



**STATE OSHA ANNUAL 2013  
REPORT  
(FY 2013 SOAR)**

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

*December 29<sup>th</sup>, 2013*

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## **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 19<sup>th</sup>, 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 1<sup>st</sup>, 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) 2013 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 FY2012 ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME)**

<b>ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT I OCTOBER 1, 2011 - SEPTEMBER 30, 2012.</b>	
<b>12-1</b>	<p>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 Timeliness of State response: VIDOSH received a total of 10 non-formal complaints with an average of 22.60 days for initiating the complaint investigations. This number represents an increase in the average number of days from the FY 2011 FAME report of 1.35 days and the FY 2010 FAME report of 3.75 days. VIDOSH continues to not satisfy this mandated requirement for initiating complaint investigations within one (1) working day from notification. (SAMM report 11-09-12 – SAMM #2).</p>
<b>RECOMMENDATION</b>	Implement internal control measure to ensure that complaint investigations are initiated within a timely manner.
<b>CORRECTIVE ACTION PLAN</b>	The TDO will be responsible for the handling and processing of non-formal and phone/fax complaint investigations per VIDOSH FOM Chapter 9, complaint and Referral Processing. The VIDOSH Director is responsible for tracking complaint investigations using the Standard Complaint tracking report to ensure the investigations are initiated within one (1) working day.
<b>STATE ACTION TAKEN</b>	VIDOSH assigned the duties of a Territorial Duty Officer (TDO) to a staff member in August 2013. The Region will be monitoring progress on a regular basis. As of 11/26/13, the corrective action is in place. The FY 2013 year-to-date SAMM report shows the average number of days to initiate complaint inspections has been reduced from 22.60 days to 1.57 days. The Region will continue to monitor the progress.
<b>STATUS</b>	<b>31 October 2013</b>

<b>ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT I OCTOBER 1, 2011 - SEPTEMBER 30, 2012.</b>	
<b>12-02</b>	<p>Notification to Complainant:                      Although the SAMM (SAMM report 11-09-12 – SAMM #3) report shows that VIDOSH met this measure and notified complainants in a timely manner 100% of the time the onsite review of case files differ. Five (5) complaint files were reviewed. Three (3) of the five (5) complaint files lacked documentation that the complainant had been notified of the results of the inspection. In one (1) of the five (5) case files reviewed the OSHA 7 was missing.</p>
<b>RECOMMENDATION</b>	Ensure case files include all required forms and all letters or communications related to the complaint.
<b>CORRECTIVE ACTION PLAN</b>	The VIDOSH staff will receive training instructing them that case files involving complaint inspections must have documentation that the complainant was notified of the results of the inspections. The VIDOSH Director will be responsible for ensuring the required documentation is in the case file.
<b>STATE ACTION TAKEN</b>	As a group, VIDOSH will conduct a 2 day training session to address all the FAME items. VIDOSH hopes to hold this training session off-site in November 2013.
<b>STATUS</b>	<b>31 December 2013</b>
<b>12-03</b>	<p>VIDOSH conducted a total of 18 inspections during FY 2012. This is 22.50% of the planned annual goal of 80. Of the 18 inspections, 11 were safety inspections which were 20% of the planned goal of 55 and seven (7) were health inspections which were 28% of the planned goal of 25. Of the 18 inspections, five (5) were unprogrammed (complaints) inspections. Thirteen (13) of the 18 inspections were programmed planned. (INSP8 report 1-24-13)</p>
<b>RECOMMENDATION</b>	VIDOSH must develop an inspection scheduling system that ensures that its Annual Performance Plan inspection goals are met.
<b>CORRECTIVE ACTION PLAN</b>	VIDOSH developed and Implemented an Inspection Scheduling System. Each CSHO is assigned a monthly inspection quota by the VIDOSH Director who is responsible for ensuring the Annual Performance Plan inspection goals are met.
<b>STATE ACTION TAKEN</b>	This item is currently being tracked by the Region on a monthly basis through conference calls with the VIDOSH Director, the Commissioner of Labor and the Asst. Commissioner of Labor. The Inspection Scheduling System was implemented in May 2013.
<b>STATUS</b>	<b>1 March 2014</b>

