

Appendix B
New Jersey PEOSH State Plan
FY 2010 Enhanced FAME Follow-up Report Prepared by Region 2
Status of Findings, Recommendations, and Corrective Actions

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
09-1 09-2	The 2009 EFAME noted that IMIS data was not being managed in both the S&H Enforcement and Consultation Programs	<p><u>09-1:</u> NJ PEOSH must ensure Compliance Staff and Management complete required IMIS forms and ensure IMIS standard reports are reviewed on a regular basis to ensure proper IMIS database management. Corrective actions should include comprehensive IMIS data entry training. OSHA is prepared to assist NJ PEOSH with IMIS training.</p> <p><u>09-2:</u> PEOSH Public Sector Consultation must ensure that consultants conferring with employees properly enter this data into the IMIS system.</p>	See State Action Taken.	<p>As of February 2010 NJ PEOSH is using and printing OSHA forms 91A, 91B, 92, 93 and 98. The PEOSH is entering the required data into the IMIS system.</p> <p>IMIS training was conducted 11/29/10. Both enforcement and consultation will be sending super users to OIS training scheduled. PEOSH Consultants (21D) took the OIS Super User training. Enforcement Super User training was March 21 – 25, 2011. Verification that IMIS data is being input is being performed by supervisors. The PEOSH Consultation Supervisors are aware of what needs to be reviewed and ensures that case files are adequately documented. NJ PEOSH uses management reports to determine whether case files are being closed in a timely manner and that all case files are being transferred to the NCR.</p>	Completed.

