

DOSH DIRECTIVE

Division of Occupational Safety and Health

Department of Labor and Industries

Keeping Washington safe and working

40.0 Training Program for DOSH Safety and Health Staff

Updated: January 20, 2015

I. Purpose

The intent of this directive is to comply with federal OSHA Directive, TED 01-00-019, Mandatory Training Program for OSHA Compliance Personnel, dated July 21, 2014. OSHA requires states with a state plan program to have a training plan that is at least as effective as the OSHA's plan, and will result in properly trained personnel who can conduct effective inspections and consultations.

II. Scope and Application

This directive provides guidance and direction to all DOSH staff about initial new hire training of Compliance Safety and Health Officers (CSHOs) and Safety & Health Consultants. In addition, this directive provides guidance and direction on continuing education and technical training for all safety and health staff. It is essential that CSHOs and consultants have the requisite knowledge, skills, capability, and varied professional backgrounds to accomplish DOSH's mission of ensuring safer workplaces in Washington.

This directive updates the guidance in DD 40.0, New Hire Training Program for DOSH Safety and Health Staff, issued November 15, 2010.

III. Background

The Division of Occupational Safety & Health (DOSH) recognizes that thoroughly trained safety and health inspectors and consultants are necessary to carry out the mandates of chapter 49.17 RCW, the Washington Industrial Safety and Health Act (WISHA). Training helps ensure safety and health inspectors and consultants are fully prepared to fulfill their roles to ensure safe workplaces in Washington State, provide consistent application of DOSH policy statewide, and acquire the appropriate technical expertise regarding occupational health and safety hazards and WISHA regulations.

The training curriculum for newly hired compliance and consultation safety specialists and industrial hygienists consists of a sequence of courses and on-the-

job-training which occurs within their first year of employment. Following their first year of employment and initial training, all compliance CSHO's are expected to complete an advanced accident investigation course, investigative interviewing, ICS 100/200 as well as forty (40) hours annually, continuing education on safety and health technical subjects to maintain and enhance the necessary skills to do their jobs.

IV. Goals and Objectives of CSHOs and Consultants Training

The goal of this directive is to establish the parameters, direction, and guidance for CSHOs, Consultants, and their supervisors regarding training.

A. DOSH Curriculum.

1. DOSH requires formal training for CSHOs and Consultants using a competency-based approach to curriculum, similar to the OSHA CSHO Functional Competency Model described in OSHA Directive, TED 01-00-019 (See Appendix 4). The OSHA CSHO Functional Competency Model is provided as an example and for information only.
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 classroom training.

B. Formal New Hire Training Program.

DOSH's new hire training program provides a wide range of training topics and learning experiences to assist CSHOs and Consultants with their professional development goals. A program that incorporates self-study workbooks, on-the-job experiences, and formal classroom training has been developed which accommodates the varying levels of experience and competence of a CSHO or Consultant during their first two years. DOSH's safety and industrial hygiene training paths reflect basic requirements and competencies applicable to each discipline as well as those intending to gain additional expertise.

C. Expected Competencies of CSHOs and Consultants.

Upon completion of the New Hire training program, the CSHO or Consultant is expected to demonstrate the following:

1. A working knowledge of the fundamentals of hazard recognition, evaluation and control of workplace safety and health hazards.
2. Basic knowledge of engineering controls and abatement strategies to control hazards.

3. A reasonable comprehension of basic industrial processes and the ability to make quantitative observations and measurements.
4. The ability to properly calibrate and use measuring instruments, take samples and interpret lab results. (industrial hygienists)
5. The ability to perform independent inspections or participate as a member in team inspections in most types of industries.
6. Ability to identify and find appropriate WISHA safety and health laws and regulations and correctly apply them to citing or advising on hazards.
7. The ability to collect and document relevant information to support citations or consultation reports, organize case files, and present inspection data accurately in legal proceedings as needed.
8. The ability to complete all forms necessary to support the inspection or consultation findings.
9. The ability to make appropriate referrals to industrial hygienists or safety specialists.
10. The ability to conduct an accident investigation and obtain all necessary information to support conclusions, findings and citations or investigative reports.

D. Continuing Education and Technical Training.

DOSH uses a flexible yet structured approach to curriculum which is intended to meet the needs of both CSHOs and Consultants with highly diverse academic backgrounds and experiences. Regional supervisors and managers are encouraged to incorporate their priorities into the CSHO's or consultant's training program. For example, the demographic needs of a region may dictate that their new CSHO or consultant receive additional technical training on industrial noise or machine guarding within their first year whereas another region may need to emphasize construction or agriculture. Selection of technical courses and determination of the sequence and priority of technical course attendance are recommended by a CSHO or consultant's supervisor. All CSHOs and consultants are expected to receive forty (40) hours of safety and/or health technical training annually.

E. Professional Certification.

Like OSHA's training policy, DOSH's new hire training requirements and scheduling of other technical training supports the pursuit of professional certification and encourages CSHOs and Consultants to strive for the recognition that such certification provides. However, since the training courses are designed to support DOSH's mission, there may not always be a one-to-one correlation between a DOSH technical course and the competencies required to achieve certification.

V. Organizational Responsibilities

A. Internal Training Section will provide new-hire training, continuing education and technical courses, and training material to educate and train DOSH compliance and consultation staff to perform their jobs competently and professionally.

Responsibilities include:

- Provide the planning function for DOSH training initiatives.
- Develop training materials and programs.
- Contract with training vendors for specialized technical training as needed.
- Schedule all training courses, classes, and symposiums.
- Conduct evaluations of training courses
- Conduct needs assessments to identify training needs for health and safety staff.
- Evaluate current training programs and courses for all health and safety staff in consultation with DOSH senior management and regional consultation and compliance managers and supervisors.

B. Training Manager.

The training manager oversees the activities of the Internal Training Section and is responsible for final decisions on required new hire courses, continuing education courses, and training and attendance exceptions.

The training manager provides supervision for training staff and coordinates with other DOSH program staff to assist in providing training. The training manager also develops and updates curriculum, oversees the content of new hire training courses, and provides train-the-trainer courses for DOSH staff who present training.

C. Internal Training Staff.

Internal training staff either conducts or assist in the presentation of new hire training courses. Internal training staff also acts as training facilitators for each new hire. Training staff are available to the CSHO and consultant supervisors to assist as follows:

1. Conduct the DOSH New Hire Orientation.
2. Assist with OJTs as requested by supervisors, including measurement of a new hire's progress in applying information gained from training.

3. Accompany new CSHOs or consultants on worksite inspections or consultations to help evaluate the application of recent training received, when requested by a regional compliance or consultation manager and approved by the training manager.
4. Answer questions or report concerns from CSHO or consultant supervisors or newly hired or trained staff regarding their training plan or curriculum.