<b>ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT I OCTOBER 1, 2011 - SEPTEMBER 30, 2012.</b>	
<b>12-04</b>	Injury/illness data was not collected. OSHA 300 logs were not placed in seven (7) of the 11 case files (86%) reviewed nor was there documentation that the logs were reviewed by CSHOs for injury/illness trends
<b>RECOMMENDATION</b>	Ensure that CSHOs are collecting the previous 3 years of OSHA 300 logs and placing them in the case files. This data is required for calculating the Days Away, Restricted, or Transferred (DART) rate.
<b>CORRECTIVE ACTION PLAN</b>	CSHOs will receive training and/or instructions on following the procedures in the FOM, Chapter 3 Inspection Procedures, Section VI Review of Records, A-1 and A-2. CSHOs will be required to review and obtain the previous three (3) calendar years of Injury and Illness logs (OSHA 300) to be placed in each case file. The VIDOSH Director, during case file review, will ensure that this documentation is in each case file.
<b>STATE ACTION TAKEN</b>	As a group, VIDOSH will conduct a 2 day training session to address all the FAME items. VIDOSH hopes to hold this training session off-site in November 2013.
<b>STATUS</b>	<b>31 December 2013</b>
<b>12-05</b>	<b><i>Lack of Case File Documentation</i></b> Unlike last years (FY 2011) case file review when the two (2) cases made available did not have citations issued, this year (FY 2012) the team reviewed 11 closed case files. The audit revealed that that all 11 case files (100%) reviewed lacked <i>prima facie</i> evidence to support the specific citations issued. For example: Of the 11 case files reviewed field notes were lacking in three (3) safety (50%) and 2 health (50%). One (1) of the six (6) safety case files showed citations were issued but the OSHA 1B was missing from the case file as well any documentation as to what was cited. Narrative documentation was missing in two (2) health files and one (1) safety file. Seven (7) of the 11 case files (86%) lacked CSHO signature and four (4) case files (25%) lacked documentation that a supervisor had reviewed the file prior to issuing citations and/or closing the case file.
<b>RECOMMENDATION</b>	Ensure case files include required documentation in accordance with VIDOSH's FOM.
<b>CORRECTIVE ACTION PLAN</b>	CSHOs will be trained to ensure the necessary case file documentation (i.e. narrative, field notes, <i>prima facie</i> evidence on the OSHA 1B's etc.) is included in each case file per the VIDOSH FOM. The VIDOSH Director will be responsible for ensuring that all the documentation is in each case file.

<b>ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT I OCTOBER 1, 2011 - SEPTEMBER 30, 2012.</b>	
<b>STATE ACTION TAKEN CONT'D 12-05</b>	As a group, VIDOSH will conduct a 2 day training session to address all the FAME items. VIDOSH hopes to hold this training session off-site in November 2013.
<b>STATUS CONT'D 12-05</b>	<b>31 December 2013</b>
<b>12-06</b>	<p><b><i>Lapse Time</i></b>                      VIDOSH's citations lapse time (the average number of calendar days from opening conference to citation issuance) for FY 2012 was calculated at 135.52 days for safety, an increase from 113.75 days in FY 2011 and above the national average of 55.9 days. The lapse time for health was 178.15 days, an increase from 157.25 days in FY 2011 also above the national average of 67.9 days. (SAMM report 11-09-12-SAMM #7)                      One (1) health case file reviewed revealed excessive time between the inspection and the issuance of citations. The other-than-serious citations were issued more than four (4) months after the inspection was completed.</p>
<b>RECOMMENDATION</b>	VIDOSH must use IMIS data/reports as a tool to effectively manage both the program and the work product of its staff.
<b>CORRECTIVE ACTION PLAN</b>	VIDOSH developed and Implemented an Inspection Scheduling System. Each CSHO is assigned a monthly inspection quota by the VIDOSH Director who is responsible for ensuring the Annual Performance Plan inspection goals are met.
<b>STATE ACTION TAKEN</b>	This item is currently being tracked by the Region on a monthly basis through conference calls with the VIDOSH Director, the Commissioner of Labor, and the Asst. Commissioner of Labor. The Inspection Scheduling System was implemented in May 2013.
<b>STATUS</b>	<b>31 March 2013</b>
<b>INSPECTION ACTIVITY 12-07</b>	<p><b><i>Overdue abatement</i></b>                      During FY 2012, the percentage of serious, willful, repeat violations cited that was verified as abated within the abatement date plus 30 days was 40.30% instead of the 100% national average (27 SWR out of 67). The 40.30% is an improvement from the 0% in FY 2011 and 29.09% in FY 2010 but still lower than the national reference. (SAMM report-11-09-12-SAMM #6)</p>
<b>RECOMMENDATION</b>	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.
<b>CORRECTIVE ACTION PLAN</b>	VIDOSH staff will receive training to include: ensuring appropriate abatement periods are assigned for unabated violations, ensuring abatement data received satisfies the citation prior to

