief of Consultation

The Program Manager is responsible for the entire Consultation and Training program. The Program Manager reports directly to the Labor and Standards Director.

#### II. Duties and Responsibilities

#### a. Alaska Consultation Safety and Health consultants

i. Safety Consultant—Alaska Consultation Safety Consultants' primary duty is to conduct on-site visits which include hazard recognition, abatement, and or elimination of occupational safety and health hazards for employers. This procedure is done by conducting on-site evaluations, assisting employers in developing site-specific safety and health programs, procedures, and job assessments. Consultants conduct formal and informal training related to safety topics for employers. They help employers understand the importance of hazard recognition and recommend ways to remedy safety and health issues. Upon

visit completion, the consultant writes and provides employers with a written report summarizing findings based on Alaska Occupational Safety and Health regulations, incorporated standards, and guidance documents. The safety consultant discusses ways to improve the employer's safety and health management system.

ii. Health Consultant—Alaska Consultation Health Consultants' primary duty is to conduct on-site health-related consultation visits throughout Alaska. The health consultant is called an industrial hygienist but is not required to possess a Certified Industrial Hygiene certification. The health consultant's on-site visit includes hazard recognition, evaluation, and elimination of occupational health hazards. This is accomplished by conducting on-site evaluations and audits of various workplaces and assisting employers in developing site-specific safety and health program and job hazard assessments. The health consultant is responsible for evaluating occupational exposure to physical, chemical, and biological hazards. The health consultant also develops and conducts formal and informal training sessions related to occupational health topics.

Additional responsibility for the health consultant is to provide regulation

Additional responsibility for the health consultant is to provide regulation interpretations to employers, assist them in hazard recognition, and suggest approaches for solving occupational health issues. The consultant identifies where and how employers could benefit from additional training assistance and provide written reports that summarize findings and suggests site-specific improvements. The health consultant provides interpretations of the Alaska Occupational Safety and Health regulations and incorporated standards and help employers understand the importance of hazard recognition and recommends ways to remedy safety and health issues. Upon visit completion, the consultant writes and provides employers with a written report summarizing findings based on Alaska Occupational Safety and Health regulations, incorporated standards, and guidance documents.

#### **b.** Office Assistant

The Office Assistant provides clerical and administrative support to the program manager, who is the direct supervisor. The Office Assistant processes workflow requests for consultants and provides clerical support to the Consultation supervisor and consultation staff. Typical duties include: typing, filing, answering phones, routing calls to correct staff members, transferring calls to appropriate agencies, recording staff meetings, processing workflow requests, tracking inventory, maintaining inventory database, collecting training records, maintaining training records and training database, ordering supplies, ensuring copiers are stocked with paper, running errands related to office needs, making office supply purchases, and other administrative duties as assigned by the Program Manager or Assistant Chief.

## c. Assistant Chief/Consultation Supervisor

The Assistant Chief of Consultation is responsible for reviewing consultants' daily work activities and ensuring all safety and health consultants perform their duties in accordance with the Consultation Policy and Procedure Manual. Specific responsibilities for the Assistant Chief include the following:

- i. Written reports. The supervisor reviews and makes necessary corrections for all written consultation reports. The supervisor is the signing authority. Once signed, supervisor returns signed reports to the consultants who sends to the employer. Consultants have 15 days from closing conference to send written reports to the supervisor. The supervisor has 3 days to review and return to consultants for corrections. All written reports are required to be sent to the employer within 20 federal working days after the closing conference.
- ii. **Extension requests**—The supervisor is responsible for reviewing and signing all extension requests and returning signed documentation back to the consultant. The consultant must indicate in the case file notes whether interim protection is required, the nature of the recommended interim protection, the date the interim protection must be in place and the dates that interim protections are expected to be replaced with the final agreed upon protections.

If the consultant is unable to verify the correction of a serious hazard before the consultant leaves the worksite, the Assistant Chief must ensure that at a minimum, the employer provides written verification that the serious hazards identified in the written report to the employer have been corrected by their correction due dates. If the employer cannot meet the agreed upon due date, they need to request an extension citing the reasons for the delay and provide a new estimated correction date. Extensions to the interim protection periods must be documented in the case file.

