



Office of Training and Education

## Outreach Training Program

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## Requirements

Revised: July 01, 2024  
Effective: October 01, 2024

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## Record of Changes

The following summary lists the substantive changes made to this document. Additional minor content, grammatical, or typographical corrections are included in this document. All OSHA-authorized Outreach trainers, Authorizing Training Organizations and other stakeholders must carefully review and adhere to OSHA Outreach Training Program requirements, procedures, and related guidance.

Page	Section	Modification	Information
Cover	Cover	Changed	“Directorate” to “Office”
Cover	Cover	Added	Suite 100 to the mailing address
2	IV.A.1	Changed	The location of the trainer’s ATO to the upper back portion of the Outreach trainer card.
3	IV.B	Added	Suite 100 to the mailing address
3	IV.B	Changed	Outreach telephone number
4	V.A.6	Moved/Revised	Moved from Section VII.E.1. Trainer card - this section refers to physical possession, responsibilities, and replacement of trainer cards.
5	V.B.	Changed	“affirming” to “attesting”
5	V.C.4.a.	Changed	“within stated deadline” to “at least seven calendar days prior to the scheduled class start date for review and processing”
6	V.E.1.c	Added	This includes email, print media, and websites.
8	V.F.6.a	Changed	“six (6) months” to “180-calendar days”
8	V.F.6.b	Changed	“6-month requirement” to “180-calendar day requirement”
8	V.F.9.b	Changed	“6 consecutive months” to “180-calendar days”
9	V.G.2	Changed	“6 (six) months” to “180-calendar days”
12	V.K.	Removed	Section for Out-of-Jurisdiction Exception Requirements – these requirements are defined in Section V.K.2.
12	V.L.2-3	Added	Class duration with simultaneous and non-simultaneous interpretation
13	V.N.	Removed	Duplicate information about exception requests and referred to Section V.C.
14	V.O.	Removed	Duplicate information about exception requests and referred to Section V.C.
14	V.P.	Added	This requirement is the sole responsibility of the Outreach trainer regardless of what records may be maintained by an employer.
17	V.Q.3	Moved	Moved from Section V.K.3. Advertising Restriction to V.Q.3 Advertising Training

<b>Page</b>	<b>Section</b>	<b>Modification</b>	<b>Information</b>
			Outside OSHA’s Geographic Jurisdiction
17	V.R.1.	Changed	“online” to “asynchronous”
17	V.R.2	Changed	“Exception request” for video conferencing to “advance notification” to their ATO.
18	V.R.2.b.1	Added	Class size
18	V.R.2.b.4	Added	“must be reported on the OTPR, and recorded under the type of training in block 11 as “remote.”
20	VIII.A.2	Added	Hand-delivery of cards
21	VIII.D.1	Removed	Language referencing paper cards
21	VIII.D.4	Removed	Card Lamination
24	APPENDIX A	Changed	“certify” to “attest” “Directorate” to “Office”
25	APPENDIX B	Revised	Updated website information and added “URL’s provided above are subject to change at any time.”
All	All	Formatting	Please note due to formatting, section and number changes have occurred throughout the entire document.

## I. Trainer Requirements

Requirements for trainers authorized through the Occupational Safety and Health Administration (OSHA) Outreach Training Program (“Program”) are contained in the following documents:

- A. **OSHA Outreach Training Program Requirements.** This document covers the requirements for all OSHA-authorized Outreach trainers. (Outreach trainers)
- B. **OSHA Outreach Training Program Industry Procedures.** These documents contain industry-specific program requirements (e.g., Construction, General Industry, Maritime, or Disaster Site Worker).
- C. **OSHA Outreach Training Program Investigation and Review Procedures.** These procedures are used by OSHA to investigate complaints or allegations of failure to comply with OSHA *Outreach Training Program Requirements*. These procedures ensure Program standardization, provide due process for resolving problems, and support Program oversight.

## II. OSHA Outreach Training Program Overview

The purpose of the OSHA Outreach Training Program is to teach workers about their rights, employer responsibilities, and how to file a complaint as well as how to recognize, abate, and prevent job-related hazards. OSHA authorizes safety and health professionals who complete an OSHA Outreach Training Program trainer course to conduct occupational safety and health classes for workers. OSHA has promoted workplace safety and health by authorizing trainers since 1971.

The OSHA Outreach Training Program is voluntary. Outreach training does not meet the training requirements contained in any OSHA standard. Some states and local jurisdictions have enacted legislation mandating OSHA Outreach Training Program training, and some employers and unions require workers to have this training to work on job sites or to fulfill their own safety training goals. However, the federal government does not mandate OSHA Outreach Training Program participation. For additional information on OSHA’s training-related requirements, see OSHA Publication #2254 *Training Requirements in OSHA Standards*, available on OSHA’s website. ([www.osha.gov](http://www.osha.gov))

## III. OSHA-Authorized Outreach Trainer Designation

- A. **Becoming an OSHA-Authorized Outreach Trainer.** To become an Outreach trainer, an individual must meet the prerequisite requirements and complete the applicable industry trainer course through an Authorizing Training Organization (ATO). See the specific industry program procedures for detailed information. Outreach trainer course prerequisites include components for both industry-specific safety and health experience, and training in OSHA standards for that

industry. These are separate components. Industry experience cannot be used to fulfill or replace the training prerequisite component. OSHA does not waive the training prerequisite component.

**B. Update Requirement.** To remain current on relevant OSHA matters and ensure quality training, Outreach trainers are required to complete a trainer update course every four years. The trainer course may also be completed to maintain a trainer's authorization status.

1. If a trainer's authorization has expired, the trainer will be unable to conduct Outreach training and receive student course completion cards.
2. Extensions to the trainer's expiration date will not be granted, except as described in Section III.C.