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
				<p>SAMM reports are used to assess the effectiveness of the 11/29/2010 training and PEOSH managers review case files on a weekly basis to assure that the all cases are transferred and closed out within the required time frames.</p> <p>Appropriate forms are completed and a copy is in the case file. Supervisor review of case files now includes assuring that appropriate OSHA forms are completed and included in the case file.</p>	
09-3	<p>The 2009 EFAME noted that there were delays in verifying abatement of serious hazards.</p> <p>Delaying abatement verification until follow-up visits delays verification of hazards that can be abated quickly.</p>	<p>PEOSH Consultation must improve its performance in verifying the abatement of serious hazards in a timely manner. OSHA suggested continuing to run abatement reports using and projecting for abatement 2 weeks prior to due dates, to enable PEOSH staff time to remind employers of abatement in advance of abatement due dates.</p>		<p>As of November 15, 2010 the PEOSH Consultation Supervisors review the uncorrected hazard reports on a weekly basis to identify cases where abatement extends beyond established time frames.</p>	Completed.
09-4	<p>The 2009 EFAME noted that case file documentation was lacking employee exposure, employer knowledge, names of contacts, etc.</p>	<p>Provide training to all field staff, including supervisory staff, to ensure that all inspection case file documentation meets the minimum requirements set forth in PEOSH's Field</p>		<p>Beginning on November 15, 2010 all case files submitted are reviewed to ensure that they contain OSHA 1Bs (as appropriate), narrative reports documentation of</p>	<p>Completed. According to PEOSH; case files are improving</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
		<p>Inspection Reference Manual or Field Operations Manual and institutionalize established documentation requirements.</p>		<p>employee exposure. Field staff attended additional training on January 14, 2011 that was provided by OSHA Region 2 in reference to case file documentation.</p> <p>All case files are required to contain all documentation outlined during the training.</p>	<p>with regards to documentation since the Jan. 14, 2011 documentation training session held by OSHA. Documentation of employer knowledge is still a concern and PEOSH managers understand that “just checking a box” is not sufficient. Managers are reviewing cases to ensure that the files document how employer knowledge was established per FOM. OSHA recommend</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
					<p>ed that the quality of the files be addressed in CSHO's performance appraisals.</p> <p>OSHA Region 2 personnel reviewed a sample of PEOSH enforcement and consultation case files that were opened subsequent to the 2009 EFAME and verified that that PEOSH is addressing this issue effectively.</p>
09-5	<p>The 2009 EFAME noted that fatality inspections lacked documentation as well as letters to the next of kin.</p>	<p>Provide training to CSHOs to reiterate the policies relating to fatality investigations including the following:</p> <ul style="list-style-type: none"> ▪ Proper procedures relating to making the appropriate communication to the family of victims (i.e. 		<p>All next of kin are now notified of fatality investigations. Letters are sent for each file. This was implemented after the NJ PEOSH was notified at the closing conference of these requirements.</p> <p>All fatality investigations</p>	<p>Completed.</p> <p>OSHA Region 2 personnel reviewed the fatality inspections that were opened</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
		<p>next of kin letters, inspection findings, etc.) and the requirement of documenting such communication in the file.</p> <ul style="list-style-type: none"> ▪ Implement internal controls to ensure that all fatality investigations are opened within a timeframe established by agency policy. ▪ Provide training to all field staff, including supervisory staff, to ensure that all accident/fatality investigations meet the minimum requirements of federal OSHA and the PEOSH FOM or FIRM (i.e. providing detailed narrative documenting the facts that surround the incident, field notes, evidence of employee exposure, evidence of employer knowledge and completion of the appropriate forms (i.e. OSHA 36's and OSHA 170's). 		<p>are opened within 1 day of the NJ PEOSH becoming aware. All fatality investigations and reports are reviewed by NJ PEOSH management. Updates on the status of these reports are completed weekly. All fatality investigations are discussed among management and staff. Comprehensive field notes are included in all files. OSHA 36's and 170's are completed for each file. Currently hard copies are included in all fatality files. These procedures have been reinforced with all field, management and support personnel.</p> <p>Immediately following the audit, NJ PEOSH implemented a procedure that requires that a letter be sent to family of deceased employees. This procedure was implemented in February 2010</p>	<p>subsequent to the 2009 EFAME and verified that that PEOSH is addressing these issues effectively.</p>
<p>09-6 09-7</p>	<p>The 2009 EFAME noted that PEOSH lacked a policy for targeting high hazard areas and selecting establishments for inspection.</p>	<p>OSHA recommended that PEOSH develop consistent inspection selection criteria for the selection of sites within targeted NAICS codes for</p>		<p>PEOSH asserted that they have a consistent inspection selection program and focuses on the facilities identified in</p>	<p>Completed. Programme d</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
		<p>inspection and that inspections that are opened as a result of unprogrammed activity (e.g., complaints and referrals, etc.) in targeted NAICS that have not recently received a comprehensive inspection are expanded to comprehensive inspections under the program.</p> <p>PEOSH should develop a formal policy relating to the industries targeted under its Strategic Plan for FY09-2013 including:</p> <ol style="list-style-type: none"> 1) The identification and selection of sites targeted for inspection 2) Guidance for CSHOs on conducting inspections of sites targeted (e.g., common hazards that may be causing the high injury and illness rates, when to expand unprogrammed inspections to comprehensive, etc.) 3) Proper coding of targeted inspections. 		<p>the 5 year Strategic plan. NJ PEOSH prioritizes inspections and responds to complaints, imminent danger and planned inspections are per the methodology fully explained in the PEOSH FIRM and the annual performance plan. Compliance staff focuses on targeted facilities. The NJ PEOSH internal data base tracks these inspections.</p> <p>PEOSH is developing inspection form guidance for all targeted facilities and will provide field staff with a check list for those specific targeted sites. These lists will identify common hazards in these facilities. In addition, PEOSH supervision will make copies of all assigned county log books and will direct field staff to target facilities and will monitor these audits weekly.</p> <p>PEOSH's inspection scheduling criteria is to inspect all targeted facilities within each assigned territory.</p> <p>NJ PEOSH has a policy</p>	<p>inspections are based on the PEOSH Strategic Plan, i.e. specific industries fire dept., police dept., etc. OSHA posed the question as to how the State is choosing a particular site for a particular day. The State's response was that every facility in a given industry within a Compliance Officer's jurisdiction needs to be inspected. The sites are prioritized based on the length of time</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
				<p>that all facilities identified within specific NAICS codes as listed in the 5 year strategic plan are inspected, negating the need for random selection criteria.</p> <p>Since the audit NJ PEOSH has instructed field staff that all inspections in targeted industries are to be comprehensive, regardless of the whether they were initiated as a programmed or unprogrammed inspection.</p>	<p>since the last inspection. This appears to be an effective method of targeting high hazard areas.</p>
09-8	<p>The 2009 EFAME noted PEOSH case file documentation is lacking, especially in safety cases. Case files reviewed lacked evidence of employee exposure, employer knowledge of the cited hazardous conditions, names and contact information for employee(s) interviewed and documentation addressing affirmative defense issues. In addition many files also did not include narratives or OSHA 1B forms or their equivalent (forms in which violations are documented).</p>	<p>Provide additional training to all field staff, including supervisory staff, to ensure that all inspection case file documentation meets the minimum requirements of a prima facie case as set forth by federal OSHA and the State of New Jersey policy (Field Inspection Reference Manual or Field Operations Manual).</p>	<p>PEOSH field staff will be re-trained to ensure document exposures are in all case files. NJ PEOSH will include printed 1B forms in all files as well as the inspection narrative that documents employee exposures.</p>	<p>As of Nov 15, 2010 field staff has have been retrained to include evidence of employee exposure in each case file. OSHA Region 2 provided additional case file documentation training scheduled for January 14, 2011</p> <p>Beginning November 15, 2010 all case files now have documentation of employee exposure, employer knowledge and contain OSHA 1A, 1 B and inspection narrative report.</p>	<p>Completed.</p> <p>OSHA Region 2 personnel reviewed a sample of PEOSH enforcement and consultation case files that were opened subsequent to the 2009 EFAME and verified that that PEOSH is addressing this issue effectively</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
09-9	The 2009 EFAME noted that PEOSH case files lack documentation of employer/employee representative involvement.	Provide training to all field staff regarding the agency’s policy of Union/Employee Representative involvement during and after inspections and the requirement to properly document compliance with this policy in the case file.	<p>PEOSH asserted that 100% of all NJ PEOSH cases have always included employee /union participation. This is documented in each case file. Opening conference check sheets have always included this information. Employee and union representatives have always received copies of all orders to comply and case closing information. OSHA acknowledges that PEOSH was making contact with unions, etc., however the special study identified that PEOSH case file did not adequately document union contact.</p> <p>NJ PEOSH staff has been retrained to include employee names in interview notes and include these as part of the inspection file. All files reviewed by the audit team contained the name of the union rep. The only criticism dealt with names to be included on field notes. This has been corrected since the audit.</p>	As of February 2010 there is a requirement that all opening conference documents include the name of employee / union representatives. Field staffs have been instructed to also include employee/employer names in interview notes.	<p>Completed.</p> <p>OSHA Region 2 personnel reviewed a sample of PEOSH enforcement and consultation case files that were opened subsequent to the 2009 EFAME and verified that that PEOSH is addressing this issue effectively.</p>
09-10	The 2009 EFAME noted that PEOSH case files lack documentation of employee exposure, employer knowledge of the cited hazardous conditions, names and contact information for employee(s) interviewed and documentation addressing affirmative defense issues. In addition many files also did not	Provide training to all field staff, including supervisory staff, to ensure that all inspection case files contain all of the documentation required by Federal OSHA FIRM and the equivalent requirements of the State of New Jersey FIRM. Implement internal controls to ensure that all cases are	All case files currently include hard copies of OSHA 1B’s and narrative reports. These were always formerly completed, but not printed out and placed in the case files. Since the audit, case file documentation has been augmented to include evidence of exposure and employer knowledge.	NJ PEOSH has completed a model case file and uses this as a template for all current cases. NJ PEOSH supervision reviews and signs off on each submitted case and maintains its case file status through its internal data base.	<p>Completed.</p> <p>OSHA Region 2 personnel reviewed a sample of PEOSH enforcement and</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
	include narratives or OSHA 1B forms or their equivalent.	reviewed on a supervisory level to make certain that all violations issued meet the prima facie requirements.			consultation case files that were opened subsequent to the 2009 EFAME and verified that that PEOSH is addressing this issue effectively
09-11	The 2009 EFAME noted that in both the health and safety cases reviewed; the overwhelming majority of violations in which abatement periods granted were given 60 day abatement periods. In many cases, given the nature of the violations, the abatement time period assessed was excessive.	<p>Provide additional training to all field staff, including supervisory staff, to ensure that abatement issues are handled in accordance with established policy including:</p> <ul style="list-style-type: none"> ▪ Ensure appropriate abatement periods are assigned for unabated violations. ▪ Ensure that all abatement information accepted satisfies the order to comply prior to closing the case. ▪ For cases with CDI, ensure that the file documents the method of abatement and that the CSHO observed the abatement. ▪ Implement internal controls to ensure that all Petitions for Modification of Abatement (PMA) 	<p>NJ PEOSH is revisiting this issue and will reassess shorter time periods for abatements and also encourage abatement during inspection whenever possible.</p> <p>NJ PEOSH verifies abatement for all Orders to Comply. (LWD) conducts 100% follow up inspections to verify abatement.</p> <p>NJ PEOSH management monitors PMA. NJ PEOSH has received additional NCR training from Region 2 in order to aid with this process.</p> <p>NJ PEOSH has a process for failure to abate. A second penalty order to comply establishing penalties is issued in these cases.</p> <p>NJ PEOSH tracks all outstanding orders to comply Employers are required to submit abatement documentation prior to the abatement date. This information</p>	<p>PEOSH concluded that shorter abatement periods are in most cases attainable. Abatement extensions will be handled appropriately through the use of PMA's and interim abatement documentation.</p> <p>PEOSH and OSHA Region 2 agree that this will be an ongoing challenge. Some municipalities have funding issues which delay abatement of hazards (i.e. major construction to abate a hazard the municipality needs to get money approval first). Supervisors are reminding their staff that violations that can be easily abated need to be done timely.</p> <p>PEOSH also stated that</p>	Completed.

