

Occupational Safety and Health Training Guidelines

For Federal Agencies

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1. Background

Section 19 of the Occupational Safety and Health Act of 1970 (the Act) includes provisions to ensure safe and healthful working conditions for federal sector employees. Under that section, each federal agency is responsible for establishing and maintaining an effective and comprehensive occupational safety and health (OSH) program consistent with standards promulgated under Section 6 of the Act. On February 26, 1980, President Carter issued Executive Order (E.O.) 12196, *Occupational Safety and Health Programs for Federal Employees*, which guides the heads of federal Executive Branch agencies in implementing Section 19 of the Act, and directs the Secretary of Labor (the Secretary) to issue a set of basic program elements to assist the various federal agencies in carrying out their responsibilities. These basic program elements are set forth at 29 CFR 1960 (Part 1960).

The E.O. also specifies that the Federal Advisory Council on Occupational Safety and Health (FACOSH) shall advise the Secretary on matters relating to the occupational safety and health of the federal workforce. The Assistant Secretary for Occupational Safety and Health chairs the Council, which consists of sixteen members: eight representing federal agency management, and eight from labor organizations representing federal employees. In 2011, FACOSH evaluated the current OSH training requirements for federal employees. As part of this evaluation, FACOSH collected information from federal agencies and labor organizations representing federal employees regarding the OSH training needs of the federal workforce. FACOSH analysis of the data resulted in a report, *Recommendations for Consideration by the Secretary of Labor on Uniform Occupational Safety and Health Training Guidelines for the Federal Government*, which included a series of recommendations for improving the consistency of OSH training requirements. In October 2012, FACOSH submitted its report to the Secretary for consideration. Upon review, Secretary Hilda Solis approved the report and tasked OSHA with implementing the FACOSH recommendations.

2. Introduction

As part of its OSH program, each federal agency is responsible for providing appropriate training to ensure that employees have the knowledge and skills necessary to fulfill their OSH obligations. The E.O. states that each agency head “shall provide safety and health training for supervisory employees, employees responsible for conducting occupational safety and health inspections, all members of occupational safety and health committees where established, and other employees.” The basic program elements in Part 1960, Subpart H also include several provisions addressing OSH training. The provisions in Part 1960 give agency heads the flexibility necessary to implement their programs in a manner consistent with their respective missions, sizes, and organizations.

These guidelines summarize the OSH training requirements set forth in the Act, E.O., and basic program elements. OSHA developed these guidelines to address the need for uniform OSH training at all staff levels of the Federal Government. The guidelines also state that OSHA will issue notices of unsafe or unhealthful working conditions to federal agencies for violations of the training requirements in Part 1960.

3. References

[Occupational Safety and Health Act of 1970, Section 19, Federal Agency Safety Programs and Responsibilities.](#)

[Occupational Safety and Health Act of 1970, Section 6, Occupational Safety and Health Standards.](#)

[Executive Order 12196, Occupational Safety and Health Programs for Federal Employees, February 26, 1980.](#)

[29 CFR Part 1960, Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters.](#)

Federal Advisory Council on Occupational Safety and Health Report, Recommendations for Consideration by the Secretary of Labor on Uniform Occupational Safety and Health Training Guidelines for the Federal Government, December 17, 2012.

[University of Wollongong, WHS Training Guidelines, April 2013.](#)

[Office of Personnel Management, "Training Needs Assessment," nd.](#)

4. Definitions

Assessment is the process of documenting specific knowledge and skills, in measurable terms.

Assessor is a person who evaluates an employee to determine his/her level of competence.

Certified Safety and Health Committee is an agency safety and health committee that meets the provisions of section 1-3 of E.O. 12196 and 29 CFR Part 1960, verified by the head of each federal agency in writing to the Secretary. These committees monitor and assist in carrying out the agency's safety and health policies and program at the workplaces under their jurisdiction.

Collateral Duty Employees are employees who are assigned official occupational safety and health duties and responsibilities in addition to the primary duties and responsibilities of the position the employee occupies.

Competency describes the work-related skills and behavior needed to perform activities in a safe manner.

Designated Agency Safety and Health Official (DASHO) is the individual who is responsible for managing the safety and health program within an agency, and is so designated or appointed by the head of the agency pursuant to §1960.6 and the provisions of Executive Order 12196.

Employee is a person, other than members of the Armed Forces, employed or otherwise suffered, permitted or required to work by an *agency*.

