



November 22, 1994

Ms. Jackie H. Ward
ENTERGY Gulf States Utilities
Post Office Box 2951
Beaumont, Texas 77704

Dear Ms. Ward:

Thank you for your letter of September 2, forwarded to the Occupational Safety and Health Administration's (OSHA's) Directorate of Compliance Programs from our Area Office in Baton Rouge, Louisiana, concerning the use of computer-based training to satisfy OSHA training requirements. In your letter, you ask a series of questions requesting clarification on whether the use of computer-based training is sufficient to comply with the minimum training requirements for initial employee training and retraining, in particular with regard to the number of hours of training required. We assume that your primary interest is in the training requirements of OSHA's Hazardous Waste Operations and Emergency Response Standard (HAZWOPER, 29 CFR 1910.120 and 1926.65), although your questions are also relevant to the training requirements of other OSHA standards. Each of the questions in your letter are answered in turn below.

Question 1. What is OSHA's position on computer-based training programs for cognitive training?

Answer: In OSHA's view, self-paced, interactive computer-based training can serve as a valuable training tool in the context of an overall training program. However, use of computer-based training by itself would not be sufficient to meet the intent of most of OSHA's training requirements, in particular those of HAZWOPER. Our position on this matter is essentially the same as our policy on the use of training videos, since the two approaches have similar shortcomings. OSHA urges employers to be wary of relying solely on generic, "packaged" training programs in meeting their training requirements. For example, training under HAZWOPER includes site-specific elements and should also, to some degree, be tailored to workers' assigned duties.

Safety and health training involves the presentation of technical material to audiences that typically have not had formal education in technical or scientific disciplines, such as in areas of chemistry or physiology. In an effective training program, it is critical that trainees have the opportunity to ask questions where material is unfamiliar to them. In a computer-based program, this requirements may be providing a telephone hotline so that trainees will have direct access to a qualified trainer.

Equally important is the use of hands-on training and exercises to provide trainees with an opportunity to become familiar with equipment and safe practices in a non-hazardous setting. Many industrial operations, and in particular hazardous waste operations, can involve many complex and hazardous tasks. It is imperative that employees be able to perform such tasks safely. Traditional, hands-on training is the preferred method to ensure that workers are prepared to safely perform these tasks. The purpose of hands-on training, for example in the donning and doffing of personal protective equipment, is two-fold: first, to ensure that workers have an opportunity to learn by experience, and second, to assess whether workers have mastered the necessary skills. It is unlikely that sole reliance on a computer-based training program is likely to achieve these objectives.

Thus, OSHA believes that computer-based training programs can be used as part of an effective safety and health training program to satisfy OSHA training requirements, provided that the program is supplemented by the opportunity for trainees to ask questions of a qualified trainer, and provides trainees with sufficient hands-on experience.

Question 2. How will computer-based training be compared to required hour training as set forth in 1910.120?

Where OSHA has specified a required duration represents, in OSHA's view, the minimum amount of training that will be needed for most trainees to acquire the necessary basic skills. For the reasons stated above, OSHA does not believe that the use of computer-based training will, in the majority of cases, enable trainees to achieve competency in substantially less time than the required minimum duration for training. Therefore, the use of computer-based training will not relieve employers of their obligation to ensure that employees receive the minimum required amount of training specified under HAZWOPER and other OSHA standards.

Question 3. Will a computer-based program's outline and development material suffice for conventional training material documentation?

Answer: OSHA standards, and HAZWOPER in particular, do not specify the kinds of materials that must be developed and maintained to document that a course meets the minimum requirements for course content. Employers may use whatever documentation is necessary to document the content of a training course.

Question 4. Will computer-based tracking of training competence levels be documentation enough for the training or will a hard copy, signed document be required?

Answer: OSHA standards that require training generally contain a requirement for the employer to maintain records of employee training; these records may be kept in any form deemed appropriate by the employer, so long as the records are readily accessible to the employer, employees and their representatives, and to OSHA. However, note that the HAZWOPER standard contains a unique requirement in that employees must be provided a certificate upon the successful completion of initial training; this is best accomplished by the use of hard copy.

We hope that this information is helpful. If you have any further questions, please feel free to contact the [Office of Health Enforcement at (202) 693-2190].

Sincerely,

Ruth E. McCully, Director
[Office of Health Enforcement]