Owner Health and Safety Training:

Stay Healthy and Safe While Giving Manicures and Pedicures:
A Guide for Nail Salon Workers

A joint project of the California Healthy Nail Salon Collaborative (CHNSC)
and the Labor Occupational Health Program (LOHP)
at the University of California at Berkeley

Checklist

☐ University of Connecticut’s guide, “I’m Pregnant... How Can I Protect Myself and My Pregnancy if I Keep My Job at the Nail Salon?” (in Vietnamese)
☐ U.S. Environmental Protection Agency guide, “Protecting the Health of Nail Salon Workers” (in Vietnamese)
☐ Material Safety Data Sheet (in Vietnamese)
☐ “Let’s Talk about Health and Safety” (in Vietnamese and English)
☐ Sign-in sheet
☐ Evaluation form
Introduction (10 minutes)

A. Make introductions.

B. Explain that you are working on a project to provide free health and safety training to nail salons in California. The purpose of the training is to help workers and owners protect themselves at work. The training covers how to protect workers and yourself from chemicals used in salons, how to prevent aches and pains, how to avoid contact with infected blood and bodily fluids, and what responsibilities you have as an employer.

C. Ask if the owner(s) is willing to participate in this free training. It will take a total of 2 hours. If necessary, offer to come back at another time or to do the training in two sessions.

D. Explain that you need the owner to write in his/her name, signature, and date on the sign-in sheet.

E. **HANDOUT:** Pass out the booklet, “Stay Healthy and Safe While Giving Manicures and Pedicures: A Guide for Nail Salon Workers.” Explain: “If you own the salon but also perform manicures and pedicures, then the tips in the booklet will help protect your health. The booklet also tells you what your responsibilities are as an employer.” Ask whether the owner performs manicures and pedicures in the salon.
Stay Healthy and Safe While Giving Manicures and Pedicures

A Guide for Nail Salon Workers
Chemicals (45 minutes)

A. Explain that chemicals used in nail salons can be harmful to your health. Ask: “What chemicals are used in your salon? What chemicals are you most concerned about?” Show the owner the list of chemicals listed in the booklet. Ask if any of these sound familiar. Explain that this is just a short list of chemicals... there are dozens of other chemicals that are used in salons.

B. Ask: “How can chemicals get into your body?” Make sure the owner mentions the following: inhalation (nose, mouth), ingestion (mouth), and absorption (eyes, skin).

Note that the woman on the right is eating food that has touched chemicals, so even though she is not working with chemicals, she is still being exposed to that chemical.

C. Explain this. Emphasize that if you use chemicals all day, every day, you are more likely to get sick than someone who uses the same chemicals once in a while.
Chemicals

Tip: Make sure your doctor or healthcare provider knows what kind work you do and the chemicals you use. Tell your provider if you are pregnant or planning to become pregnant.

The chemicals used in nail salons can be harmful to your health. However, there are steps you can take to protect yourself.

What are some chemicals that are commonly used in salons?
- Acetone (nail polish remover)
- Acetonitrile (fingernail glue remover)
- Ethyl methacrylate (artificial nails)
- Formaldehyde (nail hardener)
- Methacrylic Acid (acrylic primer)
- Methyl Methacrylate (artificial nails) (banned for use in nail salons)
- Ortho-phenylphenol (disinfectant)
- Phthalates (nail polish)
- Quaternary Ammonium Compounds (disinfectant)
- Toluene (nail polish, fingernail glue)

How can chemicals get into your body?

You can breathe them in, accidentally swallow them, or absorb them through your skin.

Chemicals affect different people in different ways. Some chemicals used in nail salons can cause: skin rashes; eye, nose, and throat irritation; dizziness; and headaches. Other chemicals may cause more serious illnesses. If you use chemicals all day, everyday, you are more likely to get sick than someone who uses the same chemicals once in a while.
D. **HANDOUT:** Pass out the guide, “I'm Pregnant... How Can I Protect Myself and My Pregnancy if I Keep My Job at the Nail Salon?”

