



**STATE OSHA ANNUAL 2009 REPORT  
(2009 SOAR )**

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

February 9<sup>th</sup>, 2010

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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 employers and employees within its jurisdiction. This means to ensure as much as practicable, that employees work in an environment free from hazards and risks to their safety and health. VI-DOSH intends to ensure that this protection is provided to all employees in the Virgin Islands, focus on public sector employees. This will involve the application of standards, enforcement, provide technical assistance, including the utilization of these OSHA tools will enable employers to maintain safe and healthful workplaces.

The Virgin Islands OSHA State Plan is currently administered by the Division of Occupational Safety and Health (VI-DOSH), 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 activities in the public sector. VI-DOSH conducts inspections at territorial-government facilities. All private sector and federal government agency complaints are 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 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 VI –OSH S Act provides for the automatic adoption of federal standards applicable to public sector citations issuance on the effective date specified in the federal standard. 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 Federal OSHA retraining private sector health and maritime industry coverage. Public sector safety and health issues were covered by VI-DOSH, as well as consultative services in both private and public sectors. On July 1<sup>st</sup>, 2003, the Virgin Islands Government 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) 2009 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.

**VI-DOSH RESPONSE TO OSHA RECOMMENDATIONS  
FROM FY2008 FAME**

<b>V. ASSESSMENT OF STATE MANDATED ACTIVITIES FY 2008 FAME (pp 10-14)</b>	
<b>ENFORCEMENT (SOURCE: MTOH INSP8 REPORT / 03/23/09)</b>	
<b>INSPECTION ACTIVITY</b>	<p>According to the Inspection Micro-to-Host Report, VIDOSH conduct a total of 96 inspections during FY 2008. Of the 96 inspection, 49 were safety and 47 were health. VIDOSH planned to conduct 90 safety inspections and conducted 43 inspections, falling short of their goal by 45%. On the health side, VIDOSH planned to conduct 43 inspections and conducted 47, exceeding their goal by 9%.</p> <p>The overall number of inspections was 28% below program goal projections (96 actual vs. 133 planned). Of the 96 inspections, 49 (or 51%) were classified as programmed planned inspections and 47 (or 49%) were unprogrammed inspections consisting of 24 complaints and 23 follow-up inspections. A total of 388 violations were cited consisting of 2 repeat, 235 serious, 80 other than serious, and 71 failure to abate notices.</p>
<b>RECOMMENDATION #1</b>	VIDOSH <u>must establish strategies</u> to increase its enforcement presence in the territory with better targeting and <u>improved data tracking methods</u> .
<b>RESPONSE</b>	VIDOSH conduct a total of 101 enforcement activities during FY 2009. The enforcement activities were as follows: for the safety inspections a total of sixty-seven (67) and thirty-four (34) for performed health inspections. The FY 2009 projected program activity was ninety (90) inspections, and VIDOSH conducted forty-six (46), which represent 51% of projected goal (46 actual vs. 90 planned). There were also enforcement activity of unprogrammed inspections which included a total of sixty-five (65), for complaints, follow ups and referrals. There were four (4) Failure to Abated inspections resulted from follow up inspections.

**V. ASSESSMENT OF STATE MANDATED ACTIVITIES FY 2008 FAME (pp 10-14)**

FY 2009 Inspection Summary report data showed a total of two hundred with eighty-six (286) violations issued, as for serious, other than serious and repeated, there were not any willful violations during FY 2009. During FY 2009 VIDOSH staff was reduced due employees' relocation and resignation. VIDOSH operation currently managed by industrial Hygienist/Acting Director until VI Governor and VIDOL Commissioner's Offices appointed their selection for the Director's position.

**A. Strategies to increase enforcement presence in the territory:**

**(1) Review all Public Sector Workers Compensation Cases**

- a. Finalize the VI Public Sector workers compensation data to identify specific work site location within agencies that results on higher injuries and illnesses workers claims.
- b. Submit final analysis report to be shared with upper management heads and Commissioners, based on OSHA tool Safety Pays, to provide tools to develop agencies Safety and Health Managements Systems.

**(2) Program Scheduling Planning and Logistics**

- a. Review the VI Establishment Random List provided by Region II in 2006 (a total of 407 establishment listed) and identify all required compliance with OSHA Directives CPL 02-00-25 CPL 2.25I – Scheduling System for Programmed Inspections.
- b. Enforce open case files abatement through increase Follow up inspection on or before three (3) months, along with updating CSHO schedule for said activities.
- c. Develop and implement a Programmed Scheduling as per OSHA CPL 02-00-25 CPL 2.25I and classified by the following steps:

**B. VIDOSH improved data tracking methods**

**(1) IMIS Quality Control and Audit System,**

- a. Develop and implement an effective as an internal evaluation management control system to ensure work site enforcement activities reports will be expedited timely.
- b. All VIDOSH staff (upper management, supervisors, senior and new hires) must be retrained on appropriate data recording on IMIS all enforcement activities and abatement processes.
- c. VIDOSH will submit report Region II reports as required for program performance.

