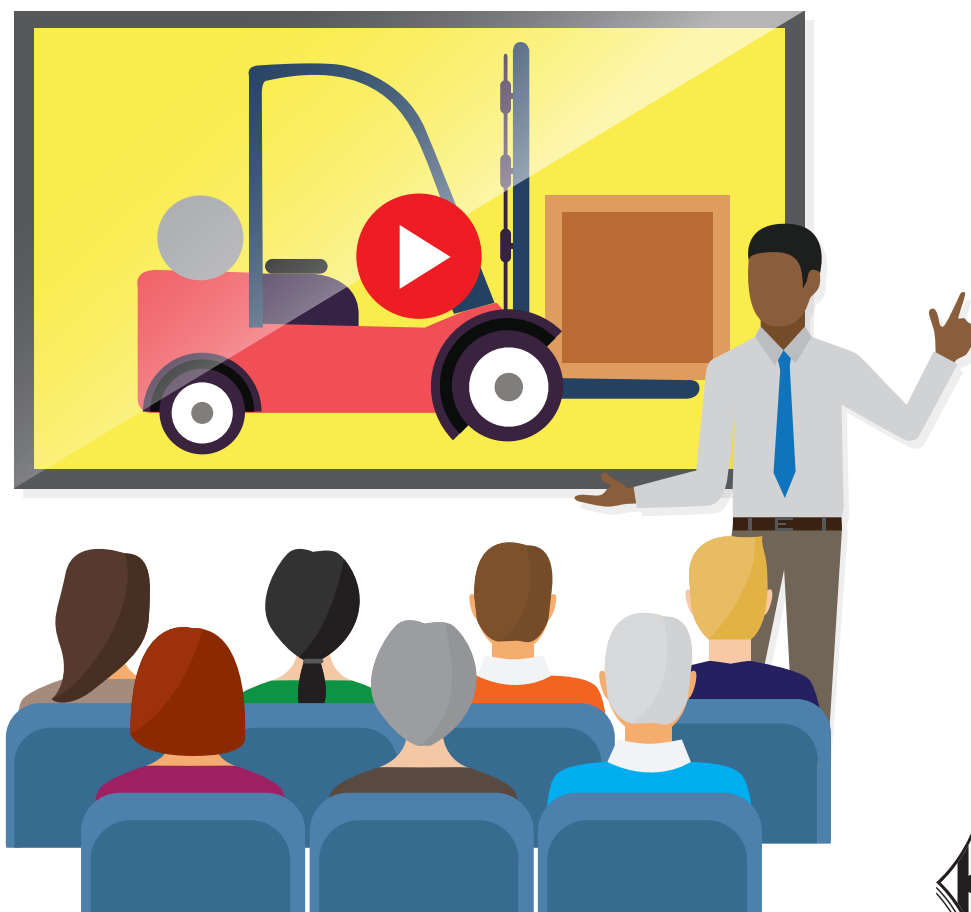


OSHA Safety Training:

Requirements and Best Practices



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OSHA Safety Training:

Requirements and Best Practices

Employee training is a common topic of concern and discussion among safety professionals. The subject generates numerous questions like:

- What training is required and what do we need for our industry?
- What does OSHA expect in a training program?
- What conditions trigger refresher training?
- What are the risks of noncompliance?
- Are our training records acceptable?

We'll take a look at each of these and give you some practical information and ideas that will help you get and stay in compliance with OSHA's training requirements.

What training is required?

This is one of the most basic questions asked. The first place to look for training requirements is in the OSHA standards. But which OSHA? Many states and territories have been approved by OSHA to operate their own safety and health programs.

These state-plan states must have standards that are at least as effective as OSHA's rules, but they may have additional requirements that could involve employee training.

If you're in one of these state-plan states, you'll need to meet the training requirements in your state. Many of these states adopt Federal OSHA rules "as is," but this isn't always the case.

State-plan states			
• Alaska	• Indiana	• Minnesota	• South Carolina
• Arizona	• Iowa	• New Mexico	• Tennessee
• California	• Kentucky	• New Jersey	• Utah
• Connecticut	• Maine	• New York	• Vermont
• Hawaii	• Maryland	• North Carolina	• Virginia
• Illinois	• Michigan	• Oregon	• Washington

Also, state plans cover public employers (state-, county-, or local-government employers) as well as private-sector employers. Federal government employers do have to comply with OSHA. To make matters more complicated, there are several state plans that apply only to public-sector employers. Private-sector employers in these states must comply with Federal OSHA.