Explain that a pregnant woman’s risk depends on many factors, such as the type and amount of the chemical used, how often you use it, and the type of ventilation in the salon. Reassure owners that there are steps they can take to reduce chemicals to the lowest levels possible. Say that we will talk in more detail about these steps in a moment. Remind owners that pregnant women should talk to their doctor.
E. **ACTIVITY and HANDOUTS:** Pass out the EPA guide, “Protecting the Health of Nail Salon Workers,” and ask owners to turn to the second to last page (page viii). Explain that the Material Safety Data Sheet (MSDS) tells you information about the chemicals you work with. Point out the different sections and then emphasize these key sections, “Health Hazard Data,” “Precautions for Safe Handling and Use,” and “Control Measures.”

**NOTE:** Some owners may not be comfortable reading (whether in Vietnamese or English). If you think this may be the case, adjust the activities so that you are reading aloud instead of the owners.
Now pass out the MSDS for Toluene. Say that toluene is an ingredient that is sometimes found in nail polish and that this is the MSDS for toluene in Vietnamese. Give the owner two to three minutes to quickly look it over and then ask these questions.

Question: What are some health hazards associated with toluene?  
Answer: (on page 1 and 2 and 6): drowsiness, dizziness, irritating to respiratory system, eye irritation, unconsciousness, etc. (Make sure the owner points out a few of these examples.)

Question: How do you protect yourself when using toluene?  
Answer: (on page 4-6): The most important thing here is that the level of protection depends on how much you are exposed to toluene. Recommended protections include: respirator, nitrile gloves, and goggles.

Explain that this is an MSDS in Vietnamese so it is easier to understand but most MSDSs are in English. The owner can contact the Collaborative or LOHP for help understanding an MSDS.

Say, “As the employer, you should have an MSDS for each chemical used in the salon. Ask the manufacturer for a copy.”
Thong tin an toàn sản phẩm

1. NHAN DANG CONG TY/DON VI SAN Xuat CHAT/CHEP PHAM

Ten san pham : Toluene
Su dung / Han che do vuoc khuyen cao : Nguyen lieu tho duoc su dung trong nganh cong nghiep hoa chat.

Nha cung cap : Cong Ty TNHH TOP Solvent (Viet Nam)
KCN G0 Dau, Long Thanh, Dong Nai

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2. NHAN DAN NGUY CO
Phan loai theo GHS :
- Cac chat long de chay, Loai 2
- Doc tinh cap tinh - qua duong nuoc, Loai 5
- Doc tinh cap tinh - tiep xuc voi da, Loai 5
- Doc tinh cap tinh - hit phai, Loai 5
- An mon da, lam rat da, Loai 2
- Ton thuong mat nghiemoi trong kich thich mat, Loai 2B
- Doc tinh toi cac co quan dac biet cu ca the (tiep xuc lap lai), Loai 3, cac anh hung gay nghiemoi.
- Loai 2, Heth sinh gia
- Doc tinh ho hop, loai 1
- Doc tinh (cap tinh) voi moi trong thuy sinh, loai 2

Cac thanh phan danh dau theo he thong dong nhat toan cau (GHS)
(Cac) Bieu tuong :

Cac tu tin hiieu
Cong bo ve nguy hiem theo GHS :
- Nguy hiem
- CAC NGUY HAI THE CHAT:
  Chay long/ hoi rat de chay.
  CAC NGUY HAI SUC KHOE:
  Co the nguy hiem nen nuoc phai.
  Co the nguy hiem khi tiep xuc qua da.
  Nguy hiem nen hit phai.
  Gai duong voi mat.
  Nghi ngo co the gay vo sinh hoac pha huuy bao thai.
  Co the gay chong va cong mat
  Co the huoi hoai the thinh giac neu tiep xuc lau dai hoac
  lap lai
  Co the gay tu vong nen nuoc phai va xam nhap duong ho hop
F. Now explain that we are going to talk about things that you can do to make your salon safer from chemicals. If you are doing this training in a salon, point out doors, ceiling vents, bottles, and other objects in the salon to help make your point.

- Explain all of the bullet points.

- Some points to add:

  - **Opening doors and windows are some of the most important things you can do to keep everyone safe.**

  - **Using fans to pull air in on one end of the salon and push air out at the other end of the salon is another very important way to keep you safe in salons.**

  - Some salons have ventilated tables. There are two types.

    1) One type has a duct that is connected to the outside. The duct pulls chemical vapors through the duct and pushes it outside. This is the best kind of ventilated table.

    2) Another kind of table uses filters to grab the chemicals in the salon, filter out chemicals, and then recirculate the air. However, these types of tables are not recommended because the filters need to be changed regularly and there is no way to determine how often the filters need to be changed. Ventilated tables can cost $500 or more.