<b>V. ASSESSMENT OF STATE MANDATED ACTIVITIES FY 2008 FAME (pp 10-14)</b>	
	<p><b>(2) <u>VIDOSH Operation IMIS/Tracking System</u></b></p> <p>a. Case file management systems and Internal Audit System results will be reported discussed with VIDOSH staff weekly.</p> <p>b. IMIS Audit Tracking and Case file management s system reported monthly to Commissioners Offices.</p>
<b>STATE ACTIVITY MANDATED MEASURES (SOURCE: SAMM REPORT – 03/23/09)</b>	
<b>SAMM 1</b>	<p><u>Average number of days to initiate Complaint Inspections.</u> During this evaluation period, VIDOSH responded to 21 complaints with an average response of 22.85 days from date of notification which is above of the 5 day response time.</p>
<b>RECOMMENDATION #2</b>	VIDOSH must expedite its initiation of complaint inspections in order to meet the established 5-day response time strategic goal
<b>RESPONSE</b>	Supervisors will be strategically ensuring NCR/IMIS daily and weekly audit tracking forms such as but not limited to citations pending, inspection summary reports, and abatement verification. Reviewed monitoring data, and create a case file checklist to be used when reviewing CSHO’s case files. VIDOSH will ensure all documentation such as OSHA forms, include employer knowledge, employee interviews and employee exposure has been documented and that the correct standard is applicable to the exposure is in the case file and expedite issuance. Citation lapse time expected to be reduced at least to 30 working days during Fiscal Year 2010.that at most to 30 working days.
<b>SAMM 6</b>	<b>PERCENT OF S/W/R VIOLATIONS VERIFIED</b>
<b>RECOMMENDATION #3</b>	VIDOSH must implement internal mechanisms (e.g. more timely follow-ups, review of management reports, IMIS retraining work closely with OSHA OMDS/DIT to resolve the IMIS issues, etc.) to ensure timely abatement verification.
<b>RESPONSE</b>	Supervisors will be strategically ensuring all Compliance Officer inspection preparation process include in depth study of review of all applicable regulations, reference enforcement directives, follow inspection process as stated in the program Field Operations Manual, reviewed monitoring data, NCR/IMIS save policy to ensure each violation cited will be fully substantiated with all supported data and documents. Case file final review will be discussed with VIDOL legal advisors. Also, an internal IMIS Quality Control and Audit System will be followed and discussed in a weekly/monthly basis to assess for full compliance with Region II and National Office reports.
<b>DISCRIMINATION PROGRAM</b>	
<b>SAMM 13,14,15</b>	<p>13) Percent of 11c Investigations completed within 90 days. 14) Percent 11c Complaints that are meritorious 15) Percent of meritorious 11c complaints that are settled. For FY 2008 VIDOSH had no recorded 11(c) Discrimination cases on the SAMM report. VIDOSH has indicated that they have not received any discrimination complaints in FY 2008. Pending Discrimination Case Files:</p>

<b>V. ASSESSMENT OF STATE MANDATED ACTIVITIES FY 2008 FAME (pp 10-14)</b>			
	[employer name removed]	Filed 1/15/99	2,975 days open
	[employer name removed]	Filed 8/19/99	2,759 days open
	[employer name removed]	Filed 4/26/99	2,874 days open
	[employer name removed]	Filed 4/28/99	2,872 days open
<b>RECOMMENDATION #4</b>	VIDOSH needs to review their records and determine the status of old discrimination cases. And ensure they have been appropriately resolved. In the event any cases need further investigation OSHA’s supervisory investigator must be notified. In addition, VIDOSH must develop at least one properly trained discrimination investigator to maintain their “at least as effective as” status.		
<b>RESPONSE</b>	All these cases were researched VIDOSH Director [name removed] during FY2009, a request letter to close was sent to [name removed] and forwarded to the National office and cases were closed in the IMIS. During FY2008 VIDOSH registered two employees to attend the OTI#1420 course and unfortunately were unable to send them for training. VIDOSH training needs addressed and submitted for VI Department of Labor Commissioner and VI Governor for one staff at least to attend OTI 1420 the Whistle Blower investigator Initial course. VIDOSH Training Coordinator registered a CSHO to attend the OTI#1420 January 2010 and to date the CSHO has completed the training. Upon being trained Compliance Officer will review archived case files and will coordinate with Region II for its contents and procedures to ensure all legal due process had been fulfilled, case file will be submitted to VIDOL Commissioner for Legal Expert review along with OSHA Federal Offices.		
<b>FEDERAL PROGRAM CHANGES AND ADOPTIONS</b>			
<b>FEDERAL STANDARDS ADOPTION</b>	<p>During FY 2008 a total of 5 Federal Program changes promulgated by OSHA required notification of state intent as follows:</p> <ul style="list-style-type: none"> <li>• CSP 02-00-002- Consultation Policies and Procedures Manual, Adopted Identical</li> <li>• CPL 02-02-07, 2008 308 -NEP Crystalline Silica, Adopted Identical</li> <li>• CPL 02-02-074,2008 309 – Inspection Procedures for Hexavalent Chromium (VI), Adopted Identical</li> <li>• CPL -02-00-147 2008 311 Control of Hazardous Energy (LOTO), Adopted Identical</li> <li>• CPL 02-(08-03) 2008 327 Site Specific Targeting 2008, Adopted Identical</li> </ul> <p>VIDOSH’s current program provides for automatic adoption of standards and federal program changes; however, VIDOSH’s long standing policy also requires publication of notice of State adoption of standards and other federal program changes in at least three local newspapers, as a means of notifying their regulated community of these changes via the internet.</p>		
<b>RECOMMENDATION #5</b>	VIDOSH must conduct a thorough study of all OSHA standards that have been adopted since the inception of the State Plan and ensure all OSHA standards (or more restrictive standards) applicable to public sector employer in the US Virgin Islands have been properly adopted.		
<b>RESPONSE</b>	<p>VIDOSH Director [name removed] implemented standards adoption as internal operation procedures; however information for said processes were not published on local newspaper to impacted stakeholders.</p> <p>The following CPLs included were adopted during FY 2009:</p> <ul style="list-style-type: none"> <li>• CPL 02—08-03 Site Specific Targeting 2008</li> <li>• CPL 03-00-007 National Emphasis Program –Crystalline Silica</li> <li>• CPL 03-00-008 Combustible Dust National Emphasis Program</li> <li>• CPL 02-00-146 General Industry Focused Inspections in Strategic Management Plan’s Seven Target Industries</li> <li>• CPL 02-02-074 Inspections Procedures for the Chromium (VI) Standard</li> </ul> <p>Based on CPLs findings, during FY 2010 VIDOSH will implement and</p>		