- iii. **Extension process**—When an employer is granted an extension, the following must be documented and placed in the case file:
  - o A written request for the extension from the employer that explains why the correction was not completed in the established time frame
  - o Evidence from the employer that the employer is safeguarding employees against the hazard with interim protection during the correction period
  - A <u>new List of Hazards</u> (a copy of which is sent to the employer and, if applicable, the employee representative) as a result of the approved extension and the revised correction due dates

An employer may request an extension of the correction due date(s) for a serious hazard(s). An extension may be granted when the employer demonstrates evidence:

- o Of a good faith effort to correct the hazard(s) within the established time frame
- That the correction has not been completed because of factors beyond the employer's reasonable control
- That the employer is taking available interim steps to safeguard the employees against the hazard(s) during the correction period
- iv. **Mentoring and Training**—The supervisor is responsible for mentoring and training all newly hired consultants for at least a year. The purpose of mentoring is to ensure staff are delivering appropriate information to clients and following procedures outlined in the CPPM. Upon approval of the Program Manager, the supervisor is responsible for designing and overseeing the new employee orientation program.

At the discretion of the Consultation supervisor a new employee is paired with experienced employees to assist with training and reviewing case visits. When a new supervisor is place in supervisory position with outstanding managerial skill but little practical skill, the peer-to-peer review will be conducted until the supervisory is fully trained in using the OIS system and completed the OSHA 1500 course at the OSHA Training Institute.

The new employee program key elements are: State of Alaska Supervisor Checklist and New Employee Orientation, Web based OTI Course # 1500 "Introduction to On-site Consultation and OTI OSHA Course Introduction to Safety for Safety Officers or Introduction to Industrial Hygiene for Industrial Hygienists. A new consultant performs 21(d) onsite consultation visits independently only after receiving OSHA Regional Administrator approval.

- v. **Leave slips and timesheets**—The supervisor is responsible for reviewing, approving or denying, signing, and managing consultants' leave slips and timesheets. All overtime must be approved by the Chief of Consultation.
- vi. **Performance evaluations and reviews** The Assistant Chief performs at least one on-the-job evaluation (OJE) for all consultants. Each OJE will include a written report of recommendations for professional development. A copy of each OJE is placed in each consultant's personal professional file. If there are major deficiencies with a consultant's professional performance, the Assistant Chief will consult with the CPM to determine what corrective actions or additional training may be required to correct the deficiency. The Assistant Chief is responsible for writing consultants' performance evaluation which are classified as interim, annual, and as needed. The supervisor is responsible for

developing Performance Improvement Plan for individuals who are underperforming. The supervisor is responsible for meeting with underperformers on a regular or as-needed basis to ensure expectation are outline. Documentation is required for all meetings, goals, and expectations.

- vii. **Visit requests**—The supervisor is responsible for receiving and monitoring, tracking, disbursing, and managing Consultation requests when they are received. The supervisor ensures equity among staff when assigning requests. Employers must make a written request for C&T Services. Request for Services are monitored daily. All requests must receive a response from AKOSH within 7 business **days** from the date the request was made by the employer. See copy of AKOSH C&T at this link:

  <a href="http://labor.alaska.gov/lss/forms/consultation\_training\_form.pdf">http://labor.alaska.gov/lss/forms/consultation\_training\_form.pdf</a> Once a request is assigned to appropriate staff, a copy is sent to the Program Manager.
- viii. **Review travel requests**—Due to the uniqueness of Alaska, employers that are deemed "remote" meaning the only means of travel is by plane, boat, skiff, or snow machine, or unconventional modes of transportation, the supervisor must closely monitor requests from these locations. Travel is approved by the Consultation Program Manager for sites that require a travel request. For remotes, visit of 3 or more sites are needed for CPM approval. The supervisor is responsible for ensuring the consultants stay in contact with the employer, acknowledging receipt of request and estimated visit date.
  - ix. **Safety minutes** The Assistant Chief along with consultants are responsible for writing Safety minutes for TRENDS Magazine. Consultants send their articles to the Assistant Chief, who in turn, sends to the Publications Officer.
  - x. Case File Reviews—The Assistant Chief is responsible for conducting case file reviews that are assigned by the CPM. Case file reviews are randomly selected by the CPM and documented in the IQAP. The Assistant Chief may solicit assistance from experience staff to assist with case file reviews
- xi. **Support CPM**—The Assistant Chief supports the CPH with the following activities:
  - Attend Federal Quarterly Meeting with CPM
  - Attend OSCON Conference with CPM
  - o Provide input for the yearly 21d and 23g grants