D. DOSH Senior Managers and Assistant Director.

The Education and Outreach Sr. Manager will have final decision authority on the training needs of new hires and existing staff in consultation with the DOSH Sr. Managers and Assistant Director. They will ensure that regional compliance managers, supervisors and consultation managers fulfill their responsibilities regarding CSHO and consultant training as described in this directive.

E. Regional Compliance Managers/Supervisors & Consultation Managers.

The regional Compliance Managers, Compliance Supervisors, regional Consultation Managers, and Consultation Supervisors are responsible for ensuring and facilitating the development and training of the CSHOs and consultants under their supervision. The managers and supervisors must ensure completion of the New Hire training program to maximize the success of their staff as outlined in this directive.

Monitoring the new CSHO's or consultant's progress through the new hire training period is critical to ensuring the success of each trainee. Monitoring provides information regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of a CSHO or consultant to achieve their training goals and objectives.

Managers and supervisors should hire new staff with enough lead time to ensure optimal training and orientation, and complete pre-requisite new hire workbooks and modules prior to starting the new hire program. Observing inspections/consultations prior to training provides context for new CSHOs and consultants and improves the overall training experience.

Specifically, the managers and supervisors must:

1. Notify the Internal Training Section when new staff will be hired and their name and starting date.
2. Identify, document, and prepare a training and development plan using the individual's Performance Planning and Appraisal Form (PPAF). Be sure to include L&I-wide and DOSH requirements.
3. Plan, coordinate, and ensure all necessary training is provided to all direct reports.

4. Review and discuss training progress with each CSHO or consultant under their supervision during the mid-year and annual performance reviews.
5. Ensure that each new CSHO or consultant has completed the necessary prerequisites including modules, workbooks, or manuals before attending new hire training courses.
6. Ensure staff complete OJT assignments as scheduled in the new hire training curriculum. Practicing new skills immediately will increase retention.
7. Assign, as needed, experienced personnel to assist in on-the-job training of newly-hired CSHOs and consultants.
8. Assess and document new hire CSHO and consultant abilities and send course waiver requests and requests for time extensions to the training manager for approval.
9. Determine when the new CSHO or consultant has sufficient experience to conduct an independent inspection or consultation.
10. Ensure that CSHOs or consultants attend needed training. Recommend at least one technical training course or conference each year.

F. CSHOs and Consultants.

CSHOs and Consultants must attend all training as directed by their supervisors. All new CSHOs and consultants must complete the entire sequence of new hire training courses, unless otherwise authorized as outlined in Section VI of this directive.

The CSHOs and consultants have the responsibility to perform to the best of their ability in all training programs. To that end, a CSHO and consultant must:

1. Discuss their performance and training progress with their supervisors.
2. Participate in the planning of their training activities.
3. Attend all assigned training courses, webinars, seminars, or other training events from beginning to end.
4. Fully participate in and complete all assigned course work.
5. Attend other DOSH events, such as a symposium, from beginning to end, when it is scheduled.

VI. Training Curriculum

- A. The training curriculum for newly hired staff covers inspection procedures, forms, documentation of inspection findings, accident investigation methods and specific topics covered by WISHA health and safety standards. The new hire training curriculum is subject to review and revision as needed. The curriculum includes some differences in required courses for safety and health specialists and industrial hygienists. A summary of the curriculum is found in Appendix 1, in this directive. The current detailed new hire course schedule is located on the “Inside DOSH – Internal Training” intranet webpage at <http://inside.lni.wa.gov/WISHA/EducationOutreach/InternalTraning/NewHireCalendar/PDF/DOSHNHCalendar.pdf>
- B. The initial new-hire training curriculum is designed to meet the criteria required to obtain OSHA 30-hour cards. Upon successful completion of the *general industry* portion of the training, the trainee will receive the OSHA 30-hour General Industry card. Upon successful completion of the *construction* portion of the training, the trainee will receive the OSHA 30-hour Construction Card.
- C. New consultants hired from the ranks of current safety and health staff will be required to attend the Consultation track, which includes “WIN Training for Consultation” and the “Consultation Manual” courses. Consultation supervisors will prepare a skill assessment and assign other new hire training as needed for these consultants.
- D. Technical training needs for current staff will be evaluated periodically and technical safety and health training courses will be scheduled by the training manager in consultation with DOSH senior management. When scheduled, DOSH may present a safety and health technical symposium for staff; such symposium will be scheduled no more than once per year as resources allow, and will be focused on relevant technical training for staff. The current technical course schedule is located on the “Inside DOSH – Internal Training” intranet web page at: <http://inside.lni.wa.gov/WISHA/EducationOutreach/InternalTraning/DOSHTrainingCalendar/DOSHTrainingCalendar.pdf>
- E. Courses offered by the OSHA Training Institute (OTI), the University of Washington – Northwest Center for Occupational Health, OSHA Region 10 (Pacific Northwest OSHA Education Center), and other courses covering occupational safety and health topics is counted as technical training. Specific health and safety courses will be arranged and presented through contracted services by the Internal Training Section as needed, and as resources are available.

- F. The Internal Training staff will provide each newly hired employee a hard copy of a New Hire Training Binder when they attend their new hire orientation in Tumwater. The training binder will include the description of new-hire courses, a training schedule, on-the-job training checklists and other information needed for new hires.
- G. Supervisors will be provided hard copies of new hire preparation checklists as soon as they inform the training manager they have or intend to hire a new CSHO or consultant.

VII. Training Schedule, Waivers and Extensions

- A. New hire training will be scheduled at least twice each calendar year.
- B. Normally, new DOSH enforcement and consultation staff will not engage in independent inspections before completing the new hire sequence of courses and on-the job training as outlined in the DOSH new-hire training curriculum. Upon completion of the new-hire training, the new hire will receive a certification of completion. Exceptions to this policy will only be allowed as outlined in subsection VII.E below, and the CSHO or consultant must be able to conduct independent inspections or consultations.
- C. Only enforcement staff who have attended the DOSH or OSHA OTI Advanced Accident Investigation course are authorized to independently conduct or lead fatality or catastrophe investigations.
- D. Waiver from Required New Hire Training Program. Newly hired CSHOs or consultants must attend new hire training as soon as it is available, normally within one year of hire date. Waivers of any portion of the new hire curriculum will be granted only with sufficient assessment and documentation of previous training or experience, and approved by the Education and Outreach Sr. Manager
- E. New Hire Waiver Assessment and Documentation. To qualify for a waiver, a supervisor must assess and document that the CSHO or consultant has demonstrated that they can perform the tasks listed in the new hire course objectives of a specific course before the course may be waived. After an assessment has been made, waiver requests shall be submitted to the training manager. The waiver request will document why the CSHO or consultant does not need to attend the specified course.

The documentation will include how the CSHO or consultant has acquired comparable 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 or consultant has institutional understanding of DOSH-specific policies and procedures. The

final decision on waiver of all or part of new hire training will be made by the Education and Outreach Senior Manager in consultation with the Compliance or Consultation Manager, the Supervisor, and the training manager.

