

Safety & Compliance Training Planning Guide

It's never too early to start thinking about your upcoming training requirements. Whether you are a seasoned safety professional or just getting started with an EH&S program, this easy to use guide will help you prepare and present your plan for your EH&S training needs.

Training Topic Needs Assessment

Job Safety Analysis

One of the most effective ways to help you identify training topics is to conduct a job safety analysis on your worksites. A job safety analysis helps you to identify hazards on the job, and determine the best course of action to lessen or remove hazards from the workplace. Often times, training is an integral piece in controlling workplace hazards.

A job hazard analysis can be conducted on all jobs in your workplace, and should always be performed when there is a change to a job, such as new equipment, a new process, or different materials in use. Priority should go to the following types of jobs:

- Jobs with the highest injury or illness rates;
- Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents;
- Jobs in which one simple human error could lead to a severe accident or injury;
- Jobs that are new to your operation or have undergone changes in processes and procedures; and,
- Jobs complex enough to require written instructions. (**OSHA 3071, Job Hazard Analysis**)

In a JSA, you will identify the location, task description, hazard description, and hazard controls – or measures you can take to reduce or eliminate the hazard. It is important to include employee feedback in your review. During this process, you should answer the following questions:

- What can go wrong?
- What are the consequences?
- How could it happen?
- What are other contributing factors?
- How likely it is the hazard will occur?

The US Occupational Safety & Health Administration (OSHA) has a number of resources on how to conduct an effective JSA. JSAs should be carried out by an experienced safety professional. There are a number of resources available for outsource if you do not have the resources in-house.

Annual Compliance Requirements

Another important consideration is your annual compliance training requirements. The following OSHA standards have an annual training requirement for affected workers.

- 29 CFR 1910.1001 Asbestos
- 29 CFR 1910.1030 Bloodborne Pathogens
- 29 CFR 1910.146 Confined Space Entry
- 29 CFR 1910.147 Control of Hazardous Energy - "Lockout/Tagout"
- 29 CFR 1910.1200 Hazard Communication
- 29 CFR 1910.120 Hazardous Waste Operations and Emergency Response – "HAZWOPER"
- 29 CFR 1910.1025 Lead
- 29 CFR 1910.1450 Occupational Exposures in Laboratories "Lab Safety"
- 29 CFR 1910.95 Occupational Noise Exposure
- 29 CFR 1910.132 Personal Protective Equipment
- 29 CFR 1910.157 Portable Fire Extinguishers

Over 100 OSHA standards contain specific training requirements, and although they may not specify an annual requirement, one of the first questions an OSHA inspector will ask in the event of an accident or injury is "Was the employee properly trained?". To ensure employees have top of mind awareness of hazards and incident prevention, training employees annually on all hazards in which they are exposed makes good business sense. Not only will it help to reduce or prevent accidents and injuries and show your dedication to employee safety, which can increase productivity and morale, in the event of an incident or inspection your training records will be up to date.

EPA & DOT Requirements

If you are a location which generates more than 1,000 kilograms per month of hazardous waste or if you are classified as a TSD (Treatment, Storage, and Disposal Facility) for hazardous waste there are specific training requirements regarding hazardous materials that you must comply with. These include the Resource Conservation and Recovery Act (40 Code of Federal Regulations (CFR) 264.16 and 40 CFR 265.16) and HAZWOPER training. The Clean Air Act, Clean Water Act and Resource Conservation and Recovery Act all contain clauses for required training where employees that are "operating a process" are properly trained on start-up, normal operation, normal shutdown, temporary operations, and emergency shutdown and operations. Stormwater Management training is required for those at a construction site who are responsible for erosion control.

Training all employees about environmental awareness helps to ensure they take an active role in preventing damage to our environment, as well as taking precautions to ensure your organization is in compliance with regulations.

The Department of Transportation (DOT), under the Federal Motor Carrier Safety Administration (FMCSA) requires annual training for hazardous materials transportation. Employees who must be trained are defined as "a person who is employed by a hazmat employer and who in the course of employment directly affects hazardous materials transportation safety". Employees must be trained on proper handling and packaging of hazardous materials for shipment, as well as hazardous material security. Employers of and employees, including those who are self-employed, who operate commercial motor vehicles are also required to maintain a drug and alcohol testing program.

Goals & Objectives

Your safety programs goals and objectives need to be in line with both your expectations for a successful program as well as the current direction of your organization.

You can easily assess and prioritize your goals and objectives by breaking them down into three categories.

Improvements / Areas of Risk – Review current accident and injury reports. This can give you an indication of where you may need to make a larger investment in training resources. It's also helpful to look at areas of high risk, such as chemical handling or manual material handling. This is also where you should take into account your goals for your safety program and where you want to see improvements in specific areas.

Company Growth or Reduction – Is your organization expanding and hiring new employees, staying the same, or reducing the workforce? Perhaps your organization is expanding in one area and reducing in another. Your safety program budget should incorporate the ebb and flow of your organization, and adjust the topic and number of employees that need to be trained accordingly.

Industry Trends or New Regulations – A new regulation or enforcement typically means more training. Reviewing the regulatory agenda can help you plan for any additional training you may need.