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
		<p>dates are reviewed on a supervisory level to ensure that all required information is contained in the request prior to granting the PMA.</p> <ul style="list-style-type: none"> ▪ Ensure that Failure to Abate Notices are issued where appropriate. 	<p>is kept in each file.</p> <p>Employers are required to submit PMA information in a timely manner and to supply NJ PEOSH with interim procedures prior to sending extensions.</p> <p>Compliance staff is required to enter abatement information into IMIS when abatement occurs.</p>	<p>they now evaluate “interim” abatement measure to evaluate whether the interim measure constitute final abatement.</p> <p>Since the audit NJ PEOSH management is monitoring to assure that this is occurring. NJ PEOSH has asked OSHA Region 2 for additional IMIS training in this area.</p> <p>NJ PEOSH maintains an internal data base that tracks all inspections and abatements. During the audit, OSHA Region 2 did not review this data base.</p>	
09-12	<p>The 2009 EFAME noted that appropriate informal conference notes were not maintained in the files thus it was not possible to determine whether correct procedures were followed. No documentation was included in the files indicating who was present or what was discussed.</p>	<p>PEOSH representatives must thoroughly document the following in the case file: The fact that notification to the parties was made (employee and/or employee representative notification) and the date such notification was made, time and location the informal conference was held; at the conclusion of the informal conference, all main issues and potential courses of action must be summarized and documented in accordance with PEOSH policy.</p>	<p>Informal conferences are attended by field staff and NJ PEOSH managers. All informal conferences include documentation of employee involvement and the outcome of the meeting. Each file contains the outcome and any further actions that were a result of the conference.</p> <p>This was not evident to the audit team as NJ PEOSH maintains separate files for penalty cases. The failure to abate files will be combined with the penalty files to eliminate this problem. Since penalty cases are not entered into the NCR (separate</p>	<p>As of February 2010 the requirement that all penalty case files include informal conference notes and document that informal conferences are attended by field staff as well as PEOSH managers has been reiterated to the field staff.</p> <p>Penalty case files are filed separately and original case files are combined with them. This procedure was instituted following the audit.</p>	<p>Completed.</p> <p>The issue of tracking changes to case files based on informal settlements will be reviewed after OIS deployment and corrective action may be required</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
			orders are issued) No tracking exists in the NCR for these cases		at that time. At a minimum PEOSH may need to develop an internal system of tracking penalty case data as its process differs from the standard OSHA procedure.
09-13	The 2009 EFAME noted that IMIS data input and maintenance was not being managed in accordance with PEOSH and OSHA policy. Rejected forms were not being corrected, standard IMIS reports such as draft forms reports were not reviewed and uplinks and data transfer from the local IMIS to the NCR Host computer was not being ensured. In many instances data was not transferred from PEOSH to the host resulting inaccurate data available for evaluation, analysis, and review.	Provide IMIS Administration training for PEOSH IT personnel, Supervisors, CSHO's, Consultants and Compliance Assistance Specialists and ensure appropriate IMIS management is implemented. Federal OSHA Region II is willing to assist in providing retraining for PEOSH personnel who use and manage the IMIS system.	See State Action Taken.	NJ PEOSH continues to work with NCR issues and as of November 29, 2010 OSHA Region 2 has provided training in this area	Completed. This issue will be reviewed after OIS deployment . Debugging of the conflicts between the PEOSH data system and OIS may be required at that time