- F. Time Extensions.** The new hire training schedule described in this instruction will normally be met. The Education and Outreach Sr. Manager, in consultation with appropriate supervisors, may grant a time extension based on extenuating circumstances. If there are unforeseen circumstances that prevent a CSHO or consultant from completing the required new hire courses within one year, completion may be extended up to a maximum of two years from a CSHO or consultants hire date. Attendance at other technical courses is allowed during the extension period.
- G. Time Extension Requests.** Time extensions shall be submitted in writing by a supervisor to the training manager. Time extension requests must include the reasons additional time is needed by the CSHO or consultant to complete the required training, the amount of time requested and the courses that will be completed during the requested time extension.
- H. Time Extension Approvals.** The Education and Outreach Sr. Manager will respond to the time extension request in writing. Copies of the responses approving time extension requests shall be provided to the DOSH Assistant Director.

VIII. Individual Training Plans

- A. Role of Individual Training Plans.** An Individual Training Plan is an active plan to aid a CSHO or consultant to achieve organizational and career goals. Training plans must be updated annually in the Performance Plan and Appraisal Form (PPAF) and serve as a tool for each CSHO or consultant to chart and monitor their own progress toward developmental goals.

An Individual Training Plan will help a CSHO or consultant:

1. Achieve and enhance the level of knowledge and skills required to achieve functional job competencies.
2. Build expertise as a DOSH safety and health professional.
3. Continue professional development throughout their career.

- B. Initial Two Year Individual Training Plans** should include the following:
 1. Mandatory new hire training required during the two-year period as outlined in this instruction.
 2. Specific regional or central office training needs.

3. Other developmental training as determined by the supervisor. For example:
 - (a) Supplemental training at the regional level that includes formal and/or informal mentoring by journey level CSHOs or consultants or those with specialized technical skills and experience.
 - (b) Participation in various types of inspections or consultations in a variety of industries and worksites.

C. Continuing Education & Technical Training.

1. Each CSHO and consultant is required to attend 40 hours of safety and health technical courses each year. Appendices 2 and 3 are provided to assist supervisors and CSHOs or consultants in preparing individual training plans for continuing development.
2. When scheduled, all safety and health specialists and industrial hygienists are required to attend the DOSH Statewide Technical Symposium.

D. Professional Standing, Recognition, and Professional Certification.

The series of courses listed for the CSHO's or consultant's first two years provide a foundation for establishing technical proficiency. Those CSHOs or consultants who choose to work toward a higher level of knowledge and skill are encouraged to continue to attend DOSH sponsored technical courses, OTI courses, or equivalent courses.

While professional certification is an important career milestone, it is not the only path to gaining professional standing or recognition. CSHOs or consultants who complete new, complex, or difficult assignments will expand their skills and capabilities as well as their role as a safety and health professional inside and outside DOSH.

IX. Evaluation

DOSH Training programs are subject to yearly audits by OSHA to ensure the standard of "at least as effective as OSHA" is maintained. DOSH internal audits often include training components as well, and the training program uses internal audit information to continually improve. In addition to OSHA and internal audits, an overall evaluation of the effectiveness of the training program for CSHOs and consultants will be conducted by Internal Training staff as follows:

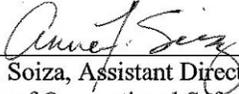
1. Course evaluation surveys are handed out at the end of each new hire training class. This information provides valuable feedback from the student's perspective to determine the perceived value and impact of instruction. It also serves as a basis for proposing changes to course objectives, course content and presentation methods.

2. All course materials are reviewed by the technical unit to ensure accuracy of technical information provided and inclusion of new and emerging trends.
3. All technical training courses and webinars sponsored by DOSH will also include course evaluation surveys. As much as possible, technical training provided by contracted outside vendors will be attended and evaluated by technical or training staff to ensure accuracy of information and conformance with DOSH standards.

X. Enforcement and Consultation Policy

All DOSH consultation and enforcement staff shall follow this training directive with respect to training. This directive shall remain in effect until superseded or cancelled.

Approved: _____


Anne F. Soiza, Assistant Director
Division of Occupational Safety and Health
Department of Labor and Industries

Appendix 1

DOSH NEW HIRE TRAINING COURSE LIST AND COURSE OBJECTIVES

The list of courses and their objectives below is listed in the sequence for courses that DOSH new hire CSHOs and consultants attend during the approximately three months of new hire classroom training. The course objectives describe what the new hire CSHO or consultant should be able to do after completing the course.

Note: Read the list of objectives below as “after attending the course, the new hire will be able to.....”

L&I New Employee Orientation-8 hrs. (Required non-DOSH course)

DOSH New hire orientation - 3 hrs.

- Understand history of worker protection-Federal
- Understand history of worker protection-State of Washington
- Understand WISHA mandate-chapter 49.17 RCW scope of authority
- Understand safety and health within Washington state today

LINIIS – 6 hrs.

- Find an employer in the LINIIS system and review claims history for same

Employer Profile - 1 hr.

- Produce an employer profile report for a specific employer
- Explain the content of the report to an employer

Industrial Insurance for DOSH - 3 hrs.

- Analyze claims trends
- Understand the claims process and employer premiums

Navigating DOSH Standards - 4 hrs.

- Learn how to identify and apply the correct standard to hazards found during a site visit
- Understand scope and sequence of WISHA standards
- Do online navigation
- Identify general “Rules of Thumb” for new CSHO s and consultants
- Answer employer questions during site visits

Core Rules - 3 hrs.

- Locate, describe and properly cite employer’s requirements with emphasis on PPE, exit routes, first aid, and sanitation.
- Identify commonly encountered hazards

Appendix 1 - Continued**APP - 4 hrs.**

- List the items that must be covered in an employer's written Accident Prevention Program (APP)
- Define the term "Regular and Predictable Hazards"
- State DOSH policy for classifying APP violations
- List the requirements for safety committees and safety meetings

Pre-Visit Prep – 8 hrs.

- Predict how a CSHO would prepare for inspecting a specific type of industry.
 - Research on the Internet (using Google)
 - Search tips for pre-visit preparation
- Search LNI Website/Access resources from different L&I programs and their associated data bases.
- List other agencies and organizations that L&I interacts with
- Differentiate between employees and independent contractors
- List the steps to follow in preparation for an inspection.
- Describe how to prioritize inspections.
- State how workers' compensation and Insurance Services Division processes affect an industry.
- **Pre-class Inspection Prep Workbook objectives**
 - Demonstrate use of the WISHA Compliance Manual to locate policies and procedures regarding compliance inspections.
 - Demonstrate how to categorize and prioritize different types of inspection activities.
 - Describe how to determine the necessary scope of an inspection.
 - Demonstrate how to prepare for investigation of S&H complaints.
 - Determine jurisdiction.
 - Explain the process for reviewing an employer's claims and inspection history.
 - Explain how an employer's experience factor is calculated.

