



STATE OSHA ANNUAL 2012 REPORT (FY 2012 SOAR)

**US Virgin Islands Department of Labor
VI Division of Occupational Safety and Health - VIDOSH
(Public Sector Only)**

December 29th, 2012

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CONTENTS

INTRODUCTION - PURPOSE OF STATE PROGRAM, HISTORY AND BACKGROUND	3
VIDOSH RESPONSE TO OSHA RECOMMENDATIONS FY 2011 FAME-----	4
MANDATED ACTIVITIES -----	10
VIRGIN ISLANDS PUBLIC SECTOR AGENCIES BLS INJURY/ILLNESSES REPORTS HIGHLIGHTS-----	11
STATE PLAN ANNUAL SUMMARY TOWARD STRATEGIC PLAN GOALS-----	14
<i>FY 2012</i> VIDOSH PLAN RESULTS-STRATEGIC GOALS 1-----	14
<i>FY 2012</i> VIDOSH PLAN RESULTS-STRATEGIC GOALS 2-----	17
PROMOTE A SAFETY AND HEALTH CULTURE WITHIN THE U.S. VIRGIN ISLANDS PUBLIC SECTOR WORKPLACES-----	22
OUTCOME GOAL TARGETS-----	22
OUTREACH PROGRAMS AND SEMINARS-----	25
VIDOSH STAFF TRAINING-----	25
PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENTS-----	25
FEDERAL LIAISON MENTORSHIP-----	25
TIMELY ENFORCEMENT AND HAZARD ABATEMENT-----	25
STAFFING RESPONSIBILITY-----	26
CONSULTATION INITIATIVE-----	26
MANDATED ACTIVITIES-----	27
CONCLUSION-----	28

INTRODUCTION

PURPOSE OF STATE PROGRAM, HISTORY AND BACKGROUND

The mission of the Virgin Islands Division of Occupational Safety and Health (DOSH) is to implement the mandates of the Federal (OSH) Act, and to ensure a safe and healthful working environment for all employees and employers within its jurisdiction. This means to ensure as much as practicable, that employees within the Public Sector work in an environment free from hazards, any other foreseeable potential hazards and risks to their safety and health. The VIDOSH Program intends to ensure that this protection is provided to all Public Sector employees in the Virgin Islands, focus on all the public sector agencies and those appointed employer representatives. This performance will involve the application of standards, enforcement of occupational regulations and to provide occupational safety technical assistance, including the utilization of these OSHA tools will enable employers and employees to maintain safe and healthful workplaces.

The Virgin Islands OSHA State Plan is currently administered by the Division of Occupational Safety and Health (VIDOSH), which is part of the U.S. Virgin Islands Department of Labor. The State Plan has offices on the two major islands: St. Croix and St. Thomas, for conducting enforcement training, outreach and consultation activities in the public sector. VIDOSH conducts inspections at territorial-government facilities. All private sector and federal government agencies complaints are referred and/or forwarded to the Puerto Rico Federal OSHA Area offices for appropriate action.

The VI-OSH Act as stated on July 19th, 2006 amendment for Public Sector only, now contains provisions for the issuance of monetary penalties for those public sector employers found not be in compliance with applicable standards on a first instances, however, the revised Act contained provisions on all Failure to Abate serious violations. The post citation issuance review proceedings are handled through a VI Hearing Examiner with the right to appeal to the Commissioner of Labor and the V.I. Superior Court in lieu of the Review Commissioner as in the Federal Program. The United States Virgin Islands–OSH Act provides for the automatic adoption of federal standards applicable to public sector for the issuance of citations on the effective date specified in the federal standards. The Commissioner for VI Department of Labor published adopted standard and procedures as rule or notice for a minimum of three days in local circulation written media and the V.I. Register to notify all impacted stakeholders

Until June 30, 2003, VIDOSH and Federal OSHA had concurrent jurisdiction over safety issues in the private sector, with Puerto Rico Federal OSHA Area Office retaining private sector health and maritime industry coverage. The public sector safety and health issues were covered by VIDOSH, as well as consultative services in both private and public sectors. On July 1st, 2003, the Government of the United States Virgin Islands voluntarily withdrew its private sector enforcement coverage while continuing its coverage for public sector workers, and entered into a new 21(d) private-sector consultation cooperative agreement with Federal OSHA. This was due in large part to the unique geography and performance issues surrounding the Virgin Islands State Plan. On September 2005, the 21(d) private sector consultation program was transferred to the University of the Virgin Islands Community Engagement and Lifelong Learning (UVI-CELL) Division.

The Fiscal Year (FY) 2012 State OSHA Annual Report (SOAR) is submitted in accordance with the Occupational Safety and Health Administration (OSHA) requirements to report their progress in accomplishing the previous fiscal year’s Annual Performance Plan goals. The Virgin Islands Division of Occupational safety and Health (VIDOSH) submits this report outlining the Division’s accomplishments and deficiencies. The following information will enable OSHA to include VIDOSH’s information in the Government Performance and Results Act (GPRA) Annual Report to Congress.

**VIDOSH RESPONSE TO OSHA RECOMMENDATIONS FROM FY2011 ENHANCED
FEDERAL ANNUAL MONITORING EVALUATION (FAME)**

ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT OCTOBER 1, 2011 - SEPTEMBER 30, 2012.	
ENFORCEMENT	
11-1	Finding 11-01 Timeliness of state response and notifications to complainant: During this evaluation period, VIDOSH received a total of 4 formal complaints, with an average of 13.75 days
RECOMMENDATION	Recommendation 11-01 Implement internal control measure to ensure that complaint inspections are conducted in a timely manner
CORRECTIVE ACTION PLAN	VIDOSH developed online complaint forms to ensure the timeliness of state response and notifications to complainant:
STATE ACTION TAKEN	VIDOSH created online templates. The online forms include instructions and a prefilled Fax Coversheet. These measures provide a streamline solution for the Public Sector customers to file a complaint. The method of complaint submittal is via fax or email. Additionally, VIDOSH has implemented an automated process utilizing the newly created VIDOSH Office email address. The said VIDOSH Office email address will be utilized for official communication between VIDOSH and Public Sector customers. Each complaint will be processed. The Director will have oversight. VIDOSH has implemented a Cradle to Grave approach on case file management. The Director will assign the complaint to a CSHO and will ensure the necessary actions are taken to close the complaint.
STATUS	Completed 1 October 2012
11-02	Finding 11-02 VIDOSH conducted a total of 54 inspections during FY 2011. This is 52% of the planned annual goal of 103 inspections. Of the 54 inspections, 26 were safety inspections which was 43% of the planned goal of 60; and 28 were health inspections which was 65% of the planned goal of 43.
RECOMMENDATION	Recommendation 11-02 VIDOSH must develop an inspection targeting and scheduling system that ensures that its Annual

ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT OCTOBER 1, 2011 - SEPTEMBER 30, 2012.	
	Performance Plan inspection goals are met and that CSHO resources are fully utilized for compliance activities.
CORRECTIVE ACTION PLAN	VIDOSH developed an inspection targeting and scheduling mechanism to ensure the organization’s Annual Performance Plan inspection and goals are accomplished.
STATE ACTION TAKEN	Thru a collaborative effort VIDOSH has work towards creating a viable State Plan Program. These measures resulted in the closing 91% of the FY-2011 EFAME findings. These measures resulted in the division's ability to provide an operational Public Sector Program. The VIDOSH Director will be able to address all facets of an effective State Plan Program
STATUS	Completed 1 October 2012
INSPECTION ACTIVITY 11-03	Finding 11-03 During the evaluation period, VIDOSH issued citations in 20 cases, 8 safety and 12 health cases. For the safety cases, VIDOSH had a lapse time of 113.75 days (the national average was 51.9 days). The lapse time for the health cases was calculated at 157.25 days (the national average was 64.8 days). Both safety and health indicators were higher than the national average.
RECOMMENDATION	ENFORCEMENT Finding 11-03: Citations and Penalties Recommendation 11-03: VIDOSH must implement mechanisms (e.g., expedited case file reviews, review of management reports, and retrain employees) in order to improve its citation lapse times.
CORRECTIVE ACTION PLAN	VIDOSH implemented mechanisms in order to improve its citation lapse times
STATE ACTION TAKEN	VIDOSH has implemented the necessary procedures to improve citation lapse time. The Director and staff reviewed all open case files; a prioritizations system and a Cradle to Grave approach on case file management were implemented. Additionally, the Director's utilization of the Standard IMIS Reports and Project Management techniques will be utilized to forecast deadlines
STATUS	Completed 1 October 2012
INSPECTION ACTIVITY 11-04	Finding 11-04 VIDOSH had seventy-four (74) open non-contested cases with abatements incomplete 60 or more days after the last abatement date and does not utilize a reliable mechanism for achieving abatement for cited hazards.
RECOMMENDATION	Recommendation 11-04: VIDOSH must fully utilize strategies such as follow-up inspections, “failure to abate” citations, and 29 CFR 1903 provisions to ensure that abatement of cited hazards is achieved in a timely manner
CORRECTIVE ACTION PLAN	VIDOSH implemented program management techniques and procedures to ensure abatement of cited hazards is achieved in a timely manner

ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT OCTOBER 1, 2011 - SEPTEMBER 30, 2012.	
STATE ACTION TAKEN	VIDOSH has implemented the necessary procedures to reduce the number of Open /Non Contested cases. The Director and the Staff reviewed all open case files; a prioritizations system and Cradle to Grave approach on case file management was implemented. Additionally, the utilization of Standard NCR reports and Project Management techniques will be utilized to forecast deadlines. These said measures resulted in approximately 65% of the said cases being closed
STATUS	IN PROGRESS/REGION WILL CONTINUE TO MONITOR.
INSPECTION ACTIVITY 11-05	Standard Adoption: VIDOSH does not exercise its statutory authority to adopt standards, and that documentation is not available to verify adoption.
RECOMMENDATION	VIDOSH should implement internal controls to ensure that all standards applicable to the public sector are promulgated within six months of the promulgation date of new federal OSHA standards in accordance with the VIOSH ACT
CORRECTIVE ACTION PLAN	VIDOSH implemented internal controls to ensure all standards applicable to the public sector are promulgated within six months of the promulgation date of new federal OSHA standards in accordance with the VIOSH ACT
STATE ACTION TAKEN	<p>VIDOSH implemented a dedicated COMPLIANCE (CPL) DOC Tab on the VIDOL/VIDOSH webpage. This measure resulted in making the CPL information available to the Public Sector</p> <p>The VIDOSH Webpage provides the public Sector with the following reports:</p> <ul style="list-style-type: none"> • A Standard CPL Roster with Hyperlinks connecting the customer with the current OSHA documentation. • A Standard CPL Directive Certificates Roster providing the Public Sector and Region II with the implementation data for each CPL Directive and Standard, and Doctrine • VIDOSH provided listings to the VIDOL Public Information Officer to publish a Government of the Virgin Islands Public Information Notification release. • The Press Release will be sent to the Governor for approval and it will be released to all Virgin Islands Public Sector Agencies and Stakeholders; as well as, the media. • VIDOSH will also utilize the VIDOL Facebook Page to inform the public of the CPL Directives updates. • The VIDOL Public Information Office is working with the local media to inform the public of the most current information—the CPLs are included in this effort. • The VIDOSH CPL Standard and Directives can be downloaded on to the iPhone platform utilizing the I-Books application—This measure provides Public Sector Smart

ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT OCTOBER 1, 2011 - SEPTEMBER 30, 2012.	
	Phone users with the searchable and bookmarking features pertaining to the CPL Standard and Directives— VIDOSH First To Date and a possible OSHA benchmark.
STATUS	Completed FY 24 July 2012
WHISTLEBLOWER	
INSPECTION ACTIVITY 11-06	VIDOSH’s discrimination program does not meet the 29 CFR part 1977.23 standards. In general, the VIDOSH discrimination program is lacking the staffing, procedural knowledge, experience, and structure necessary to effectively execute investigations and meet program objectives
RECOMMENDATION	VIDOSH needs to implement an effective discrimination program that follows the Whistleblower Investigation Manual (CPL02-03-002 8/22/2003) VIDOSH must work with the Virgin Island’s Attorney General’s Office to create a clear path for settlement review and execution of these cases. This includes access and use of the IMIS Whistleblower application and use of appropriate templates.
CORRECTIVE ACTION PLAN	VIDOSH Implemented an effective discrimination program that is compliance with the Whistleblower Investigation Manual (CPL02-03-002 8/22/2003)
STATE ACTION TAKEN	VIDOSH Director and two CSHO (One Safety and One Health) completed the 1420 Basic Whistleblower Investigations (11c) OTI course during the FY2012. VIDOSH has adopted CPL 02-03-003 Whistleblower Investigations Manual. VIDOSH has created customized Whistleblower letter templates. Additionally VIDOSH has created a Public Sector Whistleblower poster; the poster is available in English and Spanish. The VIDOSH Whistleblower program is operational
STATUS	Completed 1 October 2012
INSPECTION ACTIVITY 11-07	As also indicated in the 2009 EFAME, VIDOSH staff refers 11(c) cases to PROSHA and the U.S. Virgin Islands Department of Labor, Division of Labor Relations rather than to federal OSHA. Staff members understood that private Sector 11(c) complaints should be forwarded to Federal OSHA. Staff members stated that they contacted Federal OSHA Regional Supervisory Investigator for questions
RECOMMENDATION	VIDOSH staff needs to forward all complainants that allege retaliation to the discrimination investigator for screening. All staff members should be trained to answer basic questions about jurisdiction, coverage, and discrimination complaints. All screenings should be documented according to the guidelines in the Federal Manual. It is suggested that VIDOSH continue to refer cases out of their jurisdiction to Federal OSHA and contact Federal OSHA with any questions. VIDOSH should develop a working relationship with the Virgin Islands Department of Labor, Division

ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT OCTOBER 1, 2011 - SEPTEMBER 30, 2012.	
	of Labor Relations, so that each agency may refer appropriate cases to each other as complainants may concurrently file.
CORRECTIVE ACTION PLAN	VIDOSH Implemented an effective discrimination program that is compliance with the Whistleblower Investigation Manual (CPL02-03-002 8/22/2003)
STATE ACTION TAKEN	VIDOSH Director and two CSHO (One Safety and One Health) completed the 1420 Basic Whistleblower Investigations (11c) OTI course during the FY2012. VIDOSH has adopted CPL 02-03-003 Whistleblower Investigations Manual. VIDOSH has created customized Whistleblower letter templates. Additionally VIDOSH has created a Public Sector Whistleblower poster; the poster is available in English and Spanish. The VIDOSH Whistleblower program is operational.
STATUS	Completed 1 October 2012
CONSULTATION	
INSPECTION ACTIVITY 11-08	As also indicated in the 2009 EFAME , as required by its 2003 developmental plan, the Virgin Islands has not developed nor maintained a public sector consultation program that can provide no cost safety and health services to public sector employers
RECOMMENDATION	Recommendation 11-08: VIDOSH must ensure that a public-sector consultation program is fully operational and provides appropriate services to public-sector employers in the territory
CORRECTIVE ACTION PLAN	VIDOSH implemented a fully operational a public-sector consultation program The program provides appropriate services to public-sector employers in the territory
STATE ACTION TAKEN	VIDOSH has completed the necessary actions to deliver a Public-Sector Consultation Program. The Program is operational and provides the appropriate services to Public Sector employers in the territory.
STATUS	Completed 1 October 2012
INSPECTION ACTIVITY 11-09	VIDOSH covers public sector employers in water and wastewater treatment activities, covered by the PSM standard. VIDOSH does not have adequate trained staff to deal with these worksites
RECOMMENDATION	VIDOSH needs to ensure that an adequate number of qualified VIDOSH staff is trained to the requirements of DIRECTIVE NUMBER: 09-06 (CPL 02), “PSM Covered Chemical Facilities National Emphasis Program”
CORRECTIVE ACTION PLAN	VIDOSH will ensure the efforts are made to ensure VIDOSH receive the required PSM training to preform inspection duties of the public sector employers in water and wastewater treatment activities. VIDOSH has current staff members that have worked within PSM environment; however these members are awaiting to attend OSHA PSM classes
STATE ACTION TAKEN	. VIDOSH will work with OTI and Region II to enroll VIDOSH staff members in necessary PSM courses.

ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT OCTOBER 1, 2011 - SEPTEMBER 30, 2012.	
STATUS	TBD based on availability of OTI classes
INSPECTION ACTIVITY 11-10	1 October FY2013 A draft version of revised State Plan Narrative was due on December 31, 2005. This document has not yet been received by OSHA but VIDOSH reports that it will be submitted to OSHA for approval by the end of the second quarter of FY 2012.
RECOMMENDATION	VIDOSH must ensure that the State Plan narrative, with amendments reflecting the more limited public sector scope of the program, is completed and submitted to OSHA. This includes the narrative document as well as all relevant appendices. VIDOSH must also provide documentation on all outstanding developmental components of its State Plan.
CORRECTIVE ACTION PLAN	VIDOSH submitted a draft copy of the said State Plan narrative, with amendments reflecting the more limited public sector scope of the program, Region II .
STATE ACTION TAKEN	VIDOSH has completed and submitted a draft version of revised the State Plan Narrative to Region II for the necessary actions; upon the notification from Region II the finding will be closed
STATUS	IN PROGRESS/REGION WILL CONTINUE TO MONITOR.
INSPECTION ACTIVITY 11-11	According to VIDOSH, only four (4) of the inspections conducted in FY2011 were actually closed and available for review as part of this year's EFAME study. These closed cases only represent 7.4% of the inspections conducted during FY 2011. Even though four (4) cases were reported by VIDOSH as being closed, only two enforcement case files were made available to federal OSHA for the EFAME review. Both of these inspections were "in compliance" and no citation items were issued in either inspection. It was noted that of the 54 inspections conducted, thirteen (13) reportedly had citations issued
RECOMMENDATION	VIDOSH needs to develop and implement mechanisms to ensure that inspection case files are closed in an expedient manner and in accordance with adopted policy in the Field Operations Manual. The VIDOSH Director has begun reviewing the IMIS reports. VIDOSH Staff attended the OIS Enforcement Super User Training
CORRECTIVE ACTION PLAN	VIDOSH develop and implement mechanisms to ensure that inspection case files are closed in an expedient manner and in accordance with adopted policy in the Field Operations Manual .
STATUS	IN PROGRESS/REGION WILL CONTINUE TO MONITOR.

MANDATED ACTIVITIES

ACTIVITY	PROGRAM	ACTIVITY	GOAL		ACTUAL			
			FY 12	FY 12	FY 12	FY 12		
PROJECTIONS			SAFETY	HEALTH	SAFETY	HEALTH	GOAL	ACTUAL
ENFORCEMENT								
PUBLIC		SECTOR	55	25	12(*)	10(*)	80	22
INSPECTIONS								
CONSULTATION			5	10	2(❖)	0	15	2(❖)
- PUBLIC		SECTOR						
CONSULTATION								

Note: (❖) = Consultation visits initiated, however the consultation program was suspended due to loss of staff.

Note: (*) = Program Activity Projection actual not met due to loss of staff

ENFORCEMENT INSPECTIONS

	PROGRAMED	COMPLAINT	REFERRAL	FATALITY	FOLLOW-UP
SAFETY	8	3	0	0	1
HEALTH	5	5	0	0	0
TOTAL	13	8	0(*)	0	1

Note: (*) VIDOSH was directed by Region II to refer all Private Sector complaints to contact the Puerto Rico Federal Office directly

CONSULTATION

	INITIAL	FOLLOW-UP	TRAINING & ASSISTANCE	Total
SAFETY	2*	0	3	2
HEALTH	0	0		
TOTAL	0	0		0

Note: (*) = Consultation visit initiated but report(s) kept in draft upon reassignment of Industrial Hygienist.

VIRGIN ISLANDS PUBLIC SECTOR AGENCIES BLS INJURY/ILLNESSES REPORTS HIGHLIGHTS

Overall the BLS Non-fatal Injuries and Illnesses rate for US Virgin Islands government agencies data showed 0.33% decrease trend in the Total Recordable Cases (TRC) rates on CY 2011 (2.5) compared with CY 2008 reported rates (3.0). The CY 2011 Public Administration TRC rates decreased. The decrease can be attributed to VIDOSH's strategies; increased record keeping awareness by Public Sector Agencies. Better reporting and outreach activities have improved the reporting activities

There BLS Non-fatal Injuries and Illnesses rate showed specific rate decreased trends ranges from 4.3% to 0.078%. The Table II below describes the agencies data from CY 2008 to CY 2011. There were nine (9) agencies whose TRC decreased rate trends; one of the nine decreased was above the 1 % forecast goal.