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
09-14	The 2009 EFAME noted that prior to the study; Region II identified eight discrimination investigation cases which indicated an inordinate number of days open. The cases indicated the number of days pending from 377 days to 1896 days. A review of this matter revealed that the eight cases entered into the IMIS system were duplicates/triplicates that were created erroneously	It is recommended that supervisors continue to review IMIS Reports in order to eliminate duplicate discrimination case reporting. (A procedure had already been put in place to address this concern.)	See State Action Taken.	IMIS would not allow PEOSH managers to remove old cases which appeared to be active when they were not. This issue has been resolved and PEOSH now has the ability to manage the data. IMIS training was conducted by OSHA Nov. 29, 2010.	Completed.
09-15	The 2009 EFAME noted that at the time of the special study there were two investigators assigned to investigate complaints within the entire state of New Jersey. One investigator had recently been promoted to Assistant Chief, leaving only one investigator assigned to handle discrimination complaints.	PEOSH should review the number of discrimination investigators that are qualified and assigned to handle discrimination investigations and adjust staffing based on demand throughout the state.	See Action Taken.	PEOSH has requested additional training for discrimination officers. OTI has limited offerings and NJ PEOSH has asked Region 2 to help with this. The newly appointed Assistant Chief is continuing to handle discrimination cases as part of his duties.	Completed. As of this writing there were no openings for the Whistleblower training at OTI. PEOSH. OSHA Region 2 has committed to provide assistance to ensure that PEOSH investigators can register for classes as they become