Compliance Manual – 18 hrs. for Compliance CSHOs

- Describe the process of workplace entry
- Demonstrate how to "affirmatively ask for and document consent to continue an inspection"
- Using the WISHA Form 1A, practice an Opening Conference
- Explain how workplace hazards are evaluated and documented during an inspection.
- **Pre-class Compliance Manual Workbook objectives**
 - Describe general inspection procedures
 - Opening Conference

Appendix 1 - Continued

- Introduction
- Rights
- Walk-around
- Interviews
- Documenting HECK
- Closing Conference
 - Identification of violations
 - Discrimination
 - Abatement
 - Variances
 - Appeals
 - Rights
 - Consultation
- Describe how to use inspection worksheets
 - 1A-Inspection Worksheet
 - 1C-Hazard Identification Worksheet
 - Employee Interview Worksheet
 - SHAPE sheet for program review

Photos & Sketching - 4 hrs.

- Describe good vs. bad photos
- Describe how photos are used to document violations and hazards in files
- Explain why good photographs support inspection results
- Sketching what you see at the worksite on paper
- Describe the purpose of sketching including tips and practice
- Demonstrate the ability to show overall layout of a worksite including details of parts, people, and position(s)
- Describe the points of measurement needed for documentation.
- Describe why a legend is important.

Investigative Interviewing and Managing Aggression - 7 hrs.

- Describe interview pre-planning steps
 - Witness identification-selection
 - How to approach those being interviewed
- Describe types of interview questions and how and when they are used effectively
- Document the facts and information from the interviews
- Conduct interviews using open questions, confirming facts and feelings, and summarizing
- Recognize escalation patterns
- Practice active listening and de-escalation skills
- Assess personal safety and recognize when it is time to leave

Appendix 1 - Continued

Report Writing – 28 hrs. – For Compliance CSHOs

- Document and distinguish between facts and conclusions
- Compile clear and concise report documentation.
- Compile report documentation that contains the essential elements required to be legally defensible.
- Explain the elements considered in “probability”
- Explain the elements considered in “good faith”
- Calculate a penalty for a serious violation
- Using a WISHA Form 1A, conduct a practice closing conference
- Using WIN – Compliance
 - Create Work Assignments in LINIIS
 - Look up and Review Claims Information in LINIIS
 - Complete Enforcement Inspections using WIN
 - Look up and Review DOSH Employer History in WIN
 - Look up and Review DOSH Violation History in WIN
 - Look up and Review DOSH Appeals History in WIN
- **Pre-class Report Writing Workbook objectives**
 - Demonstrate how to abbreviate field notes
 - Demonstrate the use of sketches in the inspection process.
 - Be able to identify facts vs. conclusions
 - Describe abatement requirements using the Compliance Manual and WAC 296-900
 - Describe how to calculate penalties using Compliance Manual guidance

Consultation Manual – 26 hrs. for Consultants

- Become familiar with the Consultation Manual content
- Describe new consultant and supervisor responsibilities
- Be able to distinguish the “gray areas”
- Describe consultation forms and computerized systems

Assessing Safety & Health Management Systems (SHMS) – 10 hrs. for Consultants

- Explain the difference between mandated safety and health programs and a SHMS
- Cite and explain the three components and six subcomponents of the Form 25
- Accurately conduct a SHMS assessment and select the appropriate Form 25 attributes to complete, given the scope of the assessment
- Generate constructive recommendations to improve an employer’s SHMS in the written report

Appendix 1 – Continued**WIN – Consultation – 14 hrs. for Consultants**

- Create Work Assignments in LINIIS
- Look up and Review Claims Information in LINIIS
- Complete Consultations using WIN
- Look up and Review DOSH Employer History in WIN
- Look up and Review DOSH Violation History in WIN
- Look up and Review DOSH Appeals History in WIN
- Demonstrate the ability to complete weekly activity reports (time sheets)

OSHA 300 - 4 hrs.

- Review an OSHA 300 log and identify injury and illness trends.
- Be able to apply the appropriate regulation for report writing purposes.
- Verify posting requirements have been met.

File Review/Gap analysis – 4 hrs. for Compliance CSHOs

- In-depth file review to prepare for appeals and to ensure thoroughness of investigation documentation
- Ensure documentation tells the story of the case and includes all required elements

Electrical – 8 hrs.

- Explain potential injuries from exposure to electricity
- Correctly define common terms
- Correctly identify common equipment
- Point out common electrical hazards in general industry and construction when shown a picture
- Find the correct code for any violations
- Correctly classify the violation
- Determine if an inquiry or referral to the High Voltage Section is appropriate

Flagger Certification & Roadside Safety– 11 hrs.

- Describe Flagger Qualifications, Responsibilities and Rules of Conduct, based on state laws and the Manual on Uniform Traffic Control Devices (MUTCD).
- Identify the hazards to which flaggers may be subjected and how flaggers prepare themselves for their professional flagging activities
- Describe the methods to set up channeling devices and information on how to guide traffic safely through work zones.
- Apply OSHA rules for roadside safety to protect yourself at active flagging sites.

Appendix 1 – Continued**LO/TO – 7 hrs.**

- Explain hazards associated with failure to lockout machinery and equipment
- Differentiate between adequate and unsatisfactory lockout/tagout methods
- Be able to assess the adequacy of an employer's lockout/tagout program
- Cite LO/TO in a confined space scenario

Confined Space -14 hrs.

- Evaluate confined spaces and decipher whether or not it is a permit-required confined space or a non-permit confined space
- Recognize permit required confined spaces
- Recognize when to cite and when to refer based on hazards identified
- Provide confined space requirements including written program requirements to employers in order to abate hazards
- Cite a confined space violation in a mock scenario

Principles of Investigation – 3 hrs. for Compliance CSHOs

- Find root cause using the 5 why's method
- Apply systems of safety to scenarios
- Apply investigation principles to accidents and hospitalizations

Machine Safety- 29 hrs. for Safety

- Explain hazardous actions and motions
- Identify methods of safeguarding
- Describe guarding vs. safeguarding
- Locate and apply chapter 296-806 WAC
- Describe the principles/concepts of machine safety
- Classify methods of hazard control according to the Hierarchy of Controls.
- Identify hazards resulting from deficiencies in machine safety
- Demonstrate the process of evaluating a situation/setting as a whole
- Identify machine safety applications for specific types and examples of machinery.
- Prepare documentation that would be defensible.