Training Delivery Format

Whether you choose onsite, online, or both, there is no right or wrong when it comes to the format you select to deliver your training. There are a number of considerations you should take into account when choosing the best training format for your needs. Remember that it may not be a one size fits all; you may find it most effective to utilize a variety of formats to meet your needs and your employee's needs.

Resources – Each delivery format requires resources to make it effective. Onsite training requires someone who is knowledgeable in the subject matter and has the time to teach the training. Online training requires computer equipment and internet access. Assess what resources you have available to you by topic and by training location.

Frequency and Depth of Training - How often and how comprehensive does the training need to be to meet your goals? If you are training on a topic where you would like to see an improvement, you may want to train more often or incorporate a combination of training delivery medias, such as onsite and online. Some topics may be easy to cover with an off-the-shelf online course. Other topics, such as HAZWOPER or forklift driver training are required to have an in person training component that is site specific.

Learning Gain of Students – If your employees aren't responding to the current training, either through a measured lack of learning gain or continued issues with accidents and incidents, it may be worth switching up the training format or content. Especially when employees have seen the same training program or presentation multiple times, it may just take a refreshed approach to the topic to jump start their attentiveness.

Number of Students to Train – The decision to use digital delivery, either streaming video or online, may be beneficial to organizations that have a large or dispersed employee population. Online and streaming video training can ensure consistency in the training content from location to location, and allow you to train at times most convenient for the location. Online training also automated offers tracking and reporting capabilities.

No matter the format, challenging and engaging content is critical for success. Online training should be interactive. DVD and streaming video content should be relatable to your employees. Take the time to evaluate the content quality of the vendors you are considering.

Putting it All Together

Now that you have assessed your training topic needs based on hazards and your goals and objectives, you can begin to organize your training plan. The chart on the following page can help you in your planning as well as presenting your plan to peers or management. This information is also helpful when discussing training content and cost options with your training vendor. It may be beneficial to use a chart for each location or department in your organization. An example of how the chart may be used is shown below:

HAZARD PRESENT	HAZARD CATEGORY	HAZARD TYPE	NUMBER OF EMPLOYEES AFFECTED	GOAL OR OBJECTIVE	DELIVERY FORMAT
	Chemicals				
x		Handling & Storage	25	General awareness	Online training (Onsite for 5, limited internet in Loc 2)
		Transportation			
		Labeling			
x		Accidental Release/ Clean-Up	10	General awareness	In person and online training
		Process Safety			
x		Spill Prevention	25	Zero incidents in 2016, additional training	In person and online refresher training
x		Specific Chemical(s): Ammonia	35	New employees, additional training	Online training

Safety & Compliance Training Plan

Location: _____ Date: _____

HAZARD PRESENT	HAZARD CATEGORY	HAZARD TYPE	NUMBER OF EMPLOYEES AFFECTED	GOAL OR OBJECTIVE	DELIVERY FORMAT
	Chemicals				
		Handling & Storage			
		Transportation			
		Labeling			
		Accidental Release/ Clean-Up			
		Process Safety			
		Spill Prevention			
		Specific Chemical(s):			
	Driving/ Transportation				
		Drug & Alcohol Testing			
		General Vehicle Safety			
		Winter Driving			
	Electrical				
		Lockout/Tagout			
		Inspection and Maintenance			
		High Voltage			
		Installation and Wiring			
	Emergency Management/Read- iness				
		Emergency Action Plans			
		First Aid / CPR			
		Fire Prevention			
	Environmental				
		General Awareness			
		RCRA			
		Clean Air Act			
		Stormwater Management			
	Equipment				
		Cranes			
		Ladders			
		Hand and Power Tools			

		Forklifts/Lift Trucks			
		Powered Platforms/Man Lifts			
		Machinery / Power Presses			
		Rigging			
		Scaffolding			
		Working Surfaces (other):			
	Exposure				
		Asbestos			
		Bloodborne Pathogens			
		Confined Space Entry			
		Excavation			
		Falls / Working from Heights			
		Lead			
		Manual Material Handling			
		Noise			
		Radiation			
		Welding / Hot Work			
	Hazardous Materials				
		Combustible Dust			
		Flammable Liquids			
		Specific Hazardous Materials:			
		Hazardous Materials Transportation			
		Hazardous Materials Security			
	Temperature Extreme/Weather				
		Heat Stress			
		Cold Stress			
	Other:				

Evolved Safety is helping a number of organizations experience a new way to review and select safety training materials. We are the first company to offer customers the benefit of working with a single, safety knowledgeable resource focused on customer service with access to safety training and delivery systems from a variety of today's best-in-class providers.

We review and select only the best content and delivery systems from today's top safety training vendors. We work with you to find the right product, service and solution for your business. With Evolved Safety, you are free to explore multiple options from multiple vendors with no pressure, while working with a non-biased customer service champion so you can have confidence that the safety training is right for your particular needs.

We'd love to make it effortless for you to complete your training needs. Contact us today to get started.

Learn more at www.evolvedsafety.com or call us at 844.528.4486 (toll free).