Employee Representatives are representatives of agency employees as is consistent with the Federal Service Labor Management Relations Statute (5.U.S.C. 71), or collective bargaining or other labor management arrangements.

Management Officials means a supervisor or management official as defined in the applicable labor-management relations program covering the affected employees.

Safety and Health Training is any activity provided to agency employees to help them gain, improve, or retain knowledge, skills, or abilities related to safety and health.

Supervisory Employees are employees who exercise delegated authorities as defined by the U.S. Office of Personnel Management.

Training Needs Assessment (TNA) is the process of identifying performance requirements and the knowledge, skills, and abilities needed by an agency's workforce to achieve the requirements.

5. Responsibilities

Responsibilities for OSH training are as follows:

5.1 Agency Head

The agency head is responsible for providing top management officials with orientation and other learning experiences, which will enable them to manage the agency's OSH program. The agency head is also responsible for assuring that safety and health officials are designated at each appropriate level with sufficient authority and responsibility to plan for and secure funds for necessary safety and health staff, equipment, materials, and training required to ensure the implementation of an effective occupational safety and health program.

5.2 Designated Agency Safety and Health Official (DASHO)

DASHOs are responsible for their agency's OSH program development and implementation, as well as hazard recognition, evaluation and control, equipment and facility design, standards, analysis of accident, injury, and illness data, and OSH training.

5.3 Management Officials

Management officials are responsible for ensuring that there are adequate resources and budgetary provisions for their agency's OSH programs and initiatives, including the necessary administrative costs for training and sufficient personnel to implement and administer the program at all levels.

5.4 *Supervisory Employees*

Supervisory employees are responsible for providing and maintaining safe and healthful working conditions for employees. They are also responsible for ensuring that staff completes OSH training. This includes training on the agency's occupational safety and health program, occupational safety and health standards applicable to the agency's workplaces, procedures for reporting hazards, procedures for reporting allegations of reprisal, and procedures for the abatement of hazards, as well as other appropriate rules and regulations.

5.5 *Employee Representatives*

Employee representatives are responsible for making certain that employee groups function appropriately in ensuring safe and healthful working conditions and practices in the workplace. This includes assisting the agency in conducting workplace safety and health inspections.

5.6 *Certified Safety and Health Committee*

Each certified safety and health committee is responsible for monitoring and assisting the agency's safety and health program.

5.7 *Employees*

Each agency employee should attend OSH training programs relevant to their work as directed by their supervisor.

6. Skills, Knowledge and Training Requirements

6.1 *OSH Skills and Knowledge Base (Competencies)*

OSH competencies are the skills and knowledge required for employees to perform work activities in a safe and healthful manner. To provide appropriate OSH training, it is necessary to identify competencies for each level of responsibility or role in the agency or department. Agencies should identify competencies by taking into account the work activities of the position or role and any risks associated with the conduct of these activities.

The basic program elements in 29 CFR 1960, Subpart H, establishes the scope of training needs for six (6) different employee categories or groups. Specifically, sections 1960.54 through 1960.59 address OSH training for: top management officials; supervisors; safety and health specialists; safety and health inspectors; collateral duty employees and safety and health committee members; and employees and employee representatives.

There are specific OSH skills and knowledge that are common to all employee categories. Employees should have an understanding of the general principles and concepts included in the following documents, which provide a framework for agencies' safety and health programs:

- Section 19 of the Act;

- E.O. 12196;
- 29 CFR Part 1960; and
- Agency-specific OSH program.

Categories of OSH competencies are as follows:

- **General** – General competencies are those that are identified according to the agency’s function and OSH responsibility. These competencies are common to all employee categories (e.g., understanding the agency’s OSH program, including knowledge of employees’ rights and responsibilities and methods for identifying and reporting workplace hazards, etc.).
- **Risk-Specific** – Risk-specific competencies are identified according to the type of work being conducted (e.g., first aid, hazardous substance awareness, ergonomics, etc.).
- **Task-Specific** – Task-specific competencies are the skills and knowledge needed by an employee in order to perform their work safely (e.g., applying safe work procedures when operating a machine or piece of equipment, etc.).