Welding

- List three basic types of welding;
- List three common hazards associated with welding and cutting
- Describe ways to minimize each of the common hazards you listed

Construction – 46 hrs. for Safety

- Identify common causes of accidents in hazardous areas of construction,
- Demonstrate general knowledge of relevant WISHA regulations applied to construction, including:
 - Commercial & Residential Construction
 - Excavation & Trenching

Appendix 1 – Continued

- Scaffolding
- Ladders
- Concrete construction
- Steel erection
- Site clearing
- Cranes & crane referrals

- Fall protection
- Personal protective equipment (PPE)
- Locate WAC for citing hazards and complete WIN citations

Health Standards For IH's – 46 hrs. for IH

- Describe key enforcement issues, severity, probability, and violation classification for:
 - Noise/audiometric testing/hearing protection
 - Hazard communication/material safety data sheets (MSDS)
 - General airborne contaminants and permissible exposure limits (PELs)
 - Lead
 - Asbestos/asbestos certification
 - Emergency washing facilities and records
 - Respirators
 - Biological agents
 - Ergonomics
 - Emergency response and emergency action plans
 - Process Safety Management (PSM) awareness
 - Spray finishing
 - Abrasive blasting
 - Confined space
 - Welding and Hex Chrome
 - Radiation – ionizing and non-ionizing
 - Hazardous waste
 - Indoor air quality (IAQ) and environmental tobacco smoke (ETS)
 - Oxygen deficiency

Introduction To IH Lab & Sampling (IH Lab Boot Camp) - 14 hrs. for IH

- Complete overview on submission and analysis of samples, equipment and instruments used
- Describe common sampling techniques and conduct practice sampling
- Present data in a form understandable to employers

Powered Industrial Trucks - 3 hrs.

- Understand chapter 296-863 WAC (Powered Industrial Trucks) organization
- Understand the scope of chapter 296-863 WAC
- Recognize what trucks are not covered by chapter 296-863 WAC
- Describe Hazardous (Classified) Locations

Cranes, Referrals and Rigging – 3 hrs.

- List four major types of cranes
- Explain a basic load chart
- List at least three hazards associated with mobile cranes and information to aid in referral to the crane group
- Describe ways to eliminate the hazards you listed
- Identify hazards associated with rigging and how to cite them.

CSHO Testimony training (w/mock hearing)- 7 hrs.

- Testify clearly and effectively
- Identify different types of testimony and associated requirements
- Describe the steps in an appeal
- Describe the role of the Board of Industrial Insurance Appeals (BIIA) and the CSHO's relationship
- Describe the appeal hearing process
- How to prove WISHA violations
- Mock hearing involving a mock construction or machine safety citation

IH for Safety – 7 hrs. with field trip

- Obtain a general understanding of industrial hygiene principles
- Recognize common workplace health hazards
- Writing referrals to IH staff
- Cite specific health hazard violations

Construction Safety for IH—7 hrs. with field trip

- Recognize and refer common construction safety hazards
- Cite specific safety hazards
- Identify common causes of accidents in hazardous areas of construction
- Demonstrate general knowledge of relevant WISHA standards in construction, including:
 - Excavation
 - Trenching
 - Concrete construction
 - Steel erection
 - Fall protection
 - Personal protective equipment (PPE)

Machine Safety for Industrial Hygienists- 10 hrs. with field trip

- Explain hazardous actions and motions
- Identify methods of safeguarding
- Describe guarding vs. safeguarding

Appendix 1 – Continued

- Describe the principles/concepts of machine safety
- Classify methods of hazard control according to the Hierarchy of Controls.
- Identify hazards resulting from deficiencies in machine safety
- Differentiate between what to cite and what to refer to safety
- Make appropriate referrals to safety
- Maintain personal safety on job sites

ICS 100/200 (prerequisite for Advanced accident Investigation)

- Can be taken as an online course <http://training.fema.gov/IS/NIMS.aspx>
- Periodically offered as a 7hr ICS 100/200 combination course with additional discussion on interfacing with Incident Command

Agriculture – 7 hrs.

- Provided with region specific emphasis for crops

CSHO's Employed 1 Year or More**DOSH Advanced Accident Investigation - 32 hrs. with mock scene**

- Describe the steps for on-scene safety investigation
- Explain investigation strategies and circumstances where each type is used
- Understand setting up and interface with command centers and CSHO's roles
- Describe cause(s) and identify interviewing techniques unique to catastrophic investigations
- Practice interview, analysis and documentation
- Discuss various requirements of testimony unique to catastrophic investigations

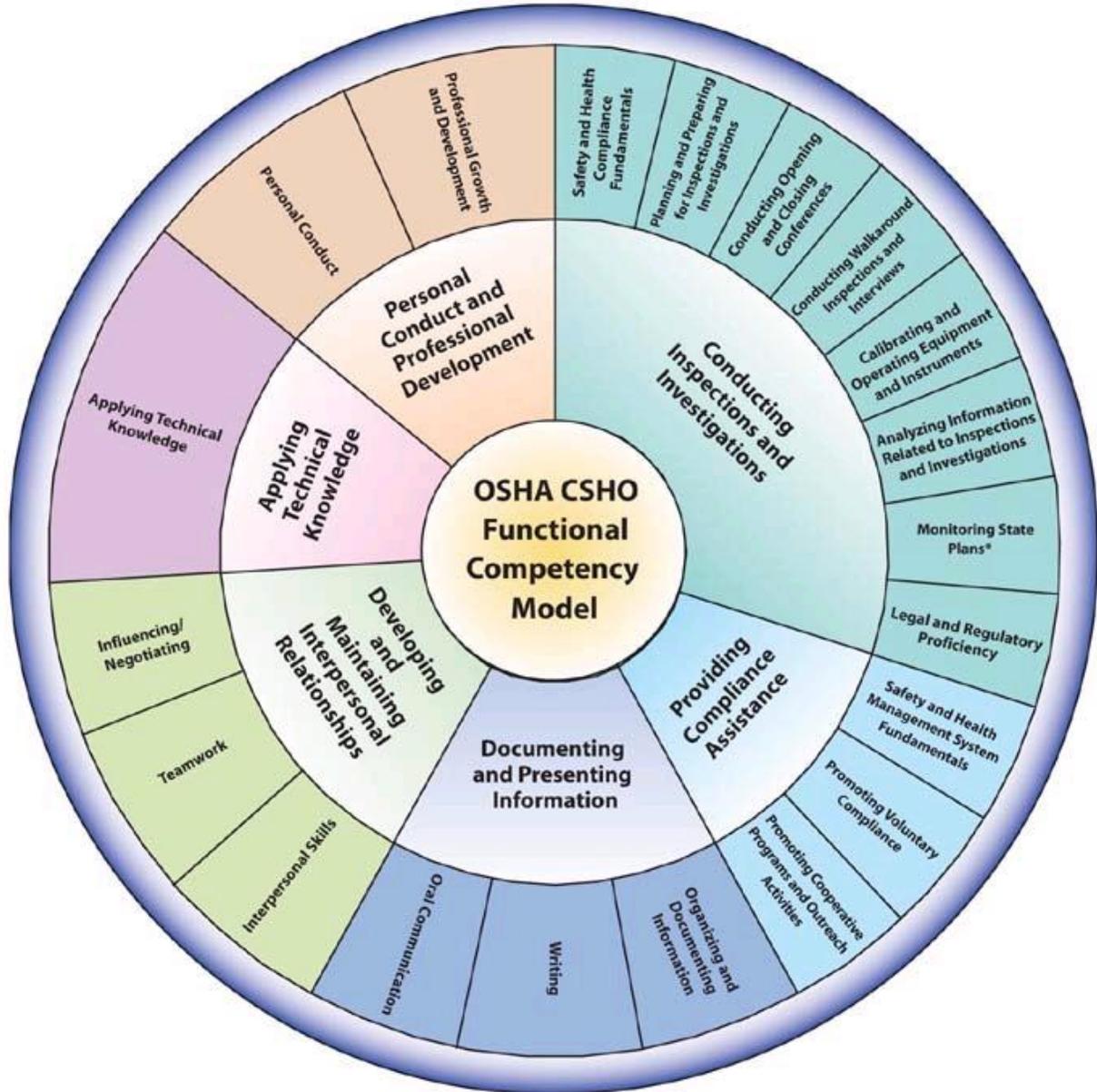
Appendix 2 SAFETY TECHNICAL COURSES BEYOND NEW HIRE TRAINING