What topics are commonly trained on?

J. J. Keller® Training On Demand offers training programs for these required topics and many more.

Now that you know where to look for the requirements, what are some of the topics that contain required training? Some of those topics include hazard communication (including Safety Data Sheets and labeling), emergency action plans, injury and illness reporting, powered industrial trucks, permit-required confined spaces, fall protection, respiratory protection, and electrical safety.

What training do we need for our industry?

OSHA does have a few industry-specific standards that do take precedence over other general industry standards. These are listed below:

- Pulp and paper mills
- Telecommunications
- Laundries
- Logging operations
- Bakeries
- Grain handling
- Textile mills
- Electric power generation
- Sawmills

Even though these standards do set industry-specific requirements, they typically reference the other general industry standards, too. The point is, if you're trying to identify your OSHA training needs, your industry probably isn't the place to start.

Once you determine that an OSHA rule applies to the operation, review the rule for its employee training requirements.

Whether or not a particular OSHA standard applies depends on your facility's activities and the hazards faced by your employees, rather than the industry your business is in. For example, if any of your employees are required to provide first aid as part of their job duties, those employees would need training in bloodborne pathogens.

Keep in mind some OSHA standards require annual training and retraining requirements.

Do we have to have monthly safety meetings?

Another common question relates to having monthly safety meetings. OSHA doesn't require employers to hold regularly scheduled training or other general safety meetings. However, according to OSHA information on safety and health management programs, employers should "regularly communicate with employees about workplace safety and health matters."

Even though regular safety meetings are not required, they're a good way to keep the lines of communication open. And, if you have to cover numerous topics for annual training, you might find it more convenient to discuss one topic each month.

What does OSHA expect in a training program?

Employers often ask about training program content or how training should be conducted. Some of the most common questions follow.

Is it OK to use computer-based training programs?

OSHA interpretations indicate that computer-based and video-based training used alone is not enough. The agency expects computer-based and video-based training to be supported by qualified trainers who can provide answers to the trainees' questions at the time the questions arise.

OSHA also says training should provide "hands-on" demonstrations and opportunities for trainees to practice using equipment and following procedures. It's clear that OSHA expects computer-based training to be only a part of a training program.

What about refresher program content?

Refresher training should:

- Highlight and summarize the important parts of the topic,
- Report on the group's progress,
- Emphasize any changes that have occurred since the previous training was held, and
- Give you the opportunity to introduce more advanced material.

There's no general requirement that applies to all refresher training. If a standard has details on the content of refresher training, be sure to follow those requirements. For example, the lockout/tagout standard says that retraining "shall...introduce new or revised...methods and procedures, as necessary."

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What are the risks of noncompliance?

No one wants to be out of compliance, but if you're ever tempted to cut costs by sidetracking training, consider the consequences.

If you don't provide training, you're at risk for some hefty OSHA fines. Training violations are typically cited as serious violations. OSHA recently increased the maximum amount of a serious violation from \$12,934 to \$13,260.

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Source: OSHA

Of course, the other risk of noncompliance is a workplace injury, illness, or fatality. When someone isn't sure of what they're doing, they have an increased risk for injury. Injuries and illnesses come with costs that are likely to be higher than OSHA fines. The obvious direct costs include medical bills, repairs to any damaged equipment, product losses, and costs to hire and train replacement workers.

You also need to consider the indirect costs, such as decreased morale and productivity in coworkers, increases in your workers' compensation premiums, and lost business contracts due to having a higher experience modification rate. Plus, your reputation in the community and industry can take a hit if the injury, illness, or fatality is publicized.

What are OSHA's requirements for training records?

There is no one OSHA requirement for training records that applies in all situations. The requirements vary from standard to standard. Many rules don't include training record requirements.

