

## ***IOSH Instruction***

IA/TED 01-00-018

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- **Record Type:** Instruction
  - **Directive Number:** TED 01-00-018
  - **Subject:** Initial Training Program for Iowa OSHA Compliance Personnel
  - **Information Date:** 01/01/2009
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### **Iowa OSHA Instruction**

Workforce Development Department

Iowa Occupational Safety and Health (IOSHA)

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#### **ABSTRACT**

**Purpose:**

This instruction provides Iowa OSHA personnel with policy and guidelines for implementation of competency-based training programs for Iowa OSHA compliance personnel.

**Scope:**

This instruction applies State-wide.

**References:**

- (1) OSHA Instruction CSP 01-00-002 (STP 2-0.22B), State Plan Policies and Procedures Manual, March 21, 2001
- (2) OSHA Instruction CSP 0100-003 (STP 2.22A, CH-3) Changes to the State Plan Policies and Procedures Manual, February 27, 1990
- (3) OSHA Instruction EAA 01-00003, Management Accountability Program, July 23, 2007
- (4) OSHA Instruction PER 05-00-001 (PER 10-1.1), OSHA Training Policy, December 14, 1979
- (5) OSHA Instruction TED 01-00-017, OSHA's Policy for Local Occupational Safety and Health Training, August 22, 2007
- (6) 29 CFR 1902, State Plans for the Development and Enforcement of State Standards
- (7) 29 CFR 1956, Plans for State and Local Government Employees Without Approved Plans
- (8) OSHA Instruction TED 01-00-018, Initial Training Program for OSHA Compliance Personnel, August 6, 2008
- (9) Department of Administrative Services (DAS) Managers and Supervisors Manual, Chapter 8, Performance Planning and Evaluation

**Cancellations:**

NA

**State Impact:**

This instruction describes a federal program change that affects State programs. Notice of Intent and Adoption are required. See paragraph VI.

**Action Offices:**

Iowa OSHA.

**Originating**

**Office:**

OSHA Directorate of Training and Education.

By and Under the Authority of

Mary L. Bryant, IOSH Administrator

## **Executive Summary**

This instruction provides guidance and direction to the Iowa Occupational Safety and Health Administration (OSHA) concerning Iowa OSHA's policies and procedures for training of Compliance Safety and Health Officers (CSHOs). It is essential that CSHOs have the requisite knowledge, skills, capability and varied professional backgrounds to accomplish Iowa OSHA's mission of promoting safe and healthful working conditions for Iowa's working men and women. In this instruction, Iowa OSHA has provided detailed guidance for training required during the initial three-year period of a CSHO's career, including recommended training that assists the CSHO with preparation for professional certification exams. This instruction identifies training paths that provide assistance to Iowa in managing their training programs.

The goal of this instruction is to assist CSHOs and their supervisors with direction, guidance and training options that directly contribute to the CSHO's ability to represent Iowa OSHA with a high degree of professional expertise. In addition, the CSHO training program identifies a correlation between CSHO competency and achieving respected credentials in the fields of safety, health and construction such as Certified Safety Professional (CSP), Certified Industrial Hygienist (CIH) and Certified Construction Health and Safety Technician (CCHST®).

## Significant Highlights

This instruction describes the training program for Iowa OSHA compliance personnel and includes:

- Each newly-hired CSHO will be required to complete a minimum of two courses offered by the OSHA Training Institute (OTI) during the first three years of his/her career as a CSHO. Every attempt will be made to also attend 6 additional required courses during that time frame. The order and sequence of these courses are as prescribed in this instruction.
- The OTI training program offers Iowa OSHA the opportunity to incorporate up to four additional technical courses into the CSHO's initial three-year training plan.
- Each CSHO and his/her supervisor will be required to track progress throughout the initial three-year period. An Individual Development Plan (IDP) will be updated annually. The IDP will be used as a planning and tracking document for reference by the CSHO and his/her supervisor to ensure that the CSHO receives all required training.
- A time extension policy and waiver policy has been put in place.
- Appendix A combines formalized training with self-instruction and on-the-job training recommendations in a comprehensive format. Supervisors and CSHOs will find this a useful tool for planning and sequencing professional development during the first year of the CSHO's career.
- Appendix B provides supervisors with recommended CSHO self-instruction and follow-up on-the-job training to reinforce OTI training provided in years two and three.
- Appendix C lists OTI courses that are required or recommended in OSHA directives as a quick reference guide. This reference may be used to assist supervisors and CSHOs in developing IDPs for continuing professional development.
- Appendix D provides information to assist supervisors and CSHOs in order to determine which OTI courses could help prepare a CSHO for the Certified Construction Health and Safety Technician (CCHST<sup>®</sup>), Certified Industrial Hygienist (CIH) or Certified Safety Professional (CSP) professional certification exam.

