



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of Labor and
Workforce Development**

Labor Standards and Safety

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June 29, 2016

Mr. Galen Blanton
Regional Administrator, Region X
Occupational Safety and Health
U. S. Department of Labor
300 Fifth Avenue, Suite 1280
Seattle, WA 98104-2397

RE: FFY 2015 Federal Annual Monitoring and Evaluation Report – AKOSH

Dear Mr. Blanton:

Thank you for the opportunity to respond to the FY 2015 FAME report. OSHA and AKOSH share the common mission of ensuring a safe and healthy environment for all workers, and the FAME is a powerful tool for realizing that mission. AKOSH has faced several challenges in recent years that have contributed to the findings in this year's evaluation. Staff turnover has been high, which has sometimes impacted quality control. We've had successes in the face of these challenges, which the FAME report acknowledges. Our consultation program continues to provide quality information and manages an excellent VPP program. Enforcement responded in a timely manner to complaints and hospitalization injuries, and performed well in its overall number of inspections. Targeted efforts in the construction, transportation/warehousing, and seafood processing industries have contributed to a decrease in their recordable injury rates. There is still room for improvement and AKOSH has made positive changes to improve performance and better serve the workers of Alaska. We have committed to a higher level of staff training and mentorship, increased management oversight, and implemented policies to enhance quality control.

Enforcement staff turnover creates a burden on everyone from the officers who must shoulder a greater case workload to management who must council new staff and carefully monitor the quality of new officers' work. This burden creates stress that in its own right contributes to the problem. AKOSH recognizes this and has recommitted to reducing turnover and developing a highly experienced and capable team. We strive to foster a positive work environment that will keep enforcement staff for the long term. Officers participate in informal conferences whenever possible, improving both the officers' knowledge and the process itself. Training is a crucial part of this effort and includes both increased classwork and mentoring. In this way new staff will have the support they need to gain competence, and veteran officers will continue to grow in skill and feel like valued members of the AKOSH enforcement team. AKOSH has a training schedule that will, by November of 2016, satisfy FAME Recommendation FY 2015-01.

AKOSH realizes that management oversight is critical to addressing many of the findings in the FAME report. Management has increased review of everything from policies to open case files. As a result, lapse time has decreased substantially in the last quarter in accordance with FAME Recommendation FY 2015-06. AKOSH has also taken steps to ensure that cases do not exceed the 180 day statute of limitations (Recommendation FY 2015-11). An electronically generated report requiring multiple levels of review eliminates the possibility of long lapse times.

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Management has also increased scrutiny of the case files themselves. The FAME report identifies several issues that are a result of case file deficiencies. AKOSH recognizes the importance of rigorous recordkeeping and has taken action to improve quality control. The chief of enforcement reviews cases for completeness and accuracy, and provides counselling to the enforcement officer to prevent reoccurring errors. The division director will also conduct a periodic review of selected case files to ensure thorough case documentation. We are confident that through these steps we will satisfy Recommendations FY 2015-02, FY 2015-03, and several others. Other measures increasing oversight will further improve performance. For example, a policy now requires the division director to approve any penalty reductions over 30% to ensure that justification is sufficient and reductions follow the AKOSH FOM.

Every Alaskan worker, no matter their location, deserves a safe and healthy work environment. Alaska can be a challenging place when it comes to reaching each and every work site. A site visit might include an airplane, a helicopter, or a skiff ride, sometimes all three in the same trip. The budget and time implications of such visits are too big to ignore. This in no way diminishes our commitment to the mission of worker safety. When a complaint or incident necessitates a site visit, we will respond promptly to meet our obligation. This is a high priority, and in this we fulfill FAME Recommendation FY 2015-04.

AKOSH continues to move forward in reducing workplace injuries, illnesses, and fatalities. The above changes represent an overall renewal of our efforts to improve and serve our purpose at a higher level. Through employee retention, management accountability, and strategic policy changes we are confident that we will reach our goals. We appreciate the opportunity for a meaningful open dialog with OSHA. Thank you for your recommendations and continued support.

Sincerely,



Deborah Kelly

Director

cc: Heidi Drygas, Commissioner
Joe Thomas, Deputy Commissioner
Ron Anderson, Acting AKOSH Chief of Enforcement
Krystyna Markiewicz, AKOSH Chief of Consultation
Scott Ketcham, Anchorage Area Director
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