Here are some examples of when OSHA does require training records:

- The permit-required confined space standard says that training certifications must include each employee's name, the signatures or initials of the trainers, and the dates of training. OSHA doesn't set a record retention time.
- Under the asbestos standard, employers have to keep training records for one year beyond an employee's last date of employment. The standard doesn't detail the content of the records.
- The bloodborne pathogens standard states that training records must include the dates of training, the contents of the training sessions, the names and qualifications of trainers, and the names and job titles of those trained. You have to keep these records for three years.

Training On Demand provides a convenient recordkeeping tool so you can keep your online and classroom training records all in one place.

Make sure you check the training records in each applicable rule to find out if training records are required, what OSHA wants you to include on the training records, and how long OSHA expects you to keep the records.

Even when training records aren't required, you may want to keep them anyway as a way to help organize your training program. Consider including the employee's name, the date of the training, the name of the trainer, and the topic covered.

How long do we have to keep training records?

Sometimes a rule will tell you how long to retain the training records, but more often than not, there is no record retention requirement.

If a rule doesn't specifically require a record retention time, an employer could set a policy to retain training records for a certain number of years or even for a period after employment has ended. This would be up to the employer.

Some employers may decide to keep all training records during the worker's full period of employment. This would show evidence of a complete training history.

Keep your training records up to date. If OSHA visits, you must be able to produce the record from the employee's most recent training.

How do OSHA compliance officers use training records?

The main reason for keeping training records is because OSHA requires them. But, what does OSHA look for in training records and how does a compliance officer (inspector) use them during an inspection?

OSHA inspectors will ask to see your training records when the OSHA rule in question requires you to keep the records. They'll pay attention to how much trouble it is for you to find the records. This gives them an indication of how well organized your training program is. When you can produce the records without delay, you show that your company does pay careful attention to training.

The inspector will see how complete your records are. Incomplete records point to disorganization, and may be an indication of an inconsistent training program.

Aside from training records, perhaps the most important method OSHA compliance officers use to evaluate your compliance is to ask employees about the training they've received. If workers praise the training program, you'll be in good shape. If many employees don't remember being trained, or give negative feedback about the training, OSHA will take a closer look at:

- Your training records,
- The materials you use to train,
- The methods you use to provide training, and
- The knowledge of your instructors.

How can we use training records?

After you've prepared the training records, don't just leave them to sit in the file. Training records have several uses during day-to-day operations. Use your records to:

- Help determine when annual refresher training is required.
- Keep track of an employee's qualifications for job assignment. If you see someone doing a job that requires specialized training, you can easily check to be certain he's received that training.
- Help you identify workers who have a solid training history and may be ready to handle more specialized training for jobs with more responsibility.

You aren't the only one who wants to know if the training program is effective. You should be prepared to periodically submit reports to management on:

- What training has taken place,
- Who's been trained,
- How much time was devoted to training,



- What training materials are available,
- How well training objectives have been met,
- How training has improved safety, and
- What training is planned for the future.

Wrap up

A good way to approach safety training, whether required by an OSHA rule or not, is to:

- Explain the hazards,
- Let employees know what you're doing to control the hazards,
- Show employees what you want them to do to stay safe,
- Make sure the employees understand what you've told them, and
- Follow up with observations to make sure employees are putting the training into practice.

How We Can Help

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The subject-matter experts responsible for J. J. Keller's safety and compliance content are acknowledged leaders in the safety, regulatory and compliance fields, most with decades of experience. These experts frequently attend seminars and workshops to keep their knowledge current and accurate, and ensure J. J. Keller training solutions incorporate the latest regulatory information and adult learning techniques. Their qualifications include advanced degrees in their fields of expertise, previous work experience as safety managers and auditors, and numerous industry-recognized certifications.

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Mark Stromme is one of the lead safety editors at J. J. Keller & Associates, Inc. He specializes in OSHA construction and general industry safety and is an authorized OSHA Construction Outreach Trainer. At J. J. Keller Mark researches and develops content for a variety of proprietary products, including training videos, newsletters, handbooks, manuals, and software. His work has also appeared in *ISHN*, *Occupational Health & Safety*, *Workplace HR & Safety*, *BIC*, *EHS Today*, *Modern Contractor Solutions*, and *Tow Professional*. Mark contributed to the OSHA 5810 – Hazards Recognition and Standards Training for the Oil and Gas industry and speaks frequently to industry groups about safety and regulatory issues.

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