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- I. Purpose. This instruction provides Iowa OSHA personnel with policy and guidelines for implementation of competency-based training programs for Iowa OSHA compliance personnel.
- II. Scope. State-wide.
- III. References.
  - A. OSHA Instruction CSP 01-00-002 (STEP 2-0.22B), State Plan Policies and Procedures Manual, March 21, 2001.
  - B. OSHA Instruction CSP 01-00-003 (STP 2.22A, CH-3), Changes to the State Plan Policies and Procedures Manual, February 27, 1990.
  - C. Reserved.
  - D. OSHA Instruction PER 05-00-001 (PER 10-1.1), OSHA Training Policy, December 14, 1979.
  - E. OSHA Instruction TED 01-00-017, OSHA's Policy for Local Occupational Safety and Health Training, August 22, 2007.
  - F. 29 CFR 1902, State Plans for the Development and Enforcement of State Standards
  - G. 29 CFR 1956, Plans for State and Local Government Employees Without Approved Plans
  - H. OSHA Instruction TED 01-00-018, Initial Training Program for OSHA Compliance Personnel, August 6, 2008
  - I. Department of Administrative Services (DAS) Managers and Supervisors Manual, Chapter 8, Performance Planning and Evaluation
- IV. Cancellations. OSHA Instruction TED 01-00-012 (TED 1.12A), Training Program for OSHA Compliance Personnel, July 7, 1992, is cancelled.
- V. Action Offices. Iowa OSHA.
- VI. Federal Program Change.
  - A. Notice of Intent and Adoption Required. This instruction describes a Federal OSHA program change which establishes a significantly modified technical training program for OSHA compliance personnel. Under 29 CFR 1902.3(h) and 1956.10(g), States must have a sufficient number of adequately trained and qualified personnel for the enforcement of standards. States must have a formal training program for their compliance personnel which must be documented in their State plans and revised as necessary to reflect current

practices. The training program must be at least as effective as that set out in this instruction and must be available for review. This Instruction establishes Iowa OSHA's formal training plan.

- B. Notification to OSHA and Submission of State Policies and Procedures. States are required to notify OSHA within 60 days whether they intend to adopt a training program identical to that in this instruction or adopt new or maintain different policies and procedures. State policies and procedures must be adopted within six months of issuance of this instruction and submitted within 60 days of adoption. If a State adopts identical policies and procedures, it must submit documentation of adoption (such as a cover sheet or notice to staff). If a State adopts or maintains a different training program, it must submit a plan change supplement either documenting and identifying new at least as effective policies and procedures or explaining how its current program is at least as effective as this instruction and will result in "adequately trained" personnel who can conduct effective inspections. The State also must either post its new or existing different training policies and procedures on its State plan website and provide the link to OSHA or provide information on how the public may obtain a copy. OSHA will post summary information on the State responses to this instruction on its website. This Instruction establishes an Iowa OSHA training plan which is at least as effective as the Federal training program document in TED 01-00-018 and will result in adequately trained personnel.

VII. Goals and Objectives of CSHO Training. The goal of this instruction is to assist CSHOs and their supervisors with direction, guidance, and training options that directly contribute to the CSHO's ability to represent Iowa OSHA with a high degree of professional expertise.

A. Competency-Based Curriculum.

1. The OSHA Training Institute offers formal training for CSHOs with a competency-based approach to curriculum, using the CSHO Functional Competency Model as the guide. A copy of the CSHO Competency Model and related information on the OTI curriculum and professional certification can be found on OSHA's Directorate of Training and Education Intranet web pages.
2. It is important to note that competence cannot be achieved through formal training alone. Proficiency requires a mix of experiences over time, personal initiative to develop to the highest level of professionalism possible, and structured on-the-job training as well as formal training.

