



AUG 2 2012

Mr. Ralph M. Shenefelt
Vice President, Strategic Compliance
Health and Safety Institute
1450 Westec Drive
Eugene, Oregon 97402

Dear Mr. Shenefelt:

Thank you for your letter dated July 28, 2011, to the Occupational Safety and Health Administration (OSHA) for a clarification of OSHA's standards pertaining to basic first aid and cardiopulmonary resuscitation (CPR). This constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any question not delineated within your original correspondence.

Your question is paraphrased and our response follows.

Question: Does OSHA consider online training only (computer-based training without a hand-on skill component or verification of competent skill performance by a qualified trainer) acceptable for meeting the intent of the basic first-aid and CPR requirements of OSHA standards at 29 CFR 1910.151 (medical services and first aid), 1910.146 (permit-required confined spaces), 1910.266 (logging operations), 1910.269 (electric power generation, transmission, and distribution), 1910.410 (qualifications of dive team), and 1926.950 (power transmission and distribution)?

Reply: Online training alone would not meet the requirements of these training standards. The word "train" is defined as "[t]o make proficient with special instruction and practice," *Webster's II New Collegiate Dictionary*, 1995, p. 1,169. These standards require training in physical skills, such as bandaging and CPR. The only way these physical skills can be learned is by actually practicing them. OSHA's *Best Practices Guide: Fundamentals of a Workplace First-Aid Program*, 2006, p. 11, states that a first-aid training program should have trainees develop hands-on skills through the use of mannequins and partner practice. The guide may be accessed at www.osha.gov. Doctors and nurses receive hands-on training.

However, the standards cited above do not require verification of competent performance, except as follows. The general industry confined space standard provides at 29 CFR 1910.146(k)(1)(i):

(k) Rescue and emergency services.

(1) An employer who designates rescue and emergency services, pursuant to paragraph (d)(9) of this section, shall:

(i) Evaluate a prospective rescuer's ability to respond to a rescue summons in a timely manner, considering the hazard(s) identified;

The logging standard provides at 29 CFR 1910.266 in mandatory Appendix B that training "... shall be conducted using the conventional methods of training such as lecture, demonstration, practical exercise, and examination (both written and practical)" (emphasis added). The diving standard at 29 CFR 1910.410(a)(3) provides that training of dive team members shall be "... (American Red Cross standard course or equivalent)." Since the American Red Cross standard courses include verification of competent skill performance, this provision requires likewise.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. Please be aware that OSHA's enforcement guidance is subject to periodic review and clarification, amplification, or correction. Such guidance could also be affected by subsequent rulemaking. In the future, should you wish to verify that the guidance provided herein remains current, you may consult OSHA's website at www.osha.gov. If you have any further questions, please feel free to contact the Office of General Industry and Agriculture Enforcement at (202) 693-1850.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Galassi".

Thomas Galassi, Director
Directorate of Enforcement Programs