**C. Trainer Update Exemption for Overseas Military Service.** Military members returning to the Continental United States (CONUS) from overseas assignment(s) have 90 calendar days from their return date to renew their trainer authorization. Proof of military status must be shown, including furnishing a copy of the military orders directing the service member's return to CONUS. Military reservists who serve more than 30 days on active duty and then leave active-duty status must furnish a copy of their DD-214.

**D. Course Offerings.** Outreach trainer and trainer update courses are offered through OSHA Training Institute (OTI) Education Centers. A searchable course schedule and a list of current OTI Education Centers can be found on OSHA's website. ([www.osha.gov/otiec](http://www.osha.gov/otiec))

#### IV. OSHA Outreach Training Program Contacts

**A. Authorizing Training Organization.** This refers to the organization that provided the trainer's most recent trainer course or trainer update course.

1. The ATO is the trainer's primary point of contact. The name of each trainer's ATO and contact information are indicated on the upper back portion of the Outreach trainer card. This organization is responsible for answering questions, processing the OSHA *Outreach Training Program Report* (OTPR), and issuing student course completion cards to the trainer. An ATO point-of-contact list is available on OSHA's website. ([www.osha.gov/otiec](http://www.osha.gov/otiec))
2. Trainers may be affiliated with only one ATO per industry. For example, a trainer may be authorized through one ATO for Construction and authorized through a different ATO for General Industry; however, a trainer may not be authorized through two separate ATOs for the same industry.



- a. Trainers must submit OTPRs for training they deliver through the ATO which authorized the trainer for that specific industry. In the example above, the trainer must submit all construction OTPRs through the ATO that issued the authorized Construction trainer card and may not request construction student course completion cards through the ATO that issued the authorized General Industry trainer card.
- b. Upon changing ATOs, Outreach trainers whose trainer authorization has not yet expired are required to notify the original ATO of their new trainer authorization through another ATO. This will ensure that trainers remain authorized through only one ATO per industry at a time.

## **B. OSHA Office of Training and Education.**

For assistance on matters specifically referenced in these requirements or on the OSHA website, please contact the OSHA Outreach Training Program via email at Outreach@dol.gov or by phone at (847) 725-7804.

Please send written correspondence to:

Branch Chief, Outreach and OTI Education Center Programs  
OSHA Division of Training Programs and Administration  
2020 S. Arlington Heights Road, Suite 100  
Arlington Heights, IL 60005-4102

## **V. OSHA Outreach Training Program Requirements**

This section contains information on the requirements for conducting OSHA Outreach Training Program classes.

- A. OSHA-Authorized Outreach Trainer Responsibilities.** It is the responsibility of each Outreach trainer to adhere to the most current OSHA Outreach Training Program requirements, guidance, and related procedures.
  1. Each Outreach trainer is responsible for timely compliance with requests from OSHA's Office of Training and Education (OTE) or OTE designee (e.g. ATOs.) Such requests include, but are not limited to, queries regarding trainer or program information, training documentation, or other supporting records.
  2. Each Outreach trainer must promptly notify their respective ATO(s) of changes to their contact information, including: mailing address, email address, phone number(s), etc.

3. Those seeking to become an OSHA-authorized Outreach trainer must use their legal name during trainer course registration.
  - a. Students seeking registration for an Outreach trainer or trainer update course must provide a federal photo identification card (e.g., Transportation Worker Identification Credential (TWIC), military ID, passport, etc.), or a REAL ID Act-compliant, government-issued identification document (e.g. state driver's license, state-issued identification card, etc.). For additional information on the REAL ID Act and acceptable forms of identification, go to <https://www.dhs.gov/real-id>.
  - b. International students seeking registration for an Outreach trainer or trainer update course must present a passport or other commonly accepted international photo identification document to verify their identity.
  - c. Only a legal name supported by a verified photo identification document may be used on trainer prerequisite forms, OSHA-authorized Outreach trainer cards, and all other Program documentation. (e.g., OTPRs, replacement card requests, etc.)
    - 1) The same legal name must be used across all industries and ATOs.
    - 2) Should an Outreach trainer legally change their name due to marriage, divorce, court decree, etc., the trainer must immediately inform their ATO(s) of the name change. ATOs will document and retain the notice of name change for a period of five years from the date of the name change to facilitate processing replacement student course completion cards and other administrative or program oversight activities. Trainers shall be issued a new trainer card reflecting the new name.
4. Outreach trainers are expected to promote Program goals and training, and represent OSHA and their ATO in a credible manner.
5. Failure to comply with Program requirements or responsibilities, or any instances of trainer misconduct, behavior, or activities that tend to discredit OSHA or diminish the effectiveness of the Program, may result in corrective action by OSHA up to and including the revocation of the Outreach trainer's authorized status.
6. Outreach trainers must maintain physical possession of their trainer card. This card serves as proof of the trainer's authorized status. The trainer card must be displayed at the beginning of each Outreach class, and upon student request. In the event of loss, damage, theft, name change, misprint,

etc., trainers must promptly contact their ATO to receive a replacement trainer card. A trainer on suspension, or whose authorization has been revoked, may not use their trainer card to misrepresent their current trainer status.

**B. Statement of Compliance.** Each Outreach trainer must sign a statement attesting that the training they conduct will be in accordance with Program requirements and procedures. (Appendix A)

**C. Exception Requests.** OTE does not routinely grant exceptions to policy for Outreach classes. Exception requests are evaluated individually. Previously granted policy exceptions do not guarantee or imply approval of future requests.