  - **ACTIVITY:** Ask the owner to look at the two pictures of the person mixing chemicals. Say, “Here are two pictures of a person mixing chemicals. You can see that the fan is set up differently in each one. Which set-up better protects the worker? Why?” Make sure the owner sees how the picture on the right is best because the window blows fresh air in, and the fan sucks air away from the worker.
Chemicals continued

To learn about the chemicals you work with, refer to the Material Safety Data Sheet (MSDS). An MSDS provides detailed information about a chemical, such as health effects, how to protect yourself, how to safely store the chemical, and what to do in an emergency.

Your employer should have an MSDS for each chemical used in the salon. Ask for a copy. The MSDSs are usually in English and can be difficult to understand. You can contact the California Healthy Nail Salon Collaborative (CHNSC) or the Labor Occupational Health Project (LOHP) for assistance (see back page for contact information).

There are many things you can do to make your work safer from chemicals.

1. Choose safer chemicals when possible. There are safer nail polishes that do not contain dibutyl phthalate, formaldehyde, or toluene. For a list, see the Nail Polish Wallet Guide on the back page.

2. Let in Fresh Air.
   - Open doors and windows when possible. If the salon has a ceiling vent, make sure it works.
   - Some salons have ventilated tables. Change filters regularly. It is best if the tables are vented to the outside.
   - Place fans near open doors or windows to let in more fresh air. Fans should pull air in on one end of the salon and push air out at the other end of the salon.

3. Use good practices.
   - Always read labels and follow instructions when using products.
   - Store chemicals in small bottles and label them. Close bottles when you are not using them.
   - Put any trash soaked with chemicals (like cotton balls) in a sealed bag before you put it in the trash can. Keep the trash covered.
   - Wash your hands before eating, drinking, or smoking. Also wash your hands before and after each client and after handling salon chemicals. Do not eat or drink near your work table.

A Guide for Nail Salon Workers
4. **Use proper personal protective equipment.**
   - Ask: “Do you or your employees wear any gloves, masks, or goggles while working? If so, when do you use them? Why do you use them?” **Try to engage in a discussion** that will cover the following topics. **Use the illustrations** of the gloves and masks to help guide the conversation.

   - Explain all of the bullet points.

   - Some points to add:

     o **Paper dust masks:** Rectangular masks (often found in drugstores) do not provide a good fit. **Also, stuffing tissues in your mask will not protect you from chemicals!!** The tissues do not keep out chemical vapors.

     o **Air-purifying respirators:** It is best to choose a mark that has been approved by the National Institute for Occupational Safety and Health (NIOSH). Follow the manufacturer’s recommendation for using these masks and for how to get a good seal. You will need to use goggles if you have a half-face mask. Or, you can buy a full-face mask that has built-in goggles.

     OSHA requires you to train, fit-test, and provide medical surveillance to workers when respirators are used. Also, there are different cartridges for different chemicals. Make sure you are using the correct cartridge that protects against nail salon products. You must train your workers on how and when to change the cartridge.
Chemicals continued

4. Use proper personal protective equipment.
   - Use the right gloves. Nitrile gloves will protect you from chemicals. Avoid latex or vinyl gloves.
   - Use a proper mask when transferring chemicals or when buffing or filing nails.
     - Paper dust masks protect you from some dusts (like nail filings) but not chemicals. The rectangular mask shown below does not provide a good fit. Also, stuffing tissues in your mask will not protect you from chemicals. It is best to use a round dust mask with a metal strip that you can adjust to fit the bridge of your nose.
     - N95 dust masks protect you against dust, viruses, and other germs but not chemicals. Some have filters that reduce chemical odors. Some have a valve to help you exhale more easily.
     - Air-purifying respirators can protect you from chemicals. But they can be uncomfortable and you must be fitted and trained to wear one that is right for you. And, you must use the correct type of cartridge to protect you from nail salon products. You must know how and when to change cartridges.
   - When transferring chemicals to small bottles, open doors and windows. Wear goggles, gloves, and possibly an air-purifying respirator. If you are using an air-purifying respirator, follow the instructions in the previous bullet.
   - Wear long-sleeved shirts and gloves. This prevents acrylic dust from touching your arms and hands. Wash your work clothes separately from other clothes. This prevents salon dust and chemicals from spreading to other clothes.
G. **ACTIVITY and HANDOUT:** Pass out the document, “Let’s talk about health and safety!” Explain that you will now read a story about a client and that you will be practicing some things that workers can say in English in response to the situation. For each story, read the story and then ask the owner what he/she would do in the worker’s position. Then, offer the suggested English phrases. Do Stories #1-3.