<b>ENHANCED FEDERAL ANNUAL MONITORING EVALUATION (FAME) BASELINE SPECIAL EVALUATION (BSE) REPORT I OCTOBER 1, 2011 - SEPTEMBER 30, 2012.</b>	
	closing the case file, for inspections with CDI (Corrected during Inspection) ensuring the file documents the method of abatement and that the CSHO observed the abatement. The VIDOSH Director will be responsible for reviewing the Violation Abatement Report weekly to determine the status of case files with open abatements.
<b>STATE ACTION TAKEN</b>	As a group, VIDOSH will conduct a 2 day training session to address all the FAME items. VIDOSH hopes to hold this training session off-site in November 2013.
<b>STATUS</b>	<b>31 December 2013</b>
<b>12-08</b>	<b><i>Employee Participation</i></b> A total of 11 case files were reviewed, seven (7) of the case files or 86% (4 health and 3 safety) had no mention or documentation of employee interviews. Case files containing field notes also lacked documentary evidence that employees were interviewed.
<b>RECOMMENDATION</b>	Provide training to all field staff to include interview notes and documentation in case files.
<b>CORRECTIVE ACTION PLAN</b>	Field staff will receive training and instructions on the requirement that documentation of employee interviews, including field notes, shall be placed in each case file. The VIDOSH Director, during case file review, will ensure that this documentation is in each case file.
<b>STATE ACTION TAKEN</b>	As a group, VIDOSH will conduct a 2 day training session to address all the FAME items. VIDOSH hopes to hold this training session off-site in November 2013.
<b>STATUS</b>	<b>31 December 2013</b>
<b>12-09</b>	<b><i>Staffing</i></b> Staffing continues to be an issue with VIDOSH having multiple vacancies. VIDOSH staffing level is allocated for eight (8) employees but currently there are only two (2) enforcement, two (2) administrative and one (1) manager are on board.
<b>RECOMMENDATION</b>	VIDOSH must fill current staffing vacancies with qualified applicants.
<b>CORRECTIVE ACTION PLAN</b>	The VIDOL Commissioner is working with the Governor’s Office to fill two (2) of the three (3) vacant CSHO positions. The two (2) VIDOSH positions to be filled are a Consultant and Safety Compliance Officer.
<b>STATE ACTION TAKEN</b>	VIDOSH will work with federal OSHA to resolve this staffing

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	<p>issue. The Region will be monitoring progress on a regular basis via calls with the Commissioner and VIDOSH.</p>
<b>STATUS</b>	<b>30 September 2014</b>
<b>12-10</b>	<p><i>Training</i> 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.</p>
<b>RECOMMENDATION</b>	Ensure adequate number of qualified staff specifically trained in accordance with “PSM Covered Chemical Facilities NEP.”
<b>CORRECTIVE ACTION PLAN</b>	VIDOSH will ensure that an adequate number of qualified staff is specifically trained in accordance with “PSM Covered Chemical Facilities NEP.”
<b>STATE ACTION TAKEN</b>	Finding 12-10 –Training, is being removed from the CAP due to changes in the processes at PSM facilities which no longer meet the requirements of the PSM standard.
<b>STATUS</b>	FY 2015
<b>12-11</b>	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.
<b>RECOMMENDATION</b>	VIDOSH must submit their State Plan narrative (and relevant appendices) with amendments reflecting its program’s more limited public sector scope; VIDOSH must also provide documentation on all outstanding components of its State Plan.
<b>CORRECTIVE ACTION PLAN</b>	VIDOSH will submit their State Plan narrative (and relevant appendices) with amendments reflecting its program’s more limited public sector scope and also provide documentation on all outstanding components of its State Plan.
<b>STATE ACTION TAKEN</b>	VIDOSH submitted a draft version of their revised State Plan narrative to the Region for review. The Region is following-up with VIDOSH regarding the submission of relevant appendices
<b>STATUS</b>	30 September 2014
<b>12-12</b>	During the on-site review for the FY 2012 FAME, VIDOSH produced 21 enforcement case files. Of the 21 case files reviewed, only 11 were closed. Of the 10 files still open the average number of days from the opening conference to citations being issued and the average number of days from the closing conference to citations being issued was 151 days. Overdue abatement was extensive for these 10 open case files. The average number of days abatement was overdue was 71.4 days.
<b>RECOMMENDATION</b>	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 (FOM).
<b>12-12 Cont'd</b> <b>CORRECTIVE ACTION PLAN</b>	VIDOSH developed and Implemented an Inspection Scheduling System. Each CSHO is assigned a monthly inspection quota by the VIDOSH Director who is responsible for ensuring the Annual Performance Plan inspection goals are met. Additionally IMIS data and/or reports will be utilized to ensure that these goals are met.
<b>12-12 Cont'd</b> <b>STATE ACTION TAKEN</b>	This item is currently being tracked on a monthly basis through conference calls with the VIDOSH Director, the Commissioner of Labor and the Asst. Commissioner of Labor. The Inspection Scheduling System was implemented in May 2013. The Region will be monitoring progress on a regular basis.
<b>12-12 Cont'd</b> <b>STATUS</b>	31 March 2014
<b>12-13</b>	<b><i>Public Sector Consultation</i></b> The VIDOSH public sector consultation program is presently not operational.
<b>RECOMMENDATION</b>	VIDOSH must ensure that a public sector consultation program is fully operational and provides appropriate services to public sector employers in the territory.
<b>CORRECTIVE ACTION PLAN</b>	VIDOSH has administrative measures and equipment in place to provide public sector consultation services and is working to fill the Consultant position which is critical to the program. The VIDOL Commissioner is working with the Governor's Office and the Division of Personnel to fill the Consultant position.
<b>STATE ACTION TAKEN</b>	VIDOSH will work with federal OSHA to resolve this staffing issue. The Region will be monitoring progress on a regular basis via calls with the Commissioner and VIDOSH
<b>STATUS</b>	30 September 2014

## MANDATED ACTIVITIES

<u>ACTIVITY</u> PROGRAM ACTIVITY PROJECTIONS	GOAL FY 13		ACTUAL FY 13		GOAL	ACTUAL
	SAFETY	HEALTH	SAFETY	HEALTH		
<b><u>ENFORCEMENT</u></b> PUBLIC SECTOR INSPECTIONS	55	25	24(*)	31(*)	80	54
<b><u>CONSULTATION</u></b> PUBLIC SECTOR CONSULTATION	8	2	0(❖)	0	10	0(❖)