Topic	Type	Who	Length
Electrical Hazards	Classroom	OTI or UW	3-5 days
Fall Protection	Classroom	Contractor, U.W.	2 days
Crane Safety	Classroom	DOSH Staff or Contractor	1-5 days
Excavating & Trenching	Classroom	OTI, D-2000 U.W.	1-2 days
Welding Safety	Classroom	U.W, OTI or contractor	2-4 days
Lockout/Tagout	Classroom	DOSH staff	2 days
Flammable Liquids	Classroom	U.W. or contractor	2 days
Machine Guarding		U. W. or DOSH Staff	2-3 days
Scaffolds	Classroom	Contractor	
Tunneling	Classroom	OTI, NW Laborers	3-5 days
Accident Investigation	Classroom	DOSH staff	5 days
Spray Finishing	Classroom	OTI, U.W, Contractor	4-5 days
Forklifts	Online course?	Contractor	1 day
Steel Erection	Classroom	OTI	
Concrete, forms & shoring	Classroom	OTI	2-3 days
Confined Spaces	Classroom	Contractor – D2000, U.W.	3 days
Agriculture Safety	Classroom	DOSH staff	3-4 days
Construction Processes	Classroom	AGC	5 days- construction inspectors
Rigging	Classroom	DOSH staff or Contractor	3 days
Hazardous materials	Classroom	OTI, U.W.	
Welding Safety	Classroom	OTI, contractor	
Grain Handling Safety	Classroom	OTI, contractor	3-4 days
Demolition	Classroom	OTI or contractor	2-3 days
Construction Safety Hazards Refresher	Classroom	DOSH staff	3-5 days

Appendix 3 INDUSTRIAL HYGIENE TECHNICAL COURSES BEYOND NEW HIRE TRAINING

Topic	Type	Who	Length
Confined Spaces	Classroom	D-2000, U.W.	3-4 days
Respiratory Protection	Classroom	Dr. Roy McKay or U.W.	2-3 days
Industrial Ventilation	Classroom	OTI, U.W.	3-4 days
Toxicology	Classroom	U.W.	3-5 days
PSM	Classroom	OTI	5-10 days
Biohazards	Classroom	DOSH Staff	2-3 days
Spray Finishing	Classroom	OTI/contractor	3-4 days
Noise Control	Classroom	Dennis Driscoll	2-3 days
Pesticides, Agriculture Health Hazards	Classroom	DOSH staff	2 days
Welding Health Hazards	Classroom	Contractor – Mike Harris	1 day
Healthcare Health Hazards	Classroom	?	?
Tunneling	Classroom	OTI	5 days
Ammonia	Classroom	Contractor	2-3 days
Emergency Response	Classroom	OTI	
Lead	Classroom	DOSH staff	1 day
Heat Illness	Classroom	DOSH Staff	1 day
Asbestos	Online/classroom	DOSH staff	1 day
Accident Investigation	Classroom	DOSH staff	5 days
Air Monitoring - Instrumentation (Lab Boot Camp)	Classroom	DOSH Lab Staff	
I.H. Enforcement Principles	Classroom	DOSH staff	4 days
Ergonomics	Classroom	DOSH ergonomists	1 day
Construction health hazards	Classroom	DOSH staff	2-3 days

Appendix 4 OSHA FUNCTIONAL COMPETENCY MODEL *(Adapted from OSHA Directive TED 01-00-018)*



Appendix 4 (Descriptions)

Conducting Inspections and Investigations

- **Safety and Health Compliance Fundamentals:** Possesses the basic knowledge and essential skills needed to perform effectively.
 - Possesses a basic knowledge of safety and health regulations and standards.
 - Possesses a basic knowledge of investigative techniques related to WISHA compliance activity and the formal requirements and processes of the legal system; applies that knowledge when conducting investigations.
 - Recognizes apparent hazards and violations of regulations and standards; documents hazards, violations, and abatements in accordance with WISHA policy and procedures.
 - Selects, calibrates, and uses appropriate equipment and instruments to identify and document safety and health hazards.
 - Capably uses computer applications (e.g., WIN, word processing, e-mail, internet browsers) to perform job functions.
 - Possesses a basic knowledge of WISHA, its mission, structure, and goals.
- **Planning and Preparing for Inspections and Investigations:** Gathers comprehensive information relevant to the workplace and uses that information to plan for inspections and investigations; manages time effectively and prioritizes work assignments appropriately.
 - Identifies, gathers, and analyzes available data, records, documentation, technical/scientific literature, relevant policy, legal and regulatory references to plan, conduct, and document an inspection; uses these resources to gain a thorough understanding of the industry, the establishment's inspection history, and industry-specific work processes, operations, hazards, standards, and terminology.
 - Possesses a working knowledge of WISHA inspection priorities and programs (e.g., special emphasis programs, differences between programmed and un-programmed inspections).
 - Researches/reviews WISHA documents (e.g., compliance directives, interpretations, partnerships, settlement agreements) to conduct inspections that conform to established WISHA policies.
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Appendix 4 (Descriptions - continued)