6.2 *Training Needs Assessment*

Agencies should conduct a Training Needs Assessment¹ (TNA) to identify and evaluate the safety and health training needs of the organization or an employee. The assessment should identify:

- What skills are required to perform the work activity;
- The agency requirements for safety and health training;
- The existing skill level of the staff performing the work; and
- Whether there is a training gap between the employee’s skill level and the skills needed to perform their work.

Agencies and departments should identify generic and risk-specific OSH competencies using the following mechanisms:

- Legislative requirements;
- Review of employees’ injury/illness performance;
- Consultation with managers, supervisors, and/or employee representatives; and

¹ For additional information on Training Needs Assessments, please visit the Office of Personnel Management’s website: <http://www.opm.gov/policy-data-oversight/training-and-development/planning-evaluating>.

- Consultation with the certified safety and health committee.

Employees should receive training that addresses their assigned responsibilities.

Employees can work with their supervisor to identify the task-specific competencies. Once OSH training competencies are identified, the relevant training should be provided to achieve employee competency levels.

Newly-identified generic and risk-specific competencies should be added to the OSH training program as they are identified.

Agencies should use qualified personnel or safety and health experts within their agency to conduct TNAs.

6.3 *Specific Training Requirements*

The basic program elements at 29 CFR Part 1960, Subpart H, require that each agency must provide the following training and learning experiences to specific employee groups.

A. Top Management Officials

Management officials must be provided with orientation and learning experiences that will enable them to manage the occupational safety and health programs of their agencies. Such orientation should include the requirements of section 19 of the Act, E.O. 12196, 29 CFR Part 1960, and the agency safety and health program.

B. Supervisors

Each agency must provide supervisory employees with OSH training that includes:

- Supervisory responsibility for providing and maintaining safe and healthful working conditions for employees;
- The agency OSH program (e.g., procedures for reporting and abating hazards, reporting and investigating allegations of reprisal, investigating accidents/incidents, reporting injuries and illnesses, etc.);
- Section 19 of the Act;
- E.O. 12196;
- 29 CFR Part 1960;
- OSH standards applicable to the agency's workplaces; and
- Other appropriate rules and regulations.

Supervisory employees should be provided with learning experiences, including introductory and specialized courses and materials that will enable them to recognize and eliminate, or reduce occupational safety and

health hazards in their work units. Such training shall also include the development of required skills for managing the agency's safety and health program within the work unit, including the training and motivation of subordinates to assure safe and healthful work practices.

C. Safety and Health Specialists

Safety and health specialists must receive training to prepare them to perform the necessary technical monitoring, consulting, testing, inspecting, designing, and other tasks related to program development and implementation, as well as hazard recognition, evaluation and control, equipment and facility design, standards, analysis of accident, injury, and illness data, and other related tasks. Each agency should implement career development programs for their occupational safety and health specialists to enable the staff to meet present and future program needs of the agency.

D. Safety and Health Inspectors

Each agency must provide training for safety and health inspectors on applicable agency standards, and the use of appropriate equipment and testing procedures.

E. Collateral Duty Staff and Certified Occupational Safety and Health Committee Members

On appointment, collateral duty safety and health personnel and all members of certified occupational safety and health committees should receive training that corresponds with the scope of their assigned responsibilities. Such training should include agency procedures for the reporting, evaluation and abatement of hazards; agency procedures for reporting and investigating allegations of reprisal; the recognition of hazardous conditions and environments; identification and use of occupational safety and health standards; and other appropriate rules and regulations.

F. Employee Representatives

Employees that represent employee groups should receive OSH training that includes both introductory and specialized courses and materials that will enable such groups to ensure safe and healthful working conditions and practices in the workplace and enable them to assist in conducting workplace safety and health inspections.

G. Employees

Employees must receive appropriate safety and health training, including specialized job safety and health training, appropriate to the work performed by the employee. Employees must also receive training on the

agency occupational safety and health program, with emphasis on their rights and responsibilities.

7. Training Programs

7.1 Development

Agencies should utilize qualified safety and health experts from available sources when developing OSH training. Such sources may include, but are not limited to, the following:

- Other federal agencies including OSHA;
- Professional OSH groups;
- OSH consultants;
- Universities;
- Labor organizations;
- Field Federal Safety and Health Councils (FFSHCs); and
- Certified safety and health committees.

7.2 Delivery

Agencies should provide employees with OSH training to close the skill gaps identified by a TNA. Qualified personnel or safety and health experts should deliver OSH training to employees. Types of training may include, but are not limited to, the following:

- OSH courses delivered by the agency;
- Training programs delivered by external providers, including OSHA Training Institute (OTI) and OTI Education Centers; and
- Training demonstrations.

