

HazCom Employer's Guide

Step 11: Retrain/Retention

What You NEED To Do

It cannot be stated enough, **your occupational health and safety responsibility to your employees is not that HazCom training is given, it is that HazCom training is understood.** Use knowledge checks and reinforce your training to make sure that employees know their responsibilities and understand what they are required to do as a part of your HazCom program. [Click here to assign retraining to your employees.](#)

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OSHA Citation

Employees are to be trained at the time they are assigned to work with a hazardous chemical. The intent of this provision ([1910.1200\(h\)](#)) is to have information prior to exposure to prevent the occurrence of adverse health effects. This purpose cannot be met if training is delayed until a later date. The training provisions of the HCS are not satisfied solely by giving employee the data sheets to read. An employer's training program is to be a forum for explaining to employees not only the hazards of the chemicals in their work area, but also how to use the information generated in the hazard communication program. This can be accomplished in many ways (audiovisuals, classroom instruction, interactive video), and should include an opportunity for employees to ask questions to ensure that they understand the information presented to them. Training need not be conducted on each specific chemical found in the workplace, but may be conducted by categories of hazard (e.g., carcinogens, sensitizers, acutely toxic agents) that are or may be encountered by an employee during the course of his duties. Furthermore, the training must be comprehensible. If the employees receive job instructions in a language other than English, then the training and information to be conveyed under the HCS will also need to be conducted in a foreign language.

Reference Interpretation and Compliance Letters:

- [The employer must provide the 1910.1200 verbal training in a language that is comprehensible.](#) [04/10/88]
- [Training required for clean-up of hazardous waste and hazardous substances.](#) [06/10/91]
- See Also: OSHA Instruction CPL 2-2.38D, Inspection Procedures for the Hazard Communication Standard, 29 CFR 1910.1200, 1915.99, 1917.28, 1918.90, 1926.59, 1928.21; [Appendix A](#), CLARIFICATIONS AND INTERPRETATIONS OF THE HAZARD COMMUNICATION STANDARD (HCS).

[What are the Requirements for Refresher Training or Retraining a New Hire?](#)

What are the Requirements for Refresher Training or Retraining a New Hire?

Additional training is to be done whenever a new physical or health hazard is introduced into the work area, not a new chemical. For example, if a new solvent is brought into the workplace, and it has hazards similar to existing chemicals for which training has already been conducted, then no new training is required. As with initial training, and in keeping with the intent of the standard, the employer must make employees specifically aware which hazard category (i.e., corrosive, irritant, etc.) the solvent falls within. The substance-specific data sheet must still be available, and the product must be properly labeled. If the newly introduced solvent is a suspect carcinogen, and there has never been a carcinogenic hazard in the workplace before, then new training for carcinogenic hazards must be conducted for employees in those work areas where employees will be exposed. It is not necessary that the employer retrain each new hire if that employee has received prior training by a past employer, an employee union, or any other entity. General information, such as the rudiments of the HCS could be expected to remain with an employee from one position to another. The employer, however, maintains the

responsibility to ensure that their employees are adequately trained and are equipped with the knowledge and information necessary to conduct their jobs safely. It is likely that additional training will be needed since employees must know the specifics of their new employers' programs such as where the MSDSs are located, details of the employer's in-plant labeling system, and the hazards of new chemicals to which they will be exposed. For example, [\(h\)\(3\)\(iii\)](#) requires that employees be trained on the measures they can take to protect themselves from hazards, including specific procedures the employer has implemented such as work practices, emergency procedures, and personal protective equipment to be used. An employer, therefore, has a responsibility to evaluate an employee's level of knowledge with regard to the hazards in the workplace, their familiarity with the requirements of the standard, and the employer's hazard communication program.

Reference Interpretation and Compliance Letters:

- [Retraining employees who have been previously trained by another employer.](#) [05/06/88]
- [Hospital technicians required to attend HCS training and a clarification of coverage of pharmaceuticals under the HCS.](#) [09/01/89]
- [Employers are responsible for training new employees on the HCS.](#) [05/11/88]

[Assign HazCom Training Now](#)

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