

Are Your Safety Trainers “Qualified”?

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No matter what industry you work in, at some point, you have to conduct safety training. Whether it's HAZWOPER, electrical safety, forklift, OSHA recordkeeping, or anything in between, there are topics that simply have to be covered from a regulatory standpoint. However, what about your trainers? Who are you designating as your trainer(s) for these topics? Are there any specific trainer requirements? Well, yes and no. Ultimately it depends on the topic being covered, but some OSHA standards do have specific trainer requirements that must be adhered to.



Some OSHA standards that have specific trainer requirements include, but are not limited:

- **Hazardous waste operations and emergency response (HAZWOPER)** – 1910.120(e)(5);
- **Bloodborne Pathogens** – 1910.1030(g)(2)(viii);
- **Fall Protection** – 1910.30(a)(2) and 1926.503(a)(2);
- **Stairways and Ladders** – 1926.1060(a)(1);
- **Powered Industrial Trucks** – 1910.178(l)(2)(iii);
- **Cranes and Derricks in Construction** – 1926.1427(a);
- **Scaffolds** – 1926.454(a); and
- **Steel Erection** – 1926.761(a)

Is there a difference between a “qualified person” and “competent person”?

Yes, these are two completely different terms. While one person may be able to hold both titles at times, it's important to understand the differences.

A qualified person, as defined by various OSHA standards, means *“one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, has successfully demonstrated his ability to solve or resolve problems **relating to the subject matter, the work, or the project**”* (29 CFR 1926.32(m)).

A “competent person”, on the other hand, is defined by OSHA as *“one who is capable of identifying existing and predictable hazards in the surroundings or working conditions, which are unsanitary, hazardous, or dangerous to employees, and who has **authorization to take prompt corrective measures to eliminate***

them” (1926.32(f)).

A qualified person might have more technical expertise than those designated as competent, but they would not necessarily have expertise in hazard recognition and/or the authority from their employer to correct the identified hazard(s). For example, in a [2003 OSHA letter of interpretation](#) regarding powered industrial truck trainers, OSHA stated that *“a trainer must have the ‘knowledge, training, and experience’ to train others how to safely operate the powered industrial truck in the employer’s workplace. **In general, the trainer will only have sufficient ‘experience’ if he has the practical skills and judgement to be able to himself operate the equipment safely under the conditions prevailing in the employer’s workplace. For example, if the employer uses certain truck attachments and the trainer has never operated a truck with those attachments, the trainer would not have the experience necessary to train and evaluate others adequately on the safe use of those attachments. However, the standard does not require that the trainers operate a PIT regularly (i.e., outside of their operator training duties) as part of their job function or responsibility.”*** As implied through the definition, a qualified person is knowledgeable about a specific task, piece of equipment, etc. This also means that a qualified person may be “qualified” for one task, but not another.

Some standards require training to be conducted by a “competent person”, others state it must be conducted by a “qualified person”, and many standards do not discuss trainer qualifications at all. If it does not specify, always ensure that the trainer is “qualified” as a bare minimum and ensure they are familiar with the specific topic as it relates to your workplace and site-specific hazards. Many OSHA letters of interpretation state that training should ensure that students “master” the necessary skills. Can your trainer(s) ensure that they’ve “mastered” what they need to in order to do their job safely, efficiently, and in accordance with regulatory requirements?



Open Door...Enter National Consensus Standards...

If you want to truly vet out your trainers and ensure they meet the minimum requirements, your best bet, in many situations, is to review the applicable national consensus standards, such as ANSI, NFPA, etc. In many cases, the relevant national consensus standards are more up to date than the applicable OSHA standard, with many ANSI and NFPA standards being updated approximately every five years or so (sometimes every three years, such as NFPA 70E). This helps ensure that your training is based on current industry best practices, recent data, and relevant research. With many OSHA standards not being updated in 40 years, it’s important to do your best to incorporate the “latest and greatest” when it comes to the minimum standards. One thing to note, however, is that in most cases, these national consensus standards are going to take it up a notch!



For example, where OSHA states that a qualified person has a recognized degree, certificate, or professional standing, **OR** has extensive knowledge, training and experience. If you look at ANSI Z359.0-2018 (Definitions and Nomenclature relating to the ANSI Z359 series of standards for fall protection), it says a qualified person is a person with a recognized degree or professional certificate **AND** with extensive knowledge, training, and experience. Therefore, OSHA allows you to essentially have “book smarts” **OR** actual experience, whereas ANSI requires that you have both. Keep in mind that OSHA is the bare minimum for all legal requirements, so wouldn’t you rather have someone that knows the technical/textbook side of things **AND** that has been there, done that?