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

### **During FY 2013 VIDOSH issued one hundred and twenty four (124) violations**

#### **FY 2013 VIDOSH Violations Types –two hundred and sixty five instances (265)**

- *Other*                    twenty one (21) –16.9%
- *Serious*                    eighty two (82) – 66.1%
- *Willful*
- *Repeat*                    twenty one (21) –16.9%
- *Post Settle*

#### **FY 2013 VIDOSH Inspection Percentages**

- *Without Violations*                    56.4%
- *Serious, Willful, Repeat*                    40%

#### **FY 2013 VIDOSH Inspection Percentages**

- *Union*                    38 inspections    69.14%
- *Non Union*                    16 inspections    29.1%

#### **FY 2013 Inspection Scope Percentages**

- *Compressive*                    48 inspections    87.3%
- *Partial*                    6 inspections    10.9%
- *Record*                    1 inspections    1.8%

## **VIRGIN ISLANDS PUBLIC SECTOR AGENCIES BLS INJURY/ILLNESSES REPORTS HIGHLIGHTS**

Overall the BLS Non-fatal Injuries and Illnesses rate for US Virgin Islands Public Sector Agencies CY 2012 Total Recordable Cases reflects (0.3); a 89% decreased trend compared with a (2.73) baseline. 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.

The BLS Non-fatal Injuries and Illnesses rate reflects a Total Recordable Cases reduction trends ranges from 89 to 99.9 percent. Table II below describes the agencies data from CY 2009 to CY 2011. One hundred percent of the nine (9) Public Sector agencies TRCs rates reduction reflected values; well above the VIDOSH strategic 1 % forecasted goal.

- The Utilities Industry Agencies CY 2012 Total Recordable Cases data reflects no change due to the BLS data being too low to report.
- The Justice, Public Order and Safety industry agencies CY 2012 Total Recordable Cases category rate showed a .05% decreased trend in CY 2011 (1.1)
- The Public Administration Agencies CY 2012 Total Recordable Cases reflects (0.01); a 96% decreased trend compared with a (2.23) baseline
- The Educational Services Colleges, Universities and Professional Schools Agencies CY 2012 Total Recordable Cases reflects (0.01); a 90% decreased trend in compared with a (1.0) baseline
- The Executive, Legislative and Other General Government Support Agencies CY 2012 Total Recordable Cases reflects (0.01); a 90% decreased trend in compared with a (1.0) baseline
- 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 Agencies CY 2012 Total Recordable Cases reflects (0.01); a 96% decreased trend in compared with a (2.6) baseline
- The Educational Services Agencies CY 2012 Total Recordable Cases reflects (0.01); a 96% decreased trend in compared with a (2.6) baseline
- The Health Care and Social Assistance Agencies CY 2012 Total Recordable Cases reflects (0.01); a 99% decreased trend in compared with a (4.6) baseline
- The Hospital Agencies CY 2012 Total Recordable Cases reflects (0.01); a 99.9% decreased trend in compared with a (2.6) baseline
- Public Administration Agencies CY 2012 Total Recordable Cases reflects (0.01); a 96% decreased trend in compared with a (2.3) baseline
- State and Local Government Agencies CY 2012 Total Recordable Cases reflects (0.3); a 89% decreased trend in compared with a (2.73) baseline

- State Government Agencies CY 2012 Total Recordable Cases reflects (0.03); a 89% decreased trend in compared with a (2.73) baseline
- Service Providing Agencies CY 2012 Total Recordable Cases reflects (0.2); a 93% decreased trend in compared with a (2.73) baseline

**Table I. US Virgin Islands BLS Non-Fatal Injuries and Illnesses Total Recordable Case (TRC) Rates trends since CY 2009 – CY 2011.**

US VIRGIN ISLAND BLS NON FATAL INJURIES AND ILLNESS	TOTAL RECORDABLE CASE RATE	% RATE CY2009 TO CY2011			
INDUSTRY	2009	2010	2011	2012	% (Increase or Decrease)
STATE AND LOCAL GOVERNMENT	2.8	2.9	2.5	0.3	89% Decrease

**Table II. US Virgin Islands BLS Non-Fatal Injuries and Illnesses Total Recordable Case (TRC) Rates trends per Public Sector Industry, since CY 2009 – CY 2012.**

US VIRGIN ISLAND BLS NON FATAL INJURIES AND ILLNESS	NAICS CODES	TOTAL RECORDABLE CASE RATE	% Rate CY2009 to CY2011			
Industry		2009	2010	2011	2012	%
State and Local Government		2.8	2.9	2.5	0.3	89 % Decrease
State Government		2.8	2.9	2.5	0.3	89 % Decrease
Service Providing		2.8	2.9	2.5	0.2	93 % Decrease
Utilities	22	❖	0.1	❖	❖	99.9 % Decrease
Education and Health Services		2.3	3.3	2.2	0.1	96 % Decrease
Educational Services	61	1.4	2.4	1.7	0.1	95 % Decrease
Educational Services Colleges, Universities and Professional Schools	6113	*	*	3	0.1	90 % Decrease
Health Care and Social Assistance	62	4.3	5.9	3.7	❖	4.63 % Decrease
Hospitals	622	4.3	5.9	3.7	❖	99.9 % Decrease
Public Administration	92	2.4	2.1	2.2	0.1	96 % Decrease
Executive, legislative and other general government support	921	❖	❖	❖	0.1	99.9% Decrease
Justice, Public Order and safety activities	9221	❖	1.2	1.1	❖	99.9% Decrease

BLS Virgin Islands Injuries and Illnesses Data 2009, 2010 2011 and 2012

❖ = 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.