<b>V. ASSESSMENT OF STATE MANDATED ACTIVITIES FY 2008 FAME (pp 10-14)</b>	
	<p>complete CPL will continue through audit and review all available data and documentation from previous OSHA Director’s and Commissioner’s Offices up to present. All revised OSHA standards and CPL’s will be listed, printed and a current file will be kept in the Director’s and VIDOL Commissioner’s Offices. Public sector employers will be notified through local newspapers and as stated on VI OSH Act § 36 (c) (1) (A) &amp; (B) to ensure that all public sector employers, employees, employees representatives, Collective Bargain Units, Unionized and Non Unionized employees, concerned citizens and all impacted stakeholders be notified for applicable OSHA regulations in the territory of the US Virgin Islands. The audit results will be submitted to the Commissioner’s offices and Region II Regional Administrator and Managers. Also, a written Action Plan to request promotion and notification of occupational regulations updates will be submitted to VI Department of Labor Commissioner’s offices with an estimated implementation deadline of 09/30/2010. Action plan objectives pursue to:</p> <ol style="list-style-type: none"> <li>(1) Update external links on the US Virgin Islands VIDOL/ Safe Working Environment web page.</li> <li>(2) Coordinate for VIDOL Commissioner’s offices approval for VI-DOSH press release and available regulations sources to be published in the VI Legislature Public media and TV Public TV Station.</li> <li>(3) Request written request to VI Department of Planning and Natural Resources to establish a formal MOU with OSHA and all US Virgin Islands Public Libraries to maintain regulations updates as well as availability to navigate through the VIDOL web page for external links access.</li> <li>(4) Design a VI-DOSH brochure to disseminate throughout all VIDOL offices in St. Croix and St. Thomas, as well as to provide brochures copies during any program activities interventions (enforcement and consultation).</li> <li>(5) Review VI-DOSH database for public sector Workers Compensation claims to identify injuries and illnesses source(s) and evaluate for employers’ compliance with current regulations. Also identify work practices for which more strict regulations should be enacted and promulgated to ensure safe and health work environments in the territory.</li> </ol>
<b>VOLUNTARY COMPLIANCE PROGRAM (SOURCE: MARC REPORT 03/23/09)</b>	
	VIDOSH did not conduct any consultation visits during review period. According to VIDOSH, an Industrial Hygienist will be reassigned from enforcement to the Consultation program during the third quarter of FY 2009.
<b>RECOMMENDATION #6</b>	VIDOSH must implement a viable consultation program covering public sector employers. VIDOSH must ensure that a public-sector consultation program is operational, utilizing currently available 23(g) Federal funds or additional State funds.
<b>RESPONSE</b>	VIDOSH began Public Sector Consultation Program on May 2009. A total of thirty – three (33) formal written requests received and approximately ten (10) verbal phone communication for comprehensive, limited and consultation trainings. Four field visits performed, two (2) in St. Croix and

<b>V. ASSESSMENT OF STATE MANDATED ACTIVITIES FY 2008 FAME (pp 10-14)</b>	
	two (2) in St. John. VIDOSH lost Director staff position on August and Industrial Hygienist was appointed as Acting Director by VI Department of Labor Commissioner Hon. A. Bryan, Jr. Following instructions from VIDOL Deputy Commissioner Glen J. Smith and Mr. Jason Ellick, all performed consultation draft report visits has been kept on hold upon VI Governor appoints the VIDOSH Director's position.
<b>TRAINING AND EDUCATION PROGRAM</b>	
<b>TRAINING/EDUCATION</b>	For FY 2008 the VIDOSH program approved a total of 4 Compliance Safety and Health Officers and the Director to attend OTI courses.
<b>RECOMMENDATION #7</b>	VIDOSH should send at least one CSHO to OTI for the Basic Initial Whistleblower 11 (c) discrimination course.
<b>RESPONSE</b>	During FY2008 VIDOSH registered two employees to attend the OTI#1420 course and unfortunately Compliance Officers were unable to attend. VIDOSH Training Coordinator registered a CSHO to attend OTI # 1420 January 2010 and to date CSHO has completed the training.

## **MANDATED ACTIVITIES**

### **ACTIVITY**

<b>PROGRAM ACTIVITY PROJECTIONS</b>	<b>GOAL</b>		<b>ACTUAL</b>		<b>Total</b>	
	<b>FY 09</b>	<b>FY 09</b>	<b>FY 09</b>	<b>FY 09</b>		
	<b>SAFETY</b>	<b>HEALTH</b>	<b>SAFETY</b>	<b>HEALTH</b>		
<b>ENFORCEMENT</b>		60	30	67	34	101
- PUBLIC SECTOR INSPECTIONS						
<b>CONSULTATION</b>		15	10	04 (❖)		
- PUBLIC SECTOR CONSULTATION						

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

### **ENFORCEMENT INSPECTIONS**

	<b>PROGRAMED</b>	<b>COMPLAINT</b>	<b>REFERRAL</b>	<b>FATALITY</b>	<b>FOLLOW-UP</b>
<b>SAFETY</b>	36	07	3	0	20
<b>HEALTH</b>	10	13	2	0	10
<b>TOTAL</b>	46	20	5	0	30