1. Exception requests must include a detailed narrative describing the need for the exception, and why the inherent flexibility of the Program is insufficient to deliver quality training.
2. All exception requests must be submitted in writing by the primary Outreach trainer.
3. ATOs will receive and review all exception requests and may approve under certain limited conditions.
4. All exception requests must meet the following conditions:
  - a. Submission Timelines. All exception requests must be submitted, in writing, to the trainer's ATO at least seven calendar days prior to the scheduled class start date for review and processing; and
  - b. Exception Restrictions. A trainer is permitted only one exception in effect per class. An exception will only be granted in unusual, extenuating circumstances. OSHA does not consider cost savings, trainer availability, program or workplace time limits, or missing work to be extenuating circumstances.

**D. Investigation and Review Procedures.** The procedures used by OSHA to investigate complaints or allegations of failure to comply with OSHA *Outreach Training Program Requirements* are available on the OSHA website. (<https://www.osha.gov/training/outreach/investigation-procedures>)

**E. Trainer Code of Conduct.** Outreach trainers must always conduct themselves professionally during training, at meal and/or other break periods, in financial dealings with their students or customers, and during interactions with ATO staff, instructors, and other Program stakeholders. Examples of unprofessional behavior include, but are not limited to:

1. Inappropriate Behavior or Activity. This includes such inappropriate behavior as:
    - a. Serving or allowing alcohol to be served at, during, or in conjunction with training activities.
    - b. Suggesting how to circumvent OSHA regulations.
    - c. Making discriminatory or defamatory remarks towards or regarding OSHA, an ATO, or any individual or group of individuals. This includes email, print media, social media, and websites.
    - d. Telling jokes that could reasonably be considered offensive, insulting, humiliating, or demeaning.
  2. Improper Class Setting. This includes conducting training at a place not conducive to learning. For example, providing training in bars, locations with outside distractions, or in-person training at private residences.
  3. Felony Conviction. Outreach trainers convicted of a felony may be subject to corrective action including suspension or revocation. Prior felony conviction does not automatically preclude a prospective trainer from attending a trainer course or seeking authorized trainer status.
  4. Failure to Handle the Payment and Refund of Course Tuition and Fees in a Professional Manner. This includes failing to reimburse full course tuition and fees within five business days of canceling a class; or if the trainer reschedules the canceled class, failing to reimburse full course tuition and fees to each student that does not affirmatively agree within 10 business days of the class cancellation to attend the rescheduled class.
  5. Double Scheduling. Outreach trainers may not schedule multiple classes projected to occur at the same date and time.
- F. Training Delivery.** Outreach training that does not comply with the requirements listed below will not be recognized, and student course completion cards will not be issued to the trainer.
1. Definitions. OSHA defines an Outreach trainer course, class, and student as follows:
    - a. Course: OSHA defines a “course” as a series of lessons addressing specified topics to teach hazard awareness that meets the required minimum student contact hours.

- b. Class: OSHA defines a “class” as an offering of a 10- or 30-hour Outreach course within a specific timeframe that meets required minimum student contact hours.
  - c. Student: OSHA defines a “student” as a person attending a class. Trainers (primary, assistant, or guest) are not considered students. Therefore, the Outreach trainer must not include their name on the student roster.
2. Attendance. To receive a student course completion card, the student must attend the entire class and complete all class requirements, including all requisite topics and the minimum number of contact hours.
3. Student Contact Hours. Student contact hours refer to the time spent covering course content. Student contact hours do not include breaks for meals or other breaks, or time spent on administrative matters such as taking attendance or administering optional tests.
4. Daily Student Contact Hour Limit.
- a. Training is limited to a maximum of 7.5 student contact hours conducted per calendar day. Therefore:
    - 1) 10-hour classes must take a minimum of two calendar days.
    - 2) 30-hour classes must take a minimum of four calendar days.
  - b. The entire duration of an individual training session can be no more than 10 consecutive hours including 7.5 student contact hours, and administrative time such as lunch/meal and other breaks, taking attendance, and optional testing. For example, a training session can be conducted from 9:00 pm through 7:00 am the following day; but, cannot run past 7:00 am.
  - c. No more than 10 hours of training (including student contact hours, lunch/meal and other breaks, and administrative matters such as attendance and tests) may be conducted in a 16-hour period. An 8-hour break (minimum) is required if 7.5 or more hours of training (including student contact hours, lunch and other breaks, and administrative matters and tests) are conducted in a 16-hour period. This break may need to be longer to ensure compliance with Section V.F.4.a.
5. Breaks and Meal Periods. At a minimum, a 10-minute break period must be provided after every two consecutive student contact hours of

instruction. A meal period of at least 30 minutes must be provided for each training session which lasts for more than six hours. The break and meal periods are not intended as instructional breaks, training is not allowed during these times.

6. Class Duration.

- a. Outreach trainers may break the class into segments to deliver the training over multiple days, weeks, or months provided the training is completed within 180-calendar days of the class start date. Each segment must be a minimum of 30 minutes.
- b. The 180-calendar day requirement applies unless the ATO has granted an exception, in writing, to the duration requirement. (See Section V.C.)

7. Class Style.

- a. OSHA expects Program training to meet adult learning needs and include interactive activities. Therefore, training must include workshops, case studies, exercises, and demonstrations that involve student participation and interaction.
- b. Videos cannot comprise more than 25% of the instructional time spent on Program training.

8. Student Verification. Outreach trainers must employ every reasonable effort to verify the identity of each individual attending their Program classes.

9. Providing 10-hour Students Additional Training to Receive a 30-hour Card. Outreach trainers may provide 20 additional hours to 10-hour students. Students may receive 30-hour cards under the following conditions:

- a. The same Outreach trainer must conduct the initial 10-hour training and the additional 20-hours.
- b. All Outreach training must be completed (from the start of the 10-hour class to the end of the 30-hour class) within 180-calendar days.
- c. The original 10-hour card must be returned to the ATO for the student to receive the 30-hour card. If the 10-hour card is not available or returned to the ATO, a 30-hour card will not be issued to the trainer.

