

# Monitoring: Key to Success

by Tony Alotto

OSHA has recently initiated a new requirement for all of the OSHA Training Institutes regarding monitoring of OSHA Authorized Outreach Trainers. This consists of two parts:

1.) a record audit, which may be conducted on the paperwork that must be kept by all OSHA Authorized Outreach Trainers, and 2.) a training observation, which may be conducted to assess one of your outreach classes.

As you know, normally, all that is required for submission of card requests are the appropriate Outreach Training Program Reports for Construction, General Industry, Maritime, or Disaster Site Worker. However, as an Authorized OSHA Outreach Trainer, you must keep several other documents, listed in the OSHA Outreach Training Program Requirements, for a period of five years. A record audit will require you to provide copies of all required documents for a selected time period or for a number of courses.

**Why does OSHA want to do record audits?** OSHA requirements have changed over time. Depending on the type of class conducted, you are required to teach a select number of hours per day, spend specific amounts of time on selected topics, ensure you have student sign-in sheets, and meet other OSHA mandates. A record audit is an opportunity to review those required documents to ensure you are meeting your obligation as an Authorized Outreach Trainer. We have found that most problems identified through a record audit either can be quickly remedied, or can be remedied going forward. Most often, a record audit is “after the fact.” Therefore, it does not impact a card request in progress.

**Why does OSHA want to do training observations?** A training observation is just that; one of our qualified TEEX instructors will simply show up at one of your classes to observe all or part of the class. The purpose of this observation is to ensure that all of the correct paperwork is being completed, the class sizes are within OSHA guidelines, the appropriate topics are being taught (depending on the class type), and the OSHA required minimum and maximum amounts of training time are being applied. Training should be conducted in a professional manner and should incorporate the following practices:

- appropriately using audio/visual media, hands-on demonstrations, and class discussions,
- focusing on hazard awareness, recognition, and mitigation, and



- providing fact sheets to the students for each topic covered.

We have all sat through good training and bad training. OSHA wants to ensure that the training provided by its Authorized Outreach Trainers is high quality, professional, and appropriate to the audience.

**What's in it for you?** As an outreach trainer, you can gain from a record audit by correcting any paperwork problems early as you work directly with the OTI center. These problems are most often caused by a misunderstanding of the requirements or not being aware of changes in OSHA paperwork retention requirements. You stand to gain even more from a training observation: minor problems can be corrected without OSHA's intervention; training tips, techniques, updated materials, etc. are available; and the monitoring report can provide you direct feedback that can help improve your training.

More information about the Monitoring and Audit program can be found in Section IX of the OSHA Outreach Training Program Requirements document which can be found at: [osha.gov/dte/outreach/program\\_requirements.html](https://www.osha.gov/dte/outreach/program_requirements.html)

If you have any questions, please contact Tony Alotto at the TEEX OSHA Training Institute Southwest Education Center (OTISEC) at 800-SAFE-811 (800-723-3811).

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[teex.org/outreach](https://teex.org/outreach) 800-723-3811