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**Story 1:** You are about to file a client’s acrylic nails. You put on an N-95 mask. The client looks worried and asks you why you are wearing a mask. What would you say and do?

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**Story 1:**
- “I do manicures and pedicures every day so I have to be extra careful.”
- “No, you are not dirty!”
- “This mask protects me from the dust.”
- “These fans blow dust and fumes away from you and out the door.”
- “This won’t get in the way of your manicure. I can still give you a nice manicure!”
H. Conclude this section: “If there is one thing I hope you will remember today from our discussion of chemicals it is that ventilation is very important in salons. Encourage workers to keep windows and door open. Show workers how to use fans wisely.” Ask if there are any questions.
Preventing Aches and Pains

A. Explain that nail salon workers can get aches and pains from bending over or being in the same position... these are called “ergonomic hazards.”

B. ACTIVITY. Ask: “Imagine that you are getting home from a long day of work. Imagine that you are taking off your coat and shoes, perhaps about to make dinner. Imagine yourself doing the things you usually do after work. How does your body feel after working all day. Do you feel sore? Where? Do you feel any pain?”

Ask the owner to mark on the diagram the places where they feel any discomfort. Ask: "Why do you think you have aches and pains?"

Explain that some aches and pains could be caused by work (but not all)!... now you will talk about what aches and pains can be caused by working in a salon.

C. ACTIVITY: Refer to the photo of the worker and ask, "What is wrong with this picture? What could cause this worker to be injured?" Explain that there are two possible causes of aches and pains. First, explain that an awkward position could cause injury. In this picture the worker is bent over the client's hand. Leaning too far forward can sometimes strain the neck and shoulders. Second, putting pressure on contact points can cause injury. Here, the worker is resting her arms on the edge of the table. Over time, this could cause aches and pains.

Then ask: “Do you or your employees sometimes bend over your work like this? Any ideas on what can be done to help this worker be in a better position? How can this worker minimize pressure on contact points?”

Refer to the second photo of the worker and ask: “What improvements do you see?” Make sure the worker notices: the worker is sitting with her back straight, she has good task lighting, her elbow is resting on a foam pad, and her client’s hand is raised slightly.
Preventing Aches and Pains

Nail salon workers can get aches and pains from bending over or being in the same position... these are called "ergonomic hazards."

Take a moment to think about whether there are any parts of your body that are hurting or uncomfortable. Where do you hurt?

What can cause these injuries at work?

Aches and pains can be caused by holding the body in an awkward position. Aches and pains can also be caused by pressure on contact points... this can happen when your body touches a hard surface.

What is wrong with this picture?

What improvements do you see?
D. Now explain that there are many things you can do to prevent aches and pains.

- Explain the tips:
- **ACTIVITY**: Do gentle stretching exercises in between clients. You may need to check with a doctor first! Here are some ideas at the bottom of the page to get you started. Ask the owner if it would be okay to try a few of the stretches. (Make sure the owner isn’t in any pain or discomfort before stretching!)
E. **ACTIVITY**: Refer back to the document, “Let’s talk about health and safety!” Do Story #4.

![Story 4: You are doing a manicure for a client. Your neck and back are starting to hurt from bending over the client’s hand. You would like to raise the height of the client’s hand by putting a pillow underneath her wrist. What would you say and do?](image)

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I. **Conclude this section**: “The most important thing to remember about preventing aches and pains is to make adjustments! Show workers how to adjust the lighting, chair, pads, or whatever is needed to make them more comfortable.” Ask if there are any questions.
Infectious Diseases

A. Infectious diseases include the common cold, flu, HIV, and Hepatitis B (a liver infection). You can become infected if you come into contact with infected blood or bodily fluids. Ask: “How might you become exposed to an infectious disease in a salon?” Possible answers: cutting a client’s skin by accident, doing a pedicure when you have an open cut on your hand, touching a client’s blister, etc.

B. **Activity:** Explain that you will now do a quick exercise. Say, “I will read you a sentence. Please tell me if the sentence is true or false.”