<b>FY 2013 VIDOSH PERFORMANCE GOALS</b>	
<b>Strategic Goal #1:</b> Improve Workplace Safety and Health for all Public Employees in the U. S. Virgin Islands.	
<b>Performance Goal #1-1</b>	Reduce occupational hazards exposures in the public sector by conducting direct interventions in agencies with a history of Workers Compensation claims.
<b>Year One Performance Goal #1-1.1</b>	Reduce occupational hazards exposures in the public sector by focusing on public employees with frequent Workers Compensation claims over the past 3 years.
<b>Strategy</b>	Develop LEP to target Public Sector agencies with high Workers Compensation claims.
<b>Performance Indicators</b>	<b>Primary Outcome Measure Results</b>
<b><u>Goal Activity Measures</u></b>	<p>Reduce the number of injuries resulting in Worker’s Compensation claims</p> <p><b><u>Outcome Measure</u></b></p> <ul style="list-style-type: none"> <li>• <b>Number of inspections conducted in targeted agencies: fifty five (55)</b></li> </ul> <p>A total of twenty four (24) safety (S) and thirty one (31) health (H) public sector agencies inspections were completed</p> <p>Staffing limitation impacted the complete implementation; VIDOSH experienced the resignation of one Industrial Hygienist on September 7, 2012, these vacancies remained vacant during FY2013 further impacting the division’s performance goals. During FY 2013, revisions were made to VIDOSH Public Sector Employees Injuries And Illnesses Database</p> <p>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.</p> <ul style="list-style-type: none"> <li>• <b>Number of hazards identified that could result in injuries:</b> As of December 13, 2013 NCR Inspections Summary Report a total of <b>124</b> violations were issued for all enforcement activities</li> <li>• <b>Reduction in number of injuries resulting in Workers Compensation claims;</b> The US Virgin Islands BLS data showed a TRC rate decreased trends in all Public Sector agencies for CY 2012</li> </ul>

<b>FY 2013 VIDOSH PERFORMANCE GOALS</b>	
	<ul style="list-style-type: none"> <li>• VIDOSH reviewed 100% of the open case files dated from 2010-2013. The case files were reviewed for outstanding abatement documentation. The open citation report reflected seventy seven (77) case files- at the beginning of this process. VIDOSH is working aggressively to close the said case files.</li> <li>• The case files were reviewed for outstanding violations and/or abatement documentation. The applicable NCR actions were accomplished The Virgin Islands Department of Labor Senior Management was an intricate part of the process.</li> <li>• The case files were reviewed for outstanding violations and/or outstanding abatement documentation. The necessary NCR actions (s) were taken to permit the closure and/or status update of these case files.</li> </ul>
<b>Data Source(s)</b>	IMIS, <i>VI Workers Comp</i>
<b>Baseline</b>	CY 2009 data <b>2.46</b> per 100,000 people
<b>Strategic Goal #1 :</b> Improve Workplace Safety and Health for all Public Employees in the U. S. Virgin Islands	
<b>Performance Goal #1-2</b>	Reduce occupational hazards exposures in the public sector by ensuring that workplace receive direct intervention.
<b>Year One Performance Goal #1-1.2</b>	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 2009 data of 2.46 per 100,000 people.
<b>Performance Indicators</b>	<b>Primary Outcome Measure Results</b>
	<p><b><u>Outcome Measure</u></b></p> <p><b>a) Number of establishments receiving direct interventions: fifty four ( 54)</b> VIDOSH conducted a total of fifty four (54) enforcement activities. The enforcement activities per categories were: twenty four (24) safety inspections and thirty one (31) health inspections.</p> <p><b>b) Number of citations issued:</b> A total of 124 violations were issued for all enforcement activities, all of them issued during FY 2013. These enforcement citations were issued during FY 2013.</p>
<b>Strategic Goal #1 :</b> Improve Workplace Safety and Health for all Public Employees in the U. S. Virgin Islands	
<b>Performance Goal #1-3</b>	Reduce occupational hazards exposures in the public sector by ensuring that workplace receive direct intervention.
<b>Year One Performance Goal #1-1.3</b>	Conduct health inspections, including being able to address indoor air quality (IAQ) issues.

