

QUARTERLY SPECIAL REPORT

TOP OSHA TRAINING MISTAKES AND HOW TO AVOID THEM

SAFETY
& HEALTH



INTRODUCTION

To help employees protect themselves from hazards, employers need to provide training. The better the training, the better employees can protect themselves. Unfortunately, training can fall short in a number of ways.

First, employers might fail to identify all training needs. Numerous OSHA standards require training, but many others imply a need for training without explicitly using words like “train” or “training.” However, employers have been cited for failing to deliver training even when a regulation doesn’t specifically require it.

Second, effective training must cover hazards specific to the work environment and must be delivered in a memorable manner. If employees don’t remember the training or don’t understand how to apply the information on the job, the training wasn’t effective. Our experts frequently get questions about the qualifications for trainers, but even the most qualified person (on paper, at least) will not necessarily deliver effective training.

Finally, employees usually need refresher training, regardless of whether OSHA requires it. Even if initial training was effective and memorable, employers should not expect trainees to remember all the details without an occasional refresher. Delivering refresher training also allows the employer to cover topics that need more emphasis, especially problem areas identified by injury reports, and to reiterate the importance of following procedures.

By recognizing and addressing these potential shortfalls, employers can better ensure that their training is complete, comprehensive, memorable, and repeated when needed. This paper will examine each potential shortfall and provide examples.



IDENTIFY ALL TRAINING NEEDS

Many OSHA regulations don't explicitly mention training, but effective training could help prevent injuries. The following examples illustrate training needs that might be overlooked or underappreciated. These standards don't include words like "train" or "training," but delivering effective training is clearly beneficial.



MACHINE GUARDING

OSHA does not require training machine operators, but has cited employers for failing to address recognized hazards. Machines that require guarding could cause a serious injury, so even though OSHA doesn't explicitly require training, the agency has issued citations for lack of training under the General Duty Clause.

A hazard may be recognized if the operator manual addresses it, such as warning that guards must be properly installed and functioning. Workers using machines need to understand the purpose of the guards and how they work. They must also know to never bypass a guard, and to stop work if a guard is faulty. Each machine is unique, and the instruction manual is a good place to start.

A related issue involves abrasive wheels: OSHA often issues citations for improperly adjusted work rests. Again, this is an area where training could help.

ELECTRICAL SAFETY

Any employee who uses equipment or tools powered by electricity likely requires training. Electrical safety training isn't just for electricians, and is a commonly overlooked training area.

For instance, 1910.303(b)(2) says, "Listed or labeled equipment shall be installed and used in accordance with any instructions included in the listing or labeling."

Although this does not mention training, it does require employers to ensure that workers follow any instructions for using specific equipment. Problems may arise if, for example, someone exceeds the capacity of a power strip, uses the wrong size or rating of an extension cord, or overloads an electrical outlet. Employees must know and follow any warnings and limitations on electrical equipment.

Similarly, 1910.334 says, "Portable equipment shall be handled in a manner which will not cause damage" and "portable cord and plug connected equipment and flexible cord sets (extension cords) shall be visually inspected before use on any shift for external defects."

Employees need training on proper equipment handling, including how to inspect cords before use. Without training, workers may not know what type of damage would require removing a tool or cord from service.

Note that OSHA recommends against using electrical tape to cover minor nicks on cords because the tape can prevent a thorough inspection. If workers wrap tape around tool or extension cords, the employer may need to deliver some training.



EMERGENCY EQUIPMENT AND EXIT ROUTES

All too often, employees cause violations by blocking areas that must remain clear. OSHA frequently cites employers for blocking emergency exit routes, failing to maintain clear space around electrical panels, or blocking access to fire extinguishers or eyewash stations.

Marked aisles in a plant or warehouse are often part of an exit route and must be kept clear at all times. Blocking exits or emergency equipment could result in serious injuries or fatalities, so these violations are cited as “serious” with correspondingly high fines.

OSHA requires three feet of clearance around most electrical panels. Employers often paint lines on the floor to keep the area clear, but sometimes find boxes or other items in the marked area. Similar problems can happen with fire extinguishers or eyewash stations.

If emergency routes or equipment get blocked, the employer may need to deliver training on the importance of keeping those areas clear. This can help avoid citations and, more importantly, ensure that emergency equipment is readily available when needed.

