Re-Imagineering the Cal/OSHA IIPP (T8CCR3203) "Understanding Code Speak"

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Recent (2019) Cal/OSHA Realities

Assembly Bill 2774

- ☐ "Realistic Possibility" for Serious Citations
- ☐ CSHO = Expert Witness

Penalty Increases

☐ Leveraging Abatement Credits

Repeat Citations

- **□** Corporate Wide
- ☐ Up to 134K +/-

Critical Premise: All Regulators

Law Enforcement

Judges

Attorneys and yes

Compliance Officers (CSHO'S

are:

BORN AND BRED IN MISSOURRI

Understanding Regulatory messages?

What is the Context

What is the intent

What is the medium

How is it stated

Example 1. Clear?



Example 2. Concise?



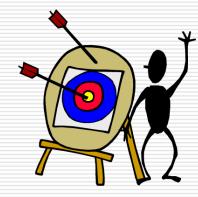
Example 3. Do you understand?



Now act according to your understanding?

Pronoun Reference

I'll position the target, and when I nod my head, shoot at it.



Defining "Code Speak"

Acceptable	Train	Adequate	Applicable	Appropriate
Careful	Immediately	Improper	Effective	Periodically
Practicable	Foreseeable Emergency	Reasonable	Recognized	Safe
Secure	Maintain	Substantial	Routine Operations	Timely

If you don't, Compliance will

Other "Code Speak" phrases

"...extent practicable." A decision in the eyes of the READER OR EVALUATOR?

"...where applicable." No criteria for judgment/OR IS THERE?.

"...shall be considered." READER OR EVALUATOR? will think about...

And the latest **AB 2774** addition:

"realistic possibility" (the new basis for ISSUING SERIOUS CITATONS

"Controlling Labor Codes"

Section 6406 No person shall do any of the following:

- (a) Remove, displace, damage, destroy or carry off any safety device, safeguard, notice, or warning, furnished for use in any employment or place of employment.
- (b) Interfere in any way with the use thereof by any other person.
- (c) Interfere with the use of any method or process adopted for the protection of any employee, including himself, in such employment, or place of employment.
- (d) Fail or neglect to do every other thing reasonably necessary to protect the life, safety, and health of employees.

On boarding New Hires, Reference these rather than "Company Policy" "Controlling Labor Codes" (Employer/Employee Duties)

Section 6407

Universal Citation

Every employer <u>and</u> every employee shall comply with occupational safety and health standards, with Section 25910 of the Health and Safety Code, and with all rules, regulations, and orders pursuant to this division <u>which are applicable to his/her own actions and conduct.</u>

(Amended by Stats. 1977, Ch. 62.)

On boarding New Hires,
Reference this Code rather than "Company Policy"

See Independent Employee Act of Misconduct

"Controlling Labor Codes" (Cal/OSHA/Emplr relations)

§ 6314(d) In the course of any investigation or inspection of an employer or place of employment by an authorized representative of the division, a representative of the employer and a representative authorized by his or her employees shall have an opportunity to accompany him or her on the tour of inspection. Any employee or employer, or their authorized representatives, shall have the right to discuss safety and health violations or safety and health problems with the inspector privately during the course of an investigation or inspection.

Preventive Measures Know OSHA's "Rules of Engagement"

	Policies and Procedures								
P&P no.	Title	Last Revised							
C-1A	Inspection Procedures	2/21/19							
C-1B1	Documenting the Existence of a Violation	7/22/19							
C-1B2	Documenting the Classification of a Violation	7/22/19							
C-1B3	Documenting the Penalty Adjustment Factors of a Violation	5/24/17							
C-1C	Multi-Employer Worksite Inspections	12/8/00							
C-1D	Dual-Employer Inspections	12/12/17							
C-1E	Equipment Calibration Sheet (Cal/OSHA 1E)	8/1/94							
C-1H	Laboratory Sample Analysis Request and Sample Seal (Cal/OSHA 1H, 1HX, 1HS)	4/10/15							
C-2	Citation, Notification of Penalty and Verification of Abatement (Cal/OSHA 2, 2X, 160, 161 and 161A)	6/2/08							
C-3	Special Order (Cal/OSHA 3 and 3X)	2/29/12							
C-4	Notice (Cal/OSHA 4 and 4X)	2/1/95							
C-5	Information Memorandum (Cal/OSHA 5 and 5X)	2/1/95							

