

## Virtual 10- and 30-Hour Exception Requests

Dear instructor. OSHA has waived the 60-day notice for requesting virtual 10- and 30-hour courses until the end of 2020. Here is what you will need to do a “virtual” course:

Alternative training requests must be directed to Wendy Clouser, our director:  
([Wendy@Midamericaosha.org](mailto:Wendy@Midamericaosha.org))

Here are the rules from the 2019 Outreach Training Program Requirements, **be certain to address each item on the list then you can email a copy and also send a written copy to Mid-America OSHA Education Center 33 Greenwood Ln. Springboro, Ohio 45066:**

**R. Alternative Training Methods.** OSHA Outreach Training Program classes must be conducted in-person, unless a written exception is obtained from OSHA or the trainer’s ATO as described in Section V.C above.

**1. Online Training.** OSHA Outreach Training Program authorized trainers may not conduct online OSHA Outreach Training Program classes. Only OSHA-authorized online Outreach training providers may conduct online OSHA Outreach Training Program classes

**OSHA Outreach Training Program training conducted through a remote site video conferencing or other live, interactive instruction that is not standard in-person classroom instruction is not allowed unless OSHA or the relevant Authorizing Training Organization has granted a written exception for the conduct of such training.**

**The written request must be submitted to the primary Outreach trainer’s ATO and include the following:**

- a) A detailed narrative statement indicating why the trainer believes an exception is necessary, and explaining why the inherent flexibility of the OSHA Outreach Training Program is insufficient to deliver quality training.
- b) Name(s) of the primary OSHA Outreach Training Program authorized trainer and assistant OSHA Outreach Training Program authorized trainers or guest trainers which will conduct the training.
- c) A copy of the relevant OSHA Outreach Training Program authorized trainer card(s).
- d) Documentation for all trainers (primary, assistant, and guest) of prior experience delivering occupational safety and health training via video conferencing, webinar, or other instruction that is not standard in-person classroom instruction, including topics, number of courses delivered, number of students trained, and cumulative student contact hours.
- e) The type of hardware, software, and/or systems students will utilize to participate in the alternative training method.
- f) Location of the origin training site and the type of hardware, software, or system that will be used at the origin training site.
- g) List of the offsite training locations. Students must receive training in a classroom, auditorium or conference room setting.
- h) The primary OSHA Outreach Training Program authorized trainer must ensure that a proctor is present at each training location.** The proctor will monitor consistent student attendance, and collect daily student sign-in sheets. The proctor’s printed first and last name, and signature must appear on the sign-in sheets.
- i) A detailed course outline which indicates each topic, and the length of time for which each topic will be taught.
- j) List of the materials that will be provided to each student including a description of when and how students will receive the materials.

- k)** Description of how the primary OSHA Outreach Training Program authorized trainer will ensure that the *Introduction to OSHA* module will be conducted in a participatory manner.
- l)** Description of how the primary OSHA Outreach Training Program authorized trainer will ensure that one or more OSHA Outreach Training Program authorized trainers are available to respond to student questions.
- m)** Description of how the primary OSHA Outreach Training Program authorized trainer will ensure that student questions are answered quickly and effectively.
- n)** Description of how the primary OSHA Outreach Training Program authorized trainer will ensure that effective two-way communication will be incorporated into the OSHA Outreach Training Program training.
- o) All training must be accessible to OSHA and the respective ATO(s) for auditing purposes.**
- p)** Due to the dispersed nature of the training delivery, **a testing component is required for Video Conferencing training.** Affirmative confirmation and a description of processes the primary OSHA Outreach Training Program authorized trainer will use to ensure effective evaluation of the training and testing of the students. Time allotted for administering the testing component is administrative in nature, and is not considered nor counted as instructional time. The method for conducting evaluation and testing must include the following three Evaluation Levels:
  - 1)** Level 1 – Student satisfaction surveys for content and delivery (including summary narratives for each).
  - 2)** Level 2 – Testing.
  - 3)** Level 3 – Follow-up impact evaluation.

If you have additional questions about alternate delivery please feel free to reach out to:  
[karen@midamericaosha.org](mailto:karen@midamericaosha.org)