

## HHS/Union Training Workgroup Recommendations

### **Introduction:**

On April 30, 2008, the HHS/Union Training Workgroup met to discuss a broad range of environmental & occupational safety and health issues; identify the current state of safety and health training throughout the DOE complex; explore possible areas of future collaboration; and develop recommendations on a unified path forward on training issues of common interest to HHS, labor unions, and other interested groups, such as the National Institute for Environmental Health Sciences (NIEHS).

Suggestions for a unified path forward were based, in large measure, on the organizational shift of training responsibilities within DOE. The National Training Center, the HHS central training organization, now has the responsibility for:

- 1) addressing specific areas of worker and contractor safety and health training program development and implementation;
- 2) defining its new safety and health training role for workers and contractors with respect to developing training courses, training pre-requisites, serving as a training clearinghouse, leveraging existing training resources, and utilizing existing training organizations, to assist it achieve its mission; and
- 3) coordinating training issues with other HHS offices, unions, HAMMER, NIEHS, and other interested organizations.

### **Recommendations**

In light of the HHS National Training Center's new role and responsibilities with respect to safety and health training, specific recommendations were made by the Workgroup to support HHS and the National Training Center's mission, as follows:

*Clearinghouse.* The Union representatives serving on the Workgroup have a long history and extensive expertise in providing safety and health training to workers and contractors working throughout the DOE complex. The Workgroup recommends that a listing of all union training facilities, safety & health training programs, and course catalogues be collected and made available. The Workgroup recommends that because most of the unions providing training for DOE and contract workers are supported by the NIEHS WETP, which currently maintains a training clearinghouse, that this activity is coordinated between HHS and NIEHS.

*Rule 851 Training.* While the 851 rule and its implementation for production and contract construction workers differ, the Workgroup recommends the development of a standardized

training package for workers at all DOE sites, to ensure the training is uniform, of high quality, and that all workers, whether direct hire or under contract, know the general requirements of 851. The Workgroup recommends a joint meeting with the HHS/Labor 851 Workgroup, and/or the establishment of a sub-committee consisting of members of both Workgroups, to convene for the purposes of developing an action plan forward, that will include:

- 1) an assessment of current 851 training programs and gaps;
- 2) development of an outline of topics to be included in a standardized 851 training program; and
- 3) development of a training implementation and assessment protocol.

To leverage resources, take advantage of existing expertise, and avoid duplication, the Workgroup recommends that the NIEHS WETP awardees be designated the primary 851 training providers.

*HAMMER Model.* While the Workgroup recognizes it's not practical or feasible to have physical training facilities such as HAMMER in Hanford, WA at DOE sites across the country, it is very supportive of the model in that it is built on the principles of: worker involvement, hands-on training, and partnerships with unions.

The Workgroup recommends that the basic key elements of the HAMMER model are applied throughout the DOE complex.

*Minimum Standards and Pre-requisites.* The Workgroup strongly recommends that DOE develop minimum safety and health training requirements and pre-requisites for all workers and contractors working throughout the DOE complex. Such minimum standards across the complex will provide uniformity, avoid duplication and inconsistencies, and ensure that workers have at least the baseline environmental and safety & health training needed to protect themselves, co-workers, and the environment.

In the instance of construction workers, who typically move on and off DOE sites and are employed by contractors and sub-contractors, the Workgroup recommends that at a minimum that DOE require that all contract workers have at least the OSHA 10 hour training. In the case of contract employees, the Workgroup recommends that DOE pre-qualify contractors, and that safety and health training is an integral component of a contractor's qualification to work at DOE sites.

To establish minimum criteria and pre-requisites for training, the Workgroup recommends that the NIEHS Clearinghouse conduct an assessment to determine the impact of rules and programs, such as 851, VPP, and integrated safety and health management systems, on occupational safety and health training. Such an assessment should be incorporated into an overall safety and health training evaluation to determine training needs and gaps across the DOE complex.

*Data.* The Workgroup recommends establishing a sub-committee to include representatives for the Data Tracking Workgroup, to assess DOE data sets, including CAIRS, in addition to union

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data sets, to continually track injury/illness data for purpose of identifying safety and health training needs.