Hazard Assessment Primary Source "Rules of Engagement"

OSHA Technical Manual

General Information -

Health Hazards ▼

Safety Hazards *

Construction Hazards -

Expanded Table of Contents OSHA Instruction TED 01-00-015

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Expanded Table of Contents

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CHAPTER 1. PERSONAL SAMPLING FOR AIR CONTAMINANTS [Updated 02/11/2014]

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- IV. Post-Inspection Activities
- V. Bibliography

Appendix A Pre-Weighed Filters

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Appendix D Shelf-Life of Sampling Media

Appendix E Sampling Media for Most Frequently Requested Analyses From the

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- III. Petroleum Refining Operations
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CHAPTER 3. PRESSURE VESSEL GUIDELINES

- I. Introduction
- II. Recent Cracking Experience in Pressure Vessels
- III. Nondestructive Examination Methods

Know Cal/OSHA pre-inspection activities

https://www.osha.gov/oshstats/

NOTE: OSHA is currently migrating its legacy system. Cases prior to 2011 (Federal OSHA) and 2013 (OSHA State Plans) may be affected by this migration. Cases indicated *without* the .015 extension reflect the data as of 08/05/2016. The next updates for those cases will be reflected October, 2016. Should you need case status updates for those cases before October 2016, please contact your originating OSHA Office.

Inspection Data

Inspection Detail Definitions

- <u>Establishment Search</u> is a query tool which locates OSHA inspections which were conducted within a particular establishment
- Search Inspections By NAICS is a query tool which locates OSHA inspections which were conducted within a particular industry group
- Inspection Information enables access to information about an inspection when the activity number identifying the inspection is known
- High Penalties by state lists all enforcement cases with initial penalties of \$40,000 or more, by state, starting January 2015
- <u>Fatality and Catastrophe Investigation Search</u> enables the user to search the text of the Accident Investigation Summaries (OSHA-170 form) which result from OSHA accident inspections.
- General Duty Standard Search enables the user to search the text associated with 5a1 standards cited during OSHA inspections.
- Frequently Cited OSHA Standards is a query tool which allows the user to determine the most frequently cited Federal and State OSHA standards for a given NAICS code. The NAICS code may be determined by accessing the online NAICS Manual
- <u>SIC Search</u> Provides the ability to search the alphabetic index of the 1987 version manual by keywords; access detailed information for a specified SIC, Division, or Major Group
- SIC Manual Access detailed information for a specified SIC, Division,

