

Recommendations for Consideration by the Secretary of Labor
on Uniform Occupational Safety and Health Training
Guidelines for the Federal Government

Prepared by the
Federal Advisory Council on Occupational Safety and Health
(FACOSH)

EXECUTIVE SUMMARY

On June 7, 2011, the Federal Advisory Council on Occupational Safety and Health (FACOSH) tasked its Training Subcommittee with developing occupational safety and health (OSH) training guidelines that would achieve consistency at all staff levels across the Federal Government for training requirements contained in 29 CFR Part 1960. The guidelines are designed to provide training that is tailored to the broad set of responsibilities and duties that are applicable for a given staff level. Agencies can utilize the guidance to identify and address deficiencies and gaps in their OSH training programs. The following recommendations for FACOSH, as well as the attached Training Guidelines (Appendix A) and the generic training Standard Operating Procedures (Appendix B) are the product of the subcommittee's effort.

ISSUE

To achieve consistent safety and health training across the Federal Government, there is a need for uniform OSH training guidelines at all staff levels.

RECOMMENDATIONS

- 1A)** The Secretary should direct OSHA to develop and issue Occupational Safety and Health (OSH) training guidelines for federal agencies. The guidelines should:
- a. Establish a fundamental baseline of OSH training elements that federal agencies should use when developing and providing training for federal employees.
 - b. Address the frequency and duration of required OSH training.
 - c. Identify a method or means of assuring that federal agencies provide employees with required OSH training and that the employees understand the OSH training that they receive.
 - d. Give agencies latitude to implement the most effective and efficient methods of delivering required OSH training.
 - e. Require agency heads to develop and implement a program for evaluating the effectiveness of their OSH training and training delivery methods.
 - f. Include a sample Standard Operating Procedure to aid agencies with the implementation of the OSH training guidelines.
- 1B)** The Secretary should direct OSHA to revise 29 CFR Part 1960: 1) for agencies to provide employees with annual OSH training that covers new or emerging hazards as well as issues of importance to a given agency or job task/function and 2) to make the failure to provide annual OSH training citable by OSHA.

- 1C)** The Secretary should direct OSHA to send a memorandum to the Designated Agency Safety and Health Officials (DASHOs) announcing the issuance of OSH training guidelines for federal agencies. The memo should encourage DASHOs to utilize safety and health experts from whatever source available when developing OSH training, including but not limited to other agencies, professional groups, consultants, universities, labor organizations, and safety and health committees.
- 1D)** The Secretary should correspond with agency heads emphasizing their responsibility to provide employees with OSH training consistent with the revised standards of 29 CFR 1960.
- 2A)** The Secretary should send a memorandum to the Director of the Office of Personnel Management (OPM) requesting that OPM training orientation, training resources, and the OPM Federal Training Policy Handbook include OSH information and materials for supervisors, managers, and executives that will enable them to implement the OSH programs of their agencies. Such orientation should include coverage of Section 19 of the Occupational Safety and Health Act of 1970, Executive Order 12196, and the requirements of 29 CFR 1960.
- 2B)** The Secretary should request that OPM distribute OSHA training requirements by: 1) posting them to the OPM website, and 2) communicating them to agency heads, human resource departments, and Employee Assistance Programs.
- 2C)** The Secretary should request that OPM update the section of the OPM Federal Training Policy Handbook titled, Supervisory, Managerial, and Executive Development Federally Mandated Training, to include OSH training time-frames for all employees and for supervisors.
- 3A)** The Secretary should direct OSHA to monitor agencies' OSH training programs through inspections and evaluations. During monitoring activities, OSHA should verify that employee training records are retrievable and clearly identifiable as meeting the requirements of 29 CFR 1960.
- 3B)** The Secretary should direct OSHA to include a requirement in the annual report for agency heads to provide written summaries of their OSH training and self-evaluations, including: 1) evidence verifying that OSH training was developed in accordance with the requirements set forth in 29 CFR 1960 and EO 12196; 2) a list of the training conducted, 3) information pertaining to the matrix the agency used to evaluate the effectiveness of its OSH training and training delivery methods; and 4) documentation of the funding allocated to OSH.

- 3C)** The Secretary should direct OSHA to widely publicize the new reporting requirements for training to the DASHOs and safety and health managers, prior to including it in the annual report request.

APPENDIX A

The following list contains the names of FACOSH members, Technical Experts, and OSHA staff who actively participated on the Training Subcommittee during its analysis of safety and health training requirements for all staff levels of federal agencies.

FACOSH Members

Dennis Bushta, Deputy Director, Office of Administration, U.S. Environmental Protection Agency

Deborah Kleinberg, Counsel, Seafarers International Union, AGLIWD

William Kojola, MS, Industrial Hygienist, Safety and Health Department, AFL-CIO

Milagro “Milly” Rodriguez, Occupational Health and Safety Specialist, AFGE

Technical Experts

Craig Brown, Senior Industrial Hygienist, U.S. Department of Veteran Affairs

Henry Cleveland, Program Analyst, U.S. Department of Veteran Affairs

Edward Collier, U.S. Environmental Protection Agency

Cathie Cronin, Director, Office of Training and Educational Development, Occupational Safety and Health Administration, U.S. Department of Labor

Chesha Gartmon, Program Manager, U.S. Department of the Treasury

Brian Marcyjanik, General Safety Program Manager, U.S. Department of Veteran Affairs

Brenda Miller, Senior Safety Advisor, U.S. Department of the Army

Lynn M. O'Brien, CP-12 Program Administrator, U.S. Department of the Army

Daniel Pubal, Safety and Occupational Health Manager, Federal Aviation Administration

David Smith, Manager, Occupational Safety and Health Program, U.S. Department of Energy

Howard Wilson, Deputy Director, Safety, Health and Environmental Management Division, U.S. Environmental Protection Agency

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