- d. The primary Outreach trainer is responsible for completing the reporting requirements outlined in Section VII.

10. Stand Alone Training. Outreach Training Program courses are considered stand-alone courses and must not be conducted as part of, or in conjunction with, other OSHA Outreach Training Program training. This does not prevent organizations from developing wrap-around coursework that is not part of the OSHA Outreach Training Program.

For example, an Outreach trainer may not treat a General Industry 10-hour class as a combination General Industry 10-hour class and Construction 10-hour class because the trainer combined like-portions and subsequently taught all the other required portions of both 10-hour classes in a single training. In such a circumstance, the Outreach trainer will receive course completion cards for one 10-hour class in one industry only.

This restriction does not apply to the use of portions of a 10-hour class to fulfill requirements toward a 30-hour class in the same industry. (See Section V.F.9.)

**G. Makeup Training.** If a student misses any portion of the class, the student may be eligible to complete the training at a later time. This is considered “makeup training.” The Outreach trainer may conduct makeup training for a student in accordance with these requirements:

1. The student must have completed at least 50% of the instructional contact hours during the original class offering. Eligible student documentation and makeup training documentation must comply with the document submittal requirements in Section VII.
2. The Outreach trainer must schedule makeup training, and makeup training must be completed, within 180-calendar days from the start of the training class date, in accordance with Section V.F.9.b.
3. Makeup training may be performed by the primary Outreach trainer or by an assistant Outreach trainer in accordance with Section V.M. However, the primary Outreach trainer is responsible for completing the reporting requirements outlined in Section VII.
4. Students may complete the makeup training with a guest trainer who conducted the missed training portion (s), provided this part of the training is coordinated by the primary Outreach trainer. The student must have access to the primary Outreach trainer for any follow-up questions.

5. Makeup training classes consisting of fewer than three students are permitted.

## H. Training Topics.

1. Types of Training Topics. Program courses consist of required, elective, and optional topics. These topics are outlined in the specific industry procedures.
  - a. Required. Required topics must be conducted for the minimum amount of time indicated. These topics are determined by OSHA.
  - b. Elective. Elective topics must be chosen by the Outreach trainer from the list provided in the specific industry procedures. These choices are based on industry, locality, or audience needs. OSHA requires a minimum number of elective topics to be delivered, and a minimum amount of time that must be devoted to these topics. The list of acceptable elective topics is determined by OSHA.
  - c. Optional. Optional topics are intended to supplement the required and elective topics. These topics are intended to provide an Outreach trainer with the flexibility to meet diverse training needs. Additional time in required or elective topics is necessary if optional topics are not covered. Optional topics are determined by the Outreach trainer and must clearly relate to occupational safety and health.
2. Designated Training Topics. The designated training topics sections in the specific industry procedures contain detailed information on subjects that must be covered in Program classes along with associated time requirements.
3. Ineligible Training/Topics.
  - a. Topics must be occupational safety and health topics dealing with hazard recognition or prevention.
  - b. CPR and First Aid instruction or training cannot be counted towards fulfillment of OSHA *Outreach Training Program Requirements*.
  - c. Training conducted to comply with OSHA standards cannot be counted toward OSHA *Outreach Training Program Requirements*.



## I. Training Materials

### 1. Required Curriculum.

- a. Outreach trainers must use required curriculum as noted on OSHA's Outreach Training Program webpage. ([www.osha.gov/training/outreach](http://www.osha.gov/training/outreach) - see Appendix B) Outreach trainers must maintain awareness of current Program requirements.
- b. *Introduction to OSHA*. This 1-hour curriculum is required to be covered in every OSHA Outreach Training Program class. The module materials include an instructor guide, student handouts, and participatory activities. The curriculum is available on the Outreach page at [www.osha.gov/training/outreach](http://www.osha.gov/training/outreach). Additional information on this module is available in each specific industry procedures document.

2. Trainer Resources. Outreach trainers may receive resources from their ATO during Outreach trainer classes. Please note that most course materials provided in the Outreach trainer classes are intended for use by Outreach trainers and are not designed for students.
3. Student Materials. Outreach trainers must provide students with reference materials that highlight the key training points for each topic covered. For helpful training resources, see Appendix B.
4. Trainer Contact Information. Outreach trainers must provide all students with the: trainer(s) name(s), trainer(s) contact information, ATO, and instructions on how to request a replacement student course completion card. Outreach trainers must present their original trainer card (not a copy) at the beginning of each Outreach class, and upon student request.

**J. Topic Duration.** OSHA has assigned a minimum time period for each required topic. The minimum time period an Outreach trainer may spend on any topic is 30 minutes. Unless otherwise noted, OSHA recommends spending at least one hour on each topic.

1. 10-Hour Class. Outreach trainers may not spend more than four hours on any single topic, unless permitted in the specific industry procedures.
2. 30-Hour Class. Outreach trainers may not spend more than six hours on any single topic, unless permitted in the specific industry procedures.

## **K. Geographic Limitations.**

1. OSHA Outreach Training Program classes may only be conducted in training locations within the geographic jurisdiction of the Occupational Safety and Health (OSH) Act. The geographic jurisdiction of the OSH Act is limited to the 50 U.S. States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, Wake Island, Outer Continental Shelf Lands defined in the Outer Continental Shelf Lands Act, and Johnston Island.
2. OSHA Outreach Training Program classes delivered outside the geographic jurisdiction of the OSH Act to members of the U.S. military and to civil service employees are permissible and these personnel are eligible to receive student course completion cards. In these cases, Outreach trainers are not required to request an exception, but must ensure their ATO is aware that the persons trained are members of the U.S. military or civil service employees of the U.S. government. A civil service employee is defined as a federal employee who is either a Competitive Service, Excepted Service, or a Senior Executive Service employee. Non-civil service employees, contractors for the U.S. government, and individuals not subject to the OSH Act cannot be trained outside of the geographic jurisdiction of the OSH Act.