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
					<p>available.</p> <p>PEOSH is committed to having the discrimination investigator s trained and provided that the budget allows and courses are offered will send staff the appropriate OTI classes as they become available. In addition OSHA Region 2 will work with PEOSH to attempt to find effective alternatives to training at OTI.</p> <p>This is an on-going issue.</p>

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
					Attempts are continually being made to bring OTI persons to give Whistleblower training. Due to budgetary restraints and lack of course availability this issue has not been resolved.
09-16	The 2009 EFAME noted that for several years prior to the special study PEOSH was unable to send Safety and Health Compliance and discrimination investigation personnel to the OSHA Training Institute for technical training. The lack of training is directly attributed to the New Jersey Department of Labor and Workforce Development's (LWD) policy that precludes state funds from being expended for employees to travel outside the state due to budgetary restrictions.	PEOSH should ensure discrimination investigators assigned to the program are properly trained. Means to send investigators to required training should be developed.	See State Action Taken.	OTI has limited offerings so PEOSH has decided to use local resources to bring in new training opportunities. PEOSH attends all courses offered through OSHA Region 2 and has sent compliance staff to OTI. Additional staff attended OTI in the fall of 2010 for legal aspects training.	Completed. Though the moratorium on out of state has been lifted budgetary constraints are still in place for travel. OSHA is working with PEOSH to find low cost training,