<table>
<thead>
<tr>
<th>Sentence</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>If a client looks healthy, you don’t need to worry about getting infected. True or False?</td>
<td><strong>False.</strong> Someone could look perfectly healthy but carry an infectious disease. This why it is important to treat all blood and bodily fluids as if they were infected.</td>
</tr>
<tr>
<td>Nail salon workers should wash their hands after every client, even if wearing gloves. True or False?</td>
<td><strong>True.</strong> Workers should wash their hands with soap and water after every client and after removing their gloves.</td>
</tr>
<tr>
<td>Once blood gets on a worker’s hands, it’s too late to prevent infection. True or False?</td>
<td><strong>False.</strong> If blood gets on a worker’s hands, the sooner it is washed off, the less chance the worker has of becoming infected.</td>
</tr>
</tbody>
</table>

C. Explain that there are many ways to protect yourself, employees, and clients. Explain and **add:**

- Explain all of the bullet points.

- Some points to add:
  - You can be infected by small amounts of blood or bodily fluid that you can’t see!
  - As the employer, it is your responsibility to provide gloves to workers.
  - Ask: “When should you wash your hands during the workday?” Answers should include: after each client; after going to the bathroom; before eating/drinking/smoking; before touching children; before going home.
  - Consider getting immunized against Hepatitis B. If you work in a salon, your doctor can help you decide whether this is needed. You can go to your doctor to request the shot or you can go to a low-cost health clinic. There are no shots to prevent Hepatitis C or HIV.
That is why it is so important to follow the recommendations we are discussing today.

**Infectious Diseases**

Infectious diseases include the common cold, flu, HIV, and Hepatitis B (a liver infection). You can become infected if you come into contact with infected blood or bodily fluids.

There are many ways to protect yourself:
- **Avoid touching any blood or bodily fluids.**
- **Wear gloves.** This is especially important if a client has any cuts, open sores, or blisters. Throw away your gloves immediately after using them.
- **Always wash your hands with soap and water.**
- **Bandage and cover all open cuts or bruises.**
- **If a client bleeds, don’t touch the blood.** Hand the client a cotton ball. Ask the client to throw the cotton ball in the trash.
- **Consider getting immunized against Hepatitis B.** Your doctor can help you decide whether this is needed.

**Disinfect tools after each client:**
1. Wash tools with soap and water. Use a scrub if needed.
2. Rinse in clean water.
3. Dry with a clean cloth or towel. It’s important to dry.
4. Immerse tools in an EPA-registered disinfectant. Soak the tools for 10-30 minutes, depending on manufacturer’s directions. The disinfectant must be covered at all times.
5. Dry with a clean cloth or towel.
6. Store all disinfected items in a clean, covered place.

**Disinfect foot basins and spas** after each client and at the end of the day. Follow the Board of Barbering & Cosmetology rules (Title 16, California Code of Regulations § 980.1-980.3) for how to clean basins. There are different rules for cleaning whirlpool footspas, pipe-less footspas, and non-whirlpool foot basins. Always use gloves. Always write down the time and date of each cleaning in a pedicure-cleaning log.

**Tip: Protect yourself when using disinfectant**
- Try to avoid using disinfectants that contain quarternary ammonium compounds.
- Let in as much fresh air as possible.
- When disinfecting surfaces like worktables, disinfect only in areas where it is necessary.
- Try to clean surfaces before disinfecting. This can help reduce the amount of disinfectant you use.
- Follow manufacturer’s directions for diluting disinfectant with water.
D. **ACTIVITY:** Refer back to the document, “Let’s talk about health and safety!” Do Stories #5-7.

**Story 5:**
You are using a cuticle nipper when you accidentally cut the client’s skin. The client starts bleeding. What would you say and do?

- “I’m so sorry.”
- “Here is a cotton ball. Please put it on the cut.”
- “I will get the first aid kit.”
- “It is safer if you clean the cut yourself.”

**Story 6:**
A client asks you to shave her calluses using a “credo blade.” She has brought her own blade from home. What would you say and do?