<b>FY 2013 VIDOSH PERFORMANCE GOALS</b>	
<b>Strategy</b>	Continue to implement a comprehensive health program.
<b>Performance Indicators</b>	<b>Primary Outcome Measure Results</b>
<b>Goal Activity Measures</b>	<p>a) <b>Number of Health Inspections:</b> VIDOSH conducted a total of <u>31</u> health enforcement activities. The enforcement activities included planned and unprogrammed (complaint inspections). Several factors impacted VIDOSH operations:</p> <p>b) Implement an IAQ procedures and strategies based on VIDOSH FY2009 to FY 2013 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 &amp; guidelines.</p> <p>c) VIDOSH implemented a position of The Territorial Duty Officer (TDO). The Director and TDO will work on handling and processing of non-formal and phone/fax complaint investigations per VIDOSH FOM Chapter 9, complaint and Referral Processing. The VIDOSH Director will track the complaint investigations using the Standard Complaint tracking report to ensure the investigations are initiated within one (1) working day.</p> <p>d) VIDOSH is in compliance of the direction of Region II to instruct all Private Sector complaints to contact the Area 2 Puerto Rico Federal OSHA office directly via fax/email/phone. VIDOSH still doesn't enter Private Sector complaint into the NCR to generate a referral. VIDOSH instructs Private Sector customers during Technical Assist and Educational and Trainings sessions to contact Area 2 Puerto Rico Federal OSHA office directly via fax/email/phone. Even after implementing this policy VIDOSH has not seen a decrease in the need for OSHA information from the Private Sector.</p>
<b>Data Source(s)</b>	IMIS, Workers Comp CY 2009 data <b>2.46</b> per 100,000 people
<b>Strategic Goal #2:</b> Promote a safety and health culture within the U.S. Virgin Islands Public Sector Workplaces.	
<b>Performance Goal #2-1</b>	Promote a safety and health consultation and training, education, seminars, etc.
<b>Year One Performance Goal #2-1.1</b>	Increase training and education to public employers/employees to promote systematic approaches to safety and health.
<b>Strategy</b>	Upgrade the level of V.I. Government awareness of Health and Safety issues.
<b>Goal Activity Measures</b>	<p><b>a. Internal Training/Education.</b> Ensure that VIDOSH staff attended at least two courses per CSHO at OTI during FY 2013.</p> <p>1. Number of training sessions VIDOSH staff attended during FY2013: VIDOSH Staff attended six (6) OTI courses. The staff reduction due to vacant positions impacted the accomplishment of the goals.</p>

<b>FY 2013 VIDOSH PERFORMANCE GOALS</b>		
<p><b>Internal</b>                      Number of training sessions VIDOSH staff attended during FY 2013 (both OTI and “other”): 6 OTI training (refer to table enclosed.                      Please refer to table below:</p>		
VIDOSH Staff	Date	OSHA Training Intuition Course Title
<i>Dean Andrews</i>	November 2013	<ul style="list-style-type: none"> <li>• #3315-EPA’s Health and Safety -40 Hr (HAZWOPER)</li> </ul>
<i>Marra Austrie</i>	March 2013  May 2013  May 2013  November 2013	<ul style="list-style-type: none"> <li>• #3090-Electrical Standards</li> <li>• #1250-Introduction to Health Standards for Industrial Hygiene</li> <li>• #2220-Respiratory Protection</li> <li>• #3315-EPA’s Health and Safety -40 Hr (HAZWOPER)</li> </ul>
<i>Floretta Nesbitt</i>	April 2013	<ul style="list-style-type: none"> <li>• #1000-Intital Compliance</li> </ul>
<p>VIDOSH has taken an aggressive approach to schedule the staff for the applicable OSHA classes for FY 2013. VIDOSH has made it a continual effort to make training a forefront part of the divisions mission</p> <ul style="list-style-type: none"> <li>• The completion of several of the classes will assist in closing open EFAME findings.</li> <li>• The Administration assistant attendance of the #1000- Initial Compliance Course. These measures will the Territorial Duty Officer (TDO) with the applicable skillsets to assist in increasing the division’s proficiency dealing with complaints</li> <li>• VIDOSH has implement cut training measures for the support staff. VIDOSH has utilized in-house and local providers to supply the required training.</li> </ul> <p><i>Andrews, Dean</i></p> <ul style="list-style-type: none"> <li>• Winter OSHSPA</li> <li>• Spring OSHSPA</li> <li>• #3315-EPA’s Health and Safety -40 Hr (HAZWOPER)</li> </ul> <p><i>Austrie, Marra</i></p> <ul style="list-style-type: none"> <li>• #2220-Respiratory Protection</li> <li>• #3090-Electrical Standards</li> <li>• #1250-Introduction to Health Standards for Industrial Hygiene</li> <li>• #3315-EPA’s Health and Safety -40 Hr (HAZWOPER)</li> </ul> <p><i>Nesbitt, Floretta.</i></p> <ul style="list-style-type: none"> <li>• #1000-Intital Compliance</li> <li>• Administrative Assistant Skillpath Project Management Seminar</li> </ul> <p><i>Joseph, Marilyn.</i></p>		

