



Employment Training Panel

Guidelines for: **CERTIFIED SAFETY TRAINING**

Effective: December 12, 2014

Revision History: 04/24/2018 Revised to include that partial training for less than 10/30 hours is acceptable as trainees may receive other OSHA training elsewhere. 1/23/2015 Revised to include HAZWOPER and HAZMAT Training and to distinguish Cal-OSHA from CalTRANS oversight. Revise guideline title to reflect the fact that this safety training leads to certification. 03/07/2014 Revised to reflect the reduction of minimum class/lab delivery from 24 hours to 8 hours, regardless of business size, for new contracts funded in FY 14/15.

These are guidelines only. If a proposal raises the need for further modifications, that will be accomplished on a case-by-case basis with direction from Executive Staff. **Unless modified by these guidelines, all other program criteria apply**

BACKGROUND

Historically, ETP has not funded “general safety training” if required to do business in California by the Occupational Safety and Health Administration (Cal-OSHA in California). This prohibition appears in Title 22 California Code of Regulations at Section 4420.5.

However, the prohibition on general safety training does not extend to all safety training. ETP will fund courses on specific safety topics, especially where the trainee earns a certificate of competency after successful completion. Three certified training programs with specific safety content are approved for funding, as shown in the Overview below:

OVERVIEW

1. **OSHA 10/30** has been approved since December 2014. This is training in specific safety topics for particular occupational titles or industry sectors. It is typically geared to the construction industry, or manufacturing. This coursework must be approved by Cal-OSHA and the instructors must be certified by Cal-OSHA. The training topics are bundled as follows:
 - A 10-hour class intended for entry level workers, or
 - A 30-hour class intended for supervisors or workers with direct safety responsibility

ETP funds both OSHA-10 and OSHA-30 as appropriate to the trainee occupation. Training may be delivered as Class/Lab or CBT, with no cap on CBT. As noted above, this training leads to a certificate of competency. This coursework is all classroom (or CBT) for a 10-hour or 30-hour bundle. It requires Cal-OSHA certified instructors, and leads to a certificate of competency portable to the employee. All hours are approved for funding.

Trainees may receive some OSHA training outside of the ETP contract and only require a few hours of ETP funded OSHA training. Therefore, ETP will fund training to those who require partial OSHA training (See Reimbursement section below for additional information.)

2. **HAZWOPER** (Hazardous Waste Operations and Emergency Response) training has been approved for at least as long as OSHA 10/30. It is shown as a sub-set of HAZMAT under Section 6.6 of the Staff Reference Manual (SRM) but it was not previously included in these guidelines. [Note: It is not actually a sub-set since there are different coursework and certification requirement as explained at Paragraph 3 below.]

HAZWOPER training is specifically designed for workers engaged in the removal of hazardous substances, or other activities which expose them to such substances. This coursework must be approved by Cal-OSHA and the instructors must be certified by Cal-OSHA. The training topics are bundled as a 24-hour course or 40-hour course, depending on occupational title. There is an 8-hour refresher.

The amount of instruction depends on whether the workers are at a hazardous-substance worksite full-time, or only occasionally. Workers who are onsite full-time typically include equipment operators or laborers; those who are onsite occasionally most likely include surveyors or engineering technicians. Supervisors are generally held to the standard of a full-time onsite worker.

- Full-time onsite work requires a minimum of 40 hours of classroom instruction, and a minimum of three days of training in actual field work under an experienced trainer/supervisor.
- Occasional onsite work requires a minimum of 24 hours of classroom instruction, and a minimum of three days of training in actual field work under an experienced trainer/supervisor. These workers may require the full 40 hours and three days of training if they are required to wear respirators onsite.
- All workers and supervisors are required to receive the 8-hour refresher in classroom instruction on an annual basis.

ETP funds HAZWOPER for front-line workers, supervisors and managers, as appropriate to the industry sector and occupation. Hours should be capped as

appropriate to the trainee occupational titles. The cap should be expressed in Exhibit B (see example at the end of these guidelines).

Although HAZWOPER requires field work to obtain certification, that component is not funded by ETP. Otherwise, all hours of classroom or CBT training are approved for funding as required to obtain or retain the certificate of competency.

3. **HAZMAT** (Hazardous Material) courses have been approved for many years under Section 6.6 in the SRM. The course length and complexity depends on the occupational titles and their role in hazardous waste handling and transportation. This training has oversight by the Department of Transportation (CalTRANS in California). The coursework must be certified by CalTRANS or another government entity (e.g., State Fire Marshal). There is an 8-hour annual refresher course to retain certification.