## d. Consultation Program Manager

The Consultation Program Manager is responsible for the overall performance of the Consultation Program. The CPM oversees goals and measures for the Consultation Program in accordance with the 21d and 23g grants, the 5-year Strategic Plan, the Annual Plan, and Consultation Cooperative Agreement. Specific responsibilities for the Consultation Program Manager include the following:

- xii. **Hiring staff**—The CPM is the hiring authority for all Consultation and Training staff. The Assistant Chief provides input on employee selection.
- xiii. **Staff meetings**—Staff meetings are conducted at least once a month and at most once a week when deemed necessary. Current staff meetings are held Mondays from 2pm-3pm. Topics of discussion include current trends, organizational updates, upcoming holidays/scheduled leave, consultants' travel schedule, workload, upcoming conferences or activities, monthly/quarterly goals, training topics, etc.
- xiv. **Manager's meetings**—The Chief of Consultation and Training attends the weekly and sometimes bi-weekly LSS Director's staff meeting. This meeting includes all four sections of LSS.
- xv. **Quarterly meetings**—The CPM is required to attend all federal quarterly meeting and report the quarterly progress of the Consultation and Training team. The CPM provides quarterly input information to Project Assistant for the federal quarterly review
- xvi. **Significant Activity Report**—Every week the LSS Director requires all for sections to submit a significant activity report. This report contains Consultation programmatic activities for the week. Information such as conference attendance, travel, presentations, publications, or any type of program achievement or significant activity is included. In the absence of the CPM, the Assistant Chief will submit this report.
- xvii. **Conferences**—The Consultation Program Manager is required to attend the OSHCON, National VPP, and Regional VPP conferences once a year.
- xviii. **Ride-alongs**-- CPM will participate in a ride-along with C&T staff members. The purpose of the ride-along is to assess the employee's performance while in the field. The ride-along will be yearly, at least once within a consultant's evaluation year. Ride-alongs will be documented in the IQAP for record.

- xix. **Travel**—The CPM review, approves, disapproves, and signs all travel requests. If approved, the CPM forwards to the LSS Director.
- xx. **OIS reports**—The CPM is responsible for running weekly reports in order to keep consultants apprised of their progress towards meeting federal requirements as outlined in the 21d and 23g grants. The following OIS reports are run:
  - Consultation Evaluation—weekly
  - Compliance Assistance activities—weekly
  - MARC Report—monthly
  - Uncorrected Hazards—weekly
  - Reports Pending—monthly
  - Open Visits—monthly
  - Metrics and Lapsed Days—as needed for performance evaluation information
- xxi. **Separation process**—When a consultant leaves AKOSH C&T, the CPM is responsible for ensuring the former employee's caseload is given to the Assistant Chief who is responsible for reassigning to other staff. The Open or Pending Visits are the best indicators that show what reports are open or pending. Once the Assistant Chief reassigns the visits, the information is updated in the OIS system with the new consultant's name who is taking over the visit. The new consultant is required to contact the employer, introduce themselves, and continue with C&T services.
- xxii. **Separation paperwork and requirements**—The CPM is responsible for ensuring the following items are completed when a staff member leaves. The following documentation is required to be sent to payroll in a singular packet:
  - o Employee resignation letter or email
  - PARF
  - Employee final timesheet
  - SOA Employee clearance form
  - o Employee final performance evaluation

The CPM confirms the below separation documents and are processed by AKOSH Project Assistant:

- Lan/Delete Mainframe Request
- OIS Account User Request
- xxiii. **Purchase requests**—The CPM reviews, approves, and signs all purchase order requests.
- xxiv. **Training Plans**—The CPM will develop, design and administer a personal professional development-training plan for all consultants. The plan is designed to ensure all consultants are acceptably proficient in the Consultant Function-Competency Statements outlined in Appendix K of the CPPM. The CPM is responsible for emailing Federal OSHA for approval to be released
- xxv. **Overtime approval**—The CPM is responsible for approving all overtime requests for all Consultation and Training staff.
- xxvi. **Expenditures**—The Consultation Program Manger is the holder and keeper of the Consultation and Training purchase card. The CPM approves all purchases on the card. Staff members who use the card are required CPM approval before using the card and must provide receipts to the CPM after all purchases.
- xxvii. **IQAP updates**—The IQAP is a continuously working document. The CPM is responsible for ensure the IQAP is current and included all the 21d grant and other required federally required documentation for the Consultation program.
- xxviii. **Grants--**The CPM is responsible for preparing, writing, submitting the 21d and 23g grants to federal OSHA.
  - xxix. **Website updates**—The Chief of Consultation and Training is responsible for submitting current information to the webmaster pertaining to the AKOSH Consultation and Training website.