**L. Training Language.** Outreach trainers must teach in a language that students understand. If a student's vocabulary is limited, the training must accommodate that limitation. The primary Outreach trainer must be fluent in the training language, or interpreters may be used. If using an interpreter, the following criteria apply:

1. Interpreter Qualifications. The interpreter must have a background in occupational safety and health.
2. Class Duration with Simultaneous Interpretation. The primary Outreach trainer must ensure a sufficient amount of class or additional class time is incorporated for the interpretation, when training is presented in one language and simultaneously translated and presented in a second language by a dedicated interpreter. Simultaneous translation must be conducted in a non-disruptive manner for all class students.
3. Class Duration with Non-Simultaneous Interpretation. The primary Outreach trainer must ensure the length of the class is held for a minimum of twice the amount of time to allow for adequate interpretation where training is presented in one language and then provided in a second language (non-simultaneously).

## **M. Types of OSHA-Authorized Outreach Trainers.**

1. Primary Outreach Trainer. The primary Outreach trainer must:
  - a. Design and coordinate the class;
  - b. Teach a minimum of 50% of the class, except as indicated in Sections V.M.2-3;
  - c. Be in attendance at all times to answer questions, except as indicated in Sections V.M.2-3;
  - d. Document the class and retain class documentation, including student attendance; and
  - e. Maintain a list of assistant/guest trainers used for each class, their qualifications, and topics that each trainer delivered.
2. Assistant Outreach Trainers. Use of assistant Outreach trainers relieves the primary Outreach trainer from the responsibility of attending all training sessions. When assistant Outreach trainers are used, the primary Outreach trainer must be in attendance for at least 20% of the class. The assistant Outreach trainer(s) must be authorized in the specific industry course being delivered. The primary Outreach trainer must document, coordinate, and retain records of all training sessions.
3. Guest Trainers. Guest trainers are defined as subject matter experts who are not OSHA-authorized Outreach trainers. Outreach trainers may use guest trainers to assist in delivering their classes. There must be at least one Outreach trainer in attendance at all times.

## **N. Minimum Class Size.**

1. OSHA intends for Outreach training to be participatory. For this reason, OSHA requires Outreach trainers to teach at least three students per class, except as noted below.
2. ATOs may allow an exception under extenuating circumstances. A written request for an exception to this requirement must be submitted by the Outreach trainer to the ATO. A separate request must be submitted for each class for which an exception is sought. (See Section V.C.)

**O. Maximum Class Size.**

1. Outreach classes are limited to a maximum of 40 students, except for video conferencing as described in Section V.R.2.
2. ATOs may allow an exception under unusual, extenuating circumstances. A written request for an exception to this requirement must be submitted by the Outreach trainer to the ATO. A separate request must be submitted for each class for which an exception is sought. (See Section V.C.)

**P. Records Retention.** Outreach trainers must retain Program class records for five years from class end date. This requirement is the sole responsibility of the Outreach trainer regardless of what records may be maintained by an employer. OSHA reserves the right to request copies of class records for verification purposes at any time. The class records for each class must include the following:

1. Daily Student Sign-in Sheets. The following documentation is required:
  - a. Separate sign-in sheets must be completed for each day of the course.
  - b. Each sign-in sheet must contain:
    - course name;
    - date/time of course sessions;
    - training location(s) name, city, and state;
    - students' printed or typed first/last name adjacent to students' signatures; and the
    - primary/assistant Outreach trainer(s) printed or typed first/last name with signature attesting to the accuracy of the data listed.
2. Student Contact Information. This is the address where the Outreach trainer will deliver the student course completion card. This location may be the student's home or business address.
3. Detailed Topic Outline. The outline must indicate the following:
  - date,
  - training site address,
  - course title,
  - specific time of each topic delivered (e.g., 1 pm to 2 pm),
  - all break/meal periods, and
  - all trainers must be listed next to the topic they instructed.

4. OSHA Outreach Training Program Report. A copy of the official OTPR submitted to request student course completion cards must include the following:

- training site address,
- student names,
- list of topics taught, and
- cumulative class time spent on each topic.

**NOTE:** An ATO Outreach Training portal report is not equivalent to, and may not be substituted for, the official OTPR.

5. Student Course Completion Cards. Prior to issuing student course completion cards, Outreach trainers must make a complete copy of the front and back of each student course completion card. Copies may be electronic, digital, or paper. This measure will enable the Outreach trainer to track the card number issued to each student and facilitate the processing of replacement card requests.

6. Guest Trainers. A list containing:

- name of each guest trainer,
- specific topics taught,
- cumulative class time spent on each topic, and
- guest trainer qualifications.

7. Assistant Outreach Trainers. A list containing:

- name of each assistant Outreach trainer,
- specific topics taught,
- cumulative time spent on each topic, and
- copy of each assistant Outreach trainer's valid trainer card.

**NOTE:** Completion, submission, and retention of all records associated with Outreach training classes are the responsibility of the primary Outreach trainer. If the Outreach trainer leaves an organization for which they conducted training, for any reason, retention of the original training records remains the responsibility of the Outreach trainer. Duplicate copies of training records may be maintained by the organization for their records. Outreach trainers may not rely on internal or external staff, clients, employers, or third parties to prepare, submit, report, retain, or maintain the required training records.

**Q. Advertising.** Outreach trainers must properly identify the current industries they are authorized to deliver. If advertising is false or misleading, the Outreach trainer must promptly correct the problem. These restrictions also apply to course

completion certificates, and other advertising or marketing materials and documents.