- Researches/reviews control and abatement procedures relevant to the expected work processes and operations.
- Selects appropriate technical and personal protective equipment for use during the inspection or investigation.
- Appropriately prioritizes own activities related to inspections and investigations and ensures that assignments are completed within established timeframes, even in the face of competing priorities.
- **Conducting Opening and Closing Conferences:** Conducts opening conferences to explain the reasons for selecting the establishment for inspection, to obtain information about the establishment, and to outline what the inspection will entail; conducts closing conferences to present inspection findings and to explain the employer's and employees' rights and responsibilities.
 - Meets with management and employee representatives to explain the purpose, scope, and procedures of an ensuing inspection.
 - After the inspection, advises management and employee representatives of safety and health hazards that were identified, outlines apparent violations, reviews applicable standards, explains employer's and employees' rights and responsibilities, and promotes voluntary compliance; as appropriate, provides positive feedback about compliance efforts.
 - Discusses possible abatement methods and time frames, recommends preventative measures, and proposes alternative control actions for identified hazards.
 - Consistently demonstrates mastery in negotiating abatements, time lines, expectations, and other issues; expertly maneuvers through difficult, stressful, or emotional discussions to reach compromises and agreements that provide reasonable solutions for all involved parties.
- **Conducting Walk-around Inspections and Interviews:** Conducts walk-around inspections and interviews according to established procedures, gathering complete, accurate, and legally sufficient information and recognizing potential hazards and violations.
 - Conducts walk-around inspections of worksites, reviewing safety and health programs and inspecting machine and equipment operations, environmental conditions, work practices and processes, protective devices and equipment, and safety procedures.
 - Recognizes and evaluates safety and health hazards and accurately documents those hazards using appropriate equipment and instruments (e.g., measurement devices, cameras, camcorders).

Appendix 4 (Descriptions - continued)

- Interviews management, employee representatives, employees, witnesses, and others to acquire a wide range of information (e.g., specific details on hazardous operational processes and conditions, information used to determine citation and type of penalty to be assessed, information on working conditions used to evaluate the total worksite environment).
- Interviews and/or obtains written statements from a variety of persons according to WISHA policies, eliciting information to support legal sufficiency, even in the face of resistance or poor rapport.
- Evaluates the adequacy of answers to interview questions and asks insightful and probing follow-up questions to fully explore an issue.
- Obtains and reviews relevant documents and records (e.g., injury and illness records, exposure records, maintenance records, an establishment's safety and health programs).
- **Calibrating and Operating Equipment and Instruments:** Calibrates and uses equipment and instruments to gather information about hazardous conditions at the worksite.
 - Charges, calibrates, and tests equipment and instruments to ensure that they are in proper working order for inspections.
 - Safely and skillfully uses equipment and instruments (e.g., air sampling pumps, sound level meters, dosimeters, electrical testers) to document exposure to hazards.
 - Safely and effectively uses audio/video recording equipment (e.g., digital cameras, camcorders, cassette recorders) to gather evidence about operations and apparent hazards and to ensure legal sufficiency.
- **Analyzing Information Related to Inspections and Investigations:** Analyzes information to determine safety and health risks, employer knowledge, regulatory compliance, and the effectiveness of abatement methods.
 - Uses logic to identify solutions to problems, identifies and evaluates potential sources of information, and generates alternatives to solve problems where precedents do not exist.
 - Uses evidence to draw conclusions; determines key causal factors by using qualitative and quantitative methods to make connections between disparate pieces of information.

Appendix 4 (Descriptions - continued)

- Interprets or analyzes complex information (e.g., evidence when facts are inconclusive) to discern trends, patterns of behavior, accident causes, and relationships, and draw conclusions.
 - Accurately classifies violations and calculates recommended penalties, considering the severity of possible injury or illness and the probability of occurrence.
 - Determines whether standards apply and cites the safe place standard for unconventional or new hazardous work operations, materials, equipment, and/or machinery.
 - Appropriately addresses employer knowledge and potential employer affirmative defenses.
 - Identifies feasible abatement methods, evaluates proposed abatement methods, and verifies implemented abatement methods to determine whether they effectively control identified hazards.
- **Legal and Regulatory Proficiency:** Possesses substantive knowledge of occupational safety and health laws, regulations, standards, directives, and enforcement practices and documents; applies that knowledge in support of the DOSH mission.
 - Applies knowledge of WISHA, occupational safety and health laws, regulations, standards, and directives in support of the DOSH mission.
 - Researches and reviews legal decisions as needed to establish preliminary justification and support for citations.
 - Draws legally defensible conclusions based on legal and regulatory guidance.
 - Provides information for, and participates in, informal resumption conferences as needed.
 - Prepares or provides information for the preparation of legal documents (e.g., denial and anticipatory forms, warrant applications, subpoenas, responses to interrogatories) that contain the proper content and formatting.
 - Effectively supports legal actions (e.g., by serving warrants and subpoenas, participating in depositions and hearing preparation, providing testimony).
 - Determines when to secure physical and electronic evidence, secures evidence, and ensures chains of custody requirements are met.

Appendix 4 (Descriptions- continued)

Providing Consultation and Technical Assistance

- Safety and Health Management System Fundamentals: Possesses the basic knowledge and essential skills needed to provide appropriate advice and assistance to employers for their Accident Prevention Programs (APP).
 - Possesses a working knowledge of safety and health management system and APP requirements.
 - Possesses a working knowledge of advisory and outreach assistance tools and services.

- Promoting Voluntary Compliance: Assists employers, employee and employer organizations, and other stakeholders in fostering a safety and health workplace culture through voluntary programs.
 - Promotes voluntary compliance with WISHA through guidance, training, and workshop presentations.
 - Provides timely and responsive service to employers to support their efforts to establish a safety and health workplace culture.
 - Promotes industrial practices that are consistent with the goals and principles of occupational safety and health.
 - Effectively promotes the value of collaborative and cooperative programs by providing services such as evaluating and recommending improvements to safety and health programs such as APP.
 - Able to explain WISHA standards, policies, guidelines and employer and employee rights and responsibilities.
 - Works cooperatively with reluctant industries, associations, and groups to develop and improve the safety culture.
 - Adjusts emphasis focus between enforcement and assistance as needed in response to changing work situations or demands.
 - Reviews employer APP to identify deficiencies and make recommendations for improvement.

- Promoting Recognition Programs and Outreach Activities: Provides information to employers about available DOSH assistance programs; markets and uses available programs and outreach materials and efforts to assist employers and employees with their efforts to create a culture that values and fosters a safe and healthful workplace.
 - Raises awareness of DOSH's voluntary and assistance programs such as consultation, Voluntary Protection Program, and outreach efforts.

Appendix 4 (Descriptions - continued)

- Assists in promoting and monitoring SHIP grants and local employer/employee partnerships and joint efforts to improve the safety culture.
- Gives presentations and participates in safety fairs or similar activities, promoting occupational safety and health.
- Assists with on-site consultation and technical assistance.
- Conducts on-site VPP reviews.