# Section C: Program, state, or other policies and procedures

#### I. Calendar Year

The Consultation and Training program operates from Federal, State, and Annual Calendar years. Each calendar year has different quarters. The below chart outlines the quarters for each different calendar year.

# a. Federal Fiscal Year

1 <sup>st</sup> quarter	October 1—December 31
2 <sup>nd</sup> quarter	January 1-March 31
3 <sup>rd</sup> quarter	April 1—June 30
4 <sup>th</sup> quarter	July 1—September 30

#### b. State Fiscal Year

1 <sup>st</sup> quarter	July 1—September 30
2 <sup>nd</sup> quarter	October 1—December 31
3 <sup>rd</sup> quarter	January 1—March 31
4 <sup>th</sup> quarter	April 1—June 30

#### c. Calendar Fiscal Year

1 <sup>st</sup> quarter	Jan 1—Mar 31
2 <sup>nd</sup> quarter	April 1—June 30
3 <sup>rd</sup> quarter	July 31—Sep 30
4 <sup>th</sup> quarter	Oct 1—Dec 31

#### II. Technical links found on the OSHA website:

https://www.osha.gov/laws-regs/regulations/standardnumber/1910

https://www.osha.gov/laws-regs/regulations/standardnumber/1926

http://labor.alaska.gov/lss/forms/2019 CPPM.pdf

http://labor.alaska.gov/lss/oshhome.htm

#### **III. The Consultation Function Competency Statement**

To ensure AKOSH hires qualified individuals to fill the Consultation and Training Safety or Health consultant positions, the interview process is modeled in accordance with the AKOSH follows a 3-prong process:

# a. Hiring Process

After all potential candidates have been interviewed for a position and the CPM wishes to select an individual for hire, the CPM must seek approval for the Federal Regional Administrator (RA) **before** making a job offer. A letter must be written outlining the candidate's job qualifications and a copy of the candidate's résumé and other supporting documentation must be included.

## b. Approval

Upon approval to hire from the RA, the CPM must then submit an Individual Development Plan (IDP) to the RA and outline a plan of action for the trainee

## c. Individual Development Plan

Upon completion of the IDP, the CPM must submit a completed IDP, indicating all of the items completed and request approval to work from the 2(d) grant. An example of this is located in APPENDIX D. The RA will respond indicating the consultant has completed the training program and can work from the 21(d) grant.

### IV. Relationship of Consultation Programs to Enforcement

Every consultant must ensure the employer they are visiting is not under Enforcement jurisdiction before scheduling a C&T visit. To find out if an employer is under Enforcement search the following link: https://www.osha.gov/pls/imis/establishment.html

#### a. Under Enforcement

If the employer is under Enforcement, the consultant must communicate with the employer why a visit cannot be conducted and encourage the employer to contact AKOSH C&T after they are no longer with enforcement.

### b. Follow-up

After the consultant notifies the employer, the CPM follows up with a formal letter stating due to the Enforcement review, C&T is unable to provide Consultation services. A sample letter is in APPENDIX F.

## V. Programmatic counterparts

The following are contacts names to assist with OIS or program management questions:

Nicole Flessner	206-757-6688	flessner.nicole@dol.gov	Regional Program Officer
Abby Lopez	503-231-2084	lopez.abby.b@dol.gov	Assistant Regional Administrator
Mary Shannon	202-836-1663	shannon.mary@dol.gov	OIS Subject Matter Expert
Pam Cant		edwp235@lni.wa.gov	WA Consultation Program Manager
Kimberli Reynolds	208-426-3297	kimberlireynolds@boisestate.edu	ID Manager
Greig Lowell	971-352-1181	greig.k.lowell@dcbs.oregon.gov	OR Manager

#### VI. Hazard corrections

Ensuring that hazards are identified, correction advice is offered to employers, and abatement is verified. It is strongly recommended that the CPM runs the Uncorrected Hazard Report on a weekly basis to ensure consultants are following up with employer abatements and hazards are being abated in a timely manner.