- “I’m sorry. We are not allowed to use those blades in California. They are not safe for customers or workers.”
- “I am not trained to use this blade.”
- “Credo blades can give you an infection.”
- “I could be fined for using a credo blade.”
- “Can I use this foot file instead?”
E. Conclude this section: “The most important thing to remember about infectious diseases is to avoid touching any blood or bodily fluids. Encourage workers to wear gloves and follow rules for disinfecting.” Ask if there are any questions.
Your Responsibilities as an Employer

A. Ask: “Are the people who work in your salon employees or independent contractors? Why?”

B. Explain the difference between an Employee and an Independent Contractor:

C. Explain why it matters:
   • Employees have the right to workplace health and safety, minimum wage, workers’ compensation, and other benefits. Independent contractors do not.
   • Just because you give a worker a 1099 form doesn’t necessarily mean that they are an independent contractor. Salons that misclassify their workers may be required to pay penalties. If you need help, you can contact the CHNSC, LOHP, or an attorney.

D. Explain the responsibility of owners:
   • It is your responsibility to provide workplaces that are safe and healthy. This includes correcting any hazards that may result in serious injuries to workers. Cal/OSHA is the state agency responsible for ensuring the health and safety of workers. Cal/OSHA can come to a worksite if they believe the employer is violating worker health and safety standards. Cal/OSHA’s free Consultation Service can assist employers with health and safety problems. To get help from Cal/OSHA Consultation, call 1-800-963-9424.
   • As an employer, you may not fire or punish a worker in any way for reporting or making a complaint about unsafe work conditions.
   • As an employer, you must also pay at least the minimum wage.

E. Conclude this section: “The most important thing to remember is that it is your responsibility as the employer to make the salon safe and healthy for your employees.” Ask if there are any questions.
Your Rights as a Worker

What is the difference between an Employee and an Independent Contractor?
- There is no set definition of employee or independent contractor. Instead, courts and state agencies will look at a long list of factors to determine whether you are an employee or independent contractor.
- For example, if you: rent a station; purchase all your own supplies and tools; have your own customers and set your own appointments; set your own rate and are paid by customers directly; and have your own business license, you are more likely to be classified as an independent contractor.
- However, if: the owner sets the schedule, you are paid by the hour, the owner or receptionist makes the appointments for all workers; you do not rent the space; the owner sets the rate paid by customers; and you use the owner’s tools and equipment, you are more likely to be classified as an employee.

Why does it matter?
- Employees have the right to workplace health and safety, minimum wage, workers’ compensation, and other benefits. Independent contractors do not.
- Just because a salon owner tells you that you are an independent contractor does not mean that you are. And, just because an owner gives you an IRS form 1099 instead of a W-2 does not mean that you are an independent contractor. Salons sometimes misclassify their workers. That is why it is important for you to know the difference between an employee and independent contractor. If you need help, you can contact the CHNSC, LOHP, or a legal services organization.

What are my workplace health and safety rights?
- As an employee, you can report hazards to Cal/OSHA, a state agency responsible for ensuring the health and safety of workers. Cal/OSHA can come to a worksite if they believe the employer is violating worker health and safety standards. To file a complaint, you can call, fax, or go in person to your local Cal/OSHA office. To find your local office, call 1-866-924-9757 (enter your zip code to find the local office) or visit http://www.dir.ca.gov/dosh/DistrictOffices.htm
- As an employee, you also have the right to refuse to do work that would violate a worker health and safety standard and cause a real and apparent hazard to you or other employees. You may not be fired or punished in any way for reporting or making a complaint about unsafe work conditions. If you experience retaliation, you may file a complaint with the Division of Labor Standards Enforcement (also known as the State Labor Commissioner) within six months. For more information, visit http://www.dir.ca.gov/dlse/dlseDiscrimination.html
- If you are being paid less than the minimum wage, contact the Division of Labor Standards Enforcement at http://www.dir.ca.gov/dlse/dlseWagesAndHours.html.
For More Information

1. Point out the resources listed in the booklet.

2. Make sure the owner knows how to contact you, the Collaborative, and LOHP.
Conclusion

1. Thank the owner for participating.
2. Ask if it’s okay to ask a few questions to get feedback about our training.

After the training

1. Make sure the evaluation form is filled out completely.
2. Give the sign-in sheet and evaluation form to ______________.
3. Please complete all trainings by ____________.

This training is supported under grant #SH22240SH1 from the Occupational Safety and Health Administration, U.S. Department of Labor. It does not necessarily reflect the views or policies of the U.S. Department of Labor, nor does mention of trade names, commercial Products, or organizations imply endorsement by the U.S. Government.