- The Utilities data showed a 4.3% decreased trend. The trending data reflect no change due to the BLS data being too low to report.
- The Justice, Public Order and Safety industry category agencies showed a .05% decreased trend in CY 2011 (1.1)
- The Public Administration data showed a 0.08% decreased trend in CY 2011 (2.2) as compared with CY 2008 baseline (2.4).
- The Educational Services Colleges, Universities and Professional Schools showed a 0.95% decreased trend in CY 2011 (3.0) as compared with CY 2008 baseline (4.9).
- The Executive, Legislative and Other General Government Support industries data were not reported.

The TRC rate for the State and Local Government and Service Providing Agencies showed a 0.4% decrease trend in CY 2011 (2.5) as compared with CY 2008 baseline (2.8). The BLS Non-fatal Injuries and Illnesses rate showed a decrease; trends range from 0.03% to 4.3%.

- The Education and Health services data showed a 1.2. % decrease trend in CY 2011 (2.2) as compared with CY 2008 baseline (3.4).
- The Educational Services agencies data showed .5% decrease trend in CY 2011 (1.7) as compared with CY 2008 baseline (2.2). The Health Care and Social Assistance and Hospitals showed a 0.3% decrease trend in CY 2011 (3.7) as compared with CY 2008 baseline (4.0).
- The Hospital CY 2011 baseline (3.7) decrease 2.7% compared with CY 2008 baseline (6.4).
- Public Administration CY 2011 baseline (2.2) decrease 0.2% compared with CY 2008 baseline (2.4).
- State and Local Government CY 2011 baseline (2.5) decrease 0.5% compared with CY 2008 baseline (3).

- State Government CY 2011 baseline (2.5) decrease 0.5% compared with CY 2008 baseline (3).
- Service Providing CY 2011 baseline (2.5) decrease 0.5% compared with CY 2008 baseline (3).
- Educational Services Colleges, Universities and Professional Schools CY 2011 baseline (3.0) decrease 1.9% compared with CY 2008 baseline (4.9).

Table I. US Virgin Islands BLS Non-Fatal Injuries and Illnesses Total Recordable Case (TRC) Rates trends since CY 2008 – CY 2011.

US VIRGIN ISLAND BLS NON FATAL INJURIES AND ILLNESS	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	% RATE CY2008 TO CY2011
INDUSTRY	2008	2009	2010	2011	% (Increase or Decrease)
STATE AND LOCAL GOVERNMENT	3.0	2.8	2.9	2.5	0.33% Decrease

Table II. US Virgin Islands BLS Non-Fatal Injuries and Illnesses Total Recordable Case (TRC) Rates trends per Public Sector Industry, since CY 2008 – CY 2011.

US VIRGIN ISLAND BLS NON FATAL INJURIES AND ILLNESS	NAICS CODES	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	% RATE CY2008 TO CY2011
Industry		2008	2009	2010	2011	% Rate
State and Local Government		3.0	2.8	2.9	2.5	0.3% Decrease
State Government		3.0	2.8	2.9	2.5	0.3% Decrease
Service Providing		3.0	2.8	2.9	2.5	0.3% Decrease
Utilities	22	❖	❖	0.1	❖	4.3% Decrease
Education and Health Services		3.4	2.3	3.3	2.2	0.6% Decrease
Educational Services	61	2.2	1.4	2.4	1.7	0.225% Decrease
Educational Services Colleges, Universities and Professional Schools	6113	4.9	*	*	3.0	0.95% Decrease
Health Care and Social Assistance	62	4.0	4.3	5.9	3.7	0.78% Decrease
Hospitals	622	6.4	4.3	5.9	3.7	1.375% Decrease
Public Administration	92	2.4	2.4	2.1	2.2	0.075% Decrease
Executive, legislative and other general government support	921	❖	❖	❖	❖	❖
Justice, Public Order and safety activities	9221	❖	❖	1.2	1.1	.05 % Decrease
BLS Virgin Islands Injuries and Illnesses Data 2008, 2009, 2010 and 2011						
❖ = Too low to report						
* = No data reported in the BLS references tables						

STATE PLAN ANNUAL SUMMARY TOWARD STRATEGIC PLAN GOALS

The Virgin Islands Division of Occupational Safety and Health (VIDOSH) strategic goals, objectives, and activities focused to perform our enforcement, education and training duties to promote that all public sector employers provide a safe and healthful workplace, and the reduction and prevention of injuries and illnesses. Strategic goals and objectives defined for both enforcement and consultation interventions.

FY 2012 VIDOSH PERFORMANCE GOALS																																		
Strategic Goal #1: Improve Workplace Safety and Health for all Public Employees in the U. S. Virgin Islands.																																		
Performance Goal #1-1	Reduce occupational hazards exposures in the public sector by conducting direct interventions in agencies with a history of Workers Compensation claims.																																	
Year One Performance Goal #1-1.1	Reduce occupational hazards exposures in the public sector by focusing on public employees with frequent Workers Compensation claims over the past 3 years.																																	
Strategy	Develop LEP to target public sector agencies with high Workers Compensation claims.																																	
Performance Indicators	Primary Outcome Measure Results																																	
<u>Goal Activity Measures</u>	<p>Reduce the number of injuries resulting in Worker’s Compensation claims</p> <p><u>Outcome Measure</u></p> <p>a. Number of inspections conducted in targeted agencies: <u>22</u> A total of twelve (12) safety (S) and ten (10) health (H) public sector agencies inspections were completed. The enforcement activities breakdown per public sector agency were as follows, (agencies classified by NAICS code):</p> <table style="width: 100%; border-collapse: collapse;"> <tbody> <tr> <td style="width: 15%;">NAICS 92212</td> <td style="width: 60%;">VI Police Department</td> <td style="width: 25%;">H (0) S (1)</td> </tr> <tr> <td>NAICS 61110</td> <td>VI Department of Education</td> <td>H (1) S (3)</td> </tr> <tr> <td>NAICS 612399</td> <td>VI Department of Health/Hospital</td> <td>H (1) S (1)</td> </tr> <tr> <td>NAICS 541820</td> <td>VI Public Service</td> <td>H (1) S (1)</td> </tr> <tr> <td>NAICS 926110</td> <td>VI Department of Tourism</td> <td>H (1) S (1)</td> </tr> <tr> <td>NAICS 517910</td> <td>VI Bureau Of Information</td> <td>H (1) S (1)</td> </tr> <tr> <td>NAICS 813910</td> <td>Office of Collective Bargaining</td> <td>H (2) S (1)</td> </tr> <tr> <td>NAICS 921120</td> <td>VI Legislatures</td> <td>H (2) S (1)</td> </tr> <tr> <td>NAICS 921130</td> <td>VI Internal Revenue</td> <td>H (0) S (1)</td> </tr> <tr> <td>NAICS 921190</td> <td>Government Employee Retirement</td> <td>H (1) S (0)</td> </tr> <tr> <td>NAICS 812930</td> <td>Department of Housing Parks and Recreation</td> <td>H (1) S (0)</td> </tr> </tbody> </table> <p>Staffing limitation impacted the complete implementation; VIDOSH experienced the resignation of one Industrial Hygienist on September 7, 2012, the vacancy impacted the performance goal. Prior to the official resignation date the employee also took personal leave. During FY 2012, revisions were made to VIDOSH Public Sector Employees Injuries And Illnesses Database</p>	NAICS 92212	VI Police Department	H (0) S (1)	NAICS 61110	VI Department of Education	H (1) S (3)	NAICS 612399	VI Department of Health/Hospital	H (1) S (1)	NAICS 541820	VI Public Service	H (1) S (1)	NAICS 926110	VI Department of Tourism	H (1) S (1)	NAICS 517910	VI Bureau Of Information	H (1) S (1)	NAICS 813910	Office of Collective Bargaining	H (2) S (1)	NAICS 921120	VI Legislatures	H (2) S (1)	NAICS 921130	VI Internal Revenue	H (0) S (1)	NAICS 921190	Government Employee Retirement	H (1) S (0)	NAICS 812930	Department of Housing Parks and Recreation	H (1) S (0)
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FY 2012 VIDOSH PERFORMANCE GOALS