***BLOCKING EXITS OR
EMERGENCY EQUIPMENT
COULD RESULT IN SERIOUS
INJURIES OR FATALITIES.***



PROVIDE ADEQUATE TRAINING

After identifying all training needs, employers must deliver training that covers all required elements, and in a manner that employees will remember. For example, if employees don't apply what they learned in the near future, the information is likely to fade from memory. In addition, training might need to be delivered in languages other than English, depending on the workforce. Training won't be effective if language or vocabulary barriers limit worker comprehension.

Note that even though OSHA outlines trainer qualifications in many standards, the agency rarely challenges a trainer's qualifications. Generally, OSHA focuses on whether employees learned and retained the required information. To illustrate, the following offers some common OSHA citations involving training.



LOCKOUT/TAGOUT

The Control of Hazardous Energy (Lockout/tagout) Standard always makes OSHA's annual list of top ten violations. Not all citations are for training, but many are. In particular, OSHA frequently issues citations under the paragraphs for training authorized employees in hazardous energy sources, the type of energy, and the methods for isolation and control.

Citations don't necessarily mean the employer failed to provide any training. Perhaps employees got some training, but it didn't cover all required elements. Similarly, if the OSHA inspector questions employees, but they can't answer specific questions, OSHA may cite the employer for a training failure. Sometimes, an OSHA inspector may show up in response to a reported serious injury and determine that a lack of training was a contributing factor.

Energy sources include electrical, mechanical, hydraulic, pneumatic, chemical, thermal, and others. A lot of equipment uses more than one type, and workers must receive training for everything they'll encounter. In addition, they need to know and follow the employer's procedures for isolating and controlling that energy.

In particular, Subpart S on electrical hazards provides additional requirements. Simply pushing an emergency stop button does not isolate electricity. A qualified person must verify that electrical hazards are de-energized, and the authorized employee under lockout/tagout is not necessarily also a qualified person under Subpart S.

Finally, keep in mind that "affected" and "other employees" who work in areas where energy control procedures are used also require training. This may include temps from a staffing agency, if they're assigned to work in those areas.



POWERED INDUSTRIAL TRUCKS

The Powered Industrial Trucks Standard also regularly makes OSHA's list of top ten violations. Again, not all citations are for training, but many are. Employers certainly train their forklift operators, but this standard keeps getting cited for a number of reasons.

- ▶ If an OSHA inspector questions the operator, but the operator cannot answer safety questions, OSHA may cite the employer for a lack of training.
- ▶ If the OSHA inspector sees the operator doing something unsafe, like failing to sound the horn at an intersection, OSHA may cite the employer for lack of training.
- ▶ If the operator was involved in an accident, OSHA is likely to examine the operator training program and question the operator on safety rules.

In some cases, an OSHA inspector notices a problem with the truck, like a headlight not working. That should be noted during a vehicle inspection, but if the operator is driving the forklift anyway, OSHA may issue a citation for lack of training.

Citations may also be issued for failure to provide refresher training. If an operator is involved in an accident, for example, the employer probably documented the incident, and should have documentation that refresher training was provided. Similarly, if an operator was observed doing something unsafe, refresher training must be provided and should be documented.

Note that the forklift standard requires refresher training “in relevant topics” so the employer doesn’t have to repeat a full training program. As an example, if the operator was carrying an unstable load, refresher training might focus on how to recognize an unstable load and how to secure it. In addition, that employer may also want to train the workers who stack the loads, since the forklift operator probably didn’t stack items on a pallet.



HAZARD COMMUNICATION

Hazard communication is also one of OSHA's top ten violations. Employees must be trained when assigned work that would be covered by the standard. Keep in mind that employees who do not actually use chemicals but only handle sealed containers (like in warehousing or shipping) still need some training.

Also, the standard allows employers to deliver training that covers the specific chemicals used. This is common

if employees only work with a few different substances. However, if a new chemical is added, or an employee transfers to an area with different chemicals, the extra training required might be overlooked.

Finally, if employees can't answer questions from OSHA during an inspection — for example, if they don't know where to get safety data sheets or how to read labels — OSHA may cite that as a training violation.




DELIVER EFFECTIVE TRAINING

Trainees are more likely to remember the information presented if the speaker is enthusiastic about the content and the trainees view the material as valuable, relatable, and applicable.

