

# Exception Request/Advance Notification Templates

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## Exception Request Notes:

- Submit all exception requests to **otc@clpccd.org**
- All exception requests must be submitted at least **7 calendar days in advance** of the requested training start.
- OTE does not routinely grant exceptions to policy for Outreach classes.
- Exception requests are evaluated individually. Previously granted policy exceptions do not guarantee or imply approval of future requests.
- A trainer granted an exception is permitted only one exception in effect at a time. *Example: you may not request an exception for both a virtual class and for fewer than 3 students.*
- An exception will only be granted in unusual, extenuating circumstances. OSHA does not consider cost savings, trainer availability, program or workplace time limits, or missing work to be extenuating circumstances.

## Advance Notification Notes:

- Advanced notification for Video Conferencing/Virtual Outreach classes must be submitted no later than **7 seven calendar days prior** to the scheduled class start date.
- Trainers and students must use camera and audio hardware for the duration of the entire class.
- Classes delivered using an alternative training method, i.e., video conferencing, must be reported on the OTPR, and recorded under the “Other” type of training in block 11 as “remote.”

### **Minimum Class Size – fewer than 3 students**

OSHA intends for Outreach training to be participatory. For this reason, OSHA requires Outreach trainers to teach at least three students per class. We may allow an exception under extenuating circumstances.

**Trainer Name(s):**

**Class Type (ex: 10-hour construction):**

**Dates and Times of Requested Training:**

**Detailed narrative describing the reason why you believe an exception is necessary:**

**Indicate who the target audience will be (example: in-house employee needing class for orientation purposes, employee fulfilling company or jurisdictional policies):**

**Maximum Class Size – more than 40 students**

In-person Outreach classes are limited to a maximum of 40 students. We may allow an exception under unusual, extenuating circumstances

**Trainer Name(s):**

**Class Type (ex: 10-hour construction):**

**Dates and Times of Requested Training:**

**Detailed narrative describing the reason why you believe an exception is necessary (cost savings, trainer availability, program or workplace time limits, or missing work are *not* considered unusual, extenuating circumstances):**

**Indicate who the target audience will be (example: in-house employee needing class for orientation purposes, employee fulfilling company or jurisdictional policies):**

## **Daily Student Contact Hour Limit**

### **Includes:**

- *10-hour class conducted in fewer than two calendar days*
- *30-hour class conducted in fewer than four calendar days*
- *Student contact hours conducted longer than 7.5 hours per calendar day*
- *Entire length of individual training session longer than 10 consecutive hours per calendar day*
- *More than 10 hours of total time conducted in a 16-hour period (minimum of 8-hour break required if 7.5 or more of training (including contact hours & breaks) are conducted in a 16-hour period)*

### **Trainer Name(s):**

### **Class Type (ex: 10-hour construction):**

### **Dates and Times of Requested Training:**

**Detailed narrative describing the reason why you believe an exception is necessary, including why the program's inherent flexibility is not sufficient (cost savings, trainer availability, program or workplace time limits, or missing work are *not* considered extenuating circumstances):**

## Class Duration

### **Includes:**

- *Class session(s) shorter than 30 minutes*
- *Outreach Training Program class completed in more than six months from start date*

### **Trainer Name(s):**

### **Class Type (ex: 10-hour construction):**

### **Dates and Times of Requested Training:**

**Detailed narrative describing the reason why you believe an exception is necessary (cost savings, trainer availability, program or workplace time limits, or missing work are *not* considered extenuating circumstances):**

### **Out-of-Jurisdiction – outside OSHA’s geographic jurisdiction**

The geographic jurisdiction of the OSH Act is limited to the 50 U.S. States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, Wake Island, Outer Continental Shelf Lands defined in the Outer Continental Shelf Lands Act, and Johnston Island.

**Note:** Requests for exception will only be granted for training that is provided on a contract basis for a specific organization and only for its employees, and is intended to apply to persons subject to the OSH Act. The contracting organization is defined as the party which has a legally binding contract with the OSHA Outreach Training Program authorized trainer to provide training outside of OSHA’s geographic jurisdiction. OSHA’s Office of Training and Education retains final authority to approve or deny this exception.

**Trainer Name(s):**

**Trainer(s)’ email address:**

**Class Type (ex: 10-hour construction):**

**Dates and Times of Requested Training:**

**Detailed narrative describing the reason why you believe an exception is necessary. Please address specific training audience and why this audience cannot receive training within OSHA’s geographic jurisdiction (cost savings, trainer availability, program or workplace time limits, or missing work are *not* considered extenuating circumstances):**

**Contracting organization's name and address:**

**Detailed topic outline indicating each topic, length of time each topic will be taught, and specific date and time the topic will be taught (may be included as a separate document if more space is needed):**

**Guest/Assistant authorized trainer name(s) if applicable:**

**Physical address where training will be conducted:**

**Please include the following:**

- **Copy of OSHA Outreach Training Program authorized trainer card(s)**
- **Signed OSHA Outreach Training Program Trainer Statement of Compliance**
- **Proof that the training is for individuals covered under the OSH Act**
- **Typed list of employees to be trained on the contracting company letterhead**

**Video Conferencing/Virtual Training Advance Notification**

**Trainer Name(s) including assistant or guest trainers:**

**If using a guest trainer, please list their qualifications:**

**Class Type (ex: 10-hour construction):**

**Dates and Times of Requested Training:**

**Number of Students Enrolled:**

**Types of hardware, software, or system the trainer(s) will use to deliver the alternative training method (cellular devices are not permitted to deliver or receive training):**



**The maximum class size must not exceed 20 students unless a proctor is present for the entire class duration.**

**If you are using a proctor, please indicate their name(s):**

**Detailed course outline indicating each topic, and length of time each topic will be taught (may be included as a separate document if more space is needed):**

**List of student materials to be provided to each student including a description of when and how students will receive these materials (may be included as a separate document if more space is needed):**

**Please include the following:**

- **Copy of OSHA Outreach Training Program authorized trainer card(s) for primary and assistant trainers (if applicable)**
- **Meeting link to video conference/virtual training for auditing purposes**