All new employees should complete an orientation or basic OSH training course, which should include coverage of section 19 of the Act, 29 CFR Part 1960, E.O. 12196, and the agency safety and health program. All employees should complete general OSH training on a yearly basis. For example, the annual training should cover new or emerging hazards and OSH issues of importance to the agency or job task/function. Other training, including risk-specific and task-specific training, should be delivered on an as-needed basis. Examples of instances when agencies should deliver training include, but are not limited to, the following:

- When an employee is hired;
- Annually for new and emerging OSH hazards;
- Upon completion of a risk assessment;
- As a result of an incident or OSH audit corrective action;
- When new safety and health injury and illness trends are identified;

- When an employee transfers jobs or has a change in job assignment; and
- When there is a change in technology, work process, equipment, and/or substances used for a job.

7.3 *Learning Methods*

For any type of training, learning methods may include, but are not limited to, the following:

- Review of health and safety guidelines;
- Specialist instruction;
- Computer assisted learning;
- Demonstration of safe work procedures;
- On-the-job training;
- Supervision; and
- Other resources or techniques essential to achieving skills and knowledge competency.

The person coordinating the training should assess the literacy, language, and other learning requirements of an employee by asking the training participants if they have any special needs.

7.4 *Assessment of Competency*

An assessment of competency should be conducted to ensure that an employee successfully attained the necessary skill or knowledge upon completion of training.

- (a) There are numerous methods available to administer an assessment of competency. The method to determine competency will vary depending on the type of training delivered. For example, the assessment of competency may be by means of a written test, verbal test, or demonstration. For instance, where training on a task-specific competency is required, an employee can prove competency by demonstrating the safe operation of the procedure to the assessor or by answering questions during or at the end of training sessions.

Agencies should choose the appropriate assessment method according to the nature of the competency. Agencies must document all competency assessments.

- (b) Any person whom an agency deems to have sufficient experience in the task being conducted is able to assess competency.

An agency should determine an assessor's competency based on education, training, and experience. An assessor must demonstrate competency through the application of their specific knowledge and skills.

7.5 *Recording Competency*

Agencies should maintain training records as evidence of training delivery and assessment of competence. Each agency should establish procedures for collecting and compiling OSH training records, including documentation of competency, for proper evaluation and necessary corrective action.

7.6 *Duration of Competency*

The continuation of competency is achieved by undertaking the task or process according to the recognized standard or practice.

The level of competency may be deemed inappropriate where evidence indicates there has been deterioration in the level of competency. This may include:

- Operating equipment in an unsafe manner;
- Operating a different mobile or stationary equipment;
- Changes in workplace conditions that could affect safe operation of equipment;
- Occurrence of an incident or near miss incident resulting from the person performing the task;
- Changes in relevant OSH regulatory standards and/or scientific evidence may require updating competencies; and
- The task, process, or equipment changes and requires all persons to demonstrate their competencies.

As such, the person may be deemed to be 'not yet competent' until competency can be demonstrated through the process of retraining and/or reassessment.

8. Training Records

Federal agencies should maintain records for all OSH training. Records must include documentation of competency. Training records should be easily retrievable and clearly identify training as meeting the requirements of the Act, 29 CFR Part 1960, E.O. 12196, and other applicable OSH standards.

OSHA should have access to agency records of OSH training unless they are specifically required by Executive Order to be kept secret in the interest of national defense or foreign policy. Such records should not be submitted to OSHA but may be used by the agency to evaluate its OSH program, to reduce occupational injuries, illnesses, and incidents.

9. Training Program Evaluation

In accord with 29 CFR 1960, Subpart J, agency heads are required to develop and implement a program for evaluating the effectiveness of their agency's OSH programs. Agency heads should assess their OSH training programs, through review by a competent OSH person, to verify that their agency's OSH training meets the requirements of the Act, 29 CFR Part 1960, E.O. 12196, and this OSHA guidance.

