



Oregon
Theodore R. Kulongoski, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)
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July 23, 2001

Reviewed: October 8, 2007

Benjamin J. Richards
Safety Education Officer
Oregon Health Sciences University
Environmental Health & Radiation Safety
3181 S.W. Sam Jackson Park Rd., PP236
Portland, OR 97201-2940

Dear Mr. Richards:

This is in response to your request for us to evaluate your online training course for Bloodborne Pathogens refresher training. Please accept our apologies for the delay in our response.

As we understand the purpose of this software, it is not intended to replace the initial training. It is intended to address the annual refresher training required by OAR 437-002-1910.1030, "Bloodborne Pathogens." In a telephone conversation with Dave McLaughlin, you also explained that this method of training is intended for professional staff who deal with these issues on a continuous basis, namely doctors and nurses. You also explained that this would not completely replace the live annual training. You explained that the computer-based training would be an option available to employees every other training cycle, meaning that one year, employees would have the option of completing the refresher training online, then the following year, they would need to attend live training, and so on.

This software operates by explaining concepts, and then asking a series of questions. If the employee's score is better than 70%, they can print out a certificate that shows they have completed the course. If the score is 70% or below, they must retake the course. When a question is answered, a window pops up to give more information on that particular topic. The software is designed so that one cannot change their answer.

Traditionally, OSHA has viewed computer-based training as not being specific enough to the workplace, as they are usually developed by a third party. In this case, however, the software

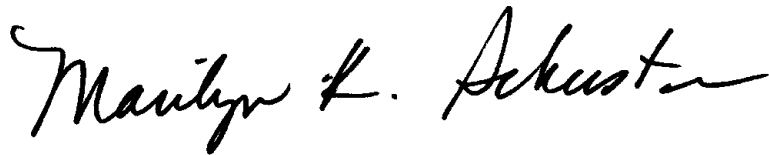
has been developed in-house, and you explained that you will be updating the software on a regular basis.

Another potential problem with computer-based training is in meeting the requirement for trainees to ask questions, and have those questions answered quickly. You explained that you met this by setting up a hotline in the OHSU Emergency Department, and this hotline is staffed by trained nursing staff, and is available 24 hours per day, 7 days a week.

As long as all of the above remains constant, and employees understand the material presented, we do not foresee any problems with conducting this type of training in this particular case.

If you have any questions or if we can be of further assistance, please contact David McLaughlin in our Technical Section at (503) 947-7457.

Sincerely,

A handwritten signature in black ink that reads "Marilyn K. Schuster". The signature is fluid and cursive, with a long horizontal flourish at the end.

Marilyn K. Schuster, Manager
Standards and Technical Resources Section
Oregon Occupational Safety and Health Division