1. Advertising may include:

- a. “OSHA-authorized.” Indicates that the trainer is authorized by OSHA; the use of “OSHA-authorized” is allowed.
- b. “OSHA” and “Department of Labor” Usage. The terms “OSHA” and “Department of Labor” may be used in advertising but not in a manner which implies or expresses that the OSHA-authorized Outreach trainer is an employee of OSHA or that the Outreach class is being conducted by, has been approved by, is endorsed by, or is being done in cooperation with OSHA or the Department of Labor.

2. Advertising must not include:

- a. Department of Labor and/or OSHA Logos. The use of the OSHA logo, the U.S. Department of Labor logo, and the U.S. Department of Labor seal is strictly prohibited.
- b. Certified/Licensed. The OSHA Outreach Training Program is not a certification program and must not be advertised as such. Neither OSHA-authorized Outreach trainers nor students are certified/licensed, nor are OSHA Outreach Training Program curricula certified. The Outreach trainer is authorized, and students receive student course completion cards. Advertisements must not use any form of the word “certify,” “license,” or imply that the OSHA Outreach Training Program class will result in the individual being certified/licensed.
- c. OSHA “Approved.” OSHA does not “approve” trainers or classes. Advertising cannot state, imply, or suggest that OSHA Outreach Training Program or OSHA-authorized Outreach trainers are approved by OSHA.
- d. OSHA Trainer Courses (e.g., #500, #501, #5400, #5600). Outreach trainers cannot conduct OSHA trainer courses. Outreach trainers must not refer to an OSHA Outreach Training Program class as an “OSHA” trainer course or an “Outreach” trainer course. Outreach trainer courses may only be conducted by an ATO.
- e. Use of “Train-the-Trainer.” Outreach trainers must not combine the use of “OSHA” and “Train-the-Trainer” in advertising. Students who complete Outreach classes are not recognized as OSHA-authorized Outreach trainers and are not entitled to receive student course completion cards for individuals they may train.

- f. Outreach trainers cannot provide cards to students which are depictions or representations of an OSHA Outreach Training Program student course completion card, or which may be misconstrued as a student course completion card. Unobscured or fully legible depictions of student course completion cards may not be posted on trainer or training organization websites, or otherwise incorporated into advertising or marketing materials.
  - g. Outreach trainers cannot state that training is OSHA compliant or that it meets the training requirements of any OSHA standard.
3. Advertising Training Outside OSHA's Geographic Jurisdiction. Outreach trainers may not disseminate or post promotional materials, advertising, or information of any kind (including electronic mail, print media, and/or websites) for OSHA Outreach Program training conducted outside the geographic jurisdiction of the OSH Act, and may not post information regarding this training on any website.

#### **R. Types of Alternative Training Methods.**

1. Asynchronous remote training. Outreach trainers may not conduct asynchronous (not live instructor-led) remote classes. Only OSHA-authorized online Outreach training providers may conduct asynchronous remote Outreach classes.
2. Video Conferencing. OSHA's preferred delivery method is through standard in-person classroom instruction. Training conducted through a remote video conferencing platform is permitted.
  - a. Advance Notification. The primary Outreach trainer's ATO must receive advanced notification no later than seven calendar days prior to the scheduled class start date. The notification must include the following:
    - name of primary/assistant Outreach trainer(s);
    - name of any guest trainer(s);
    - copy of relevant Outreach trainer card(s);
    - guest trainer qualifications;
    - type of hardware, software, or system the trainer(s) will use to deliver the alternative training method (cellular devices are not permitted to deliver or receive training); and
    - list of the materials that will be provided to each student including a description of when and how students will receive the materials.
    - a detailed course outline which indicates each topic, and the length of time for which each topic will be taught.

b. Requirements.

- 1) Class Size. The maximum class size must not exceed 20 students unless a proctor is present for the entire class duration. This enables proper and manageable student observations to be conducted.
- 2) Accessibility. All training must be accessible to OSHA and the respective ATO by submitting a valid class website address link for observation purposes.
- 3) Hardware. Trainers and students must use camera and audio hardware for the duration of the entire class.
- 4) Reporting. Classes delivered using an alternative training method, i.e., video conferencing, must be reported on the OTPR, and recorded under the “Other” type of training in block 11 as “remote.”

## VI. Industry Sector-Specific Emphasis Training

Organizations interested in developing industry sector-specific emphasis training courses must submit a written request to the OSHA Office of Training and Education. The written request should be sent to the address in Section IV.B., and must include the following elements:

**A. Justification.** A detailed narrative justification for the industry-specific emphasis training must include:

1. The industry sector(s) that will be addressed.
2. Why the training is needed.
3. Why the inherent flexibility of the Program is insufficient to meet the training need.
4. The training goals and objectives used to address the training need.

**B. Topics Listing.** A listing of topics and minimum instructional times must be provided. Topics covered must align and comply with the requirements outlined in the OSHA *Outreach Training Program Procedures* in the applicable industry.

**C. Training Materials.** Requesting organization must:

1. Provide a copy of all training materials developed for delivery.



2. Ensure the training materials are current and relevant for the specific industry.
3. Include the method(s) of delivery (e.g., audiovisuals, handouts, workshops).
4. Ensure training materials are compliant with Section 508 of the Rehabilitation Act of 1973, as amended in 1998 (29 U.S.C. §794 (d)).
5. Annually, conduct review and provide to OSHA updated training materials to post on OSHA's website.

## **VII. How to Obtain Student Course Completion Cards**

After conducting a Program class, the Outreach trainer must submit the following documentation to their ATO to receive student course completion cards.

