



OSHA NOTICE

U.S. DEPARTMENT OF LABOR

Occupational Safety and Health Administration

DIRECTIVE NUMBER: 04-07 (CSP 02)

EFFECTIVE DATE: 08-25-04

SUBJECT: Consultation Policies and Procedures Manual Chapter # 5

ABSTRACT

- Purpose:** This Notice cancels and replaces Chapter 4 (titled Training and Assistance Visits) of the Consultation Policies and Procedures Manual, OSHA Instruction CSP 02-00-001 [TED 3.6]. It implements one of fourteen (14) chapters in the CPPM, which provides the overall policy framework for administering the OSHA Consultation Program. This chapter outlines policy on how to conduct training and assistance visits for the OSHA Consultation Program.
- Scope:** This Notice applies OSHA-wide.
- References:** The IMIS Consultation Data Processing Manual [IRT 01-00-013]; Safety and Health Program Management Guidelines [FR 54: 3904-3916]; Standard Element Paragraph (STEP) Manual [CNS3.6]; 29 Code of Federal Regulations 1908, Cooperative Agreements.
- Cancellations:** OSHA Instruction CSP 02-00-001 [TED 3.6], Chapter 4 August 06, 2001.
- Expiration Date:** This Notice will expire on December 31, 2005.
- State Impact:** States operating Cooperative Agreements under Section 21 (d) of the OSH Act are required to follow the instructions outlined in this Notice. States operating their private sector consultation programs under their State plans with 23(g) funding must have requirements at least as effective as those outlined in this notice.
- Action Offices:** National, Regional, and Area Offices
- Originating Office:** Directorate of Cooperative and State Programs

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By and Under the Authority of
John L. Henshaw
Assistant Secretary

Executive Summary:

This Notice cancels and replaces Chapter 4 (titled Training and Assistance Visits) of the Consultation Policies and Procedures Manual, OSHA Instruction CSP 02-00-001 [TED 3.6]. It implements one of fourteen (14) chapters in the CPPM, which provides the overall policy framework for administering the OSHA Consultation Program. This chapter outlines policy on how to conduct training and assistance visits for the OSHA Consultation Program.

Significant Changes:

- A. Offsite training must be coded as an intervention.
- B. Updated criteria for Informal Training.

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Chapter 5

Training and Assistance Visits

- I. Training. Consultants help employers determine their training needs and may provide training to employers and employees concerning the: 1) identification, 2) control, and 3) elimination of hazards. The consultant may provide formal or informal training, as long as a hazard survey has been completed within the past 12 months. The training should be based on the employer's needs as described below.
 - A. Formal Training. Consultants provide formal training in a classroom-like setting, following a syllabus which, upon completion of the training, must be placed in the case file. Formal training may take place onsite or offsite:
 1. Onsite Training. Training visits may only be conducted on-site when specifically requested by the employer and only in conjunction with or within twelve months of a hazard survey. If the training visit is subsequent to a hazard survey not conducted by the Consultation Project, the consultant must have access to the survey report and be able to confirm that serious hazards were or are being corrected. The consultant must also conduct a brief walk-through of the workplace to verify hazard corrections and review current conditions to determine that no new hazardous conditions exist.
 2. Offsite Training. Off-site training is technical in nature and takes place at a location other than the employer's place of business. It may be coded as either a visit or an intervention, based on the following criteria:
 - a. Offsite training is provided for a single employer and directly connected to one or more hazards found during an initial or follow-up visit. Offsite training activity should be recorded on the Visit Form (Form 30).
 - b. Offsite technical training is not directly related to an on-site visit (as specified in 2(a) above). Offsite technical training should be recorded as an intervention on the Intervention Form (Form 66). A hazard survey is not a prerequisite for providing this service.

- B. Informal Training. Consultants may provide informal safety and health training to employers and employees while conducting a hazard survey. Informal training does not involve any planned preparation or a syllabus. Training should be tailored to specific safety and health hazards observed at the workplace.

II. Training Documentation.

- A. During the Initial Visit. Training services provided during the initial visit must be included in the written report to the employer.
- B. Following the Written Report. Training services provided after the written report has been sent to the employer must be followed-up with a letter describing the training to the employer and a copy of the letter must be placed in the case file.

III. Recording Training Time. Instructions for recording training activity can be found in the IMIS Consultation Forms Manual (IRT-01-00-13).

IV. Trainers Qualifications.

- A. Informal Training. To be qualified to provide informal training the consultant must have:
 - 1. Completed the Basic On-Site Consultation (OSHA 1500) course;
 - 2. Completed the Safety and Health Program Evaluation (OSHA 2450) course; and
 - 3. Have subject matter knowledge in the area of the training being offered.
- B. Formal Training. To be qualified to deliver formal training the consultant must meet all of the requirements for informal training and all of the following:
 - 1. Be selected by the Consultation Project manager to deliver formal training; and
 - 2. Be trained as a trainer.

V. Resource-Related Considerations.

- A. Economies of Scale. Offsite training leverages resources when one consultant can address a common training need for multiple employers.

- B. Training Coordination. To avoid duplication of effort and to ensure the most efficient use of limited consultation resources, requests for off-site training approved by the Consultation Project Manager should be coordinated with other providers of similar or related training. In particular, the Consultation Project Manager should coordinate with Susan Harwood grantees, the OSHA Training Institute, OSHA Strategic Partnership Participants, Alliance members, and Small Business Development Centers. In addition, the Consultation Project Manager should also coordinate with the OSHA's Compliance Assistance Specialists and other regional or State personnel to assure that joint training sessions are conducted where appropriate.

- C. Over-Reliance on Consultants by Employers. One result of successful training by consultants is that employers may come to rely on or to expect consultants to provide all of their safety and health training. To conserve scarce resources, consultants should encourage employers to develop their own training programs.