The Public Sector Employees Injuries And Illnesses Database is used to develop the strategies; identifying potential actual hazardous conditions. The tool provides VIDOSH the ability to analyze public sector employee's injuries and illnesses trends.

- **Number of hazards identified that could result in injuries:** As of December 13, 2012 NCR Inspections Summary Report a total of **50** violations were issued for all enforcement activities
- **Reduction in number of injuries resulting in Workers Compensation claims;** The US Virgin Islands BLS data showed a TRC rate decreased trends on five public sector agencies for CY 2011
- VIDOSH reviewed 100% of the open case files dated from 2006-2011. The case files were reviewed for outstanding abatement documentation. The open citation report reflected one hundred and eighty one (181) case files- at the beginning of this process.—FY 2012-June
- The case files were reviewed for outstanding violations and/or abatement documentation.
- The applicable NCR actions were accomplished
- Twenty two (22) of the one hundred and eighty one (181) case files contained all appropriate abatement documentation
- The twenty two (22) case files were closed—zero penalties were assigned.
- VIDOSH reviewed the remaining one hundred and fifty nine (159) open cases files. These open case files contained outstanding abatement actions. However, there were zero assessed penalties pertaining to these case files. Thirty seven (37) case files identified were closed and the impacted establishments were scheduled for re-inspection. The unabated hazards/exposure will be readdressed during the re-inspection activity.
- The Virgin Islands Department of Labor Senior Management was an intricate part of the process.
- The case files were reviewed for outstanding violations and/or outstanding abatement documentation. The necessary NCR action (s) were taken to permit the closure and/or status update of these fifty nine (59) case files

FY 2012 VIDOSH PERFORMANCE GOALS	
	<ul style="list-style-type: none"> One hundred and twenty two (122) open case files— twenty two (22) of the case files contained all of the abatement documentation; however, these case files had issued penalties. Due to the current economic constrains of the Government of the Virgin Islands, the VIDOL Commissioner waived the penalties and these case files were closed. The applicable signed documentation was placed in each applicable case file
Data Source(s)	IMIS, <i>VI Workers Comp</i>
Baseline	CY 2008 data 2.5 per 100,000 people
Strategic Goal #1 : Improve Workplace Safety and Health for all Public Employees in the U. S. Virgin Islands	
Performance Goal #1-2	Reduce occupational hazards exposures in the public sector by ensuring that workplace receive direct intervention.
Year One Performance Goal #1-1.2	Reduce occupational hazards exposures in the public sector by conducting programmed inspections, focusing on establishments that have not been inspected in the past three years. Achieve 1% reduction using baseline data established in CY 2008 data of 2.9 per 100,000 people.
Performance Indicators	Primary Outcome Measure Results
	<p><u>Outcome Measure</u></p> <p>a) Number of establishments receiving direct interventions: <u>22</u> VIDOSH conducted a total of 22 enforcement activities. The enforcement activities per categories were: twelve (12) safety inspections and ten (10) health inspections.</p> <p>b) Number of citations issued: A total of 50 violations were issued for all enforcement activities, all of them issued during FY 2012. These enforcement citations issued during FY 2012 VIDOSH.</p>
Strategic Goal #1 : Improve Workplace Safety and Health for all Public Employees in the U. S. Virgin Islands	
Performance Goal #1-3	Reduce occupational hazards exposures in the public sector by ensuring that workplace receive direct intervention.
Year One Performance Goal #1-1.3	Conduct health inspections, including being able to address indoor air quality (IAQ) issues.
Strategy	Continue to implement a comprehensive health program.
Performance Indicators	Primary Outcome Measure Results
<u>Goal Activity Measures</u>	a) <u>Number of Health Inspections:</u> VIDOSH conducted a total of <u>10</u> health enforcement activities. The enforcement activities included planned and unprogrammed (complaint inspections). During FY 2012 the percentage of IAQ inspection were 40% (<u>4/8=50%</u>) for all public sector agencies. Several factors impacted VIDOSH operations: The resignation of the enforcement

FY 2012 VIDOSH PERFORMANCE GOALS

Industrial Hygienist resulted in incompleteness of four case files
Number of health inspections in response to IAQ complaints 4

Activity Measures:

- a) Number of health inspections /investigations conducted: 4
- b) Number of IAQ issues observed: 4
- c) Number of IAQ complaint received: 4
- d) Number of IAQ complaint investigation completed: 4

Implement an IAQ procedures and strategies based on VIDOSH FY2009 to FY 2012 performance for IAQ complaint inspections, data will be used to develop a specific IAQ procedure applicable for this type of intervention. Workplace and establishment inspections performed using monitoring methodology procedures to follow through the OSHA Technical Manual and published OSHA references & guidelines.

VIDOSH adopted 02-00-140 CPL standards (Complaint Policies and Procedures) and the development and implementation of VIDOSH Complaint database; the tool has facilitated and enhanced collection of pertinent information during the complaint process.

In the implementation process during FY 2012, VIDOSH maintained the database recording a total of 50 Non Formal Complaints. These complaints were received either by phone, referral or by walk-ins. The origin of the complaints covered two of the three islands as follows:

- **St Croix** 1 Complaints 12.5 %
- **St Thomas** 7 Complaints 87.5%
- **St John** 0 Complaints 0 %

The condition(s) in the complaint were reported to the following:

- 100% were reported to the Supervisor
- 12.5% were reported to the VIDOSH previously
- 12.5% were reported to the Elected Official
- 25% were reported to the Media

The primary location of the facility/sites where the complaint originated

- 100% originated with in a USVI Gov't Property

The number of employee(s) as per the establishment size that were allegedly exposed to the hazard

- 7% of the establishment size had 1 to 7 employees (Total 3)
- 23.3% of the establishment size had 8 to19 employees (Total 10)
- 16.3% of the establishment size had 50 to 99 employees (Total 7)
- 11.6% of the establishment size had 20 to 49 employees (Total 5)
- 4.7% of the establishment size had 100 to 249 employees (Total 2)