ANSI Z490.1-2016 – Criteria for Accepted Practices in Safety, Health, and Environmental Training

If you are a trainer, you should be referencing this ANSI standard religiously. ANSI Z490.1 goes it details regarding your entire training program as a whole, rather than just the training session itself. It discusses how and when to conduct a training needs assessment, how to develop your training to help ensure a proper delivery, learning objectives, and, of course, trainer qualifications.

One section in this standard that is relevant to this topic is trainer qualifications, as well as the need to continuously evaluate our training staff. A few months ago, I was asked by a fellow safety professional in his 70s why he would need to be attending professional development conferences at his age when he’s been doing it for years. This generated some great discussions between us and there’s no doubt that this gentleman had a wealth of knowledge that he had gained over his decades in the industry, but if your last formalized training or continuing education was over ten years ago, then how are you able to offer the same quality of service to your customers as you did years ago? We, as safety professionals (and organizations) have to strive to better ourselves.

As I always tell my workers, “***I expect progression, not perfection.***” You may have been more than qualified when you first started, but how would you rate yourself now? Would you continue to use an old PowerPoint from the previous safety manager that’s been gone for 5-10 years? While some would, many of us would say that’s not a safe bet and that “times have changed” and “it’s probably outdated”. So, what would be the difference in hiring someone, (whether internally or a third party), but not continuing to vet them out as years go by to ensure they’re still delivering the same quality you strived for, to ensure they’re still covering the learning objectives, and to ensure that you’re still achieving your desired result(s)?



ANSI Z490.1-2016 states “*Trainers shall maintain their training skills by participating in continuing education, development programs, or experience related to their subject matter expertise and delivery skills*”. This ensures we stay on our “A” game to continue delivering high-quality training to our internal and/or external customers. Companies do a fairly good job of evaluating contractors every year to ensure

they have a good focus on safety, good record over the past three years, etc., but we tend to forget to evaluate ourselves as consistently and as stringently as we do others.

The Kirkpatrick Model

The Kirkpatrick Model, which is adapted from *Kirkpatrick's Four Levels of Training Evaluation* by James D. Kirkpatrick and Wendy Kayser Kirkpatrick, has become a standard for both formal and informal training evaluations. The model describes four levels or types of evaluation. Almost all trainers use Level 1 evaluations for their course, but most would prefer to use Level 2 because knowledgeable trainers know that Level 1 alone is a poor indicator of how much actual knowledge was imparted by a course.

Kirkpatrick's four levels are:

- **Level 1 – Reaction (“Smile Sheets”).** This level is a solicitation from the individual students, usually at the end of the day or course. As the name implies, it provides only an initial “gut” reaction to the course and topics taught: Was it valuable and relevant? Did it meet the course objectives? Their own expectations? Are there suggestions for improvement? Student reactions often are the **only** evaluation of a course used by instructors and employers, even though it is the least informative and least useful in gauging an increase in knowledge, skills, and abilities (KSAs).
- **Level 2 – Learning.** Was there a measurable improvement in the KSAs of the course participants? To determine this, pre- and post-evaluation instruments covering the topics taught in the course are a “must”. Level 2 evaluation can be reassuring to instructors and employers because it can document how much and what new knowledge was “gained” by each participant. Often, this is all an instructor or employer is looking for; but Level 2 stops short of determining whether the new knowledge and skills are applied back in the workplace.
- **Level 3 – Behavior.** Only after the participants are back on the job for a while can judgement be made about whether a course led to the desired change in behavior or improvement. There are numerous reasons why participants may not be able to apply their new knowledge and skills. This evaluation level is much more difficult to measure, as it requires analysis and “shop floor” methods for observing and recording the results of training over time. Additionally, a failure of behavioral change often is because of other circumstances. Unfortunately, relatively few organizations provide the “follow-up” needed for a proper Level 3 evaluation.
- **Level 4 – Results.** Did the training provide the employer with the expected benefits? This level is intended to identify the tangible “bottom line” results of training. If analysis shows reduced cost, improved quality and efficiency, increased productivity, employee retention, increased sales, or higher morale...depending on the original reason for undertaking the training...then success for the training is evident! Measuring these types of ROIs can be expensive, time-consuming, and usually available only after a long time after training. When and where possible, Level 4 evaluation can be very valuable for a company in judging the success of its training programs.

Summary

While training is not the “fix all” solution for everything, it can be a critical component of your overall organization – **IF done correctly**. Some organizations fall into the trap of conducting training after any incident and assuming that will fix all your problems, but that’s rarely the case and is usually used simply to “check the box”. However, before you “check the box”, ensure that you know what that “box” contains. Is the refresher training actually solving the issue? If not, maybe your training program and delivery methods need to be examined to see how they can potentially be improved.

If you have any questions or would like to discuss this further, please feel free to contact me and I'll be glad to help!

Thank you and have a safe week!



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