Since most employees don't look forward to training, keeping their interest can be tough. If the presenter isn't passionate about the topic, the training will suffer, and trainees' attention will wander. Sharing stories and real-life examples to illustrate the importance of the material can help keep everyone engaged.

Another way to increase engagement is to explain how the material impacts the trainees personally. By making the content relatable, the trainer can better keep everyone's attention, and they'll be more likely to remember the information.

Showing the benefits is also important. People attend seminars on topics like "how to get rich" because they're hoping to get something out of it. If safety training doesn't deliver something that trainees view as a positive outcome, they won't see the value and may lose interest. Show them the benefits of safety, not just the hazards to be avoided.

A man and a woman wearing yellow hard hats and high-visibility vests are looking at a tablet together in an industrial setting. The man is pointing at the screen while the woman looks on attentively.

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EMPLOYEES THE BENEFITS OF
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TO BE AVOIDED.***



Often, training programs include a lot of “do not’s” but workers need action items that they can apply on the job. Training can offer more “do’s” and fewer “do not’s” by applying relatively simple changes. For example:

- ▶ Instead of saying, “Do not block the fire extinguisher,” try saying, “Make sure the fire extinguisher is always accessible.”
- ▶ Rather than telling forklift drivers, “Never carry unstable loads,” try saying, “Verify that the load is stable before moving it.”

When delivering training, the audience will be more engaged, more likely to remember the material, and more likely to follow the training if they understand how the material is relevant. If the trainer shows interest in the topic, makes the content relatable, highlights the benefits, and provides more action items than “do not” items, most trainees should pay attention. However, if the trainer does not personally understand or support the material, the trainees won’t be engaged.

DELIVER REFRESHER TRAINING

Employers may need to deliver refresher training even if OSHA does not require it. A number of standards require annual refresher training, but most do not. However, if employees don't remember key information, the employer should deliver refresher training.

Remember, if employees cannot answer questions from an OSHA inspector, the company can be cited for lack of training, even if someone waves a piece of paper showing that the employee attended training.

To determine when refresher training might be needed, select a few employees and ask specific questions about things they should have learned. If they can't answer, then refresher training is probably needed.

Reviewing injury logs might also indicate a need for refresher training. Hopefully, employees report near-miss incidents as well as injuries. A pattern of injuries or near-miss reports likely indicates a need for more training.



Conducting self-audits can also identify training shortfalls. If audits find violations like blocked fire extinguishers or exit routes, that means employees aren't correcting those violations. (In fact, employees are probably causing those violations.) Additional training may be needed.

Finally, if employees were trained more than a few years ago, it's probably worth going back and delivering some refresher training.

If OSHA doesn't specifically require refresher training, the employer doesn't have to go through an entire program. Refresher training can simply touch on key points, perhaps focusing on problems identified. When planning to deliver regular refresher training, consider covering different points each year to keep the content fresh rather than covering the same material every year.

***TO BE EFFECTIVE,
TRAINING MUST BE
MEMORABLE AND
RELATABLE.***



SOLUTION: COMPREHENSIVE, EFFECTIVE, REPEATED TRAINING

Reviewing applicable regulations for training requirements is a good start, but keep in mind that training may be needed even if OSHA doesn't specifically require it. OSHA can issue citations for lack of training under the General Duty Clause where training could have addressed a recognized hazard.


Employees are less likely to recognize hazards or follow safe procedures without effective training. To be effective, training must be memorable and relatable. If employees don't remember what they learned or don't understand how it applies on the job, the training wasn't effective.



Review training records to determine when training was last delivered. If it's been more than a few years, question a few workers on what they remember; this can help identify any knowledge or skills gaps. Also, review incident reports and audit the workplace. If audits find any problem areas, consider refresher training to address those issues.

Update the training materials to keep employees engaged during refresher training. Delivering the same content year after year can get boring for the attendees.

Finally, when delivering training, remember to show the benefits and how the content applies to the trainees. They need to understand that your ultimate goal is to keep them safe.



Trainings

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Ed joined J. J. Keller & Associates, Inc. in 1999 and currently specializes in safety issues such as injury recordkeeping, walking-working surfaces, and forklifts. He is responsible for researching regulatory activity and issues facing EHS professionals in order to develop and update content for J. J. Keller's EHS products.

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