- B. Formal Training Program. OTI's formal training program provides a wide range of training opportunities and learning experiences to assist CSHOs with their professional development goals. A flexible program that incorporates technology-enabled learning, self-study packages, on-the-job experiences and

formal training has been developed to accommodate the varying levels of experience and competence during the initial three-year period of a CSHO's career. OTI's safety, health and construction training paths reflect basic requirements and competencies applicable to all CSHOs as well as those intending to gain additional expertise.

- C. Technical Training during the First Three Years. OTI's flexible yet structured approach to curriculum meets the needs of CSHOs with highly diverse academic backgrounds and experiences. Supervisors are encouraged to incorporate their training priorities into the CSHO's training program. For example, the needs may dictate that new CSHOs receive technical training in industrial noise or machine guarding within their first year. The OTI training program offers the opportunity to incorporate up to four additional technical courses at any time during the CSHO's initial three year training plan provided the CSHO has completed both the #1000 Initial Compliance and one of the Standards courses. Selection of the technical courses to be attended and determination of the sequencing and priority are at the State of Iowa's discretion.
- D. Professional Certification. OTI's articulated progression of training requirements for the first three-year period of a CSHO's career supports the pursuit of professional certification and encourages CSHOs to strive for the recognition that such certification provides. Since OTI's courses are designed to support Iowa OSHA's mission, there may not always be a one-to-one correlation between an OTI technical course and the competencies required to achieve certification. Correlation of OTI courses to professional certification can be found in Appendix D of this instruction.

VIII. First Three Years of CSHO Training. *[OSHA Training Institute Career Path for CSHOs \[First Three Years\]](#)* (see Figure 1) illustrates a recommended training sequence for the CSHO's first three years.

- A. The following two courses must be completed within the first year of a CSHO's career. Although these courses are required during the first year, there is no limit to the number of courses a CSHO may take during any year.
  - 1. #1000 Initial Compliance and Iowa OSHA's In House Training.
  - 2. One of the following courses on OSHA Standards.
    - a. #1050 Introduction to Safety Standards for Safety Officers (safety career path/safety specialists).
    - b. #1250 Introduction to Health Standards for Industrial Hygienists (health career path/industrial hygienists).
    - c. #2000 Construction Standards (construction career path/construction specialists).

B. As budget allows or if the courses can be scheduled in Iowa, the following courses will be taken after the CSHO has completed one of the Standards courses.

1. #1310 Investigative Interviewing Techniques.
2. #1410 Inspection Techniques and Legal Aspects.

These courses will also be supplemented by Iowa's Legal Aspects which will encompass training by the Iowa Legal Staff.

NOTE: The #1410 Inspection Techniques and Legal Aspects course is the only course that cannot be waived per Section XI.

