

Monitoring: Key to Success

by Tony Alotto

OSHA has recently initiated a new requirement for all of the OSHA Training Institutes regarding monitoring of OSHA Authorized Outreach Trainers. This consists of two parts: 1.) a record audit, which may be conducted on the paperwork that must be kept by all OSHA Authorized Outreach Trainers, and 2.) a training observation, which may be conducted to assess one of your outreach classes.

As you know, normally, all that is required for submission of card requests are the appropriate Outreach Training Program Reports for Construction, General Industry, Maritime, or Disaster Site Worker. However, as an Authorized OSHA Outreach Trainer, you must keep several other documents, listed in the OSHA Outreach Training Program Requirements, for a period of five years. A record audit will require you to provide copies of all required documents for a selected time period or for a number of courses.

Why does OSHA want to do record audits? OSHA requirements have changed over time. Depending on the type of class conducted, you are required to teach a select number of hours per day, spend specific amounts of time on selected topics, ensure you have student sign-in sheets, and meet other OSHA mandates. A record audit is an opportunity to review those required documents to ensure you are meeting your obligation as an Authorized Outreach Trainer. We have found that most problems identified through a record audit either can be quickly remedied, or can be remedied going forward. Most often, a record audit is “after the fact.” Therefore, it does not impact a card request in progress.

Why does OSHA want to do training observations? A training observation is just that; one of our qualified TEEX instructors will simply show up at one of your classes to observe all or part of the class. The purpose of this observation is to ensure that all of the correct paperwork is being completed, the class sizes are within OSHA guidelines, the appropriate topics are being taught (depending on the class type), and the OSHA required minimum and maximum amounts of training time are being applied. Training should be conducted in a professional manner and should incor-



porate the following practices:

- appropriately using audio/visual media, hands-on demonstrations, and class discussions,
- focusing on hazard awareness, recognition, and mitigation, and
- providing fact sheets to the students for each topic covered.

We have all sat through good training and bad training. OSHA wants to ensure that the training provided by its Authorized Outreach Trainers is high quality, professional, and appropriate to the audience.

What's in it for you? As an outreach trainer, you can gain from a record audit by correcting any paperwork problems early as you work directly with the OTI center. These problems are most often caused by a misunderstanding of the requirements or not being aware of changes in OSHA paperwork retention requirements. You stand to gain even more from a training observation: minor problems can be corrected without OSHA's intervention; training tips, techniques, updated materials, etc. are available; and the monitoring report can provide you direct feedback that can help improve your training.

More information about the Monitoring and Audit program can be found in Section IX of the OSHA Outreach Training Program Requirements document which can be found at: osha.gov/dte/outreach/program_requirements.html

If you have any questions, please contact Tony Alotto at the TEEX OSHA Training Institute Southwest Education Center (OTISEC) at 800-SAFE-811 (800-723-3811).

Note: Tony Alotto is the TEEX OTISEC Outreach Coordinator.



Class Schedule

The following classes are being taught February-April, 2012, by TEEX's OSHA Training Institute Southwest Education Center. To see additional OSHA class schedules, go to teex.org/osh and click the "complete list of courses."

If you are interested in becoming a TEEX Certified Safety & Health Official™ (CSHO), visit teex.org/csho. For more information, email us at otisec@teexmail.tamu.edu, or call 800-SAFE-811 (800-723-3811).

OSH500 – Trainer Course in Occupational Safety & Health Standards for the Construction Industry (31 Hours, 4 Days)

OS-OSH500-112	Feb 14-17	Austin, TX
OS-OSH500-106	Mar 12-15	Mesquite, TX
OS-OSH500-111	Mar 20-23	Albuquerque, NM
OS-OSH500-107	Mar 20-23	San Antonio, TX
OS-OSH500-108	Apr 24-27	Mesquite
OS-OSH500-98	Apr 24-27	San Antonio

OSH501 – Trainer Course in Occupational Safety & Health Standards for General Industry (31 Hours, 4 Days)

OS-OSH501-141	Feb 14-17	Mesquite, TX
OS-OSH501-134	Feb 28-Mar 2	New Iberia, LA
OS-OSH501-150	Mar 6-9	Corpus Christi, TX
OS-OSH501-149	Mar 20-23	Austin, TX
OS-OSH501-142	Mar 27-30	Houston, TX
OS-OSH501-143	Apr 2-4	Mesquite, TX
OS-OSH501-133	Apr 24-27	Bryan, TX

OSH502 – Update for Construction Industry Outreach Trainers (19.25 Hours, 3 Days)

OS-OSH502-62	Feb 6-8	San Antonio, TX
OS-OSH502-65	Feb 13-15	Bossier City, LA
OS-OSH502-66	Apr 9-11	Oklahoma City, OK

OSH503 – Update for General Industry Outreach Trainers (19.25 Hours, 3 Days)

OS-OSH503-68	Feb 8-10	San Antonio, TX
OS-OSH503-70	Feb 15-17	Bossier City, LA
OS-OSH503-71	Apr 11-13	Oklahoma City, OK
OS-OSH503-69	May 16-18	Mesquite, TX

OSH510 – Occupational Safety and Health Standards for the Construction Industry (31 Hours, 4 Days)

OS-OSH510-113	Feb 14-17	San Antonio, TX
OS-OSH510-120	Mar 6-9	Albuquerque, NM
OS-OSH510-116	Mar 6-9	Mesquite, TX
OS-OSH510-114	Apr 2-5	San Antonio, TX
OS-OSH510-115	Apr 10-13	Mesquite, TX
OS-OSH510-117	Apr 17-20	Houston, TX

OSH511 – Occupational Safety and Health Standards for General Industry (31 Hours, 4 Days)

OS-OSH511-176	Feb 14-17	Mandeville, LA
OS-OSH511-191	Feb 21-24	Abilene, TX
OS-OSH511-190	Feb 28-Mar 2	Corpus Christi, TX
OS-OSH511-177	Mar 20-23	Mesquite, TX
OS-OSH511-182	Apr 10-13	Bryan, TX

Outreach insideR



The TEEX *Outreach Insider* is a publication of the OSHA Training Institute Southwest Education Center (OTISEC), Texas Engineering Extension Service (TEEX). TEEX is a member of The Texas A&M University System. This newsletter's primary audience is OSHA Authorized Outreach Trainers and focuses on information important to that primary audience. If you have suggestions for improving this newsletter, please contact us (see below).

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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.

If you have questions, please contact Tony Alotto at the TEEX OSHA Southwest Education Center at 800-SAFE-811 (800-723-3811).

Note: Tony Alotto is the TEEX OTISEC Outreach Coordinator.



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Welcome!

This is the inaugural issue of the *TEEX Outreach Insider*. Our aim is to make you as well-informed and successful as possible. Please let us know how we can improve this newsletter to better serve you.

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