

OSHA's Draft Revised Safety and Health Program Assessment Worksheet
Form 33 Pilot Study Procedures

1 Purpose

- 1.1 The purpose of this instruction is to ensure the effective and efficient collection of data in support of the Pilot Study designed to ensure the reliability and validity of the Occupational Safety and Health Administration (OSHA) Draft Revised Form 33 instrument.
- 1.2 The study is designed to ensure the Draft Revised Form 33 (DRF33) instrument can be generalized throughout the OSHA Consultation Program; across employers' sectors, size and the safety and health disciplines.

2 General

- 2.1 The assistance required during this data collection is voluntary in nature.
- 2.2 All consultation visits conducted under this effort will count towards meeting the number of consultation visits projected for the FY, in a State On-Site Consultation program's Cooperative Agreement with OSHA, as described in the Consultation Annual Program Plan for the Consultation program (see the Consultation Policies and Procedures Manual, [CPPM](#)). Under the Cooperative Agreement, OSHA reimburses states ninety (90) percent of the budget for implementing Consultation programs. OSHA and State On-Site Consultation programs will not incur the estimated cost for participating in the Pilot Study described herein, as a separate additional cost. This is because, all consultation visits conducted will count towards meeting the number of consultation visits projected for the fiscal year, in a State On-Site Consultation program's Cooperative Agreement (with OSHA).
- 2.3 The sampling effort calls for 30 consultation visits (data) in each of OSHA's 10 Regions.
 - 2.3.1 For each of the 5 (five) industry sectors selected per Region, three (3) small-sized companies (i.e., less than or equal to 25 employees on-site) and three (3) medium-sized companies (i.e., greater than 25 but less than 250 employees on-site) will be visited.
 - 2.3.2 Within the 30 sampling population, five (5) of them will be visited simultaneously by another consultant in the same discipline. A minimum of 2 consultation visits will be conducted simultaneously by each discipline (safety or health).
 - 2.3.3 The workplaces selected for Pilot Study consultation visits must not have an active OSHA inspection or involvement at the time of the consultation visit and must be in business for at least 2 years. The employer must not have an employee population of more than 250, corporate wide. Each workplace may be asked to provide informed consent prior to participating in the study (pending?).
 - 2.3.4 Consultants will receive training on the DRF33, use of the data entry tool, and the Pilot Study procedures and requirements prior to participating in the study.

3 Responsibilities

3.1 Pilot Study Project Manager/Team

- 3.1.1 Will identify the five (5) industry sectors that will be involved in the study.
- 3.1.2 Coordinate the collection and quality of the data in the DRF33 in the preferred data acquisition tool.
- 3.1.3 Arrange for the training of the consultants volunteered by the Consultation Program Managers (CPMs) to conduct consultation visits in each Region.
- 3.1.4 Coordinate with OSHA to assess training and announce the training details for Pilot Study participants.

3.2 OSHCN¹ Board Regional Representatives

- 3.2.1 Promote the intent of the Pilot Study throughout their respective Regions which is expected to run from May 2022 to Sep 2022.
- 3.2.2 Select Consultation programs that represent a diverse characteristic of each Region, in other words do not assign all 30 consultation visits to one program.
- 3.2.3 Ensure all consultation visits performed under this Pilot Study in the Region meet the threshold and criteria established in the design. Use the following spreadsheet at Table 1 to show progress:

Table 1: Consultation Visits Sampling Points

Industry #1		Industry # 2		Industry # 3		Industry # 4		Industry # 5	
<i>Small Size</i>	<i>Medium Size</i>								

* Note: Five (5) of these visits can be conducted by two (2) different consultants in the same discipline.

¹ The National Association of Occupational Safety and Health Consultation Programs (OSHCN):

3.2.4 After this table is completed, the OSHCON Board Regional Representative will forward to the Pilot Study Project Manager.

3.3 Consultation Program Managers

3.3.1 Develop a marketing campaign towards the five (5) industry sectors identified in the sampling plan. Ensure only those establishments are captured in data analyses. Marketing strategies are routinely utilized by State On-Site Consultation programs and fully funded under the Cooperative Agreement with OSHA. These strategies include dissemination of Consultation program newsletters to businesses within the state, presentations at safety and health meetings, and promotion of consultation services on Consultation programs web pages, state social media platforms, and by state agencies such as Workers Compensation Offices. Some states also offer incentives such as workers compensation discounts to employers who use consultation services.

3.3.2 Follow the policies and procedures specified in the CPPM and your Internal Quality Assurance Procedures (IQAP) when conducting your consultation visits.

3.3.3 Ensure there is a fair/equal mix of both disciplines, safety and health, when coordinating your consultation visits.

3.3.4 **Ensure all 47 attributes of the Draft Revised OSHA Form 33 are addressed and given a rating.**

3.3.5 To the extent possible, work with the OSHCON Board Regional Representative to ensure data collection from companies with an even distribution of small- (i.e., less than or equal to 25 employees on-site) and medium-sized businesses (i.e., greater than 25 but less than 250 employees on-site). This is especially important for the simultaneous consultation visits.

3.3.6 Ensure all attributes in the DRF33 are assessed by the consultant and entered in the data acquisition tool (i.e., findings, recommendations, and ratings).

4 Process

- 4.1 Assignments of a particular Consultation Visit should begin during the 2nd Quarter of Fiscal Year 2022 and can be accomplished by:
 - 4.1.1 Sharing the consultation visit sampling tool with the various CPMs in the Region to solicit their feedback on their likelihood of being able to conduct the required consultation visits in the select industry and size (active) OR
 - 4.1.2 Issuing a data call each month to determine which CPM has received employers' requests for consultation visits from the required industry sector (passive).
 - 4.1.3 The CPMs indicating a higher probability of obtaining and conducting the consultation visits will be given the assignment or the assignments can be issued as requests trickle in to the various CPMs.
- 4.2 Any consultant that would ordinarily be assigned to a consultation visit, by reason of their discipline, expertise, past client or geographical area, can be used for this project.
- 4.3 Where duplicate consultation visits are required (5 per Region), CPMs can use the accompanied visit requirement of the Consultation Policies and Procedures Manual (CPPM), with the following exception:
 - 4.3.1 Both consultants will be the same discipline (safety or health) and
 - 4.3.2 Both will enter their own unique respective DRF33 findings, recommendations, and ratings in the data acquisition tool.