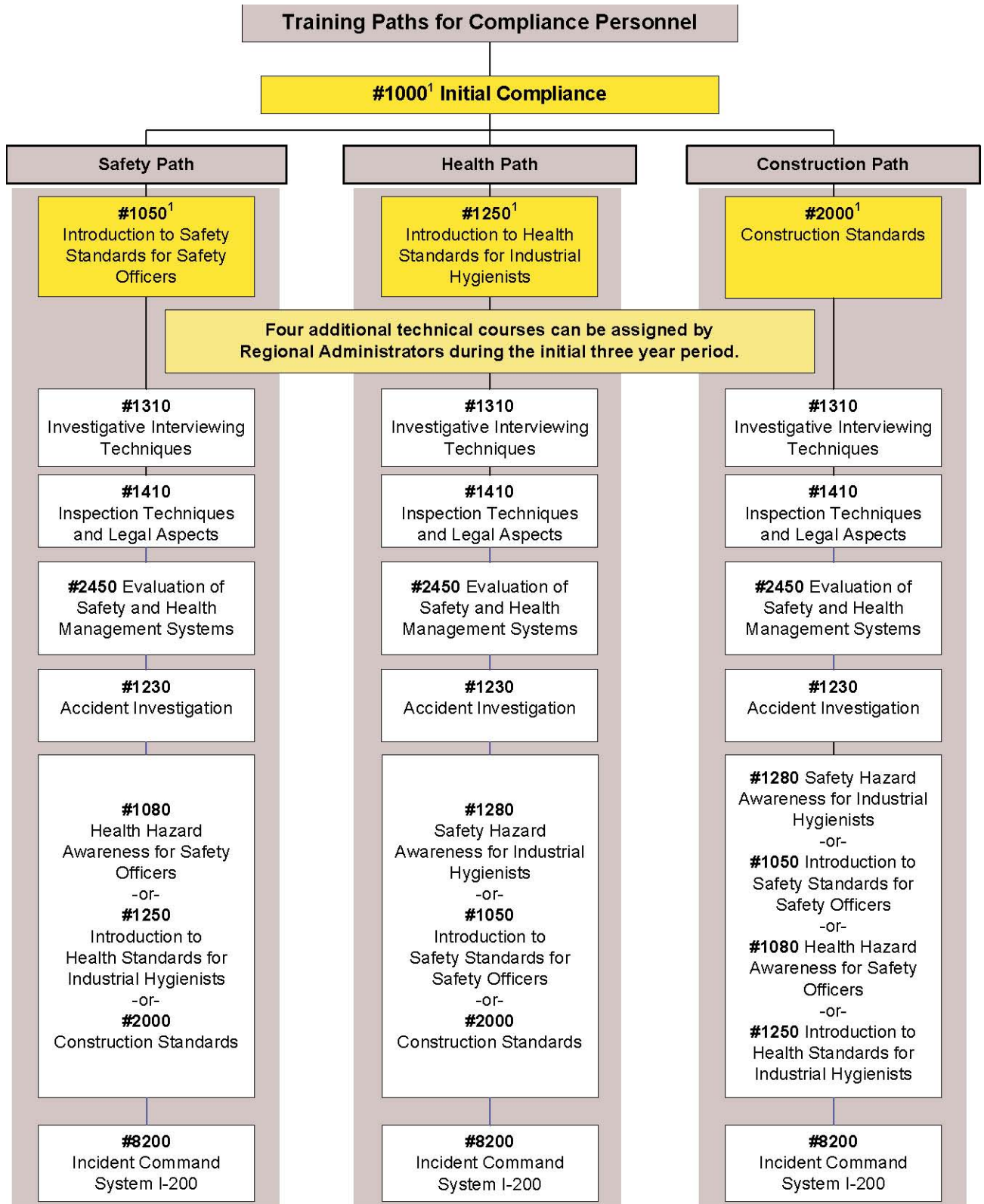
3. #2450 Evaluation of Safety and Health Management Systems.
4. #1230 Accident Investigation.

C. As budget allows or if the courses can be scheduled in Iowa, at least one of the following courses will be taken during a CSHO's initial three-year period to enhance multi-disciplinary competence.

1. Safety career path CSHOs will take at least one of the following:
  - a. #1080 Health Hazard Awareness for Safety Officers
  - b. #1250 Introduction to Health Standards for Industrial Hygienists
  - c. #2000 Construction Standards
2. Health career path CSHOs will take at least one of the following:
  - a. #1280 Safety Hazard Awareness for Industrial Hygienists
  - b. #1050 Introduction to Safety Standards for Safety Officers
  - c. #2000 Construction Standards
3. Construction career path CSHOs will take at least one of the following:
  - a. #1280 Safety Hazard Awareness for Industrial Hygienists
  - b. #1050 Introduction to Safety Standards for Safety Officers

- c. #1080 Health Hazard Awareness for Safety Officers
  - d. #1250 Introduction to Health Standards for Industrial Hygienists
- D. The #8200 Incident Command System I-200 course, or equivalent training (i.e., course conducted by other governmental agencies such as FEMA or web-based course) must be taken during the initial three years of training; however, the specific sequence is not critical.
- E. Four additional technical courses can be assigned by the IOSH Administrator during the initial three years of the CSHO's training plan as specified in Section VII.C.