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
					such as Region 2's CSHO In-Service Training which is presented in central NJ, upstate NY and metro NY.
09-17	The 2009 EFAME noted that there was a lack of consistency with the methods and procedures followed for the investigation of discrimination complaints.	PEOSH should adopt a case file organization system such as the system which is outlined in the discrimination investigators manual.	NJ PEOSH follows OSHA's discrimination file organization form outline while conducting whistleblower investigations. PEOSH has 2 discrimination officers and following the audit, both are following the OSHA format	As of February 2010 PEOSH is following the case file organization as per the discrimination investigation manual. Supervisors are verifying the forms are correctly filled out.	Completed.
09-18	<p>The 2009 EFAME noted that at the time of the special study PEOSH used a "Discrimination Complaint Form" which was filled out by the complainant, is signed and dated and then mailed to the Office of Public Employee Safety.</p> <p>This form initiated the start of an investigation. The Complaint Form aside there was no formal documentation of interviews with either complainants, witnesses or other involved or interested parties. PEOSH did not use written or recorded statements or memorandums to file to document the underlying elements of a</p>	PEOSH should use either a statement form or a memorandum to file to document statements made by complainants, witnesses or other interested parties; and utilize the Case Activity Log and the Final Investigative Report format.	NJ PEOSH is following the format as indicated by OSHA Region 2 in its assessment of the NJ PEOSH whistleblower program. Both discrimination investigators are <i>following</i> the same format in case files.	As of February 2010 PEOSH is following the case file organization as per the discrimination investigation manual. Supervisors are verifying the forms are correctly filled out.	Completed.

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
	discrimination complaint. PEOSH did not use the Case Activity Log or any other means to document the flow of investigative activity with respect to each case.				
09-19	The 2009 EFAME noted that for several years prior to the special study, PEOSH had not sent Safety and Health CSHOs or their supervisors to the OSHA Training Institute or any other out-of-state location for technical training. This is directly attributed to a State policy that prohibits state funds from being used for employee travel outside the state (ostensibly due to budgetary restrictions).	PEOSH and the state of NJ should resolve the budgetary restrictions which prohibit investigators from attending courses at The OSHA Training Institute and the Annual Discrimination Investigator Training.	See State Action Taken.	<p>PEOSH staff members are attending OTI and local and regional training when offered. OTI has severely limited course offerings and PEOSH sent staff to available courses in the summer and fall of 2010. PEOSH is using local training sources and attending courses put on by OSHA Region 2.</p> <p>PEOSH is currently sending field staff to training at OTI and is also using Rutgers University to provide updated training for field/management staff.</p> <p>NJ LWD is approving training requests for PEOSH staff to attend training at OTI as the budget allows and classes are made available</p>	Completed. Restrictions have been lifted allowing the State to send people for training. This is evidenced by CSHOs being waitlisted initially and now on the list to attend training outside the state.
09-20	The 2009 EFAME noted that there were several CSHOs who did not receive mandatory training, for example; 50% of the enforcement staff (both safety and health) did not have Legal Aspects training.	Develop and implement a comprehensive training plan to provide mandatory training to CSHOs and their supervisors to bring them up to the minimum training standards established in OSHA Instruction TED-01-00-018	PEOSH will schedule staff for training required by TED 01-00-018. Since there are limited class openings PEOSH will prioritize the training plan based on staff training needs available space and program needs. The training plan will be put in place by the end of	See Corrective Action Plan.	Completed. Budget restrictions have been lifted allowing the State to

Appendix B New Jersey State Plan

Rec #	Findings	Recommendations	Corrective Action Plan	State Action Taken	Status
		<p>“Initial Training Program for OSHA Compliance Personnel” and to provide adequate training for discrimination investigators. PEOSH must also ensure the allocation of necessary funding to accomplish the training plan.</p>	<p>November 2010.</p>		<p>send people for training. This is evidenced by CSHO's being wait-listed and then approved to attend training outside the state.</p>