The subject matter of training is based on the function of the emergency-response employer, and duties to be performed by their employees. There are five levels, and each may have different minimum hours:

1. First Responder, Awareness Level (FRA): No minimum defined
2. First Responder, Operations Level (FRO): Minimum 8 hours training or experience equivalent
3. Hazardous Materials Technician: Minimum 24 hours training
4. Hazardous Materials Specialist: Minimum 24 hours training
5. Incident Commander/On-Scene Manager: Minimum 24 hours training

Although HAZMAT requires field work to obtain certification, that component is not funded by ETP. Otherwise, all hours of classroom or CBT training are approved for funding as required to obtain or retain the certificate of competency.

GUIDELINES

ELIGIBILITY

- Standard employer eligibility criteria apply.
- Single Employers are eligible. Training must be ancillary to other job skills training identified in the Curriculum. The Curriculum cannot consist entirely of OSHA or HAZWOPER/HAZMAT courses. (See Ancillary Training Requirement below.).
- MEC participating employers are eligible. Training need not be ancillary to other types of training in the Curriculum. The Curriculum may consist entirely of OSHA 10/30 or HAZWOPER/HAZMAT courses.
- The 20% limitation on training for managers/supervisors may apply, unless an exemption is justified in the ETP130.

Training Delivery

- Training may be delivered by Class/Lab or CBT, not as field work.
- The trainer-to-trainee ratio for Class/Lab training is 1:40 rather than 1:20.
- The 50% cap on total CBT hours does not apply.
- The 10% limitation on safety training does not apply.

Instructors

- Instructors for OSHA 10/30 and HAZWOPER must be certified by Cal-OSHA
- Instructors for HAZMAT must be certified - not by Cal-OSHA, but from among one or more of several entities including:
 - California Specialized Training Institute
 - State Fire Marshal's Office
 - University of California
 - U.S. National Fire Academy

Curriculum

- OSHA 10/30, and HAZWOPER/HAZMAT, should “stand alone” in the Curriculum as a separate Type of Training.
- OSHA 10/30 does not have a breakdown of individual course titles.
- HAZWOPER/HAZMAT may have a breakdown of individual course titles. This will be case-by-case depending on the employer's function, and job duties of the occupations to be trained.

Ancillary Training Requirement

For single employers: Training must be ancillary to other job skills training identified in the Curriculum. The Curriculum cannot consist entirely of safety training. However, this ancillary requirement is applicable to the Curriculum as a whole. It is not applied on a per-trainee basis. In other words, an individual trainee may receive only OSHA 10/30 or HAZWOPER/HAZMAT training and no other types of training - as long as the trainee meets the minimum requirement of 8 hours.

For MEC participating employers: Training need not be ancillary to other types of training in the Curriculum. The Curriculum may consist entirely of OSHA 10/30 or HAZWOPER/HAZMAT training.

Reimbursement

- All hours of training DO NOT have to be completed for OSHA 10/30 coursework for reimbursement. Partial hours can now be allowed, and no certification is required.

Field Experience for HAZWOPER: In addition to classroom training, the 40-hour and 24-hour HAZWOPER courses must include a minimum of one, two or three days of training in the field at the actual worksite. The field training is not reimbursable by ETP, but is required before the certificate of completion can be issued. Because the delivery of field training cannot be readily monitored, trainees are not required to receive the certificate of completion before payment is earned.

Field Experience for HAZMAT: All five levels of training may combine class/lab, workshops and field work. These delivery methods may vary in duration depending on the employer's function, job duties of the occupations to be trained, and the certification entity. The field training is not reimbursable by ETP, but is required before the certificate of completion can be issued. Because the delivery of field training cannot be readily monitored, trainees are not required to receive the certificate of completion before payment is earned.

Additional Information

- Requests to add OSHA 10/30 and HAZWOPER/HAZMAT training to an existing ETP contract may be processed as a modification or in-house amendment
- Unless revised by these guidelines, all other program criteria apply (e.g. reimbursement rate, minimum wage, retention).

ETP130

There is new canned language, replacing the paragraph on OSHA 10/30, in the ETP100 template. See "Certified Safety Training".

ETP100

There is revised narrative text at Section 3.2.3 CBT (capping CBT), Section 3.10 (setting trainer-to-trainee ratio) and Section 5.22(e) (allowing certified safety training courses to be added by modification). These revisions apply to all contract types, consistent with these guidelines.

Exhibit B

It is recommended that OSHA 10/30, HAZWOPER and HAZMAT be identified as separate courses in Exhibit B, consistent with how they are listed on Chart 1. [Note: Maximum hours and certification entity will vary for HAZMAT, depending on the occupations to be trained.] See example:

0-30 hours	OSHA 10/30 (OSHA Certified Instructor)
0-40 hours	HAZWOPER (OSHA Certified Instructor)
0-XX hours	HAZMAT (<Name> Certified Instructor)