



THE LIMITS OF ONLINE
TRAINING FOR OSHA
COMPLIANCE

2/20/2020

TODAY'S AGENDA

Moderator



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Webinar Speakers



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1. About SitePro
2. Concerns About Online Training
3. New Updates to OSHA's RFI
4. Computer Based Training Shortcomings
5. Future of Online Training & Your Business
6. Q&A



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- Industry experts for risk control guidance and proper valuation of operations & equipment
- Competitive rates & flexible payment plans
- Expert claims handling
- World-class risk control services

Eligibility Map

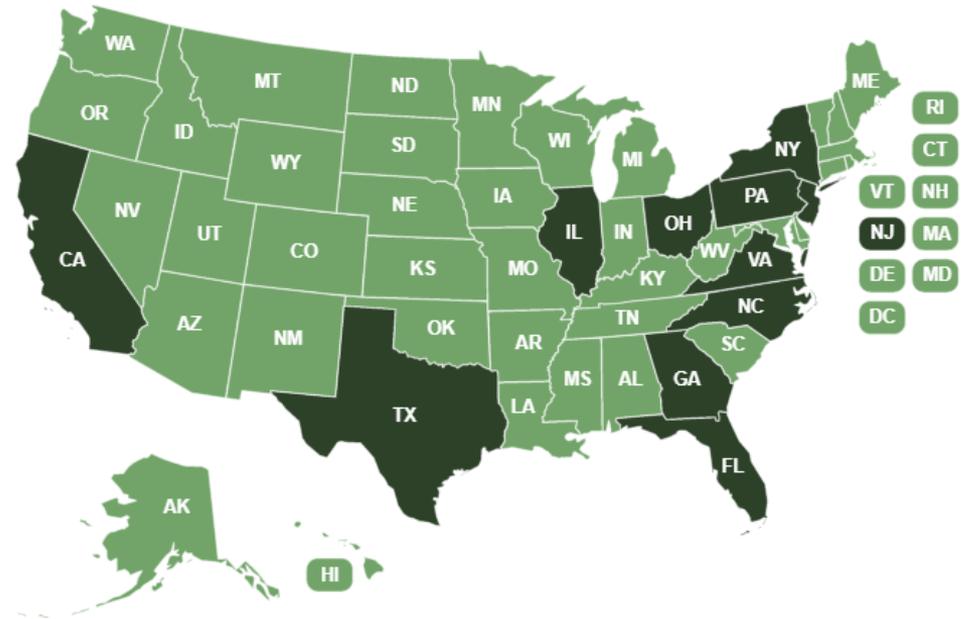
Available in ALL states



Target States



Other Eligible states



THE LIMITS OF ONLINE TRAINING FOR OSHA COMPLIANCE

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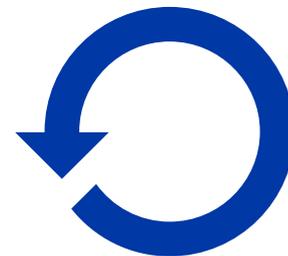
Safety & Health



BOOTS ON THE GROUND



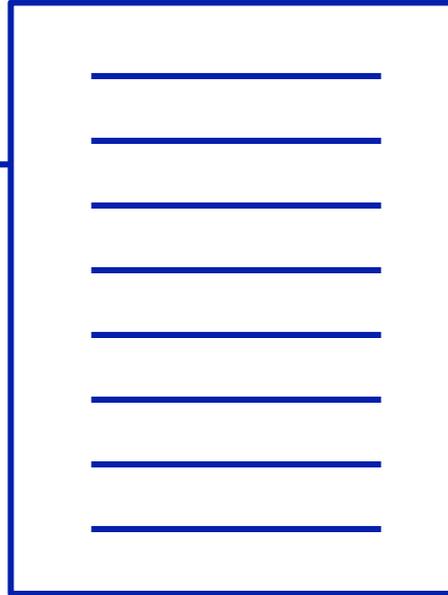
NATIONWIDE



360° DEFENSE

Why sudden concerns about online training?

JULY 2019
LETTER OF
INTERPRETATION



OCTOBER 2019
RFI: ONLINE
TRAINING FOR 10-
HOUR / 30-HOUR
COURSES

What's new?

How OSHA answered a July 2019 letter...

THEN

Letters focused on specific questions and standards. For some purposes, some online training might have been enough.

NOW

Q&A more general about online training. “Would not be sufficient” by itself unless it “contains interactive and hands-on components.”

What else is new?

OSHA's RFI on online 10/30-hour training

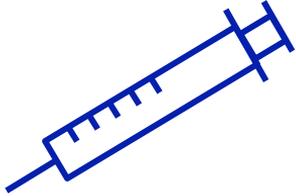
- OSHA may update online 10-hour & 30-hour training.
- But OSHA notes: This training is not necessarily compliant. Often need supplemental site-specific, interactive, and/or hands-on.
- In 2009, OSHA froze the online program – too many complaints:
 - Fraud (people impersonating others)
 - Attempts to complete in less than minimum required time
 - Problems with timely issuance of completion cards
 - Poor customer service and technical support
 - Misleading advertising.

Since 1994: Online training can't satisfy all OSHA requirements

- OSHA has often responded to questions that different standards require different training for different situations/activities.
- Not one-size-fits-all. 2019: “emphasize the importance of reviewing specific OSHA standards and related guidance to determine what OSHA requires in specific situations.”
- Often, OSHA said where online training was insufficient for various particular standards.



CBT insufficient for...



1997

Bloodborne pathogens

Need site-specific elements, training for particular duties, and practice with PPE like removing gloves.



