

Prudent Training VS Minimum Mandated Training

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Some people have a “get by” kind of attitude about life and others have a “let’s do the best job I can do” kind of attitude. Most companies I work with in PCOC have a “let’s do the best job I can do” kind of attitude toward life and toward their companies. Unfortunately many of these companies, owners and managers have a contradictory attitude regarding training. The contrast between companies attempting to get away with the minimum amount of training and supervision versus the companies who go out of their way to integrate a comprehensive training and safety program into their management strategy has struck me many times during the past year.

In reviewing our claims and in reflecting upon many of the risk management consulting visits I perform a common thread which appears in companies with employee and claims problems (and those who will eventually have employee and claims problems) is the attempt to get away with the bare minimum in many areas of regulatory compliance, technical and safety training, and in managerial oversight of field employees.

Training is a crucial and integral part of managing a company, not a bothersome thing companies and managers have to do “in addition to the important” stuff. One of the problems with the way people approach the idea of training, and especially safety training, is to think of safety as a frame of thought or attitudes. While certainly poor attitudes and perspectives on meeting standards of behavior within the workplace can play a role, the larger issue is not with the attitude of the employee but the attitude of the management toward both the standards of behavior themselves and their attitudes toward the training. If management is dismissive to training, or sees training as bothersome and taking away from “the important work,” then employees will also have a dismissive attitude toward both the training process itself and the established behavioral goals of the training. The key to implementing management programs is to manage the employee’s *behavior*.

In looking at what training is prudent, managers should look at several things. First they should look at both the end product goals, and then look the behavioral steps which will reach those goals. Employers should also look at what training is mandated by law or suggested by industry groups and examine the goals and reasons for those mandated programs and expand upon them.

It is a warning sign to me when employers ask me to describe the absolute minimum they must do to comply with various regulatory mandates upon our industry. Are you one of those who want to get by with the minimum or do you want to go above and beyond? Which group do you want your doctor to fall

under? Which group do consumers of pest control services want their pest control companies to fall under?

Do you cut corners or do you try to go the extra mile? As it pertains to training requirements, too many employers look to cut corners wherever they can.

Training is important and serves some very important roles in our companies. While there are many approaches to looking at training programs one perspective is to break training down into three key components:

- 1: A measurable goal or standard of behavior
- 2: An organized way of conveying this information to the employee
- 3: Follow through measuring to establish if or at what level the goals or standards are being met.

Too often the employer focuses on training for training sake, or training for the purpose of meeting a minimum regulatory standard.

Many employers forsake “in-office” documented training for on the job field training. On the job training is perhaps the core of our training, but it is unreliable and in many ways ineffective without proper organization, framework and management of the on the job training. There is quite a bit of training which should prudently occur prior to on the job as well as legally mandated training we must provide our employees before sending them into the field for on the job training. Employers should critically look at what they describe as on the job training. What are the written criteria for the training? Do you have checklists used to ensure that each employee has been trained properly? Too often employers assume that their employees know how to perform a specific task, or how to deal with a particular situation. Employers need to have written documentation that each employee has been trained appropriately in each task or skill area that is germane to his or her position. Employers also need to have a written evaluation system for establishing the success of the training. This type of training and documentation is needed not only to ensure that the employees are properly representing your company in the field but also to provide legal protection for the company.

A few words on mandated training in California. While this article is focusing on encouraging employers to go above and beyond the minimum required training, too many companies do not even meet the minimum mandated training requirements. Many employers are under the false impression that the only training requirement they are required to follow are the Department of Pesticide Regulation *Pesticide Safety Information Series*. There are many other potential training programs we must have in place including training pursuant to 8619(a) of the Structural Pest Control Act (see the Winter 2005 Voice of PCOC) Hazard Communication Training, and a Written Injury & Illness Prevention Program.

Even within the scope of the Pesticide Information Series, many companies attempt to get by with the absolute minimum. Many companies do not regularly

review pesticide labels and Material Safety Data Sheets (MSDS) but rather simply ask their employees to read the label. While I agree that your employees need to read and review labels and MSDS on their own, I also suggest that you routinely review specimen labels and MSDS with your employees. I have encountered quite a few incidents where the employee flagrantly violated the label instructions resulting in an incident. In one case the employee documented his violation on almost every service slip! The company should have been checking their employee's work, including the employee's worksheet to catch this flagrant violation. Now that an incident has occurred, the company has a significant problem since the employee has clearly documented his ongoing violation. Review labels and application procedures, and follow up to make sure your employees are both legal and safe while they work in the field. Remember they are representing **you**, and how they act will reflect upon you and your company. Many employers point to the new regulations, which allow the County Agricultural Commissioner to cite and fine the employee rather than the employer. In the case of an incident involving one of your customers or a member of the public, however, they will be going after **your** pocket book and reputation, not your employee's!

The Written Injury & Illness Prevention Program is a legally mandated management tool used to evaluate and manage potential exposures and risks your employees may be exposed to during the course of employment, and provides tools to aid the employer and employees to manage and mitigate these risks. As part of your Injury and Illness Prevention Program you need to have many different programs for evaluating overall generic risks your employees may be exposed to as well as evaluating the specific risks your employees may be exposed to at each jobsite. Some of the standard training and mitigation programs pest control companies need to have as part of their Written Injury & Illness Prevention Program include programs to deal with slips, trips, and falls, exposures to heights, drivers safety, and tool safety.

Technical training is as every bit as important as training we think of as "safety training" to protect workers from injuries. The overwhelming percentage of general liability claims, such as property damage, alleged consumer injury, error and omissions, and auto claims are caused by manageable behaviors. The key to controlling the outcome is to train and manage our employees.

Don't rely upon statutory mandates to define your training criteria. Don't attempt to get by with the absolute minimums. Establish a comprehensive safety and overall training program which will benefit all facets of your company and the service you offer the public.