### **CONSULTATION**

	<b>INITIAL</b>	<b>FOLLOW-UP</b>	<b>TRAINING &amp; ASSISTANCE</b>	<b>Total</b>
<b>SAFETY</b>	4*	0	4	4
<b>HEALTH</b>		0		
<b>TOTAL</b>		0	4	4

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

The Virgin Islands government agencies Injuries and Illnesses rate published report showed and 3.4% increased incidence in overall total recordable rate (2.5) from CY 2006 to CY 2008. The TRC increase rate was a direct result of enforcement activities within the establishments and found employers under reporting public sector work sites and agencies. However, BLS data showed a significant injuries rate decrease on four (4) public agencies. Public sector agencies whose data showed rate decrease were: Educational Services, Health Care and Social Assistance, Executive, legislative and general government supports services and Justice, Public Order and safety activities (VI Department of Justice, Superior and Territorial Courts and VI Police Department, VIPD), classified within SIC 9221.

US VIRGIN ISLAND BLS NON FATAL INJURIES AND ILLNESS	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	% RATE CY2006 TO CY2008
INDUSTRY	2006	2007	2008	% Rate
STATE AND LOCAL GOVERNMENT	2.9	2.5	3.0	3.4%

US VIRGIN ISLAND BLS NON FATAL INJURIES AND ILLNESS	NAICS CODES	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	TOTAL RECORDABLE CASE RATE	% RATE CY2006 TO CY2008
Industry		2006	2007	2008	% Rate
State and Local Government		2.9	2.5	3.0	3.4% Increase
State Government		2.9	2.5	3.0	3.4% Increase
Service Providing		2.9	2.5	3.0	3.4% Increase
Utilities	22	5.4			
Education an Health services	61	3.3	2.5	3.4	3.0% Increase
Educational Services		2.5	1.9	2.2	3.3% Decrease
Educational Services Colleges, Universities and Professional Schools			❖	4.9	No change as there is a base number 4.9 for 2008
Health Care and Social Assistance	62	5.2	❖	4.0	2.3% Decrease
Hospitals			❖	6.4	No change as there is base number 6.4 for 2008
Public Administration	92	2.3	2.2	2.4	4.34% Increase
Executive, legislative and other general government support	921	❖	❖	❖	Too low to report
Justice, Public Order and safety activities	922	2.8	2.4	❖	1.4 % Decrease
BLS Virgin Islands Injuries and Illnesses Data 2006, 2007 and 2008					

## STATE PLAN ANNUAL SUMMARY TOWARD STRATEGIC PLAN GOALS

The Virgin Islands Division of Occupational Safety and Health strategic goals, objectives, and activities focused to perform our enforcement, education and training duties to promote that all public sector employers to 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 2009 VI-DOSH 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 claim 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> <p><b>a. Number of inspections conducted in targeted agencies: 50</b></p> <p>The projected Local Emphasis program to target public sector agencies with high Workers Compensation claims was not fully developed and implemented, however agencies whose database showed the higher quantity of workers compensation claims received enforcement intervention. The scheduling plan to conduct enforcement activities used the VI Establishment Random List (provided by Region II as a system on 2006 to establish a fair systematic enforcement. Those included were VI Department of Education, VI Government Hospitals, and Public Administration For those public sector agencies who operations were Service providers a total of twenty-two (22) safety and eleven (11) health inspections; for agencies categorized to provide services for Education and Health (such as VI Department of Education and VI Department of Health) a total of fifteen (15) safety and ten (10) health inspections performed; in the Public Administration were fourteen (14) for safety and three (3) for health and finally two inspections, one health and one safety performed. Two (2) complaint enforcement activities performed within VI government Utilities agency. One of the factor that impacted VIDOSH operations was reduction due to loss of staff.</p>

**FY 2009 VI-DOSH PERFORMANCE GOALS**

The projected Local Emphasis program to target public sector agencies with high Workers Compensation claims was not fully implemented. One factor that impact VIDOSH operations was staff reduced due to loss of two (2) employees (resignation and retirement). During FY 2009 VIDOSH updated VI Public Sector Workers Compensation Excel raw database for years 2004 to 2008. Database spreadsheet required fields were design to identify injuries and illnesses source(s) per position and public sector agencies per island. The final analysis summary aimed to assess and evaluate employer and employees knowledge with required OSHA regulations, verify recordkeeping procedures and public agency workplaces compliance. All data summary and analysis will be guided by OSHA Safety Pays injuries/illnesses cost template to substantiate request and implementation for Local Emphasis Programs on or before May 30, 2010. All reports and summary will be submitted to VIDOL Commissioner and Region II Managers for review and approval

**b. Number of hazards identified that could result in injuries:**

A total of **286** violations were issued for all enforcement activities  
Violations/Categories

<u>Serious</u>	<b>206</b>	<b>206</b>
	Safety	153
	Health	53
<u>Other than Serious</u>	<b>71</b>	<b>71</b>
	Safety	48
	Health	23
<u>Repeat Violations</u>	<b>09</b>	<b>09</b>
	Safety	04
	Health	05
<b>Total Number of Violations</b>		<b>286</b>

**c. Reduction in number of injuries resulting in Workers Compensation claims**

The US Virgin Islands BLS data showed injuries/illnesses rate decrease on four (4) public agencies range 1.4% to 3.3%. The public sector agencies whose data showed rate decrease were: Educational Services 3.3% decrease; for Health Care and Social Assistance 2.3% decrease, in the Executive, legislative and general government supports data showed too low to report rates; and for Justice/Public Order (such as VI Department of Justice, Superior and Territorial Courts and VI Police Department, VIPD) a 1.4 % Decrease, classified within SIC 9221. Another outcome observed related to direct enforcement activities were BLS rates reported for the other public agencies showing an increase of