<sup>1</sup>Initial Compliance and one of the Standards courses must be completed during first year

Figure 1

IX. Organizational Responsibilities.

- A. Office. Iowa OSHA will support the training program, as appropriate, by providing resources, supplying current information on the status of agency programs, standards, regulations, and directives, ensuring program consistency, and auditing training programs.
- B. Iowa OSHA will make every attempt to ensure that money is budgeted and available or that the courses will be scheduled in Iowa for new hires to complete the required training during their first three years as CSHOs.
- C. The Directorate of Training and Education. The Director, Directorate of Training and Education shall be responsible for providing programs to educate and train OSHA compliance personnel in the skills and knowledge required to perform their duties. Responsibilities include:
  - 1. Planning, developing and conducting Agency technical and specialized training courses and seminars.
  - 2. Conducting needs assessments and gap analyses to identify training needs for compliance personnel.
  - 3. Developing classroom and technology-enabled training products designed to support the training and development of CSHOs.
  - 4. Maintaining and updating competency-based training information on the OSHA Intranet to assist CSHOs in selecting OSHA Training Institute courses and other training and development opportunities that match his/her Individual Development Plans (IDPs) and other professional development needs.
  - 5. Maintaining and updating the technology-enabled OTI course catalog on the OSHA Intranet.
  - 6. Conducting evaluations of training courses and programs designed for compliance personnel.
  - 7. Annotating the CSHO's training records to reflect waived required training and time extensions for required training.
  - 8. Annotating the CSHO's training records to reflect alternative training for the #8200 Incident Command System I-200 course.
  - 9. Preparing a courtesy report for the Regions, the Assistant Secretary, the Deputy Assistant Secretary, the Director of the Directorate of Enforcement Programs, and the Director of the Directorate of Construction listing the courses that have been waived and time

extensions granted by the Regional Administrator within the past twelve months. The report will be made available once per fiscal year and will reflect data from the previous twelve months only.

- D. The OSHA Training Institute. The OSHA Training Institute Director shall be responsible for the scheduling and delivery of occupational safety and health training. Specific responsibilities include:
1. Overseeing and conducting courses and seminars for federal and State compliance officers, consultants, compliance assistance specialists, regional and national office staff and other federal agency personnel.
  2. Participating in the design and development of technical and specialized courses, including development of course materials, detailed lesson plans, and other educational aids necessary to carry out Institute training programs.
- E. IOSH Administrator. The IOSH Administrator (IA) shall direct the execution of the training and education program in accordance with Iowa OSHA policy. Specifically, the IA may, at his/her discretion and based on the CSHO's experience level.
1. Assign up to four additional technical courses during the initial three year period of a CSHO's training program. This is in addition to the required OTI courses outlined of this instruction.
  2. Grant waivers and time extensions in accordance with the procedures explained in Sections XI and XII of this instruction.
- F. Reserved.
- G. Reserved.
- H. Public Service Executive. The Public Service Executive (PSE) shall be responsible for ensuring and facilitating the development and training of the CSHOs under his/her supervision. The PSE directs the execution of the training program in accordance with regional procedures and protocols. The PSE shall ensure the successful implementation of the training program for compliance personnel as outlined in this instruction. Specifically, the PSE shall:
1. Ensure the professional development of CSHOs under his/her supervision in accordance with the detailed training options outlined in this instruction and Appendices.
  2. Identify and document through an Individual Development Plan (IDP) process the training needs of CSHOs assigned to his/her supervision, and plan and coordinate all training.

3. Provide and coordinate instruction, assistance, and guidance that is consistent with the IDP process for CSHOs to meet the training program objectives outlined in this instruction.
  4. Review and discuss training progress with each CSHO under his/her supervision during the mid-year and annual performance reviews.
  5. Assign, as needed, experienced personnel to assist in the on-the-job training of newly-hired CSHOs.
  6. Access, document CSHO abilities and send waiver requests per section XI.B. and requests for time extensions per section XII.B. to the IOSH Administrator for approval.
- I. Compliance Safety and Health Officer (CSHO). The CSHO has the responsibility to perform to the best of his/her ability in all training programs. Specifically, the CSHO shall:
1. Discuss his/her performance and training progress with their supervisors.
  2. Participate in the planning of training activities.
  3. Fully attend, participate in, and complete all assigned training courses, seminars and other events.
- X. Professional Development during the CSHO's First Three Years.
- A. Required Training. In the interest of nationwide consistency, it is expected that CSHOs will attend the required courses outlined in this instruction offered by the OSHA Training Institute. The information provided in this section is intended to assist Iowa OSHA in determining equivalency when issuing waivers. The Directorate of Training and Education Intranet page offers up-to-date information on course objectives, whether a course is blended, or has specific prerequisites.
  - B. Blended Courses. Blended courses include at least one online, web-based training requirement plus an instructor-led portion. Whenever a course prerequisite includes an online, blended session, that web-based training must be completed prior to attending the instructor-led session. There is no waiver process or equivalent to completing the online prerequisite of an OTI course. This strict requirement is due to the close link between the training offered online and the subsequent classroom (i.e., instructor-led) training which is designed specifically to complement one another.
  - C. Course Sequence. Both the Initial Compliance course and Iowa OSHA's In House Training and a Standards course must be completed in year one of the

CSHO's training path. It is recommended that courses listed as third through eighth should be completed in a sequence optimal to attaining professional development goals and at the discretion of the IA.