FY 2012 VIDOSH PERFORMANCE GOALS			
	VIDOSH was directed by Region II to instruct all Private Sector complaints to contact the Area 2 Puerto Rico Federal OSHA office directly via fax/email/phone. VIDOSH no longer enters the complaint into the NCR to generate a referral		
Data Source(s)	IMIS, Workers Comp CY 2008 data 2.5 per 100,000 people		
Strategic Goal #2: Promote a safety and health culture within the U.S. Virgin Islands Public Sector Workplaces.			
Performance Goal #2-1	Promote a safety and health consultation and training, education, seminars, etc.		
Year One Performance Goal #2-1.1	Increase training and education to public employers/employees to promote systematic approaches to safety and health.		
Strategy	Upgrade the level of V.I. Government awareness of Health and Safety issues.		
<u>Goal Activity Measures</u>	a. Internal Training/Education. Ensure that VIDOSH staff attended at least two courses per CSHO at OTI during FY 2012. 1. Number of training sessions VIDOSH staff attended during FY2012: VIDOSH Staff attended eight (8) OTI courses. The staff reduction due to vacant positions impacted the accomplishment of the goals.		
	Internal <u>Number of training sessions VIDOSH staff attended during FY 2012 (both OTI and “other”): 8 OTI training (refer to table enclosed.</u> Please refer to table below:		
	Dean Andrews	○ 5/15-24/2012 ○ 6/19-22/2012-	#1420-Basic Whistle Blower Investigation #1310-Investigative Interview Techniques
	Marra Austrie	10/4-7/2012 3/21-29/2012	● #1310-Investigative Interview ● #1230-Accident Investigation
	Barbosa, Jannette	5/15-17/2012 1/24-2/2/2012	● #1900-Recordkeeping for Compliance ● #1420-Whistle Blower Investigation ●
Andre Smith	1/24-2/2/2012	● #1420-Basic Whistle Blower Investigation	

FY 2012 VIDOSH PERFORMANCE GOALS		
	5/9-17/2012	<ul style="list-style-type: none"> • #3600-OSHA Technical Assistant for Emergencies
	<p>VIDOSH has taken an aggressive approach to schedule the staff for the applicable OSHA classes for FY 2012. VIDOSH has made it a continual effort to make training a forefront</p> <ul style="list-style-type: none"> • The completion of several of the classes will assist in closing open EFAME findings. • The Administration assistant will be attending #1000- Initial Compliance Course. This measure will assist in increasing the division’s proficiency. <p>Andrews, Dean #1420-Basic Whistle Blower Investigation 5/15-24/2012 #1310-Investigative Interview Techniques 6/19-22/2012</p> <p>Austrie, Marra #1310-Investigative Interview 10/4-7/2012 #1230-Accident Investigation 3/21-29/2012</p> <p>Smith, Andre P. #1420- Basic Whistle Blower Investigation 1/24-2/2/2012 #3600-OSHA Technical Assistant for Emergencies 5/9-17/2012</p> <p>Barbosa, Jannette #1900-Recordkeeping for Compliance 5/15-17/2012 #1420-Whistle Blower Investigation 1/24-2/2/2012</p>	
Data Source(s)	IMIS, Workers Comp CY 2008 data 2.8 per 100,000 people	
	<p>b. External Training Education Compliance Assistance VIDOSH Director continued efforts to ensure that Territorial Government offices are educated about their responsibilities, and works toward creative avenues to achieve compliance with safety and health regulations.</p> <p>Director Andrews attended the following activities</p> <ul style="list-style-type: none"> ▪ Three Quarterly OSHSPA Meetings (Fall, Winter, and Summer) ▪ State Plan Monitoring meetings /conferences. ▪ Whistleblower Training <p>During FY2012 VIDOSH completed several Interventions/ Training Outreach Sessions. VIDOSH provided outreach to ten thousand three hundred and sixty four individuals. This is a substantial increase over the annual goal of 150 personnel. During one of the Outreach sessions VIDOSH was interviewed and televised.</p> <p><u>Technical Assistance -- Alexander Henderson Elementary School.</u> May 14, 2012 VIDOSH performed an OSHA intervention on Mold Mediation and hazards in the workplace --Primary SIC is 7349</p>	

FY 2012 VIDOSH PERFORMANCE GOALS

Locations: St Croix
Attendees: 10 attendees
Number of Sessions: 1
OSHA Intervention # 801880295

Technical Assistance – Cladue O Markoe Elementary School.

May 23, 2012 VIDOSH performed an OSHA intervention providing an educational program to teachers and supporting staff. VIDOSH presented the “Ensuring Your Safety and Health to the Department of Education Development Workshop. VIDOSH provided brochures and handouts.

Evaluation forms were completed by the attendees.-- Primary SIC is 8211

Locations: St Croix
Attendees: 20 attendees
Number of Sessions: 1
OSHA Intervention # 801880303

Technical Assistance – Virgin Islands Territorial Agency.

May 27, 2012 VIDOSH performed an OSHA intervention and participated in a territorial wide exhibition. The theme of the Annual All Hazard Preparedness Expo was “Preparing Together. The event was held territory wide to include Water Island from May 24-27 2012.

VIDOSH provided OSHA publication to the Juan F. Luis Hospital public sector employees and to the All Hazard Preparedness Expo participant’s. This effort was part of the Annual All Hazard Preparedness Expo. VIDOSH hosted the Lemuel International Ministries, a group of emergency response, health care workers and community volunteers. The Lemuel International Ministries and VIDOSH dedicate a free concert to recognize the value of all Emergency Response, Health care and Hispanic public sector. VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 9229

Locations: St Croix, St Thomas, St John and Water Island
Attendees: 206 attendees
Number of Sessions: 4
OSHA Intervention # 8018801352/8018801345

Technical Assistance – Virgin Islands Department Human Services Pre School Service.

August 20, 2012 VIDOSH performed an OSHA intervention at the Annual Pre-Service Training for the Head Start employees. VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 8299

Quick Card Topics

FY 2012 VIDOSH PERFORMANCE GOALS

- Mold
- Carbon Monoxide Poisoning
- Electrical Safety
- Tree Trimming
- Works Zone Safety
- Portables Generator Safety
- Aerial Lift
- Protect Yourself
- General Decontamination/ Descontaminacisn General
- Chain Saw
- Envenenamiento por Monsxido de Carbono
- Seguridad de Generadores
- Hand Hygiene in Hurricane Affected Area

Locations: St Croix,
Attendees: 28 attendees
Number of Sessions: 1
OSHA Intervention # 801880386

Technical Assistance – Virgin Islands Territorial Agency.

June 30, 2012 VIDOSH performed an OSHA intervention and participated in a mini All Hazard Preparedness Expo. The event was televised on the local television station and exposure was unlimited. The following participants, other than VIDOSH, were in attendance: Department Of Health, VI Fire Department, ST Croix Rescue, Department of Planning And Natural Resources, Department of Labor, Office of Lieutenant Governor, VI Water and Power Authority (WAPA) VI Waste Management Authority (VIWMA) American Red Cross, St Croix Animal Welfare Center, Innovative Corp, Caribe Supply, Caribe Home Center and a host of local government agencies. VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 9229.