<b>FY 2009 VI-DOSH PERFORMANCE GOALS</b>																																																							
	reported injuries and illnesses, an average of 3.4 % from the baseline CY 2006.																																																						
<b>Data Source(s)</b>	IMIS, Workers Comp																																																						
<b>Baseline</b>	FY 06 data 2.9 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 FY 06 data of 2.9 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: <u>101</u></b> VIDOSH conducted a total of 101 enforcement activities. The enforcement activities per categories were: sixty-seven (67) safety inspections and thirty-four (34) health inspections. Inspections categories per priorities were as follows: forty-six (46) program planned, thirty (30) follow up, and the total of unprogrammed inspections were sixty-five (65). Incoming complaints that resulted in enforcement inspections were thirty (30) complaints, included thirteen (13) indoor air quality complaints and five (5) referral inspections. Data presented based on Micro-to-Host Report, [Investigation Summary Report, 03/16/10- processed and provided to Region II Enhance FAME Study Audit Team].</p> <table style="margin-left: 40px;"> <tr> <td><b>Inspections/Category:</b></td> <td>Programmed</td> <td style="text-align: right;"><u>46</u></td> <td style="text-align: right;"><b>46</b></td> </tr> <tr> <td></td> <td>Follow Up</td> <td style="text-align: right;"><u>30</u></td> <td style="text-align: right;"><b>30</b></td> </tr> <tr> <td></td> <td>Total Complaints</td> <td style="text-align: right;"><u>30</u></td> <td style="text-align: right;"><b>30</b></td> </tr> <tr> <td></td> <td>Complaint (IAQ )</td> <td style="text-align: right;">13</td> <td></td> </tr> <tr> <td></td> <td>Referrals</td> <td style="text-align: right;"><u>05</u></td> <td style="text-align: right;"><b>05</b></td> </tr> <tr> <td></td> <td><b>Total Number of Inspections</b></td> <td style="text-align: right;"><b>101</b></td> <td style="text-align: right;"><b>101</b></td> </tr> </table> <p><b>b. Number of hazards identified that could result in injuries:</b> A total of <b>286</b> violations were issued/ enforcement activities</p> <table style="margin-left: 40px;"> <tr> <td><u>Serious</u></td> <td style="text-align: right;"><b>206</b></td> <td style="text-align: right;"><b>206</b></td> </tr> <tr> <td style="padding-left: 20px;">Safety</td> <td></td> <td style="text-align: right;">153</td> </tr> <tr> <td style="padding-left: 20px;">Health</td> <td></td> <td style="text-align: right;">53</td> </tr> <tr> <td><u>Other than Serious</u></td> <td style="text-align: right;"><b>71</b></td> <td style="text-align: right;"><b>71</b></td> </tr> <tr> <td style="padding-left: 20px;">Safety</td> <td></td> <td style="text-align: right;">48</td> </tr> <tr> <td style="padding-left: 20px;">Health</td> <td></td> <td style="text-align: right;">23</td> </tr> <tr> <td><u>Repeat Violations</u></td> <td style="text-align: right;"><b>09</b></td> <td style="text-align: right;"><b>09</b></td> </tr> <tr> <td style="padding-left: 20px;">Safety</td> <td></td> <td style="text-align: right;">04</td> </tr> <tr> <td style="padding-left: 20px;">Health</td> <td></td> <td style="text-align: right;">05</td> </tr> <tr> <td><b>Total Number of Violations</b></td> <td></td> <td style="text-align: right;"><b>286</b></td> </tr> </table>	<b>Inspections/Category:</b>	Programmed	<u>46</u>	<b>46</b>		Follow Up	<u>30</u>	<b>30</b>		Total Complaints	<u>30</u>	<b>30</b>		Complaint (IAQ )	13			Referrals	<u>05</u>	<b>05</b>		<b>Total Number of Inspections</b>	<b>101</b>	<b>101</b>	<u>Serious</u>	<b>206</b>	<b>206</b>	Safety		153	Health		53	<u>Other than Serious</u>	<b>71</b>	<b>71</b>	Safety		48	Health		23	<u>Repeat Violations</u>	<b>09</b>	<b>09</b>	Safety		04	Health		05	<b>Total Number of Violations</b>		<b>286</b>
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<b>FY 2009 VI-DOSH PERFORMANCE GOALS</b>	
	<p><b>c. Number of citations issued within LEP</b> A total of <b>286</b> violations were issued for all enforcement activities, all of them issued during FY 2009. A Local Emphasis program to target public sector agencies with high Workers Compensation claims was not fully completed and implemented. Those enforcement activities citations issued on FY 2009 VIDOSH resulted from inspection reports which also included agencies with the higher quantity of workers compensation claims (such as VI Department of Education, VI Government Hospitals, and Public Administration agencies). VIDOSH planned and focused to complete public sector workers Compensation data entry, the final analysis stage is to summarize data and prepare report for VIDOL Commissioner to substantiate request and implementation for Local Emphasis Program goal was not met by September 30, 2009.</p>
<b>Data Source(s)</b>	IMIS, Workers Comp
<b>Baseline</b>	FY 06 data using 2.9 per 100,000 people will be represented in the SOAR
<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>Strategy</b>	Continue to implement a comprehensive health program.
<b>Performance Indicators</b>	<b>Primary Outcome Measure Results</b>
<b><u>Goal Activity Measures</u></b>	<p>a) Increase in number of health inspections: Only 46 health inspection performed, twenty (20) of them complaints inspections and thirteen (13) classified as indoor air quality issues. Performed activities did not achieve 10% planned for this specific goal.</p> <p><b>b) Number of health inspections with IAQ issues: 13</b></p> <p><b>Activity Measures:</b></p> <p>a) Number of health inspections /investigations conducted: <b>13</b></p> <p>b) Number of IAQ issues observed: <b>13</b></p> <p>c) Number of IAQ complaint received: <b>30</b></p> <p>d) Number of IAQ complaint investigation completed: <b>13</b></p> <p>Implement an IAQ procedure Based on VIDOSH FY2009 performance for IAQ complaint inspections, data will be used to develop a specific IAQ procedure</p>