Industrial Hygiene Air Sampling Data

Chemical Exposure Health Data

OSHA Data Initiative

Establishment Specific Injury & Illness Data

Severe Injury Reports

Severe Injury Reports

Statistics

- Commonly Used Statistics
- DOL Enforcement Website
 - Data Catalog

Est	Establishment				Date Range					O	Office	Zipcode	State					
US	Army			08/05/20	08/05/2015 to 08/05/2020					a	II	all	all					
100000	Please note that inspections which are known to be incomplete will have the identifying Activity Nr shown in italic. Information for these open cases is especially dynamic, e.g., violations may be added or deleted.																	
Sor	Sort By: Date Name Office State											Return to Search •						
By D	Cal/OSHA pre-inspection activities – Establishment Search												Results 1 - 20 of 36 Result Page: 1 2 >					
Ge	t Deta	il Select All	Reset	<u>https</u>	<u>s://</u>	<mark>WWW.O</mark>	sha.gov/	pls/	<u>'imis/</u>	<u>est</u>	<u>cablishme</u>	ent.html						
	#	Activity	Opened	RID	St	Туре	Sc	SIC	NAICS	Vio	Establishment N	ame						
	1	1463030.015	02/11/2020	0936100	CA	Planned	Partial		721211		Us Army Corp Of Engineers							
	2	1449173.015	12/05/2019	0420300	NC	FollowUp	Partial		928110		Us Dept Of Army							
	3	1438738.015	10/17/2019	0936100	CA	Planned	Partial		237990	1	Us Army Corps Of Engineers							
	4	1426628.015	08/27/2019	0420300	NC	Referral	Partial		928110	3	Us Dept Of Army							
	5	1408525.015	06/12/2019	0418500	sc	Referral	Partial		928110	2	Us Dept Of Army							
	6	1384625.015	03/13/2019	0524700	ОН	Complaint	Partial		921190		Us Army Corps O	f Engineers						
	7	1347813.015	09/20/2018	0418500	sc	FollowUp	Partial		928110		Us Department O	f The Army						
	8	1305480.015	03/27/2018	0418500	sc	Unprog Rel	Partial		928110	1	Us Department O	f The Army						
	9	1273475.015	10/27/2017	0522500	он	Referral	Partial		924110	2	Us Army Corps O	f Engineers - Huntington	District					
	10	1272306.015	10/23/2017	0215800	NY	Referral	Complete		928110	6	Us Army-Fort Drum Department Of Public Works							
	11	1261362.015	09/06/2017	0419700	FL	Planned	Records		928110		Us Army Corps O	f Engineers						
	12	1243004.015	06/26/2017	0936100	CA	Referral	Complete		541620	4	Us Army Corps O	f Engineers - Institute For	Water Resources					
ot	13	1243716.015	06/26/2017	0936100	CA	Referral	No Insp/Other		541620		Us Army Corps Of Engineers - Institute For Water Resources							
	14	1238162.015	06/06/2017	0418500	sc	Referral	Partial		928110		Us Army Corps O	Corps Of Engineers						

2019 Cal/OSHA Most Common Citations

			Total	Serious	%
#	Code	Description	Viol	Viol	Serious
1	3203	♯ IIPP	2323	208	9.0
2	3395	Heat Illness Prevention	2035	329	16.2
3	1509	Code of Safe Practices	1173	86	7.3
4	3314	Energy Control/LOTO	653	273	41.8
5	5194	🖶 Haz. Com	639	10	1.6
6	342	Reporting Work Fatalities/Ser Inj	545	8	1.5
7	5162	Emergency Eye Wash/Shower	481	210	43.7
8	5144	Respiratory Protection	425	17	4.0
9	6151	Portable Fire Extinguisher	415	1	0.2
10	3276	Portable Ladders	336	105	31.3
11	3650	Industrial Trucks: General Req.	333	128	38.4
12	461	Permit to Operate Air Tanks	326	3	0.9
13	2340.16	Work Space About Elect. Equip.	310	5	1.6
14	3328	Machinery & Equipment	287	102	35.5
15	1512	Construction: Emergency Med Svcs	275	3	1.1
16	3668	Powered Ind. Trucks – Training	216	33	15.3
17	5189	♣ PSM	195	16	8.2
18	1670	Fall Protection & Devices	169	104	61.5
19	4650	Compressed Gas & Air Cylinders	168	36	21.4
20	1712	Impalement Protection	161	102	63.4
21	3577	Abrasive Wheels; Protection	158	83	52.5
22	1644	Metal Scaffolds	148	74	50.0
23	3421	🖶 Tree Work – General	148	35	23.6
24	341	4 Permit Requirements – Constr.	145	5	3.4
25	3400	Medical Svcs & First Aid	144	4	2.8