2004

HAZWOPER

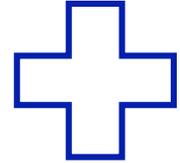
Online can be part of program, only if “supplemented” by opportunity to ask questions of qualified trainer and with “hands-on familiarity with protective equipment.”



2011

Powered industrial trucks

Requires practical demonstrations, exercises, and trainee evaluation.



2012

First and CPR

“These standards require training in physical skills, such as bandaging and CPR. The only way these physical skills can be learned is by actually practicing them,” including practicing with mannequins and partners.

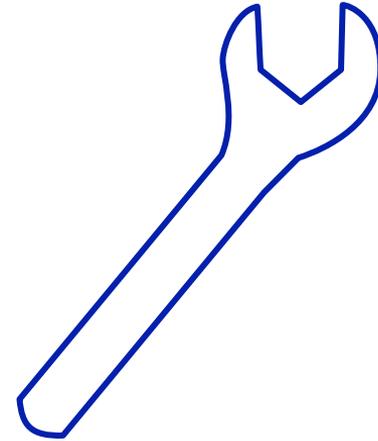
Example: CBT insufficient for HAZWOPER.

- 1994 OSHA letter said computer-based training was insufficient.
- “Essentially the same” as OSHA viewed on training videos.
- OSHA worried that employees need:
 - Site-specific and job-specific training.
 - Ability to ask questions.
 - To become “familiar with equipment and safe practices in a non-hazardous setting” like hands-on training and exercises.
 - Supervision: Confirmation they “mastered the necessary skills.”

What's missing from computer-based training?

Hands-on experience.

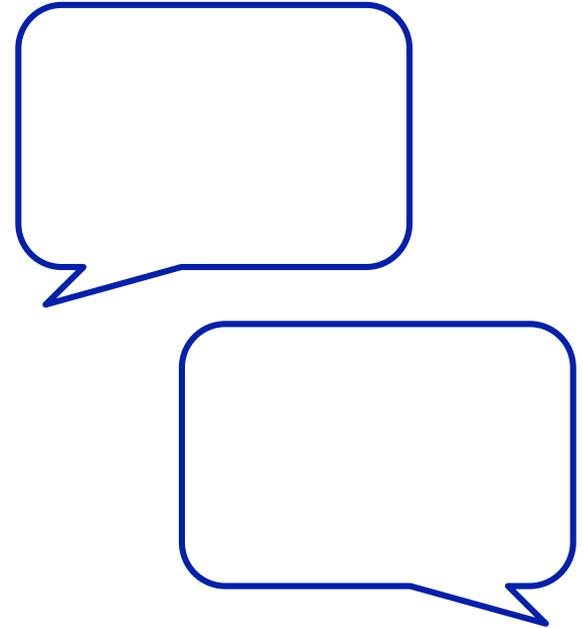
- OSHA likes hands-on components.
- Ability to “interact with equipment and tools in the presence of a qualified trainer(s).”
- “[L]earn or refresh . . . skills through experience.”
- Trainer evaluation to “assess whether the trainees have mastered the proper techniques.”



What's else is missing from CBT?

Timely Q&A and interactivity.

- OSHA expects training will include “opportunity for workers ... to ask questions of, and receive responses from, a qualified trainer(s), in a timely manner.”
- For best learning, interaction should not be “delayed or limited.”
- One solution: Telephone hotline to call a qualified trainer directly during the training.



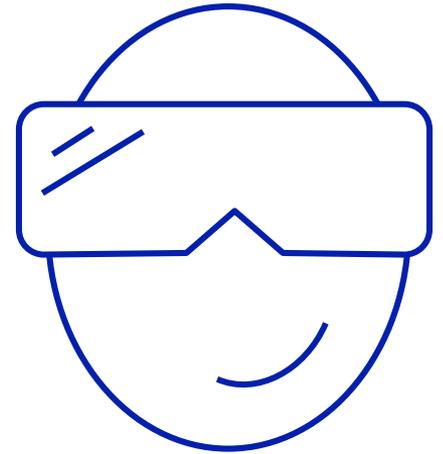
Example: Current 10-hour/30-hour programs

OSHA has made similar points when setting the requirements for OSHA 10-hour and OSHA 30-hour programs, which must:

- Be “participatory.”
- Include “interactive activities,” such as “workshops, case studies, exercises, and demonstrations” with student participation.
- Generally limit amount of material delivered via videos.
- Have minimum class sizes for more interaction.
- Offer two-way communication with trainers for quick responses.

Virtual training as the future?

- OSHA asks: How interactive should it be?
- Four possible levels of interactivity –
 1. Purely passive (view text/graphics and click to next screen).
 2. “Limited” (also multiple choice questions).
 3. “Complex” (also fill in empty fields with answers).
 4. “Real time” (life-like simulation with cues and responses like virtual reality or flight simulators).



What should you do now?

Audit your programs!

- Review site and workforce exposures. Which rules with training apply?
- Include site-specific and hazard-specific training.
- Is your training interactive?
- Do you offer timely Q&A?
- Do you evaluate successful learning?
- Can you add hands-on? See, touch, feel, try.
- Invite ideas from your employees.

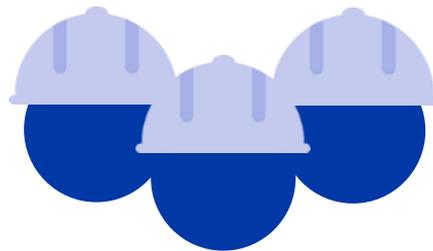
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Questions?



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Q & A

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