<b>FY 2009 VI-DOSH PERFORMANCE GOALS</b>			
	applicable for this type of intervention. Workplace and establishment inspections performed, published OSHA references & guidelines, monitoring methodology procedures to follow through the OSHA Technical Manual are the ones to frame it, for which VIDOSH planned to fully develop and implement goal was not met by September 30, 2009.		
<b>Data Source(s)</b>	IMIS, Workers Comp		
<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 an education to public employers/employees to promote a systematic approaches to safety and health		
<b>Strategy</b>	Upgrade the level of V.I. Government awareness of Health and Safety issues.		
<b><u>Goal Activity Measures</u></b>	<p><b>a. Internal training/education.</b> Ensure that VI-DOSH staff attended at least two courses per CSHO at OTI during FY 2009.</p> <p>1. Number of training sessions VI-DOSH staff attended during FY09: <b><u>11</u></b> VIDOSH Staff attended to eleven (11) OTI courses</p> <p><b>Internal</b> <u>Number of training sessions VI-DOSH staff attended during FY 2009 (both OTI and “other”): 11</u>OTI training (refer to table enclosed. All three CSHOs attended at least one training session at OTI/Chicago, Industrial Hygienist Trainee, attended three out of four core training, Administrative staff attended NCR/ACE reports training in Maryland</p> <p>Please refer to table below:</p>		
	[name removed]	IMIS /OSHA - System/OIS	Sep 2009 / OTI - Maryland
	[name removed]	IMIS/Informix/ACE Reports	July 2009 / OTI - Maryland
	[name removed]	IMIS/OSHA - System/OIS	July 2009 / OTI - Maryland
	[name removed]	Informix/Ace Report / July ,	August 2009/OTI - Maryland
	[name removed]	OTI #3190 - Electrical Power Generation, Trans & Distribution	August 2009 / OTI - Colorado
	[name removed]	OTI #1230 - Accident Investigation Techniques	January 2009 / OTI - Chicago
	[name removed]	OTI #1080 - Health Hazards Awareness for Safety Officers/	April 7-10, 2009/OTI Chicago
	[name removed]	#2450 - Evaluation of Safety and Health Management Systems, 1	June 2009 /OTI, Chicago
	[name removed]	#1500 – Consultation Online	May 2009 / OTI - Maryland
	[name removed]	OTI #1000 - Initial Compliance	January 2009/OTI - Chicago
	[name removed]	OTI #1250 - Intro Health Standards	February 2009/OTI Chicago
	[name removed]	OTI #1410 - Legal Aspects And	June 2009/OTI Chicago

<b>FY 2009 VI-DOSH PERFORMANCE GOALS</b>	
	Inspection Techniques
	<p><b>b. External training Education compliance assistance.</b> VIDOSH Director continued efforts to ensure that Territorial Government offices are educated about their responsibilities, and work toward creative avenues to achieve compliance with safety and health regulations.</p> <ul style="list-style-type: none"> <li>▪ VIDOSH Director [<i>name removed</i>] participated in the Fall and Spring OSHSPA and State Plan Monitoring meetings/conferences.</li> </ul> <p><b>1. Number of Outreach Seminar conducted</b></p> <p>a. On December 2008, VIDOSH coordinated a joint Safety and Health prevention activity and Food Safety Training with the University of Puerto Rico-Rio Piedras Campus.</p> <p>b. VIDOSH participated in the 4<sup>th</sup> VI Governor’s Safety and Health Conference in Feb 2009 jointly with The University of the Virgin Islands and Homeland Security Offices in St. Croix and St. Thomas. Region II</p> <ul style="list-style-type: none"> <li>▪ At the 4<sup>th</sup> VI Governor’s Safety and Health Conference approximately 125 public and private sector attended, the higher attendance percentage VI Government including a senior High School Youth group from VI Department of Education Career and Technical School. Sixteen (16) session per specific topic and OSHA regulations OSHA 10H Courses for General Industry, Construction and Specialized Conference such as OSHA Record Keeping, Mold in the Workplace. The interactive course for Safety and Health Management Systems.(PR Fed OSHA).</li> </ul> <p>c. On April 2009, VIDOSH coordinated an OSHA 10 Hours Course for 4 Hazard Recognition Construction sites Industry within public sector agencies and open to all interested public and citizens, public sector constructions contractors</p> <ul style="list-style-type: none"> <li>▪ VIDOSH April 2009 outreach activity in St. Croix received a approximately 20 trainees from all impacted public sector and public sector construction providers.</li> </ul> <p>d. On September 2009, VI-DOSH actively participated on VI Department of Labor Month outreach with Posters session and one-one interaction with all citizens at Gertrude’s Restaurant in St. Croix.</p> <ul style="list-style-type: none"> <li>▪ VIDOSH September 2009 outreach and poster session registered approximately 85 participants which received poster introduction and all available free OSHA publications and posters.</li> </ul>
<b>Data Source (s)</b>	<p>a. IMIS OSHA 55 Intervention Form</p> <p>b. OTI Source Catalog/Individual Training Plan</p> <p>c. Periodic Progress Report</p>