1. #1000 Initial Compliance. This course is designed for newly hired CSHOs and focuses on the basic elements of conducting inspections in accordance with current OSHA policy. Also emphasized is the importance of personal conduct and professional development. Role-play is used to allow students to practice how to conduct an opening conference. The course ensures that participants have the fundamentals of information gathering to document the *prima facie* elements in a case file. During a mock inspection, participants work in teams to investigate and document the validity of alleged complaint items. At the conclusion of this course, the student will be able to identify CSHO responsibilities related to conducting an inspection as well as promoting, assessing and enforcing workplace safety and health compliance.
  
2. Standards Courses. The purpose of these courses is to provide CSHOs with an introduction to the organization and content of the standards, hazard recognition, and documentation of identified hazards.
  - a. #1050 Introduction to Safety Standards for Safety Officers. This course is designed specifically for safety officers and emphasizes a wide range of safety hazards covered by 29 CFR 1910. During the course, students observe staged hazardous conditions in the OTI safety laboratories where they will evaluate, document, select and apply standards and recommend corrective actions. At the conclusion of the course, the student will be able to apply inspection techniques, basic safety hazards recognition and abatement for general industry inspections.
  
  - b. #1250 Introduction to Health Standards for Industrial Hygienists. This course is designed specifically for industrial hygienists and emphasizes recognition, evaluation and control of a wide range of health hazards covered by 29 CFR 1910 and substance-specific standards in 29 CFR 1926. The featured practicum in this course includes analysis of the health hazards in a foundry. At the conclusion of this course, the student will be able to employ basic health hazard recognition; apply inspection sampling and instrumentation techniques and related OSHA policies; and, identify abatement methods.

- c. #2000 Construction Standards. This course is specifically designed for safety specialists and industrial hygienists who specialize in construction inspections. The CSHO will become acquainted with how the building process proceeds from site clearing to building finishing. Corresponding subparts of 29 CFR 1926 are presented in conjunction with the building process. The course features a field trip to a construction site to emphasize and reinforce learning.
3. #1310 Investigative Interviewing Techniques. This course is intended to serve as a practical interviewing guide for OSHA compliance personnel. A major component of this course includes role-play using scenarios that provide the opportunity for students to practice interviewing skills. The course emphasizes developing a plan for gathering the necessary facts, characteristics of good questioning techniques, active listening, and cross-cultural communication.
4. #1410 Inspection Techniques and Legal Aspects. This course introduces the student to inspection techniques related to OSHA compliance activity and to the associated formal requirements and processes of the legal system. Emphasis is placed on documenting a legally sufficient case file. The course includes the essential elements of conducting walkaround inspections and interviews, and analyzing, organizing and documenting information related to inspections and investigations. Students develop a sample legally defensible case file and participate in a mock trial as the culminating learning experience. This course cannot be waived as per Section XI.A.
5. #2450 Evaluation of Safety and Health Management Systems. This course emphasizes applying the principles of Safety and Health Management Systems (SHMSs) using OSHA guidelines and policies. Upon completion, the students will be able to evaluate the effectiveness of an employer's SHMS. A focus on recordkeeping requirements assists the CSHO in identifying system deficiencies between applicable safety and health elements and illness and injury reduction. Using active training techniques, students are guided to promote the value of an effective program that contributes to reducing illness and injury.
6. #1230 Accident Investigation. This course covers the key elements that are essential to conducting successful accident investigations. Major topics include investigation planning, documenting the scene, collecting facts through interviewing, failure analysis and analytical tools, collecting and analyzing physical evidence, and control

strategies. Using a case file and interactive class workshops, students work in teams to gather and analyze evidence to develop facts, findings and conclusions.