<b>FY 2013 VIDOSH PERFORMANCE GOALS</b>	
	<ul style="list-style-type: none"> <li>• Administrative Assistant Skillpath Project Management Seminar</li> </ul>
<b>Data Source(s)</b>	IMIS, Workers Comp CY 2009 data <b>2.46</b> 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"> <li>• Three Quarterly OSHSPA Meetings (Fall, Winter, and Summer)</li> <li>• State Plan Monitoring meetings /conferences.</li> <li>• Whistleblower Training</li> </ul> <p>During FY2013 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><b><u>Technical Assistance – Cladue O Markoe Elementary School.</u></b>                      September 2013 VIDOSH performed an OSHA Technical Assist to the senior leadership of the Department of Education and the Department of Education. The technical assistance addressed the potential constructional hazards pertaining to an active construction on an operational campus of the Cladue O Markoe Elementary School.</p> <p style="padding-left: 40px;">Locations: St Croix                      Attendees: 10 attendees                      Number of Sessions: 2</p> <p><b><u>Technical Assistance – Virgin Islands Territorial Agency.</u></b>                      June, 2013 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 . 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.</p>

<b>FY 2013 VIDOSH PERFORMANCE GOALS</b>	
	<p>Locations: St Croix</p> <p>Attendees: 10,000 attendees— The VIDOSH representative was interviewed and the televised audience was estimated to be 10,000 plus viewers</p> <p>Number of Sessions: 1</p>

The VIDOSH FY 2013 inspection activities produced a total of fifty five (55) enforcement inspections. The inspections activities per categories were: twenty four (24) Safety inspections and thirty one (31) Health inspections. Inspection categories per priorities were as follows:

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 two large scale territorial training and outreach activities. Additionally VIDOSH made several upgrades to the VIDOSH webpage providing customized education and training information to the Public sector. VIDOSH has commenced the measures to launch an online safety video library to provide real time outreach and education information the Public Sector. VIDOSH has garnered webpage storage space to launch the online education VIDOSH Library.

#### **Division of Occupational Safety and Health & Unemployment Insurance Seminar**

The VI Division of Occupational Safety and Health (VIDOSH) hosted its annual seminar from September 10-13, 2013. Public Sector Union Leaders, Shop Stewards, Safety Professionals, Human Resources Managers and other personnel were invited to participate in the conference hosted on St. Croix and St. Thomas. A substantial effort was made to provide the leadership of the Public Sector Unions with information of the services provided by the VIDOSH Public Sector Program.

- Track One – OSHA 101, Injuries, Ergonomics, Slip and Fall Prevention, Stress Reduction Techniques, Mold and Air Quality Awareness, Guest Speaker – Milton Jacobs, CSP, MPH (President of Safety Solutions Consultants, Inc.)
- Track Two – OSHA 101, Whistleblower Discrimination, Unemployment Insurance, Workers Compensation, Labor Relations and Hearing and Appeals, Guest Speakers –

Maren Roebuck (Motivational Speaker and Prevention Coordinator of Mental Health) and Zandra Petersen (Executive Director of Public Employees Relations Board)

***A total of one hundred and fifty eight attendees were involved in the conference; both private and public sectors.***

- Public Sector Employee Non Union – Nine percent
- Public Sector Employee Union—Twenty two percent
- Shop Steward—Nineteen percent
- Human Resources—Twenty four percent
- Other - Twenty two percent

***The seminar attendees rated the VIDOSH Outreach and Training Literature accordingly***

- Sixty percent--Extremely Good
- Thirty three percent--Very Good
- Seven percent—Good

***The seminar attendees rated the OSHA 101 Presentations--Question & Answers accordingly***

- Sixty three percent--Extremely Good
- Thirty seven percent--Very Good

***The seminar attendees rated accordingly VIDOSH's Staff Professionalism/Interaction***

- Fifty six percent--Extremely Good
- Forty four percent--Very Good

***The seminar attendees rated the conference information as valuable accordingly.***

- Fifty four percent--Extremely Good
- Forty four percent--Very Good

***The seminar attendees rated how well VIDOSH the learning objectives were established***

- Fifty four percent--Extremely Good
- Forty four percent--Very Good

***The seminar attendees rated accordingly how well conference learning objectives were met***

- Fifty four percent--Extremely Good
- Forty four percent--Very Good

Locations: St Croix--(Track One) – 30 attendants--Number of Sessions: 1  
Locations: St Croix--(Track Two) – 26 attendants--Number of Sessions: 1  
Locations: St Thomas--(Track One) – 52 attendants--Number of Sessions: 1  
Locations: St Thomas--(Track Two) – 50 attendants--Number of Sessions: 1

*Attendees: 158 attendees—  
Number of Sessions: 4*

**Water and Power Authority (WAPA) Technical Assistance**

VIDOSH fielded several requests for additional outreach and/or Technical assistance from several Public sector agencies e.g. Department of Education, Human Services, and various Labor Unions

Director Andrews provided several Technical Assistance Session meet with the new Virgin Islands Water and Power Authority Safety Manager. During these sessions both parties addressed several areas in which VIDOSH and WAPA can improve the safety awareness and/or culture within the WAPA facilities. Additionally, communication with the WAPA Legal Counsel was accomplished. These new lines of communication have improved the relationship between VIDOSH and WAPA.