#### a. Hazard Identification

The correction of all hazards identified during the consultation visit must continue to be verified through the agreed-upon hazard correction period

#### b. Employer Responsibility

The employer is required to provide certification of abatement to the consultant

## c. Failure to Comply

If the employer fails to take the action necessary to correct hazards within the agreed upon time frame or for any extensions, the consultant contacts the employer and offers an extension.

#### VII. Referral to Enforcement

Only the Consultation Program Manager has the authority to refer an employer to enforcement. Either of the following conditions are grounds for referral to state OSHA enforcement by the Consultation Program Manager:

#### a. Imminent Danger

An imminent danger situation that is not immediately corrected by the employer

#### b. Referrals

After several attempts to confirm abatement from the consultant, a serious hazard that is not corrected within the established time frame must be referred to the Assistant Chief of Consultation.

# **VIII. NAICS Codes for AKOSH Local Emphasis**

Utilize the Consultation High Hazard List or the NAICS Look-up Tool to assist with prioritizing employers. Prioritization should be given to the following:

# a. High hazard employers

(as defined by the high hazard list—Excel Spreadsheet)

# **b.** Small business employers

(as defined by CPPM)

# c. Local emphasis employers

(Below are AKOSH Local Emphasis Programs)

- i. Healthcare NAICS 621-624410
- ii. Construction NAICS 236-238990
- iii. Seafood NAICS 31171-311721

NAICS 42446-424460 NAICS 445220

## Section D. Reports

### I. MARC Report

It is a good idea to run the MARC report monthly and quarterly. This report shows your performance on mandated activities. All MARC measures include draft and final visits with the exceptions of Measures 3 and 4. Measures 3 only captures final visits and Measure 4 only captures final initial visits that are closed to ensure we are pulling the latest data for conferring with employees and for hazards abated. Therefore, the initial visits count in Measure 3 will not equal the initial visit count in Measure 1 and serious hazards count in Measure 4 will not equal the serious hazards count found in other CNS reports.

- i. Ownership—Private sector
- ii. Ownership—Local and State Government

### II. Consultation Annual Program Plan (CAPP) Report

All Consultation programs are expected to achieve the goals outlined in the CAPP report. The CAPP report is run in OIS.

### III. Consultation Annual Program (CAPR) Report

The Consultation CPM must prepare a CAPR to summarize and analyze the progress made in attaining the goals set out in its Consultation Annual Program Plan (CAPP). The CAPR must include a summary and evaluation of the outcome data, a summary of the quarterly progress updates, discussion of obstacles faced, and the reasons for not meeting projected goals. The CAPR is prepared after the end-of-year data has been compiled and is due annually by the end of the calendar year to the RA. Some useful OIS reports to assist with this process are: the CAPP Tracking Report, the Coding Summary Report, and the NAICS Activity Report.

- a) Due Date. The CPM must submit the CAPR to the RA by December 1 of each year. The RA must forward all CAPRs to DCSP by January 15 of each year.
- **b)** Content. The CAPR must include the following elements:
  - Executive Summary. The Executive Summary highlights key contributions; puts results into context with the OSHA or State Plan Strategic Plan and the Consultation program's budget; clarifies the program's rationale, relationships between major program activities and the intended results; and identifies successful and unsuccessful efforts as well as the methods with which the Consultation program will revise strategies to achieve the desired results.

- Discussion of Results in Achieving CAPP Performance Goals. The discussion of results in achieving CAPP performance goals must include the following:
  - 1. For each OSHA or State Plan annual performance goal addressed in the CAPP, the CAPR must contain a summary of results achieved including an evaluation of the strategies and activities used to achieve the goals set in the CAPP. Questions to address may include:
    - ✓ Did these strategies work and were the activities used to implement them effective?
    - ✓ What modifications are needed to the strategies and activities to more effectively reach goals?
    - ✓ Were there situations where external factors affected performance?
    - ✓ Are there ways to coordinate with others or leverage resources or knowledge to help achieve goals?
  - 2. Any specific performance measures relating to the Consultation program or performance measures developed 113 by the CPM must be analyzed in the CAPR. Questions to address may include:
    - ✓ Did the results exceed expectations, and by how much?
    - ✓ Did activities and efforts fall short of expectations, and by how much?
  - 3. Finally, the measures themselves must be evaluated. Did the program evaluate the right things, did they measure things that they had direct control over, and were the data elements essential to measuring the effectiveness of strategic goals, strategies and activities? What measurements were effective in gauging performance and what measurements were simply counts of activities? Did the Consultation program use measurements to evaluate progress and adjust future implementation strategies?