7. Multi-Disciplinary Courses.

- a. #1280 Safety Hazard Awareness for Industrial Hygienists. This course provides industrial hygienists with the knowledge and skills to become aware of selected safety hazards related to common worksite processes. By the end of the course, students will be able to decide if a referral is appropriate in accordance with OSHA's occupational safety standards and guidelines.
- b. #1080 Health Hazard Awareness for Safety Officers. This course equips safety specialists with the skills to recognize health hazards while conducting workplace inspections and investigations. During the course, students participate in laboratories where they use detector tube pumps to screen for potential air contaminants and sound level meters to screen for noise hazards. By the end of the course, students will be able to decide if a referral is appropriate in accordance with OSHA's occupational health standards and guidelines.
- c. #2000 Construction Standards. This course is specifically designed for safety specialists and industrial hygienists who specialize in construction inspections. The CSHO will become acquainted with how the building process proceeds from site clearing to building finishing. Corresponding subparts of 29 CFR 1926 are presented in conjunction with the building process. The course features a field trip to a construction site to emphasize and reinforce learning.

8. #8200 Incident Command System I-200. When responding to an identified incident, the CSHO will be able to operate efficiently within the parameters of an Incident Command System (ICS).

- a. Regions may approve one of three options:
  - OTI #8200 course which covers the content of ICS-100 and ICS200 as specified by the National Integration Center (NIC).
  - An equivalent ICS training sponsored by another government agency (federal, state, or local); such a course must follow the guidelines developed by the NIC provided in the *National Standard Curriculum Training*

*Development Guidance* document. The most current version of this document can be found on the Federal Emergency Management Agency's (FEMA's) National Incident Management System (NIMS) Training Internet web pages. Additionally, instructors must have qualifications specified by the NIC as posted on these web pages.

- FEMA ICS-100 and ICS-200 online courses. These NIMS courses are located on FEMA's Emergency Management Institute Independent Study Program Internet website. The current title for ICS-100 is *IS-100, Introduction to Incident Command System I100* and the current title for ICS-200 is *IS-200, ICS for Single Resources and Initial Action Incidents*.

- b. The Regional Training Officer/Training Designee will furnish to the Director of the Directorate of Training and Education a copy of the approved alternative training course completion for annotation in the student's record.

#### XI. Waiver from Required Training Program.

- A. Waiver Conditions. The training program outlined in this instruction is required to be completed during the first three years of a CSHO's career. The IOSH Administrator IA) has discretion to waive any of the required courses listed, with the exception of the #1410 Inspection Techniques and Legal Aspects course. Waivers shall be used rarely and shall be granted only in exceptional circumstances.
- B. Assessment and Documentation. The Public Service Executive (PSE) must assess and document that the CSHO has demonstrated that he/she can perform the tasks listed in the course objectives for the course being waived. After an assessment has been made, waiver requests shall be submitted in writing by the PSE to the IOSH Administrator. The waiver request will document why the CSHO does not need to attend the specified course. The documentation will include how the CSHO has acquired the levels of knowledge, skills and abilities reflected in the objectives of the course for which the waiver is being requested. Not only must equivalent technical knowledge and skills be documented, but the documentation shall also indicate that the CSHO has institutional understanding of Iowa OSHA-specific policies and procedures. For example, criteria may include experience as a former compliance officer with another OSHA State Plan State, Federal OSHA or as a former 21(d) OSHA consultant.