Compliance Risks Per Jurisdiction Cal/OSHA District Odds for Citations

	Region3 Long Beach District - Jan 1, 2017 through Dec 31, 2017												
						CitLpsTi	CitLpsT	CitLpsT					
						me	imeHlt	imeAv	Tot Ins	%Ins w/o			
CSHO	Tot Ins	Tot Viol	Tot S/W/R	%S/W/R	Viol/Ins	Safety	h	е	w/o Viol	Viol			
1	33	115	49	42.6	3.5	108	0	108	7	21.00%			
2	40	88	38	43.2	2.2	116	1250	117	9	23.00%			
3	46	175	61	34.9	3.8	84	0	84	6	13.00%			
4	44	96	39	40.6	2.2	100	104	101	14	32.00%			
5	21	82	23	28	3.9	106	73	90	2	10.00%			
6	6	4	3	75	0.7	122	0	122	2	33.00%			
7	33	141	42	29.8	4.3	91	71	85	6	18.00%			
8	35	90	30	33.3	2.6	68	0	68	18	51.00%			
9	15	80	30	37.5	5.3	116	0	116	2	13.00%			
Ave	30.3	96.8	35	36.2	3.2	101.2	166.4	99	7	22.00%			
Tot	279	855	321	37.5	3.1	98	95	98	67	24.00%			
									Ave Pen	352,028	LB District	ODDS of Be	ing Cited
									Tot Pen	3,147,032	78%		
			Regional Tota	als - 4 District	Offices 46	Active Fie	ld CSHO	s			Region 3	ODDS of Be	ing Cited
	1479 4446 1394 31.4 3 82 82 82 282.5 19%							81%					

Compliance Risk Per Jurisdiction Cal/OSHA District Odds for Citations

		Regio	n3 San Bernar	dino Distric	t - Jan 1, 2	017 thro	ıgh Dec						
						CitLpsTi	CitLpsT	CitLpsT					
						me	imeHlt	imeAv	Tot Ins	%Ins w/o			
CSHO	Tot Ins	Tot Viol	Tot S/W/R	%S/W/R	Viol/Ins	Safety	h	е	w/o Viol	Viol			
1	42	83	31	37.3	2	81	17	79	8	20.00%			
2	28	97	49	50.5	3.5	98	117	99	5	18.00%			
3	35	53	25	47.2	1.5	78	26	74	7	20.00%			
4	38	86	16	18.6	2.3	114	113	114	7	18.00%			
5	38	116	45	38.8	3.1	87	0	87	4	11.00%			
6	21	43	20	46.5	2	95	0	95	6	29.00%			
7	43	107	50	46.7	2.5	79	18	76	5	12.00%			
8	42	139	58	41.7	3.3	66	0	66	3	7.00%			
9	37	93	22	23.7	2.5	107	112	109	4	11.00%			
10	34	77	23	29.9	2.3	80	56	76	7	21.00%			
11	41	45	50	35.7	3.4	92	78	92	5	12.00%			
12	29	140	15	33.3	1.6	115	123	118	16	54.00%			
Ave	35.7	89.9	33.7	37.4	2.5	91	55	90.4	7	21.00%			
Tot	428	1079	402	37.3	2.5	87	95	88	76	18.00%			
									Ave Pen	418,586	S.B. District ODDS of B	Being Cited	
									Tot Pen	4,993,362	79%		

Cal/OSHA Inspection Survival Guide





Cal/OSHA Inspection Targets



Impact of NON- Compliance

<u>Serious Citations</u>: Max about \$125,000 Depending on Extent & Likelihood

<u>General Citations</u>: Max about. \$12,000 Depending on Severity, Extent & Likelihood. Plus considerations for Size, Good Faith & History

Repeat: Corporate Wide / 5 Year History about \$134,000

Additional Costs

Abatement/Defense/Workers Comp/Production Loss

Cal/OSHA Citation Focus on "Direction & Control

Government Code sec. 12926(s):

"Supervisor" means any individual having the authority, in the interest of the employer, to hire, transfer, suspend, layoff, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to direct them, or to adjust their grievances, or effectively to recommend that action

Why Supervisors? The Legal Premise

Supervisors represent Management...hence,

- When they talk information is known as imputed knowledge
- What they say information is known as "statements against interest"

Remember the 5th. Amendment???