- Special Accomplishments. These could be results that were far beyond expectations; and successes that were achieved in areas or constituencies that had formerly been considered difficult or unlikely. These could also outline the success of a new methodology or activity that could be implemented in other states.
- Other Issues or Adjustments. Comment on these issues and describe proposed actions or adjustments:
  - 1. Results relating to any state-specific initiatives, if any.
  - 2. Areas where annual goals were not met or new issues have emerged.
- o Internal Quality Assurance Program (IQAP). Describe the findings on each element of the IQAP and discuss the status of planned and/or completed measures taken or that will be taken to make needed improvements. Where progress has not been to an acceptable degree, either or both the CAPR and RACER must contain an analysis of the factors contributing to the unexpected outcomes and the identification of necessary changes in strategy or program operations. The CPM prepares the CAPR.

### IV. Regional Annual Consultation Evaluation Report RACER

The RA prepares this report with supporting information provided in the CAPR and other Consultation program reports. The RACER analyzes the results attained by the Consultation program and evaluates its mandated activities performance. Documentation of any findings and recommendations for addressing them, as well as a summary of the reports of quarterly discussions, must be included.

## Section E. Promoting and marketing of Consultation Services

### I. Brochures

The Consultation Program publishes brochures to market its services. When consultants conduct outreach, they are required to leave employer with a C&T brochure that explains our services. Brochures are left at the Department of Labor Business Connection. This is a service for employers working with Department of Labor

### II. Special engagements

Consultants attend various conferences, speak at industry related functions, and are members of task groups to promote C&T services.

### III. Promotional items

When funding is available, the CPM purchases swag and other promotional items to distribute to employers.

## Section F. Special Programs

Below is a list of the special programs specific to Alaska Consultation and Training. Each program is assigned a lead coordinator and a backup when staffing levels are sufficient. The Assistant Chief is responsible for schedule monthly meetings with team to ensure the programs are effective and meeting requirements.

#### I. VPP Coordinator

Information can be found in the VPP manual listed on the AKOSH Website

### **II. SHARP Coordinator**

Information can be found in the CPPM

#### **III. CHASE Coordinator**

Information can be found in AKOSH SOP 005

# APPENDIX A CPM Ride Along and Accompanied Compliance Assistance

October 1, 2024 - Sep 30, 2025

Date	Consultant Name	Employer	Safety or Health Visit	Visit #

<sup>\*</sup>Accompanied ride along not conducted.

<sup>\*\*</sup> Multiple accompanied visits are conducted for staff who are near completion of their training.

# **APPENDIX B Case File Review**

Date	Consultant Name	Employer	Safety or Health Visit	Visit #

# APPENDIX C New Hire Training Plan

The AKOSH Training Progression Table (TPT) lists activities that shall be completed within 6 months after hire date.

### **Type of Activity**

(SI) - Self-Instruction

(OJT) - On-the-Job Training

### <u>Item</u>

- (\*) Item must be signed-off by direct supervisor
- (C) Consultation section specific

### **Consultation TPT**

Item	Type of	Activity Description	Date	Employee Initials	Mentor Initials
	Activity		Complete	inicials	iniciais
*1	SI	Review parts I, II, & III of Appendix A.			
		Work with mentor to identify and become familiar with office administrative procedures.			
2	OJT				
3	OJT	Work with mentor to identify and become familiar with travel coordination procedures.  Review and become familiar with Alaska Administrative Code.			
*4	SI	Work with supervisor/mentor to review the New Hire Checklist.			
5	SI	Research and become familiar with the Federal OSHA website.			
6	SI	Research and become familiar with the State of Alaska website.			
7	SI	Sign up for, research, and become familiar with the OSHA extranet website.			
8	SI	Research and become familiar with the Alaska Occupational Safety and Health website.			
9	SI	Research and become familiar with the Consultation Policy and Procedure Manual (CPPM)			
10	OJT	Conduct and take the lead on at least 10 or more Consultation Outreach activities	Training Log		

11	TLO	Accompany a CSHOs on 20 visits and observe and participate in the following:  Visit preparation  Opening conference  Walkthrough  Closing conference  Take the lead on 5 opening and closing conferences	Training Log  Training Log
13	OJT	Review OIS 2.0 Training Videos	
14	SI	ride-alongs to observe the following:  Inspection preparation  SHMS discussion  Opening conference	Date: 1. 2.
12	TLO	Under the direction of the mentor, use OIS to conduct 5 the following:  Generate a request form  Generate a visit form  Generate a compliance assistance form  Generate Form 33  Generate written report	1. 2. 3. 4. 5.
14	OJT	Complete Federal Training Plan	Training Packet
15		At the end of 6 months, Consultation supervisor will conduct a 6-month performance evaluation.	

