New OSHA Outreach Training Requirements

by Tony Alotto

Most of these outreach training requirements aren’t really new, as they were announced in April and have been in effect since July. However, we are still getting card requests that do not meet the guidelines and have to be returned. Often, these denials are causing trainers to have to reassemble classes and re-teach portions of the classes because something was missed or not enough time was allotted. These corrections must be made before cards can be issued.

So, what are the current requirements? A summary of key elements are included in the following paragraphs. Current training requirements and procedures can be found on the OSHA Outreach Training Program website at osha.gov/dte/outreach/index.html.

What qualifies as training time? Training must not exceed 7.5 classroom hours per day without prior approval from OSHA. That means that the total classroom time each day cannot be more than 7.5 hours. Yes, that means that an OSHA 10-hour course will take at least two days, a 30-hour course will take at least four days, and a 15-hour course will be at least two days. The training time cannot include any time for breaks or lunch. So, a typical training day might start at 8 a.m., break at 10 a.m. for 15 minutes, break at noon for a lunch hour, break again at 3 p.m. for 15 minutes, and end at 5 p.m. on the first day. Though the total clock hours equal 9, the actual training contact hours equal 7.5 (2 hours + 1.75 hours + 2 hours + 1.75 hours = 7.5 hours total classroom time).

What about breaks? Breaks are required. You must give at least a 10-minute break every two hours of training time. You must give a lunch (or meal) break of at least 30 minutes if the training day lasts 6 hours or more; and it cannot be a “working lunch,” but must be a true break from training. Finally, you must give at least an 8-hour break between training days if the training day lasts 7.5 hours.

What about using a translator? All training times double if you have to use a translator for all of a class or any part being translated. So, if your whole class is being translated (either because of a mixed language group of students or because the instructor does not speak the language of the students), OSHA expects all training times to be doubled for the portion of the class needing live translation. OSHA expects that training will take place in the language of the student. Any translators used must have a background in occupational safety.

What about training site location and OSHA’s jurisdiction? OSHA Outreach Training cards can only be issued to students in classes that are covered by OSHA’s jurisdiction. OSHA’s jurisdiction includes the 50 states, the District of Columbia, and certain territories and jurisdictions under federal authority. Training conducted outside of OSHA’s jurisdiction can still be conducted; however, outreach cards will not be issued for these classes.

What about class sizes? OSHA wants a nice balance of a class large enough to ensure discussion, participation, and student interaction, yet not one so large as to be unwieldy since this discourages discussion and participation. Class sizes must be at least 3 students but not more than 40 students.

What about topics requirements? All Construction, General Industry, and Maritime Outreach classes are required to include the 2-hour Introduction to OSHA module. All 30-hour Outreach classes must also include the 2-hour Managing Safety and Health topic. Outreach classes for the Construction Industry must also include the OSHA Focus Four Hazards topic, which has a 4-hour mandate in the 10-hour class and a 6-hour mandate in the 30-hour class. Furthermore, Falls must make up at least 1.25 hours (one hour and 15 minutes) of the Focus Four requirement; Electrocution, Struck-by, Caught-in/-between must make up the remaining time and must be covered for a minimum of one-half hour each.

This is just a quick summary of some of the key changes. Please go to osha.gov/dte/outreach/index.html to read and download the New Program Requirements, Key Changes Flyer, and Trainer Procedures for your specific industry segment. There you can also obtain the latest set of PowerPoint files for your use in training, Fact Sheets to give to students for each of the topics, and other training support materials.

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