Legitimate Citations - Element 1

Hazard: "the potential to do harm"

Machines, and/or Equipment, and/or

Processes, and/or Chemicals, and/or

Physical, and/or Environmental issues/conditions;

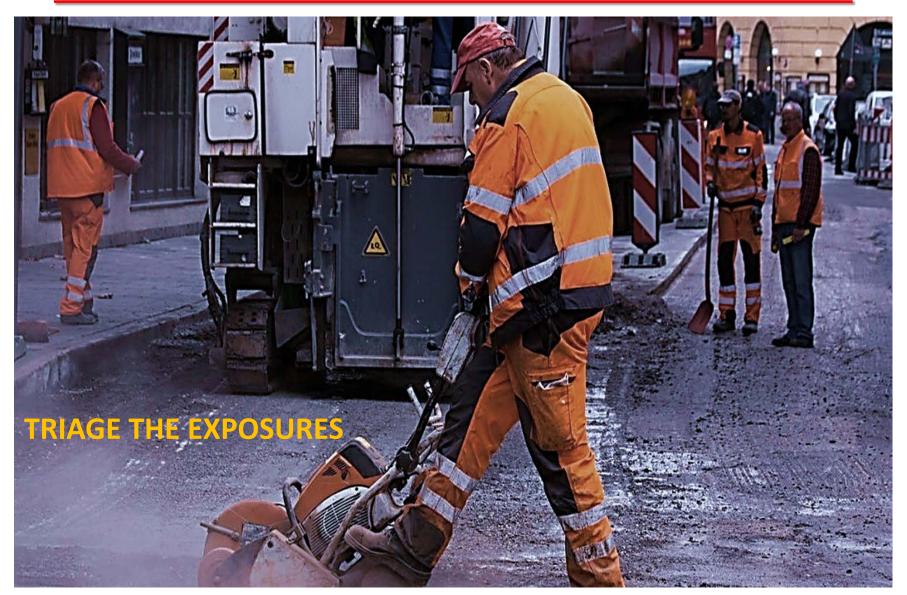
either singularly or in combination

Legitimate Citations - Element 2 "ZONE OF DANGER"

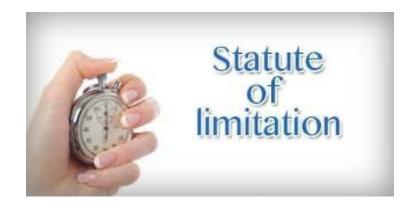


Legitimate Citations - Element 3

EMPLOYEE WITHIN ZONE OF DANGER



Element 4 of A Legitimate Citation



In General:

6 Mo. from Opening Conference;

However, recent Labor Code change on log 300 retention now 5 years;

Effectively increasing citation possibilities beyond the normal statute

Evidence of Alleged Violation

Hard Evidence

Documents, Sampling, Direct Observation, Photographs, Measurements



Corroborating & Hearsay Evidence

Oral Statements by: Employer, Employer agents/representatives (Supervisors), Employee, Union Reps.

The Inspection Process Tact, Diplomacy, Kindness & Respect Will Re-negotiate Relationships

"Opening Conference" Compliance Officer will ask to see and must conduct with "highest level of management having authority to allow continuation of inspection"

Note: Compliance Officer will respond to the address listed on the complaint/accident, i.e., Maintenance Yard, Street Dept., Sanitation, etc.

Note: Train All Department Heads/Supervision in inspection procedures and include H&S or Risk Management in Process

Note: Get to know the Compliance Officer

Ask about educational/professional background

The Inspection Process

YOUR HOUSE RULES - ENFORCE THEM ON THE CSHO (I.E.)

PPE needed prior to entry

Wrap around Goggles, Nomex, Steel Toed Shoes, etc.