**A. Outreach Training Program Report.** See specific industry procedures for information on completing the OTPR.

**B. Key Points on Submitting Class Documentation.**

1. Statement of Certification. The statement of certification on the OTPR must be signed, attesting that the training was conducted in accordance with Program requirements and procedures.
2. Time Limit on Submitting Training Documentation. Documentation of training must be submitted within 30 calendar days of class completion.
3. Report Classes Individually. Report each class separately – do not combine multiple classes in one report. This condition does not apply in cases where a 10-hour class is used to fulfill requirements toward a 30-hour class in the same industry, as described in Section V.F.9.

**C. Where to Send Class Documentation.**

1. Documentation must be submitted to the trainer's ATO. The list of ATOs is available through the OSHA website at [www.osha.gov/otiec](http://www.osha.gov/otiec).
2. Outreach trainers who have taken an update course shall submit student course completion card requests to the ATO that provided their most recent trainer authorization for that specific industry.

**D. Documentation for Students Eligible for Makeup Training.** The OSHA-authorized Outreach trainer must submit documentation for students that missed any portion of a class and are eligible for makeup training. (Section V.G.) This

documentation must be separate from the OTPR. The primary Outreach trainer must provide the following information:

1. Original OTPR for students that completed the original class,
2. Documentation for each eligible student must include:
  - a. Student contact information (Section V.P.2.)
  - b. Completed topics and contact hours
  - c. Missed topics and contact hours
  - d. Reason the student was unable to complete the original class
3. New OTPR with makeup training class end date

## **VIII. Student Course Completion Cards and Certificates**

### **A. Distribution of Student Course Completion Cards.**

1. Outreach trainers must ensure all student course completion cards are issued to students within 90 calendar days of the course end date.
2. Trainers must issue student course completion cards directly to the student, regardless of who paid for the training. Cards may be sent to the student's address on record as described in Section V.P.2., or hand-delivered. OSHA encourages, but does not require, trainers to issue course completion cards through a trackable delivery method (e.g. USPS, UPS, FedEx, messenger service, hand delivery receipt, etc.).

### **B. Receipt of Student Course Completion Cards.** To ensure student course completion cards are received by students within 90 calendar days of the course end date:

1. Outreach trainers must submit class documentation to their ATO within 30 calendar days of class completion.
2. ATOs must process a student course completion card request within 30 calendar days of receipt from the requestor.
3. Outreach trainers must provide student course completion cards to students within 90 calendar days from the class end date.

### **C. Student Course Completion Card Fees.** ATOs do not receive funding from OSHA. These organizations support their training programs and Program administrative activities through tuition and fees. For this reason, OSHA authorizes ATOs to charge fees for student course completion cards, as they

would for other course completion documents such as certificates, diplomas, and transcripts.

#### **D. Card Completion.**

1. Legibility. Outreach trainers must ensure student course completion cards are legible prior to distribution to students.
2. Card Alteration. Trainers may not alter or modify student course completion cards. Trainers may not add additional information such as company names to the cards.
3. Replacement Student Course Completion Cards. A student who lost or damaged their student course completion card must contact the trainer that conducted their training to request a replacement card. The Outreach trainer cannot request replacement cards unless the following conditions are met:
  - a. Class completion date is within the last five years.
  - b. The trainer provides the:
    - requesting student's full name,
    - class end date, and
    - type of class.
  - c. The student has not previously received a replacement card for the same class.

**E. Non-Receipt of Student Cards.** When an ATO distributes a batch of student course completion cards, and the trainer asserts that they did not receive the batch, a new set of cards cannot be requested more than 90 calendar days after the class end date. Cards requested 90 calendar days after the class end date will not be issued.

However, if the trainer requests a new set of cards 90 or fewer calendar days after the class end date, a new set of cards will be processed, provided the trainer sends the following documentation to the ATO:

- daily student sign-in sheets for each day of the class,
- student contact information,
- detailed topic outline, and

- a signed statement agreeing to pay fees associated with future student course completion card deliveries if the batch is replaced to cover the cost of the certified delivery.

**F. Misprinted or Erroneous Course Completion Cards.** All misprinted/erroneous student course completion cards shall be returned to the ATO to obtain replacements. The trainer may not attempt to correct and/or use or distribute misprinted cards.

**G. Class Certificates.** Outreach trainers are encouraged, but not required, to provide class certificates to students at the end of the class. This helps students provide evidence that they completed the class before they receive their student course completion cards. Acceptance of a class certificate is at the discretion of the requesting organization (e.g., employer, union, trade association, job site, etc.).

1. All advertising restrictions listed in Section V.Q. apply to class certificates.
2. If providing class certificates, the trainer must include the following on each class certificate:
  - student's name,
  - class end date,
  - legible OSHA-authorized Outreach trainer name, and
  - the statement below.

*“As an OSHA-authorized Outreach trainer, I attest that I have conducted this Outreach training class in accordance with OSHA Outreach Training Program Requirements. I will document this class to my Authorizing Training Organization. Upon successful review of my documentation, I will provide each student their course completion card within 90 calendar days from the class end date.”*

3. To reduce confusion, class certificates may not be the same print format or size as student course completion cards, nor may class certificates otherwise resemble student course completion cards.

## **IX. OSHA Outreach Training Program Monitoring**

Both OSHA and ATOs periodically conduct training monitoring visits and record audits of Outreach classes and/or trainers to ensure compliance with Program requirements and procedures.