The FY 2009 inspection performance showed VIDOSH conducted a total of 101 enforcement activities. The enforcement activities per categories were: sixty-seven (67) safety inspections and thirty-four (34) health inspections. Inspections categories per priorities were as follows: forty-six (46) program planned, thirty (30) follow up, and the total of unprogrammed inspections were sixty-five (65). Incoming complaints that resulted in enforcement inspections were thirty (30) complaints, included thirteen (13) indoor air quality complaints and five (5) referral inspections. A total of 286 violations were issued for all enforcement activities, all of them issued during FY 2009. For those serious violation issued there were two hundred and six (206), and per inspection categories, one hundredth fifty-three for Safety inspections and fifty-three for Health inspections. There were seventy-one other than serious violation issued on FY 2009, and per inspection categories: forty-eight on Safety inspections and twenty-three on Health Inspections. Repeated violation were also issued, a total of nine (9), four (4) on Safety inspections and five (5) on Health inspections. Data presented based on Micro-to-Host Report, [Investigation Summary Report, 03/16/10- processed and provided to Region II Enhance FAME Study Audit Team

Public sector VIDOSH activities and interventions impacted agencies in their injuries and illnesses reporting and recordkeeping. This evidence showed on Virgin Islands BLS data trends for the last three years, for which injuries/illnesses rate decreased on four (4) public agencies in a range of 1.4% to 3.3%. The public sector agencies whose data showed rate decrease were: Educational Services 3.3% decrease; for Health Care and Social Assistance 2.3% decrease, in the Executive, legislative and general government supports data showed too low to report rates; and for Justice/Public Order (such as VI Department of Justice, Superior and Territorial Courts and VI Police Department, VIPD) a 1.4 % Decrease, classified within SIC 9221.

However, another outcome observed related to direct enforcement activities were BLS rates reported for the other public agencies showing an increase of reported injuries and illnesses, an average of 3.4 % from the baseline CY 2006. Further steps to fully implement the Local Emphasis Programs planned for FY 2010. The VI Division of Occupational Safety and Health (VI-DOSH) focused its Fiscal Year 2009 resources to continue used agencies random list to target agencies with a history of non-compliance and focus on Workers Compensation Claims to reduce occupational exposures. During fiscal year 2009, the Worker's Compensation claim cases database up to 2008.

## **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 four main training and outreach activities.

### **December 2008**

VI-DOSH delivered an overall OSHA Safety Awareness, Inspections Performance, Employer and Employees duties and responsibilities along with an interactive training of safety and health hazards in the food services industries with resources from University of Puerto Rico-Rio Piedras Campus Continuing Education Programs, approximately 100 public sector employees and employers participated on both St. Croix and St. Thomas.

### **February 2009**

The second main outreach and training conference was VI-DOSH staff participation in the 4<sup>th</sup> VI Governor's Safety and Health Conference in February 2009. This was a joint effort with The University of the Virgin Islands/UVICELL Division and the Virgin Islands Homeland Security offices. Conferences delivered short courses on Emergency Response, Indoor Air Quality, Safety and Health Management Systems, OSHA 10H Certification courses on General Industry and Construction Standards. Participants included technical trade skill high school students in St. Croix and overall quantity of 125 participants.

### **April 2009**

During the month of April 2009 a detailed Four Focus Hazards 10 hours courses was delivered at the University of the Virgin Islands/ St. Croix Campus. A total of 20 trainees attended in a 16H course with participation from public sector safety and facilities maintenance staff. Course prepared and designed by Eng. Sergio Caporali, PhD,CSP and Associate Professor at Graduate School of Public Health from the Medical Sciences Campus of the University of Puerto Rico.

### **September 2009**

The Labor Month / September 2009, VI-DOSH actively participated on VI Department of Labor Month outreach with Posters session and one on-one interaction with all visitors and citizens at Gertrude's Restaurant in St. Croix on which free OSHA publications and an awareness for safety and health hazards was delivered to 80 visitors at the OSHA poster site.

### **OUTREACH PROGRAMS AND SEMINARS**

VIDOSH hosted four main outreach programs and OSHA awareness conferences titled the OSHA/VIDOSH Awareness process and procedures within Food Processing Industry (December

2008); actively participated on the 4<sup>th</sup> Annual Governor’s Conference (February 2009), provide a Four (4) Hazards Recognition for Construction training session for public sector maintenance/facilities employer and employees. Since seminar was free some private sector contractor also attended. Actively participate on VIDOL Labor month outreach. There has been and will continue to provide radio, television talk shows and public service announcements (PSA) promoting VIDOSH initiatives and safe workplace information.

### **VI-DOSH STAFF TRAINING**

VI-DOSH Compliance Officers (4) attended a total of eleven formal OTI courses. Courses include Basic Accident Investigations, Health Hazards Awareness for Safety Officers; the Industrial Hygienist Trainee attended the Initial Compliance Officer Course, Health Standards for Industrial Hygienist and Legal Aspects Techniques, Sr. Safety Compliance Officer attended an Electrical Standards, and Industrial Hygienist attended the Safety and Health Management Program course. Both administrative staff attended required NCR/IMIS and ACE Reports updated courses in Maryland.

## **PROGRESS TOWARD STRATEGIC PLAN ACCOMPLISHMENT**

### **FEDERAL LIASON MENTORSHIP**

The VIDOSH Program will seek to build their program 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 Manger 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 meeting will net valuable information on keeping abreast with safety and health policies and procedures, team participation and learning instrumental practices from other state programs. VI-DOSH outreach activities continued with its annual participation in the VI Governor’s Safety and Health Conferences. The University of Puerto Rico and Puerto Rico Federal OSHA will develop new programming on outreach and special emphasis programs that are critical for workplace injury reduction.