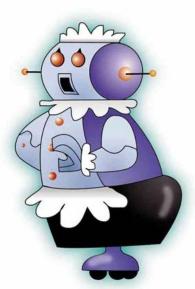
Special Hazards, Equipment, Process

Chemistries, Bio-hazards, Trenching, etc.

Special Certification Requirements

- Asbestos Cert
- HazWoper Cert
- Confined Space
- Lead Cert





The Inspection Process All about Due Process & Evidence

(Answer questions only, do not volunteer information)

- IIPP Document and Records to support the program
 - Periodic Inspection Records
 - Routine and Special Training Records
 - Haz. Com Program w/ Master List of Chemicals
 - Permits, i.e., pressure vessels, compressors, etc.
- Other Written Programs where applicable
 - Resp. Protection/Hearing Conservation Program
 - Confined Space/Silica Programs
 - PPE Certification Statements for all PPE

The Inspection Process Walk Thru



- 1. The shortest distance **DEFINITELY** a straight line
- 2. What the Officer sees, you must see.
- 3. What the Officer hears, you must hear.
- **Note:** Employee may ask compliance officer to talk in private.
 - 4. Photograph what the Officer photographs
 - 5. Sample what the Officer samples
 - 6. Measure what the Officer measures
 - 7. DOCUMENT observations and findings

The Inspection Process Closing/Exiting Conferences

 Compliance Officer should summarize findings, clarify any additional needs and arrange for any further visits

Ask Questions

- Clarify ambiguity of any condition(s) observed
- Clarify documents requests
- Ask what criteria is applied to abatement dates -Serious/General/Regulatory
- Ask for expected closing or abatement dates

What the IIPP T8CCR3203 Really Means

- Applies to ALL Employers doing business in California at any time
- Establishes the who, what, when, where, why and HOW of Health and Safety in the workplace
- Cal/OSHA's General Duty Clause
- Still the most often cited Safety Order! WHY!?
 - **❖Failure to define CODE SPEAK**

Enforcement of House Rules/Compliance

3203(a)(2) Include a <u>system for ensuring</u> that employees comply with safe work practices. Include: recognition... training and retraining programs, disciplinary actions, <u>or</u> <u>any other such means</u> that ensures employee compliance

Means: Enforce your house rules

Do you have Conditions of Employment

Do you have Duty Statements

Do you have Progressive Discipline

Is it commensurate with the HAZARDS violated

How are House Rules Communicated

3203(a)(3)...a system of communication w/employeesSubstantial compliance includes: meetings, training programs, postings...or labor/management safety committee (see 3203(c) Safety Committee 7 subsections) Means:

Committee is "Permissive" not obligated and,

Requires:

- Equal Division for Chair Duty (Mgt/Labor)
 - Formal Structure (Odd/Even members?)
 - Rules of Order
- * Technical Knowledge for Committee members

House Maintenance

3203(a)(4) Include <u>procedures</u> for identifying and evaluating work place hazards including scheduled periodic inspections...Inspections shall be...

(a)(4)(A) When...first established.

(a)(4)(B) When new processes, substances, procedures, or equipment are introduced.

(a)(4)(C) Whenever...made aware of new hazard or previously unrecognized hazard. Note: if supervisor knows, the EMPLOYER knows.

Means

Normal checklists DO NOT meet code

WHY: DO NOT EVALUATE/TRIAGE HAZARDS

How Are Mishaps Investigated

3203(a)(5) Include a <u>procedure</u> for investigating occupational injuries or illnesses.

Means:

- 1. Who does it (Experience/Qualifications)
- 2. What means/method is used (Applicable Theories)

DOES NOT MEAN:

1. Only filling out a DWC-1

How Are House Issues Fixed?

- **3203(a)(6)** Include methods and/or procedures for **correcting unsafe** work practices, conditions and work procedures in a **timely manner**:
- (a)(6)(A) When discovered or observed...
- (a)(6)(B) When an imminent hazard exists...

Means:

- Triage competing hazards based on Severity/Extent/Liklihood
 - Define time for correction
 - ❖ Serious ASAP; NLT 3 days
 - ❖ General NLT 30 days

How And Who Trains/Educates House Members?