- A. Advance Notice of Training.** Outreach trainers are required to provide one-time or ongoing advance notice of scheduled training and advance notice of cancellation of scheduled training to their ATO upon request of either OSHA or the ATO. If an Outreach trainer does not comply with or provide the advance notice information requested, the ATO will not issue student course completion cards to the trainer, for the training(s) the advance notice was not provided or was incomplete.
- B. Training Observation.** A training observation may include verification of class timing, student attendance, topic coverage, assistant Outreach trainers and guest trainers' credentials, and other OSHA *Outreach Training Program Requirements*. Outreach trainers must permit unscheduled training monitoring visits from OSHA or ATO representatives.
- C. Record Audits.** A record audit may require submission of any or all of the items noted in (Section V.P.). If a trainer does not respond to a record audit request by the stated due date, the ATO will not issue student course completion cards to the trainer.

## **X. OSHA Outreach Training Program Watch List**

OSHA maintains a list of Outreach trainers whose authorization has been suspended or revoked as a result of failure to comply with OSHA Outreach Training Program requirements and procedures. Individuals may not conduct Outreach training or attend Outreach trainer courses while their trainer authorization is suspended or revoked. Additionally, primary Outreach trainers may not use a trainer whose name appears on the Watch List as an Assistant Outreach trainer or guest trainer for any Program classes.

## APPENDIX A

### Statement of Compliance

I attest that I will conduct all Outreach classes in accordance with the OSHA Outreach Training Program. I understand that it is my responsibility to ensure that I meet the requirements of the most recent edition of the OSHA *Outreach Training Program Requirements* and related industry-specific procedures. I will maintain the training records as required by the requirements and procedures and I will provide these records to the OSHA Office of Training and Education (or its designee) upon request. I understand that I will be subject to immediate dismissal from the Program if I provide information that is not true, complete, or correct. I further understand that providing false information may subject me to civil and criminal penalties under Federal law, including 18 U.S.C. Sec. 1001 and 29 U.S.C. 666(g), which provide criminal penalties for making any false statement, representation, or certification.

\_\_\_\_\_  
Trainer Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Trainer's typed or printed name

\_\_\_\_\_  
Authorized Trainer Expiration Date

\_\_\_\_\_  
Name of Course & Course Dates (To be completed by OTI Education Center)

\_\_\_\_\_  
Name of OTI Education Center (To be completed by OTI Education Center)

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The OSHA-authorized Outreach trainer is responsible for listing all Authorizing Training Organizations (ATOs) through which they are authorized to deliver OSHA Outreach Training Program classes.

Failure or refusal to list current authorizations may result in corrective action, up to and including revocation of the trainer's authorized status. List your current authorizations below:

ATO Name	Title of course/update course	Expiration Date	Card Number

## APPENDIX B

### Training Resources

The intent of this appendix is to provide trainers with resource information to assist in the development and preparation of OSHA Outreach Training Program classes. Training resources are accessible through the OSHA website at [www.osha.gov](http://www.osha.gov).

#### OSHA Outreach Training Program References

**OSHA Outreach Training Program webpage** – [www.osha.gov/training/outreach](http://www.osha.gov/training/outreach).

- OSHA *Outreach Training Program Requirements*
- Industry-specific procedures
- Program announcements
- Frequently asked questions

**Authorizing Training Organization (ATO)** – [www.osha.gov/training/outreach/ato](http://www.osha.gov/training/outreach/ato). Find the OSHA-authorized Outreach trainer's primary point of contact.

**OSHA Training Institute (OTI) Education Centers** – [www.osha.gov/otiec](http://www.osha.gov/otiec). Locate information on how to register for trainer, trainer update, and other courses.

**Introduction to OSHA** – <https://www.osha.gov/training/outreach/teaching-aids>. Required Outreach training course curriculum.

**Investigative and Review Procedures** – [www.osha.gov/training/outreach/investigation-procedures](http://www.osha.gov/training/outreach/investigation-procedures).

#### Relevant OSHA Websites

**OSHA Home Page** - [www.osha.gov](http://www.osha.gov)

**Safety and Health Training Resources** - <https://www.osha.gov/training/library/materials> Main OSHA training resource site which includes:

- **Training and Reference Materials Library.** Training and reference materials developed by OSHA as well as links to other related sites.
- **Compliance Assistance Resources.** Resources to help understand OSHA requirements and learn about OSHA's cooperative programs.
- **Grantee Developed Materials.** Training materials such as PowerPoints, instructor and student manuals, and test questions developed by OSHA grantees.
- **Other Safety and Health Training Resources** - Training materials and resources developed by other federal and state agencies.

## APPENDIX B – Cont.

### Other Helpful OSHA Sites

**Safety and Health Topics Index** - <https://www.osha.gov/topics>

**Young Workers** – <https://www.osha.gov/young-workers>

**Making the Business Case for Safety and Health** - <https://www.osha.gov/businesscase>. Helps illustrate why investing in workplace safety and health can improve an organization’s financial performance.

**Quick Takes** - <https://www.osha.gov/quicktakes>. Sign up for OSHA’s bi-weekly e-news memo.

**OSHA Publications** - <https://www.osha.gov/publications>. Helpful quick cards, fact sheets, publications, forms, and posters. A few significant publications include:

- OSHA: All About OSHA, OSHA 3302
- OSHA At-A-Glance, OSHA 3439
- Training Requirements in OSHA Standards, OSHA 2254
- Workers' Rights – Vertical Wallet Card, OSHA 3392

**U.S. Government Bookstores** - <https://bookstore.gpo.gov/>. Order OSHA standards.

### OSHA Technical Support

**OSHA Regional or Area Offices.** For support related to enforcement and the OSHA standards. These offices also provide publications and other helpful references. When contacting a Regional Office, ask for technical support. See <https://www.osha.gov/contactus>.

**Compliance Assistance Specialists.** These specialists are in each Area Office in states under federal jurisdiction. They’re available for seminars, workshops, and speaking events. See <https://www.osha.gov/complianceassistance/cas>.

<p><b>NOTE:</b> URLs provided above are subject to change at any time.</p>
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