Sources:

Training Requirements in OSHA Standards and Training Guidelines - <https://www.osha.gov/Publications/2254.html>

Federal OSHA Standards: Training Requirements, Oklahoma State University - <http://ehs.okstate.edu/training/osha.htm>

U.S. Federal Motor Carrier Safety Association - <http://www.fmcsa.dot.gov/>

U.S. Environmental Protection Association - <http://www2.epa.gov/laws-regulations>

Justifying Your Annual EH&S Training Budget

If you are a seasoned safety professional, creating your budget is probably old hat, however, justifying your budget to the powers that be may be more of an uphill battle. Here are a few quick tips to make justifying your budget that much easier.

Outline Specific Learning Gain – Highlight what your employees will gain from their learning experience and how that will benefit the organization. For example, you may determine that training employees twice a year on electrical safety best practices will reduce incidents occurring in the latter half of the year. The extra cost of training is offset by the savings in medical, workers compensation and lost time costs.

Outline the Objectives of the Training – Go beyond, “employees will understand...” and be detailed about what objectives the training will cover. Using the example below, outline that the training covers the proper PPE to wear for each encounter with electricity and approach boundaries for arc flash versus that employees will learn best safety practices for working with electricity.

Outline What Employees Need to Effectively Learn – This is an opportunity for you to assess your current training’s strengths, weaknesses, and opportunities. Also, review your employee’s learning styles, locations and the training topics that you need to cover to be compliant as well as effective. Unfortunately, there isn’t a one size fits all answer, but it’s an opportunity for you to showcase what you know about your employees, your safety program and tie it all back to the organizations objectives.

When you can tie your budget to goals and objects, and tie those goals and objectives back to your organization’s goals, then it’s a win for everyone. Happy budgeting!

Need bids from multiple resources for your 2017 budget? We can help! Visit www.evolvedsafety.com or give us a call at 844.528.4486.

The Cost of Online Training – What Are You Really Paying For?

In the workplace safety training space, there is a group of vendors that provide very similar online training products, however, pricing for these online training platforms can range from \$2.00 – \$25.00 per student, per course. When the content, support, and technical capabilities are similar, one has to ask if you are getting what you pay for. And, what is with the huge discrepancy in pricing?

Comparing Apples to Apples

First, it's important that I clarify what group of online providers to which I'm referring. Vendors may refer to everything that is delivered via the internet, from streaming video to highly interactive, robust training courses, "online training". There is a difference. Streaming video is a video training program, the same as you would get via DVD, delivered via the internet. It may or may not be tied to a learning management system (LMS). Some streaming video programs do include quizzes to track learning gain. Online training courses, or e-learning courses, are internet based, self-led training courses which include interactivity and media such as video or animation. Not all e-learning courses are created equal. There are e-learning courses that aren't much more than the CD-ROM based training of the 1990s, or "Digital PowerPoints" as I've heard them called. These courses are text with pictures, possibly some video, and multiple choice or true or false questions. Truly engaging online training courses include these five features:

1. Text with full narration
2. Multiple medias including video and animation
3. Interactivity beyond Q&A, such as matching and scenario based selection
4. Quality, technically accurate content
5. Adult learning theory practices such as task-oriented learning versus memorization, application of why concepts are being learned, and self-directed learning

On a side note, adult learning theory is a whole other topic. For more in-depth info about adult learning theory, **this is a good place to start.**

So, if we rule out streaming video training and "digital PowerPoint" online training programs that still leaves a handful of vendors that offer quality online training with a huge discrepancy in pricing. When you have the boxes checked on all five features of quality training, why do prices range from as low as \$2 per student up to \$25 per student...even when large versus small training volumes are taken into consideration?

New Cos in the Training Space

We can't ignore the vast changes in EH&S training company ownership in the last 10 years. Three of the major players in quality EH&S training were purchased by either larger entities or private equity groups. Good, bad, or indifferent, a change in ownership of that scale has an impact on the goals and direction of the business. Privately held, small, or even family owned businesses have more flexibility in their approach, from content development to pricing. Large organizations, publicly traded organizations or those owned by private equity typically have to answer to shareholders or other entities which will directly affect pricing.

In these cases, pricing may be dictated by a need to meet required sales projections or satisfy the goals set by a board of directors or group outside the direct leadership of the company. You may be paying higher prices to satisfy these needs. As long as customers continue to pay the higher prices for the same training they can find elsewhere, vendors can justify the higher prices. Also, vendors that are not in full control of their destiny will have a difficult time lowering prices unless the market dictates it.

What Are You Paying for?

It may be time to take a second look at your training vendor and make sure you can't get the same quality training and customer service, or perhaps even better, from a different source at an improved cost.

There may be one or two advantages from one vendor over the other that can help you to justify the price. But in reality, there are only a few online training vendors that can provide you a quality product and excellent service for half the price of the others. Make sure that you are getting all that you can for what you pay, and that you're not paying to line the pocket of investors.

*Evolved Safety works with you to select your EH&S training content and delivery options from a number of best-in-class safety training providers. We streamline the process for you, removing the burden of contacting multiple vendors and acquiring multiple bids. Contact us at www.evolvedsafety.com or call us toll-free at **888.528.4486**.*