3203(a)(7) Provide training and instruction:

- (a)(7)(C) ...employees given new jobs for which training not given...
- (a)(7)(D) ...new substances, processes, procedures or equipment
- (a)(7)(E) ...employer made aware of a new hazards
- (a)(7)(F) For supervisors to familiarize themselves with the safety and health hazards which their employees are being exposed.

Means - NOT H.R. unless

- Method & Delivery of training be technically competent
- Prove Supervisors trained both in Safety/Health as well as Supervision (enforcing house rules)
- Goal = Retention of Health and Safety subjects under Compliance interview

Safety Committee – All Or Nothing?

- (c) If a labor/management safety committee is used to comply with subsection (a)(3), Employer will be in substantial compliance if the committee:
- (c)(1) Meets regularly, but not less than quarterly.
- (c)(2) Prepares and makes available to affected employees, written records of the safety and health issues discussed at the committee meetings and are maintained for 3 years. (Ca. LOG 300 = 5 Years citation exposure now extended)
- (c)(3) Reviews results of the periodic inspections.
- (c)(4) Reviews investigations and causes of occupational injuries and illnesses. Where appropriate submits suggestions to management for the prevention of future incidents.

Safety Committee – All Or Nothing?

- (c)(5) Reviews investigations of alleged hazardous conditions brought to the attention of a committee member. When determined necessary by the committee, the committee may conduct its own inspection and investigation to assist in remedial action.
- (c)(6) Submits recommendations to assist in the evaluation of employee safety suggestions; and
- (c)(7) Upon request from the Division, <u>verifies abatement</u> action taken by the employer to abate citations issued by the Division

Safety Committee – Means and hardly DOES?

Have a structure a.k.a

- Rules of Order
- Equally shared Chairpersonship
- Odd number of members
- Members screened for technical knowledge
- Trained in Hazard Recognition/Evaluation and Control

If Committee is still wanted Change Title To:

Health and Safety Advisory Council

IIPP T8CCR3203 House Recipe:

- Recognition of Hazards by seeing, hearing, feeling, smelling AND
- Evaluate Hazards through sampling, photographing, analyzing AND
- Control hazards through research and applying Best Practices & Technology and...

IIPP T8CCR3203 House Recipe:

Apply LADDER OF CONTROLS:

- ✓ Engineering controls
 - Ventilation/Noise Baffles etc.
- ✓ Administrative controls
 - Rotate Employee/Task Redesign
- ✓ Personal Protective Devices
 - Ear Plugs/Respirators

Proof is in the PUDDING or "Where's The Beef"?

Compliance Means:

- Engage in Situational Awareness/Analysis in: Haz Recog/Eval/Control
- Prove YOUR DECISION LOGIC for: Engr./Admin./PPE Controls
- Triage hazard response by defining "Timely" by create a simple **MATRIX**

Hazard Correction Work Order Matrix

P	Hazaı	rd ← Slight	Non Serious	Serious	Imminent Danger
r o b	Possible But Remote 1	1	2	3	4
a b i	Reasonable But Unlikely 2	2	4	6	8
l i t	Occasional 3	3	6	9	12
y	Probable 4	4	8	12	16
	Frequent 5	5	10	15	20

Mishap Probability

- 1. Unlikely but possible
- 2. Occurs once in 3 years
- 3. Occurs at least once per year
- 4. Occurs several times per year
- 5. Occurs any time

Hazard

- 1. Slight No Injury or Equipment damage
- 2. Non-Serious Controllable by operator or procedure
- 3. Serious Causes injury or equipment damage
- 4. Imminent Death; severe injury or major damage

Wrk Ord Period for Correction

- 1. Immediate (ASAP)
- 2. Correction W/In 14 Days
- 3. Correction W/In 30 Days
- 4. Correction as resources

become available

Thank for listening, any questions....

Up Next...

Some Functional Hand-outs are next