By signing this form, you are confirming and verifying that the material in this mentorship program has been reviewed and understood.

New employee name:	 
Mentor name:	
Supervisor name:	
Date completed:	

# **APPENDIX D Performance Evaluation Safety Matrix Consultation and Training Safety Consultants**

### Safety Matrix for employees with 1 year or less.

Below12 unacceptable

13-18 visits—low acceptable

19-25—mid acceptable

26-30—high acceptable

31+ outstanding

At least 75% of visits from private sector; between 20% - 25% of visits from public sector

### Safety Matrix for employees with 1 or more years.

Below 20 visits—unacceptable

21-27 visits—low acceptable

28-38 visits—mid acceptable

39-49 visits—high acceptable

50+ visits—outstanding

- At least 75% of visits must be from private sector
- Between 20%-25% of visits must be from public sector
- Number of employees trained on site—200 or more
- Average number of days between closing conference and written report—15 or less
- Compliance Assistance activities 30 or more
- Follow-up visits—3 or more
- Training and education visits—2 or more

Individuals who maintain Cooperative Programs to include VPP, CHASE, and SHARP will have their goals adjusted to accommodate program requirements.

# **APPENDIX E Performance Evaluation Health Matrix Consultation and Training Health Consultants**

### Health Matrix for employees with 1 year or less.

Below 10 visits unacceptable

11-15 visits—low acceptable

16-20 visits—mid acceptable

21-29 visits—high acceptable

30+ visits outstanding

At least 75% of visits from private sector; between 20% - 25% of visits from public sector

### Health Matrix for employees with 1 or more.

Below 15 visits—unacceptable

16-21 visits—low acceptable

22-29 visits—mid acceptable

30-37 visits—high acceptable

38+ visits—outstanding

- At least 3 sampling events
- At least 75% of visits must be from private sector
- At least 50% of visits must be in the healthcare industry
- Between 20%-25% of visits must be from public sector
- Number of employees trained on site—25 or more
- Average number of days between closing conference and written report—15 or less
- Compliance Assistance activities 15 or more
- Follow-up visits—2 or more
- Training and education visits—2 or more

# APPENDIX F Letter Templates Under Enforcement Review Letter

Date/Year

Dear Employer,

Employer 321 E. 5<sup>th</sup> Ave Anchorage, AK 99501

On October 7, 2019 Alaska Occupational Safety and Health Consultation and Training Section received a request for Services form dated October 3, 2019. Thank you for your interest in improving the worksite safety and health for your employees. Unfortunately, we are unable to provide consultation services to your company at this time as your business is currently under Enforcement review.

Even though we are unable to provide services to you at this time, you are still responsible for providing a safe and healthful workplace for your employees. Therefore, I would encourage you to seek other sources of safety and health assistance available to employers in your industry (e.g., your insurance carrier).

Again, thank you for requesting our assistance. Once you are no longer under Enforcement review, if we can provide any further information, please feel free to contact us.

Sincerely,

Chief of Consultation and Training Alaska Occupational Safety and Health Anchorage, AK 99504

## APPENDIX F-2 Withdrawing/Deleting Requests

Date/Year

Employer Name 20 Abbott Rd #A2 Anchorage, AK 99504

Dear Employer,

On January 13, 2020, Alaska Occupational Safety and Health, Consultation and Training Section received a Request for Services form dated January 13, 2020. Your visit was assigned to Consultant Name.

On January 27, 2020, Consultant Name received an email from you requesting to postpone the visit for a later, undetermined date. Your request has been withdrawn. Please feel free to contact our off whenever you are ready to receive Consultation services.

If we can provide any further information, please feel free to contact us.