Locations: St Croix
Attendees: 10,000 attendees— The VIDOSH representative was interviewed and the televised audience was estimated to be 10,000 plus viewers
Number of Sessions: 1
OSHA Intervention # 801880378

Technical Assistance – VI Water and Power Authority.

August 20, 2012 VIDOSH performed an OSHA intervention and addressed demolition and debris removal.

VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 4911

Locations: St Croix
Attendees: 100 attendees
Number of Sessions: 1

FY 2012 VIDOSH PERFORMANCE GOALS	
	OSHA Intervention # 801880360
	<ul style="list-style-type: none">• IMIS OSHA 55 Intervention Form• OTI Source Catalog/Individual Training Plan• Periodic Progress Report

The VIDOSH FY 2012 inspection activities produced a total of 22 enforcement inspections. The inspections activities per categories were: twelve (12) Safety inspections and ten (10) Health inspections. Inspection categories per priorities were as follows:

Thirteen (13) planned, one (1) follow up. Incoming complaints that resulted in enforcement inspections were 8 complaints, including seven (7) indoor air quality complaints. VIDOSH received 8 complaints telephonically, via fax and/or walk-in.

The US Virgin Islands enforcement and outreach activities impacted positively the injuries and illnesses rate as per reported BLS data.

PROMOTE A SAFETY AND HEALTH CULTURE WITHIN THE U.S. VIRGIN ISLANDS PUBLIC SECTOR WORKPLACES

OUTCOME GOAL TARGETS

- PROMOTE A SAFETY AND HEALTH CULTURE BY CONDUCTING CONSULTATION AND COMPLIANCE ASSISTANCE ACTIVITIES (E.G., DIRECT INTERVENTIONS, OUTREACH, TRAINING, EDUCATION, SEMINARS, ETC.)

The Virgin Islands State Plan was able to successfully coordinate and participate on twelve main training and outreach activities.

FY 2012-- May

VIDOSH performed an OSHA intervention at the Alexander Henderson Elementary School on Mold Mediation and hazards in the workplace --Primary SIC is 7349

Locations: St Croix
Attendees: 10 attendees
Number of Sessions: 1

VIDOSH performed an OSHA intervention providing an educational program to teachers and supporting staff at the Cladue O Markoe Elementary School. VIDOSH presented the “Ensuring Your Safety and Health to the Department of Education Development Workshop. VIDOSH provided brochures and handouts. Evaluation forms were completed by the attendees. -- Primary SIC is 8211

Locations: St Croix
Attendees: 20 attendees
Number of Sessions: 1

VIDOSH performed an OSHA intervention and participated in a territorial wide exhibition. The theme of the Annual All Hazard Preparedness Expo was “Preparing Together. The event was held territory wide to include Water Island. VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia.—Primary SIC 9229

VIDOSH will also provide OSHA free publication to the Juan F. Luis Hospital for Health Care Workers and Hispanic Community. VIDOSH hosted the Lemuel International Ministries, a group of emergency response, health care workers and community volunteers. The Lemuel International Ministries and VIDOSH dedicate a free concert to recognize the value of all Emergency Response, Health care and Hispanic public sector. The effort was part of the Annual All Hazard Preparedness Expo. The collaboration between VIDOSH and the Lemuel International Ministries to address the public sector Hispanic employee was applauded by Senator Samuel Sanes. Senator Sanes commended the Commissioner of Labor for the effort by the VIDOSH staff to reach out to the Hispanic Public Sector employees. VIDOSH visited the Juan F. Luis Hospital public sector employees with the Lemuel International Ministries group; since the employees were on shift. Additionally, VIDOSH did not expend any Federal Funds for the participation of The Lemuel International Ministries participation in the outreach event. -- Primary SIC is 9229

Locations: St Croix, St Thomas, St John and Water Island.

Attendees: 206 attendees

Number of Sessions: 5

FY 2012-- June

VIDOSH performed an OSHA intervention at Virgin Islands Territorial Agency mini All Hazard Preparedness Expo. The event was televised on the local television station and exposure was unlimited. The following participants, other than VIDOSH, were in attendance: Department Of Health, VI Fire Department, ST Croix Rescue, Department of Planning and Natural Resources, Department of Labor, Office of Lieutenant Governor, VI Water and Power Authority (WAPA) VI Waste Management Authority (VIWMA) American Red Cross, St Croix Animal Welfare Center, Innovative Corp, Caribe Supply, Caribe Home Center and a host of local government agencies.

VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 9229.

Locations: St Croix

Attendees: 10,000 attendees— The VIDOSH representative was interviewed and the televised audience was estimated to be 10,000 plus viewers

Number of Sessions: 1

FY 2012-- August

VIDOSH performed a Technical Assist at the Annual Pre-Service Training for the Virgin Islands Department Human Services Pre School Service Head Start employees.

VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 8299

Quick Card Topics

- Mold
- Carbon Monoxide Poisoning
- Electrical Safety
- Tree Trimming
- Works Zone Safety
- Portables Generator Safety
- Aerial Lift
- Protect Yourself
- General Decontamination/ Descontaminacion General
- Chain Saw
- Envenenamiento por Monóxido de Carbono
- Seguridad de Generadores
- Hand Hygiene in Hurricane Affected Area

*Locations: St Croix,
Attendees: 28 attendees
Number of Sessions: 1*

VIDOSH performed an OSHA intervention at the Water Power Authority addressing demolition and debris removal. VIDOSH provided OSHA pamphlets, brochures, handouts, booklets and VIDOSH paraphernalia. -- Primary SIC is 4911

*Locations: St Croix
Attendees: 100 attendees
Number of Sessions: 1*

OUTREACH PROGRAMS AND SEMINARS

VIDOSH hosted twelve outreach programs and OSHA awareness conferences titled:

1. St Croix, Department of Education, Indoor Air Quality (May FY 2012)
2. St Croix, Department. of Education, Cladue O Markoe Occupational Hazards (May FY 2012)
3. St Croix ,VI Territory Emergency Management Authority (VITEMA), EXPO All Hazards Preparedness, Emergency Response, (May FY 2012)
4. St Thomas ,VI Territory Emergency Management Authority (VITEMA), EXPO All Hazards Preparedness, Emergency Response, (May FY 2012)
5. St John ,VI Territory Emergency Management Authority (VITEMA), EXPO All Hazards Preparedness, Emergency Response, (May FY 2012)
6. St Croix, Virgin Islands Department Human Services Pre School Service Head Start All About OSHA and General Awareness (Jun FY 2012)
7. St Croix, Water Power Authority Demolition and Debris removal. (Aug FY 2012)

VIDOSH STAFF TRAINING

VIDOSH Compliance Officers (4) attended a total of 8 formal OTI courses. #1310- Investigative Interview Techniques, #1230-Accident Investigation 3/21-29/2012, #1900- Recordkeeping for Compliance; #1420-Whistle Blower Investigation 1/24-2/2/2012

Internal

Number of training sessions VIDOSH staff attended during FY 2012 (both OTI and “other”):
8 OTI training (refer to table enclosed).

PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENT

FEDERAL LIASON MENTORSHIP

The VIDOSH Program will seek to build their program to be at least as effective as model state programs in the nation. Key factors in building this program will be to continue to maintain transparent and regular direction from the Federal Program Manager and counterparts. These relationships demonstrate commitment to project completion dates and duplicate successful State Plan programs. Further attendance at Occupational Safety and Health State Plan Association, OSHSPA meetings will net valuable information on keeping abreast with safety and health policies and procedures, team participation and learning instrumental practices from other state programs. VIDOSH outreach activities continued with its annual participation in the VI Governor’s Safety and Health Conferences. Additionally, VIDOSH will increase and conduct customized conferences to meet the Public Sector requirements.

TIMELY ENFORCEMENT AND HAZARD ABATEMENT

VIDOSH has completed the necessary alliance with high level Government staff Administrators to make hazard abatement the current Administration’s priority. VIDOSH uses a combination of three enforcement initiatives to mandate hazard abatement. First, VIDOSH has emphasized to high level Administrators and Commissioners the importance of being committed to injury reduction and timely hazard abatement. Second, VIDOSH will continue to build their outreach and intervention efforts to provide knowledge of standards for safe work practices. Third, VIDOSH has implemented penalty issuance and enlisted legal representation for court mandated enforcement of “Failure to Abate” cases.

STAFFING RESPONSIBILITY

During FY 2012 both of VIDOSH’s Industrial Hygienist resigned. The Director made it a top priority to fill the personnel vacancies. The previously two vacant VIDOSH Industrial Hygienist positions (one enforcement and one consultation) are filled. The only remaining VIDOSH vacancies are two Compliance Safety Officers. Personnel actions are being taken to fill the vacant position during FY 2013. During FY 2012 VIDOSH was impacted by staff changes.

During the initial portion of FY 2012 the program was operational with only two Compliance Safety Officers and one Industrial Hygienist. One of Compliance Safety Officers was a new hire and required training a portion of the year. During the fourth quarter of FY 2012 VIDOSH’s two assigned Industrial Hygienist resigned. The Industrial Hygienist were projected to leave therefore further inspections weren’t started because they couldn’t be issued prior to the official resignation date. The Program was without an Industrial Hygienist in Enforcement and one assigned to the Consultation Program.

The initial OTI training requirement for the newly hired Compliance Safety Officer was accomplished during FY 2012. During FY 2012 the one assigned Industrial Hygienist was assigned to the Consultation and the Consultation Program is operational. Training and new enforcement and outreach initiatives also impacted and exhausted the program budget, but

yielded significant strides in obtaining strategic initiatives. There has been positive feedback from the public sector agencies towards the VIDOSH staff educational and outreach activities.

VIDOSH current staff includes: Director Andrews; **Enforcement:** 1 Safety CSHO and 1 Industrial Hygienist CSHO. Currently there are two Safety Compliance Officer positions that are vacant.

Consultation: The one Industrial Hygiene consultant resigned and a replacement has been selected and should be hired and on board by January 2013. Total of current staff is seven (7).

CONSULTATION INITIATIVE

The previously appointed VIDOSH Public Sector Consultant resigned during the fourth quarter of FY 2012.—21 September. The newly appointed VIDOSH Public Sector Consultant brings a wealth of experience to VIDOSH. The new consultant is an Environmental Engineer and was a member and involved in the Virgin Islands Division of Environmental Protection, Department of Planning and Natural Resources drafting Clean Air Act Title V Operating Permit V. Additional skill sets include Environmental assessment and experience in the regulating of outdoor air quality and the concentration of airborne contaminants.

VIDOSH implemented the 23(g) consultation program and will continue to perform visits with the current staff during FY 2013.

MANDATED ACTIVITIES

The Virgin Islands State Plan faced operational challenges to include:

1. Design and implement a consistent action plan to correct rejects on a weekly basis. The action plan to correct rejects will reduce the existing reject list by 100% by the end of the second quarter of FY13.
2. Resign and implement effective in-house refresher training for both CSHOs and Consultant on how to identify and correct rejects.
3. Director and IMIS Specialist will utilize the IMIS database as a monitoring tool to identify rejects on a weekly basis.
4. Develop new strategy on how planned inspections are being schedule.
5. During FY12 VIDOSH was impacted by resignation of two staff members.
6. Review the V.I. public sector Workers Compensation and BLS data on a quarterly basis, to capture most frequently injuries and high percentage of injuries by departments. Implement database as a working tool to perform outreach(s) and to provide VIDOSH the ability to analyze public sector employee's injuries and illnesses.
7. The VIDOSH organization implemented the automated complaint data collection tool. This tool is utilized to stream line the telephonic complaints process.
8. Conclusion

VIDOSH planned strategies for FY 2012 included steps to finalize and to achieve this performance goal focusing on:

- a. Implement the directives identified in the VIDOSH FY 2011-2016 Strategic Plan
- b. Analyze and summarize raw data to determine type of injuries and illnesses along with occupational hazards in order prioritize inspections per target agency
- c. Review CPLs to follow procedures to submit Local Emphasis Program.
- d. Ensure CSHO fully trained on Hazard Recognition and IMIS data training.
- e. Ensure CSHO assigned to Consultants receive the required OTI training and IMIS data training.
- f. Prepare and submit to VI Department of Labor Commissioner and Regional Administrator documents to implement LEP to target public agencies with higher rates.
- g. VIDOSH has identified three staff members who attend OTI Whistleblower training in FY-2012. The VIDOSH staff is familiar with the Whistleblower policies and procedures.

- h. Develop a model safety and health management program which is modeled after the OSHA 1989 Voluntary Safety and Health Management Guidelines for Public Sector Agencies.
- i. VIDOSH will increase its educational program; this will be accomplished through various partnerships. VIDOSH will work with agencies such as the Fire Department, Public Television System, and Department of Education, and Virgin Islands Fire Services to create a training media CD to address fire safety and fire extinguisher use.
- j. VIDOSH will utilize Subject Matter Experts to address educational topics key to safety and health training and outreach. These experts would be used only when VIDOSH does not have the personnel with the expertise to address these topics.

CONCLUSION

For FY2012, VIDOSH focused on building a solid Public Employees Only Safety and Health program. Currently, VIDOSH continues to work with the Office of the Governor to obtain abatement in old public sector cases. Enforcing Fine and Penalties are now a significant factor in encouraging public sector employers who fail to abate hazards. The Commissioner of Labor, Albert Bryan is assuming an increased role in contacting Commissioners and Administration officials to emphasize abatement expectation. VIDOSH continues to work on promoting a safety and health culture in the public sector by increasing education and outreach efforts. Through and increased awareness and training on Indoor Air Quality; the employees have learned to address the previously unknown hazards. VIDOSH continues to work with government agencies to increase their knowledge of building HVAC maintenance guidelines. VIDOSH plans to have a Scheduled Maintenance Outreach during FY 2012. The addition of Consultation activity will provide key positive relationships with the government agencies.