



THE INDUSTRIAL COMMISSION OF ARIZONA

DIVISION OF OCCUPATIONAL SAFETY & HEALTH



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June 27, 2019

Barbara Goto
Regional Administrator, OSHA
90 – 7th Street, Suite 2650
San Francisco, CA 94103

RE: ADOSH Response to the FFY 2018 FAME

Dear Ms. Goto:

Thank you for the opportunity to provide the Arizona Division of Occupational Safety and Health's (ADOSH) formal response to OSHA's FFY 2018 Federal Annual Monitoring and Evaluation (FAME) report. The required Corrective Action Plan (CAP) response regarding the findings and recommendations found within the FAME will be submitted to your office by July 31, 2019 as you requested.

Overall, the ADOSH program continues to be highly effective in protecting Arizona workers from workplace injuries, illnesses, and exposures. ADOSH staff is committed to ensuring the health and safety of all Arizona employees. This year's FFY 2018 FAME appears to be an objective, balanced, and constructive review of ADOSH's activities and I concur with the overall findings of the audit with regard to the effectiveness of ADOSH's program responsibilities. I appreciate the efforts made by OSHA's staff to include positive findings and to include the State OSHA Annual Report (SOAR) as an appendix to the FAME report. I believe our stakeholders would be interested in our additional proactive measures for safety and health.

With that said, I would like to take this opportunity to respond to one of the issues in the FAME. Finding FY 2018-10, the discussion is the same as FY 2018-08 and 09, staff turnover, the time required to train a new compliance offices to work independently, and the inability to hire qualified personnel were the primary reasons for not meeting the FRL range. Until we have highly trained safety and health professionals, ADOSH leadership will be aggressively working with the staff to ensure lapse time is within the FRL range. Additionally, ADOSH believes we communicate with all employers the hazards observed in a workplace inspected and strongly encourage them to proactively abate them well before receiving a citation. Simply stating that an employer is not going to abate a hazard until they receive a citation is unfounded and without any fact to support such a statement. In fact many employers provide ADOSH with abatement information and documentation well before a citation is issued.

In closing, I look forward to continuing working collaboratively with you and your staff on matters related to workplace safety and health. If you should have questions regarding this response, please feel free to contact me directly at 602-542-5726.

Sincerely,

Jessie Atencio
ADOSH Director

cc: James Ashley
T. Zachary Barnett