

TRAINING RESPONSIBILITIES OF THE HAZMAT EMPLOYER

A hazmat employee is anyone who affects the transport of hazardous materials. Hazardous materials transported from clinical laboratories include, but are not limited to, cultures and patient specimens assigned to UN3373, UN2814, and UN2900 and refrigerants, such as dry ice.

The employer of those who offer or transport hazardous materials in commerce (hazmat employer) is required to ensure proper training for all hazmat employees and to verify that each employee's performance on a competency test is satisfactory to perform his/her assigned hazmat function. The hazmat employer certifies that each hazmat employee has met the regulatory training requirements and is competent to perform his assigned hazmat functions. In addition, the hazmat employer is responsible for maintaining training documentation and certification records.

Training, competency, and the resulting certification process for each hazmat employee should be completed within 90 days for hire or reassignment to a job that affects the transport of the types of materials. Training can be conducted by the employee or provided by a third party. If the responsibility of the training is delegated to another person or agency, document that the training meets the requirements outlined in 49 CFR for training hazmat employees. Although prior training is acceptable, the hazmat employer is responsible for verifying that an employee's prior training is relevant to his current job function.

In some cases, additional training (ie. Safety procedures and security awareness) may be required. Bloodborne pathogen training and testing may meet all or part of the required hazmat safety training. The Department of Transportation (DOT) provides security awareness training, but it is not specific to laboratory, patient specimens or other infectious materials. Therefore, a more appropriate resource has been provided here for security awareness training specific to specimens and cultures being packaged and transported. Keep a copy or reference of this specific training, document training the subsequent competency performed by each employee.

Facilities that are registered to store and handle select agents must meet additional security requirements not outlined in this training module. Most are met as part of the approval process to possess select agents.

Recurrent training and subsequent testing must occur at least once every (3) years to meet the DOT regulations and at least every (2) years to meet the IATA requirements.

Documentation of the most current training and the resulting certification must be kept throughout the entire time that individual is required to perform a hazmat function and for 90 days afterwards.

The hazmat employer is responsible for certifying that each hazmat employee is trained properly.

Summary of employer hazmat training responsibilities:

1. Assure that training is specific to the job duties performed by an individual.
2. Certify that the employee has been properly trained in accordance with his work responsibilities and has completed all competencies required by the employee throughout the year.
3. Keep records of the curriculum and content of each training session.
4. Make the most current training records, competency documents readily available for inspection, and maintain throughout the entire course of the individual's employment while he/she is performing a hazmat function(s) and 90 days thereafter.
5. Provides recurring training as needed:
 - a. Every 2 years for IATA.
 - b. Every 3 years for DOT, Joint Commission and CAP.
 - c. Change in job responsibilities.
 - d. Changes in regulations.
6. Stay current with changing regulations and provide updates as needed.
7. Maintain a contract with each courier used to assure that they are meeting all DOT regulations and contract policies. Use a vetting process to thoroughly scrutinize the courier company before signing a contract. Review with carrier if:
 - a. Courier accepts or does not accept UN2814 Category A Infectious Substances.
 - b. If not accepted, are couriers instructed to not to transport or provide training to recognize difference between UN2814 Category A Infectious Substances, UN3373 Biological Substances and Exempt.
 - c. Carrier sustains adequate liability insurance if UN2814 Category A Infectious Substances are accepted.
 - d. Carrier is registered with DOT and upholds safety and compliance program (CSA) including accidents, driving records, drug or alcohol use, and hazardous material compliance. This is available on <https://ai.fmcsa.dot.gov/SMS/Search/Index.aspx>