**FY 2013--June**

VIDOSH performed an OSHA intervention at Virgin Islands Territorial Agency All Hazard Preparedness Expo. The Director was interviewed by the local television Government Access channel 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.

*Attendees: 10,000 attendees— The VIDOSH Director was interviewed by the Virgin Islands Public Government Access Channel--and televised audience is estimated to be 10,000 plus viewers  
Number of Sessions: 1*

**FY September--2013**

VIDOSH performed an OSHA Technical Assist to the senior leadership of the Department of Education and the Department of Education. The technical assistance addressed the potential constructional hazards pertaining to an active construction on an operational campus of the Cladue O Markoe Elementary School.

**VIDOSH STAFF TRAINING**

VIDOSH Compliance Officers (1) and Support Staff (1) Director (1) attended a total of 6 formal OTI courses during FY2013.

VIDOSH Staff	Date	OSHA Training Intuition Course Title
<i>Dean Andrews</i>	November 2013	<ul style="list-style-type: none"> <li>• #3315-EPA’s Health and Safety -40 Hr (HAZWOPER)</li> </ul>
<i>Marra Austrie</i>	March 2013 May 2013  May 2013 November 2013	<ul style="list-style-type: none"> <li>• #3090-Electrical Standards</li> <li>• #1250-Introduction to Health Standards for Industrial Hygiene</li> <li>• 2220-Respiratory Protection</li> <li>• #3315-EPA’s Health and Safety -40 Hr</li> </ul>

VIDOSH Staff	Date	OSHA Training Intuition Course Title
		(HAZWOPER)
<i>Floretta Nesbitt</i>	April 2013	• #1000-Intital Compliance

## **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 has continued to make it a top priority to fill the personnel vacancies. The VIDOL Commissioner is continuously working with the Office of Governor’s to fill two (2) of the three (3) vacant CSHO positions. These measures are required due to the current hiring freeze.

The said two vacant VIDOSH Industrial Hygienist positions (one enforcement and one consultation) are to be filled in FY2104.

During FY 2013 the program was operational with two Compliance Safety Officers

VIDOSH is in the final stages of completing the personnel actions complete hiring of vacant industrial hygienist positions. These individuals will continue to obtain the formal OSHA Training Intuition (OTI), training and on the Job Training.

The accepted Industrial Hygienist candidate is a cross hire from another governmental agency. Once the personnel actions are completed; the said new hire will be assigned as the VIDOSH Consultant and the Consultation Program will continue from the previous point.

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 and 2 Administrative Support. Currently there are two vacant Safety Compliance Officer positions.

**Consultation:** The second Industrial Hygiene consultant (the new hire) personnel's actions are almost completed. The Virgin Islands Department of Labor Commissioner is working with the Virgin Islands Department of Personnel to complete the final personnel matter. Total of current staff is seven (5).

### **CONSULTATION INITIATIVE**

The VIDOSH Public Sector Consultant position is still vacant. The newly appointed VIDOSH Public Sector Consultant brings a wealth of experience to VIDOSH. The new consultant candidate is an Environmental Engineer and the member is from another Public Sector Agency (the Virgin Islands Division of Environmental Protection; Department of Planning and Natural Resources) The new consultant candidate brings 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 start performing visits once the new consultant candidate personnel actions are completed

### **MANDATED ACTIVITIES**

The Virgin Islands State Plan faced operational challenges to include:

1. Resign and implement effective in-house refresher training for both CSHOs and Consultant on how to identify and correct rejects.
2. Director and IMIS Specialist will utilize the IMIS database as a monitoring tool to identify rejects on a weekly basis. The Director works with the IMIS specialist and reviews all of the IMIS details pertaining the OPEN, ISSUED, and OUTSTANDING case files
3. VIDOSH has developed a new planned inspections schedule. The inspection tool will provide each CSHO with assigned a monthly inspection quota.
4. During FY13 VIDOSH was impacted by having vacant positions. The VIDOSH Director has implemented cut training of the existing administrative staff to bridge the gap.

5. 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.
6. The VIDOSH organization implemented the automated complaint data collection tool. This tool is utilized to stream line the telephonic complaints process.
7. Conclusion

VIDOSH planned strategies for FY 2013 included steps to finalize and to achieve this performance goal focusing on:

- Implement the directives identified in the VIDOSH FY 2011-2016 Strategic Plan
- Analyze and summarize raw data to determine type of injuries and illnesses along with occupational hazards in order to prioritize inspections per target agency
- Review CPLs to follow procedures to submit Local Emphasis Program.
- Ensure CSHO fully trained on Hazard Recognition and IMIS data training.
- Ensure CSHO assigned to Consultants receive the required OTI training and IMIS data training.
- Prepare and submit to VI Department of Labor Commissioner and Regional Administrator documents to implement LEP to target public agencies with higher rates.
- VIDOSH has identified three staff members who attend OTI Whistleblower training in FY-2013. The VIDOSH staff is familiar with the Whistleblower policies and procedures.
- 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.
- 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.
- 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 FY2013, 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 2013. The addition of Consultation activity will provide key positive relationships with the government agencies.