Documenting and Presenting Information

- **Organizing and Documenting Information:** Organizes and documents information related to inspections and investigations and enters it into appropriate data storage systems, ensuring the information's accuracy, completeness, and legal sufficiency.
 - Organizes and documents information pertinent to a case file (e.g., forms, background notes, equipment calibration information, photographs, reports that summarize proposed citations, penalties, abatement dates) in accordance with DOSH policies and procedures.
 - Effectively uses computer technology (e.g., personal computers, word processing software) to organize and document information.
 - Enters case file data into appropriate data systems (e.g., Washington Information Network - WIN).
- **Writing:** Recognizes and uses correct English grammar, punctuation, and spelling; communicates information (e.g., facts, ideas, messages) in a succinct and organized manner; produces written information, which may include technical material, appropriate for the intended audience.
 - Communicates complex concepts or ideas effectively in writing in a manner that is appropriate for the intended audience.
 - Produces documents that require minimal editing and are technically sound, accurate, thorough, logical, concise, and completed in a timely manner.
 - Formats documents appropriately and uses proper grammar, punctuation, and spelling.

Appendix 4 (Descriptions - continued)

- **Oral Communication:** Expresses information (e.g., facts, ideas, messages) to individuals or groups effectively, taking into account the audience and nature of the information (e.g., technical, sensitive, controversial); makes clear and convincing oral presentations; listens to others, attending to nonverbal cues and responding appropriately.
 - Presents information in a clear, concise, organized, and coherent manner that is appropriately targeted to the audience or listener.
 - Effectively prepares and delivers formal and informal presentations, anticipating audience needs and adapting appropriately; capably uses presentation software and audio/visual aids (e.g., PowerPoint, overheads); explains complex or technical information in an understandable manner; speaks clearly and confidently.
 - Responds clearly, concisely, and credibly to difficult or challenging questions in a variety of circumstances (e.g., during contentious interviews).
 - Encourages an open, two-way dialogue with others, acknowledging and respecting diverse opinions and engaging in active listening.

Developing and Maintaining Interpersonal Relationships

- **Interpersonal Skills:** Shows understanding, professionalism, courtesy, tact, empathy, concern, and politeness to others; develops and maintains effective relationships with others; deals effectively with individuals who are difficult, hostile, or distressed; relates well to people from varied backgrounds and different situations; is sensitive to cultural diversity, race, gender, disabilities, and other individual differences.
 - Fosters constructive, professional working relationships with others; is professional, flexible, and courteous, even when discussing or eliciting sensitive or controversial information.
 - Clearly and consistently models tact, respect, trust and professionalism with all people, without regard to race, color, religion, sex, national origin, age, disability, political affiliation, marital status, or sexual orientation.
 - Shows tact, empathy, and concern when dealing with individuals involved with, or impacted by, accidents and fatalities.

Appendix 4 (Descriptions - continued)

- **Teamwork:** Encourages and facilitates cooperation, fosters commitment and team spirit, and works with others to achieve shared goals.
 - Works cooperatively with others as a member or leader of a team to support DOSH and agency goals.
 - Promotes and fosters the use of teams, encouraging and facilitating cooperation, pride, trust, and group identity among team members.
 - Encourages and facilitates collaboration within, outside, and across DOSH boundaries to achieve shared goals.

- **Influencing/Negotiating:** Persuades others to accept recommendations, cooperate, or change their behavior; works with others towards an agreement; negotiates to find mutually acceptable solutions.
 - Works with supervisor, other employees, and/or stakeholders to gain acceptance of a proposal, settlement, or solution to safety and health issues.
 - Persuades individuals or groups to provide information, accept findings, or take corrective action.
 - Cooperatively deals with other Division or agency programs to discuss and/or adjust schedules or priorities or to exchange information and referrals.
 - Discusses critical issues with others who may be resistant or do not stand to gain by negotiating.

Applying Technical Knowledge

- **Applying Technical Knowledge:** Possesses substantive knowledge of technical areas and hazards associated with those technical areas; applies that knowledge in support of DOSH's mission.
 - Applies substantive knowledge of technical areas (e.g., electricity, health care, hazardous materials, industrial toxicology, ergonomics, ventilation, scaffolding, tunnel construction, steel erection) in support of DOSH's mission.
 - Applies substantive knowledge of hazards associated with technical areas when conducting inspections, investigations, and consultations.
 - Applies technical knowledge when determining abatement feasibility and effectiveness.

Appendix 4 (Descriptions - continued)

- Applies detailed knowledge of precedent techniques and accepted procedures in identifying unsafe work environments, potential hazards, and other situations impacting employee safety and health.
- Recommends new techniques and methods to resolve critical problems resulting from the introduction of new technology, processes, chemicals, and physical agents when existing criteria and standards are inappropriate.
- Develops unique, customized solutions and recommends hazard abatement or elimination based upon research or the adaptation of precedent techniques to address occupational safety and health issues.
- Applies occupational safety or industrial hygiene principles, practices, techniques, procedures, regulations, and standards to identify and evaluate occupational safety and health hazards and recommend abatement methods.

Personal Conduct and Professional Development

- Personal Conduct: Presents oneself and interacts with others in an appropriate and professional manner; exhibits the highest standards of ethical behavior.
 - Exhibits leadership by influencing, challenging, and motivating others; gains their confidence and support in accomplishing work activities.
 - Demonstrates problem solving skills by providing positive solutions to identified problems.
 - Maintains professional appearance and dresses appropriately.
 - Uses appropriate language, terminology, and non-verbal communication under varying circumstances.
 - Demonstrates a positive and constructive attitude.
 - Takes ownership of work activities and shows pride when representing DOSH and L&I.
 - Exhibits the highest standards of ethical behavior, including integrity, credibility, professionalism, and accountability; reports unethical actions by others.

Appendix 4 (Descriptions - continued)

- Maintains confidentiality of information as appropriate (e.g., when information is sensitive, proprietary, related to trade secrets, or impacts criminal investigations or national security).
- Sets realistic personal goals, making adjustments as needed to achieve office goals; allocates time appropriately to multiple demands to meet deadlines.
- **Professional Growth and Development:** Engages in development activities to maintain and enhance own and others' professional knowledge and skills.
 - Works with supervisor to identify career objectives and to develop/revise a career plan that addresses individual strengths and weaknesses.
 - Considers own performance, proactively seeks and responds constructively to feedback from others, and applies this information to enhance performance and progress toward career goals.
 - Devotes substantial effort to increasing knowledge and skills and keeping up-to-date in the safety and health profession (e.g., by attending training courses, meetings, and conferences, reading professional publications, joining professional associations, seeking on-the-job training experiences, pursuing professional certification).
 - Provides on-the-job training and mentoring to less-experienced employees.
 - Uses imagination to develop new insight into situations and applies innovative solutions to problems.
 - Takes initiative to seek new or additional responsibilities and challenges; continually applies greater levels of effort, persistence, and autonomy toward achievement of goals.
 - Uses training and developmental opportunities (e.g., diversity training or activities such as pursuing an understanding of languages other than English) to help overcome communication barriers.