



Safety

## Going Beyond 'Good Enough': OSHA Safety Training Requirements and Recommendations

James Langford | Nov 16, 2023

It's likely to be one of the first questions federal investigators ask after a worker gets injured: Did the employee receive adequate safety training for the job?

And it hints at the complexities of complying with *federal workplace safety regulations*.

"Adequate" obviously includes required training, the specifics for which are spelled out in myriad standards enforced by the U.S. Occupational Safety and Health Administration.

But it can also include recommendations, some of them made by the agency itself and others from professional standard-setting organizations such as the American National Standards Institute, or ANSI, and the National Fire Protection Association that may or may not be referenced in OSHA's rules or letters of interpretation from its staff.

Depending on the circumstances, ignoring recommendations can lead to penalties under the agency's general duty provision requiring businesses to provide hazard-free workplaces.

"No person should ever have to be injured, become ill or die for a paycheck," OSHA says in a *reference booklet* consolidating the training requirements spelled out in more than 100 regulatory standards covering categories from general industry to maritime, construction and agriculture. "Training in the safe way for workers to do their jobs well is an investment that will pay back over and over again in fewer injuries and illnesses, better morale, lower insurance premiums and more."

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While training rules vary by regulation, with some mandating simply "instruction" while others require "adequate" or "effective" teaching, OSHA says they all obligate employers to present job-related safety information in a way that employees can understand.

In practical terms, that means that if an employee doesn't speak or comprehend English, training must be given in the worker's language, *the agency says*, and "if the employee's vocabulary is limited, the training must account for that limitation."

Additionally, if employees aren't literate, telling them to read training materials doesn't satisfy OSHA requirements.

“Employers are expected to realize that if they customarily need to communicate work instructions or other workplace information to employees at a certain vocabulary level or in language other than English, they will also need to provide safety and health training to employees in the same manner,” the agency advises.

## Adult Safety Education

To help employers provide adequate safety training, OSHA offers a variety of assistance programs including a *written guide to effective techniques*, which fall into the category of recommendations rather than requirements—something the agency is careful to point out.

While following the recommendations might be viewed as “reasonable steps” to prevent or reduce hazards—which employers are obligated to do under federal law—failing to do so isn’t, on its own, a violation of that law, OSHA explains.

In effective training, the agency says, participants should learn:

- How to identify safety and health problems in their workplaces
- How to analyze the causes of those safety and health problems
- How to make workplaces safer and healthier
- How to get co-worker support in accomplishing each of those tasks

A general review of safety education programs shows that the best ones have four traits in common, OSHA says. They are:

- **Accurate:** Materials are prepared by qualified personnel and updated as needed.
- **Credible:** Instructors and facilitators have a background in safety and health or related subject-matter expertise as well as experience in the presentation of training programs.
- **Clear:** Programs should be understandable to participants. If they rely on jargon unfamiliar to recipients, then they don’t meet workers’ needs.
- **Practical:** The information and skills should be directly useful in participants’ working lives. Learning occurs more easily when participants quickly see how they can use the information in their jobs.

Since most workplace safety training participants are adults, the agency adds, gearing methods toward their unique learning styles will make programs more effective.

Points to keep in mind include the following, OSHA says:

- **Adults are voluntary learners.** Most of them learn because they’ve decided they need to master a new topic for a specific reason.
- **Adults pick up needed information quickly.** The catch is that they usually have to understand why the information is important to them.
- **Adults typically have a considerable amount of life experience that instructors should acknowledge and even encourage them to share.**
- **Adults need to be treated with respect.** They’re likely to resent an instructor who talks down to them or ignores their ideas.
- **Adults learn best by doing.** They will retain information more easily when they try out what they’ve learned in class.
- **Adults need to know where they’re heading.** Instructors can address that requirement by providing “route maps” with clear objectives, logically building each new piece of information on to the previous lesson.
- **Adults learn best when new information is repeated, reinforced and presented in different ways.**

## Regulatory Compliance Is Only the Beginning

Safety experts point out that the benefits of going beyond basic requirements to adopt recommendations and best practices extend far beyond training initiatives to include *personal protective equipment, machine guards*, hazard barriers and more.

*MSC's industrial safety consultants*, for instance, rely on the general duty clause of the law creating OSHA and broadly applicable regulations as starting points, not end goals, when conducting workplace safety assessments.

"We're looking at risk overall, so even if something is in compliance—following the letter of what OSHA says—if there's still a good chance that someone could get hurt as a result, we'll note it and make a recommendation on how to make it safer," says team manager Jeffrey Merkel.

While the companies with the best track records in workplace safety use straightforward tactics like habit-reinforcing incentives to prompt employee compliance, global consulting firm *McKinsey & Co. says*, they also tend to emphasize softer practices "such as encouraging employees to 'own' safety problems and to take leadership in the search for solutions," the firm says.

"Engaging employees in the identification of problems and involving them in the design of solutions raises the organization's awareness, lowers its tolerance for risk and improves the chances of actually adopting a solution," McKinsey says.

**How has safety training that emphasized best practices above and beyond regulatory compliance benefited you? Tell us in the comments below.**

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