### **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, high level Administrators and Commissioners are 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 FY2008 VIDOSH hired a Director with extensive background and expertise in the safety field. During FY 2009, the program had doubled the size of their staff including two new

Compliance Safety Officers, one Industrial Hygienist and an additional Administrative Assistant. Training and new enforcement and outreach initiatives were also implemented exhausted the program budget but yield significant strides in obtaining strategic initiatives. However, at the end of FY2009, a VIDOSH workforce operation was affected due to staff member resignations: one Safety Compliance Officer and current VIDOSH Director. Program is currently managed by Acting Director until further instruction from VI Government higher management officials. VIDOL already began VIDOSH Director interview process and also published on local newspaper the position as well as open position for Industrial Hygienist.

### **CONSULTATION INITIATIVE**

Beginning May 2009 [name removed] who currently is the VIDOSH Industrial Hygienist was appointed as VIDOSH Consultant for public sector agencies. [name removed] has extensive education and experience in the safety field. The consultation initiative focused in providing a positive image to VIDOSH and public sector expertise to departments with special safety needs and challenges. Aging workplace populations, older structures, tropical environments and emergency planning requirements have demonstrated an increased need for VIDOSH to provide safe workplace guidance and direction. A total of thirty-three (33) formal request for consultation visit received, only four initial visits conducted, however reports not fully delivered due to resignation for VI-DOSH Director [name removed]. Therefore, the Virgin Islands Public Sector Consultation Program was not fully developed and implemented due to VIDOSH Director Resignation on which [name removed] was appointed to function as Acting Director in charge of Enforcement Officers upon evaluation and decision from VI Governor and Government executive management officials.

The former VIDOSH Director indicated that the program planned to develop VIDOSH's public sector consultation program in FY 2006, pending additional funding. This, however, did not take place in FY 2006. During FY 2007, OSHA and the new VIDOL/VIDOSH leadership had explored strategies to resolve this issue including the possibility of sub-contracting to a local agency for the delivery of this service this did not take place in FY 2007. During FY 2008 VIDOSH's Director proposed to reassign a CSHO to be a consultant however VIDOSH did not reassign the CSHO due to current workload.

### **MANDATED ACTIVITIES**

The Virgin Island State Plan faced operational challenges to include:

1. NCR/IMIS defective back up system for more than six months, replacement purchased, received and installed. A high Rejects Report on which an Action plan currently in place to fix and update case file data at Regional and National Offices databases. One variable to consider regarding the high this high is new hire recruiting and resignation in about 1.5 years. Due to these facts and operational IT system review, the NCR/IMIS status must be discussed with the highest priority on all on weekly meeting. The IMIS Specialist will discuss status report on weekly staff meeting and submit a written summary report to the Director's to include copy of said report for VIDOL Commissioner's offices. The weekly report pursues to identify all data entry processes that affect the system and all steps performed to address the reject issues.

2. Design and implementation for a consistent Action plan include an NCR/IMIS Program Analyst to visit worksite and evaluate with IMIS Specialist all possible source(s) and troubleshooting procedures to target the high rejects issues. The NCR/IMIS Reject List must be evaluated in a daily and weekly basis to assess correction progress.
3. Design and implement an effective in house NCR/IMIS refresher training. Training documentation and materials must be maintained at the Director's and IMIS Specialist custody focused forms data entry.
4. Continue a weekly monitoring from the IMIS Specialist for Rejected forms to target those staff which design and implementation for all Compliance Safety and Health Officers (CSHOs) and incoming Director to reduce rejects to 90% by second quarter FY 2010.
5. Increase planning process for planned inspection performance. A proposed goals and objectives strategy submitted to Commissioner's offices to evaluate and track down each activity along with mandated activities described on State Plan grant mandated activities.
6. VIDOSH Program operations affected with decreased workforce due to resignation of one Safety Compliance Officer and current VIDOSH Director.
7. Include a review for VI public sector Workers Compensation and BLS data in order to complete documentation. Develop and implement an LEP program based on higher incidents rate public sector agencies.
8. Hire a trained consultant on OSHA regulations to fully implement Public Sector Consultation Program. A total of thirty –three written request received for Consultation, since Industrial Hygienist and Health Compliance Officer transition to Public Sector Consultation program on third quarter, then appointed as Acting Director on the last six weeks for FY2009 fourth quarter upon VIDOSH Director resignation.

## **CONCLUSION**

VI-DOSH planned strategies for FY2010 included steps to finalize and to achieve this performance goal focusing on:

- a. Analyze and summarize raw data to determine type of injuries and illnesses along with occupational hazards in order to prioritize inspections per target agency
- b. Review CPLs to follow procedures to submit Local Emphasis program.
- c. Ensure CSHO fully trained on Hazard Recognition and IMIS data training.
- d. Prepare and submit to VI Department of Labor Commissioner and Regional Administrator documents to implement LEP to target public agencies with higher rates.

- e. Complete all steps to finalize partnership and alliance agreement with UPR Medical Sciences Campus, Rio Piedras Campus and other professional organization such as but not limited to AIHA-PR Chapter, ASSE- Puerto Rico Chapter

For FY2009, VIDOSH focused on building a solid Public Employees Only Enforcement 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 emphasis abatement expectation. VIDOSH continues to work on promoting a safety and health culture in the public sector by increasing education and outreach efforts. Indoor Air Quality employer and employees complaints, for which we receive many complaints, VIDOSH continues to work with government agencies to increase their knowledge of building HVAC maintenance guidelines, as many of these complaints appear to be related to that system. The addition of Consultation activity will provide key positive relationships with the government agencies.