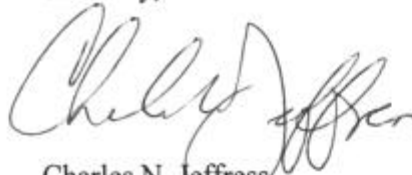


The employer is also ultimately responsible for providing access to a qualified trainer. Trainees must have an opportunity to ask and receive answers to questions where material is unfamiliar to them. Frequently, a trainee may be unable to go further with the training or to understand related training content until a response is received. OSHA has previously stated that, when web-based or computer-based training is used, a telephone hotline or e-mail satisfies OSHA's requirement for trainer access if the employee can ask and receive a responses from a qualified trainer in a timely manner.

If an employer uses an outside computer-based or web-based training program that provides trainer access during limited periods, the employer could address the limitations on trainer access in several ways. One possibility would be to limit employee training to the hours when a qualified trainer is available. A second possibility would be to provide an in-house qualified trainer to answer questions during hours not covered by the outside training provider. A third possibility would be to ensure that the training program is designed so that trainees cannot progress further in the program if they cannot indicate mastery of topics upon which additional training is based. This last option cannot replace but can supplement access to a qualified trainer.

I hope that you find this information helpful. Our enforcement guidance is subject to periodic review and clarification, amplification, or correction. In the future, you can verify that the guidance provided above is still current by consulting OSHA's website at <http://www.osha.gov>. Finally, if you need further assistance on this matter, please contact the Office of Health Compliance Assistance at (202) 693-2190 .

Sincerely,



Charles N. Jeffress
Assistant Secretary