Sincerely,

Chief of Consultation and Training Alaska Occupational Safety and Health Anchorage, AK 99504

## **APPENDIX F-3 Low Priority Letter**

Date/Year

Attn: Ms. Jane Doe Municipality of Anchorage PO Box 196650 Anchorage, AK 99519

Dear Ms. Doe,

On February 24, 2022, you submitted a Request for Services form to Alaska Occupational Safety and Health Consultation and Training (AKOSH). Thank you for your interest in improving the worksite safety and health for your employees. Unfortunately, we are unable to provide Consultation services to your company at this time. Our current policies specifically require us to give first priority to the smallest employers with 500 employees or less company-wide with the most hazardous conditions. The Municipality of Anchorage exceeds this number and is considered a large employer.

Even though we are unable to provide services to you at this time, you are still responsible for providing a safe and healthful workplace for your employees. Therefore, I would encourage you to seek other sources of safety and health assistance available to employers in your industry (e.g., your insurance carrier or private sector consultation).

OSHA provides several resources to help employers achieve compliance. Compliance assistance information is posted on OSHA's website (www.osha.gov) which all employers can quickly access at no charge. A great number of OSHA publications and posters are available for downloading and/or mail order. The text of regulations and standards are readily available, as well as Letters of Interpretation, Fact Sheets, Frequently Asked Questions (FAQs), and Small Entity Compliance Guides.

Thank you for requesting assistance from AKOSH. If we can provide any further information, please feel free to contact us.

Sincerely,

Elaine Banda, B.A., M.Ed. Chief of Consultation and Training

## APPENDIX F-4 Approval into 21d

Date and Year

Regional Administrator Office of Federal and State Operations Occupational Safety and Health Administration 300 Fifth Avenue, Suite 1280 Seattle, Washington 98104

Dear Ms./Mr. ?:

I am requesting approval for **Consultant's Name** to be authorized as a consultant in the 21(d) grant program. **Consultant** has been employed as a health consultant in the Alaska Occupational Safety and Health (AKOSH) Consultation and Training program since July 1, 2019.

**Consultant** has a Bachelor and Master of Science Degree in Environmental and Occupational Health. Additionally, she brings to our program a combined 10 years' experience in environmental health.

**Consultant** has completed the following training activities and tasks in accordance with the AKOSH Consultation Training Progression Table:

- Accompanied, shadowed, and took the lead with experienced consultants on (20) twenty
   Consultation Visits
- Participated in the following activities:
  - Visit preparation
  - o Opening Conference
  - Walk-through
  - o Closing Conference
- Completed the following OSHA E-learn web courses
  - o OSHA 1008 Intro to OSHA for New Hires
  - OSHA 0086 Recordkeeping Audit Training for VPP Managers and Team Leaders
  - o OSHA 0097 Confined Spaces in Construction
  - o OSHA 0075 Noise Hazards in the Workplace
  - OSHA 0051 Noise Monitoring and Evaluation Resources
  - o OSHA 0084 Evaluating a Hearing Conservation Program
  - OSHA 0056 Revised Hazard Communication Standard—Aligning with GHS
  - OSHA 0071 Isocyanates National Emphasis Program
  - o OSHA 0107 Silica: Regulatory Update and Outreach Resources
  - o OSHA 0137 Air Sampling Strategies
- Completed the following OIS activities:
  - o Generated request forms
  - o Generated visit forms
  - Generated compliance assistance forms

- o Generated Form 33
- Attended and completed OSHA 1500, Introduction to On-site Consultation
- Scheduled to attend OSHA 1250 Introduction to Health Standards December 3-13, 2019

**Consultant** is a tremendous asset to the Industrial Hygiene section. During her time with AKOSH, in addition to completing technical training, she has conducted formal trainings on several health related matters and assisted partnership programs with health related issues.

Finally, **Consultant** has an extremely experienced health mentor, who is a certified A.S.P., and C.S.P. She has strong supervisory support as I, along with her mentor, will review her reports and perform regular evaluations of her performance to identify specific needs and adjust her training progression as needed to ensure compliance with the CPPM Appendix K. I've attached her completed Training Progression Table while in the trainee position.

Thank you for your time and consideration in this matter. If approved, I will utilize **Consultant** to conduct private sector consultation 21(d) visits and focus on efforts that will promote safe and healthy workplaces in Alaska.

Sincerely,

Chief of Consultation and Training Alaska Occupational Safety and Health

Attachments: Consultant Complete Training Progression Table

Consultant College Degrees

cc: Director, Labor Standards and Safety

Region 10 ARA CSP State Program Manager Anchorage Area Director