Under §1960.71, agency heads must submit an annual report to the Secretary of Labor (Secretary) summarizing their agency's self-evaluation findings. Each year, the Secretary will request that agencies include the following in their reports:

- Information on the agency's safety and health training requirements;
- Evidence verifying that the agency's OSH training was developed in accord with the requirements of the Act, 29 CFR Part 1960, and E.O. 12196;
- A list of the training the agency conducted;
- Information on the method(s) the agency used to deliver training and to assess competency;
- Information on the method(s) the agency used to evaluate the effectiveness of its OSH training; and
- Documentation of the funding allocated to OSH training.

10. OSHA Training Assessment

OSHA may assess an agency's OSH training while conducting any inspection including complaints. In addition, OSHA may assess an agency's training program while conducting evaluations of their occupational safety and health management systems.

OSHA will use the agency's training records to verify that the agency has provided required OSH training to federal employees. As part of the verification, OSHA will ensure that the employees received training in a format that they could understand. OSHA will document and issue notices of unsafe or unhealthful working conditions if it determines that a deficiency exists in a federal agency's OSH training program.

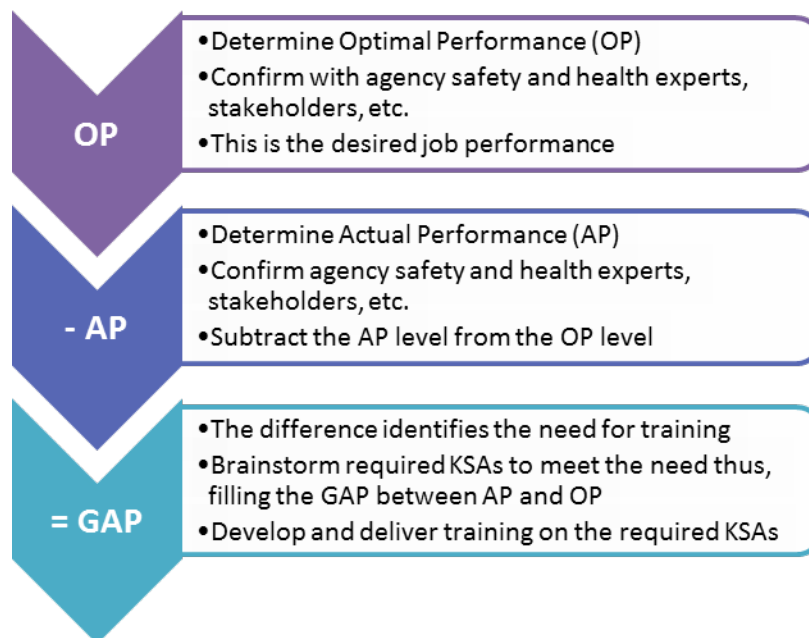
Training on specific work-related hazards does not constitute an admission of the existence of a hazard or that the agency or employee has violated an OSHA rule.

Appendix A: Training Needs Assessment (TNA) Sample

Training Needs Assessment

Developing occupational safety and health (OSH) training begins with conducting a Training Needs Assessment (TNA) to identify the knowledge, skills and attitudes (KSAs) needed to improve the OSH performance of employees.

The process for determining training needs follows the formula of: Optimal Performance (OP) – Actual Performance (AP) = GAP.



The following form can be adapted for use by each federal agency. To identify training needs, determine competencies for the agency or for each job role within the agency and use the competencies to identify specific areas where employees should improve their safety and health KSAs. Use a rating scale of 1 - 10 (1 = lowest / 10 = highest) to reflect the overall competency for the agency or for the staff in each job role. The rating scale will help when identifying training needs according to competency gaps.

Training Needs Assessment

Agency or Individuals Name:

Job Role: (If used for individuals)

GENERAL COMPETENCIES		RATING
1	Section 19 of the OSH Act	
2	Executive Order 12196	
3	29 CFR Part 1960	
4	Agency OSH Policies and Procedures	
5	Hazard and Incident Reporting	
6	Employer and Employee OSH Responsibilities	
7	Agency Emergency Procedures	
8	OSH Responsibilities for Managers/Supervisors	
RISK – SPECIFIC COMPETENCIES		RATING
11	First Aid	
12	Hazardous Substance Awareness	
13	Ergonomics	
14	Laboratory Safety	
15	Safe Work Procedures	
16	First Aid	
17	Distracted Driving	
18	Laser Hazards	

TASK – SPECIFIC COMPETENCIES		RATING
21	Ladder Use	
22	Operating a Drill	
23	Operating a Grinder	
24	Operating a Chainsaw	
25	Forklift Operation	
26	Operating a Computer	