



Safety & Health

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OSHA Considers Changes to Construction Outreach Training Program



Many of our members have already taken, or at least know about, the OSHA 10-hour and 30-hour construction safety and health outreach courses. The 10-hour course is a basic hazard awareness course, and the 30-hour course is intended for those with some safety responsibility. For each course OSHA designates core topics – such as Introduction to OSHA, Fall Protection and Electrical – that must be covered and then permits a lot of flexibility on additional topic areas to be addressed. In its program guidelines, OSHA states the emphasis should be on hazard identification, avoidance, control and prevention, and not simply OSHA standards. Trainers are urged to tailor their presentations to the needs and understanding of their audience.

Here are a few other things about this program. The OSHA 10-hour and 30-hour completion cards have no expiration dates and therefore no requirement for refresher training. But that's not the case for instructors. Instructors who deliver this outreach training must be authorized by OSHA, which means they must meet certain prerequisites and successfully complete an OSHA 500 course – a train-the-trainer course designed to help trainers effectively teach the OSHA 10-hour and 30-hour courses. The OSHA 500 trainer cards do have an expiration date. Outreach trainers are required to attend a refresher class every four years to maintain their trainer status.

The outreach training program has been hugely successful. Many construction industry sectors have embraced this program. Our union, as well as many of the construction trade unions, routinely deliver this training to their apprentices and offer this training to journeymen and foremen on an as-needed basis. A number of states – including Connecticut, Massachusetts, New Hampshire, New York and Rhode Island – now require OSHA 10-hour training for all workers on state projects. Other states are considering similar requirements.

For unexplained reasons, OSHA is considering changes to the program which surround these issues:

- ▶ Prerequisites for the OSHA 500 course
- ▶ Expiration dates on OSHA 10/30-hour cards
- ▶ Mandatory topic lists in the OSHA 10- and 30-hour programs

The most disturbing potential change involves prerequisites for the OSHA 500 program. Prerequisites for the course currently include five years of construction experience and completion of an OSHA 510 course or equivalent construction training. The OSHA 510 is a course on OSHA construction standards, policy and procedures. OSHA considered equivalent training to be 30 hours of prior safety and health training, which could include the completion of the OSHA 30-hour construction safety outreach course or other safety and health training.

These prerequisites are appropriate. The OSHA 500 instructors in our trade, like most other construction trades, are peer trainers. They're experienced tradesmen, most of whom completed apprentice training. They know the industry and related hazards. They've become skilled instructors and deliver both trade-specific and safety and health training to apprentices and journeymen. Many have also completed train-the-trainer programs and can certainly document more than 30 hours of safety and health training and experience, whether they completed the OSHA 30-hour outreach program or not.

OSHA is considering redefining equivalent training to mean an associate's, bachelor's or master's degree in the safety and health field, or a recognized certification like Certified Safety Professional or Certified Industrial Hygienist. If OSHA follows through with these changes, an instructor would have to first complete and pass the OSHA 510 course or have a degree or certification in an occupational safety and health field in order to attend the OSHA 500 course and become an authorized trainer.

This proposed change, as well as the others – revising the mandatory topics in the 10-hour and 30-hour programs and adding an expiration date to the 10-hour and 30-hour cards – provoked strong reactions among many in the construction industry. The national Building and Construction Trades Department, after consultation with construction trades unions, formally opposed changes to the existing, highly successful outreach program and strongly recommended that OSHA bring these issues to its Advisory Committee on Construction Safety and Health (ACCSH).

OSHA is now reconsidering some of these changes, and the issues have been brought before the Advisory Committee on Construction Safety and Health. We'll keep you posted on any changes that become finalized. You can also periodically check OSHA's website for changes to the program. The address http://www.osha.gov/fso/ote/training/outreach/training_program.html will take you right to the outreach training program. ■

OSHA 10-hour and 30-hour Training Resources

Roofers and Waterproofers Research and Education Joint Trust Fund

The Roofers Joint Trust's *Roofers Safety and Health Instructor Program* can be used to help deliver the OSHA 10-hour or 30-hour outreach training program. Available on CD or downloadable from the Union's web site (www.unionroofers.com), this 19 module bilingual program is highly interactive and contains information specific to roofing and waterproofing jobs. The program also includes 22 companion bilingual booklets for trainees, which are also available in downloadable format.