- C. Waiver Requests. Only the IOSH Administrator can grant a waiver. The IOSH Administrator shall respond to waiver requests in writing.
  - D. Reserved.
- XII. Time Extensions. The time requirements for completing the training shown in this instruction must be met. Only the IOSH Administrator can grant a time extension, which must be based on extenuating circumstances. The time allowed to complete the eight required courses should also allow insertion of technical courses throughout the three-year period. Technical courses may be taken at any time during the three-year period after the CSHO has completed both #1000 Initial Compliance and one of the standards courses.
- A. Time Extension Conditions. If there are circumstances that prevent the CSHO from completing the required courses within the three-year period, the IOSH Administrator can extend the time for completion of the required courses for a period of up to one year. Time extensions may not exceed twelve months. The use of time extensions could extend the time allowed for a CSHO to complete the eight required courses to a maximum of four years from his/her employment date.
  - B. Time Extension Requests. Time extensions shall be submitted in writing by the PSE to the IOSH Administrator. Time extension requests include the reason(s) additional time is needed by the CSHO to complete the required training, the amount of time requested and the course(s) that will be completed during the requested time extension.
  - C. Time Extension Approvals. The IOSH Administrator shall respond to the time extension request in writing.
  - D. Reserved.
- XIII. Monitoring the Training Program. Monitoring the CSHO's progress through the first three-year period is critical to ensure the success of the training program. Monitoring provides information regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of the CSHO to achieve training goals and objectives. The CSHO's PSE plays a major role in the monitoring process.
- A. The PSE. The CSHO's PSE shall:
    - 1. Ensure that each CSHO has completed the necessary prerequisites before attending mandatory OSHA training courses.
    - 2. Review the CSHO's performance of recommended self-study and on-the-job training (OJT) assignments.
    - 3. Conduct a review with the CSHO following each recommended self-

study and OJT inspection activity. This review provides the supervisor with information on the progress of the CSHO and can assist in identifying areas requiring further training.

4. Determine when the CSHO has sufficient experience to participate fully in developing the actual case file; the OJT review may be discontinued when this has been effectively accomplished.

B. Reserved.

XIV. Continuation of CSHO Development.

A. Professional Standing, Recognition and Professional Certification. The series of courses listed for the CSHO's first three years provide a foundation for proficiency. Those CSHOs who choose to work toward a high level of knowledge and skill are encouraged to continue to attend technical courses at the OTI and equivalent sources. While professional certification is an important career milestone, it is not the only path to gaining professional standing or recognition. CSHOs that complete new, complex or difficult assignments expand their capabilities and broaden their role as a safety and health professional inside and outside Iowa OSHA.

B. Role of Individual Development Plans. An Individual Development Plan (IDP) is an active plan to help the CSHO achieve organizational and career goals. IDPs must be updated annually and serve as a tool to provide documentation for each CSHO to chart and monitor his/her own progress toward developmental goals. An IDP can help a CSHO:

1. Achieve and enhance the level of knowledge and skills required to achieve the functional competencies of a CSHO.
2. Build expertise as an Iowa OSHA safety and health professional.
3. Continue professional development throughout his/her career.

C. IDPs for the Initial Three-Year Period. Appendices A and B serve as guidelines for the Public Service Executive supervisors to select appropriate training outlined by this instruction during the first three years. The IDP (Form DL-80) should reflect:

1. Mandatory training required during the three-year period as outlined in this instruction.
2. Iowa OSHA training requirements.
3. Other developmental training as determined by the CSHO's PSE. For example:

- a. Supplemental training at the Iowa OSHA level that includes formal and/or informal mentoring by higher graded personnel and/or CSHO's with specialized experience.
- b. Participation in various classes of inspections and a variety of industries and worksites.

D. IDPs Developed after the Three-Year Period.

1. The IDP should follow the guidance outlined in the Department of Administrative Services (DAS) Manual, Chapter 8.25.
2. An IDP helps the CSHO continue to improve his/her present performance and prepare him/her for more responsible work in accordance with his/her potential and interests, and the needs of Iowa OSHA.
3. At a minimum, each CSHO is required to attend a safety and health related course once every three years. Appendices C and D are provided to assist the Public Service Executive supervisors and CSHOs in preparing IDPs for continuing development.

XV. Evaluation. An overall evaluation of the training program for OSHA compliance personnel effectiveness will be conducted by staff from the Directorate of Training and Education.

A. Established evaluation processes and criteria include:

1. Maintaining accreditation through third party evaluations such as the International Association of Continuing Education and Training (IACET). OTI and DTE have been accredited by IACET since 2002. Retaining accreditation requires periodic internal reviews and reaccreditation not less than every five years.

B. OTI and DTE distribute course evaluation surveys at the end of each instructor-led class. This information provides valuable feedback from the student's perspective to determine the perceived value and impact of instruction. It also serves as a basis for proposing changes to course objectives, course content and presentation methods.

Appendix A. Recommended CSHO Training Activities for Year One

Appendix B. Recommended CSHO Training Activities for Years Two and Three

Appendix C. OTI Courses Required or Recommended in OSHA Directives

Appendix D. Correlation of OTI Courses to Professional Certification