

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

CORPORATE ENVIRONMENTAL, HEALTH AND SAFETY

PROCEDURE

ADMINISTRATIVE CONTROL PROCEDURES

CEHSP A12.05 – EH&S Training Program

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1.0 PURPOSE

IT IS THE POLICY OF CON EDISON TO COMPLY WITH ALL FEDERAL, STATE, AND LOCAL REGULATIONS PERTAINING TO THE TRAINING OF EMPLOYEES IN THE ENVIRONMENTAL, HEALTH, AND SAFETY (EH&S) ASPECTS OF THEIR JOBS. The purpose of this procedure is to ensure that Con Edison develops and implements an effective training program that will minimize personal injury/illness, reduce adverse impact to the environment and to the public and ensure compliance with company policy/procedures and the regulations that mandate training.

2.0 APPLICABILITY

This Corporate Environmental, Health and Safety Procedure (CEHSP) applies to all employees and company contractors.

3.0 INTRODUCTION

Many federal, state, and local laws, regulations, standards, and consent agreements explicitly require Con Edison to train its employees in the environmental, health, and safety aspects of their jobs. Numerous regulatory requirements state that job assignments may only be performed by employees that have first been trained in their specific job responsibilities. These requirements may also state that refresher training is required in order for employees to continue performing their jobs. In addition, regulatory requirements may state that only ***certified (i.e., licensed) employees, competent persons, qualified employees*** or employees with ***implicit training*** perform certain job assignments. Training requirements may be satisfied by training outside the company, ***documented on-the-job training (DOJT)***, classroom training at The Learning Center (TLC), or training at other company facilities.

This CEHSP includes the key elements and structure of the training program, which may include task-specific, function-specific, and career path-defined training; also included are the methods used to track and record training attendance; and the techniques used to measure the effectiveness of the training program.

Note: EH&S training required by particular laws/regulations is discussed throughout the Corporate Environmental, Health and Safety Procedures and, where it is appropriate, the specific training requirements are detailed. Employees who do not attend annual training by the applicable anniversary date for that training will be restricted from performing the job function. For employees scheduled on a block training basis, the due date may be extended for the annual general OSHA course in accordance with specific approval from the Director of Safety, Industrial Hygiene, and Fire Prevention.

4.0 COMPLIANCE REQUIREMENTS

4.1 COMPENDIUM OF REGULATORY TRAINING REQUIREMENTS

Con Edison has developed a compendium of all regulatory training requirements that apply to Con Edison's personnel and operations. This compendium, which consists of regulatory citations and summaries in tables organized by topic, is provided in [EH&S Training Compendium of Regulations](#) (link is on right hand side of web page under reference documents). The compendium serves as the cornerstone of Con Edison's compliance-based training program. Each table includes the following information:

- Titles of most current regulations, laws, and agreements that are applicable to work performed at Con Edison.
- Corresponding regulatory citations.
- Federal, state, and local regulatory agencies that require the training.
- Purpose and scope of training requirements; e.g., employees to be trained, content and duration of training, and instructor qualifications.
- Key training deadlines.
- Frequency of training.
- Required documents and recordkeeping.
- Certification and license requirements.
- Type of course(s) and Con Edison course number(s) that meets or provides awareness of the regulatory requirements.
- Applicable Con Edison EH&S procedures.

The compendium is a tool to determine the training needs of employees based on the tasks they perform or possible hazards they may encounter.

In conjunction with the Law Department and the Learning Center, EH&S coordinates the review of the compendium on an annual basis to determine if any of the regulations governing the training requirements have changed. EH&S will update the compendium, as necessary, and communicate those changes to interested parties (i.e. the EH&S staff at the Learning Center).

The [*EH&S Training Compendium of Regulations*](#) is available electronically on the training page of EH&S Central.

4.2 TRAINING PROGRAM ELEMENTS AND STRUCTURE

In order to achieve the goals of the training program, the following program structure has been adopted:

- The Learning Center is responsible for conducting and evaluating EH&S training courses and managing the course content as required by environmental, health, and safety laws and regulations and Con Edison policy and procedures. The Learning Center is also responsible for updating eTrain with course grades for courses taught by TLC instructors and for the creation of course numbers for Documented on the Job Training (DOJT) as outlined in Corporate Instruction CI-510-1.
- All Con Edison employees can access training information via The Learning Center's web site on the company's Corporate Portal Home Page, @Con Edison. On this site, employees can generate statistical training reports, reflecting the training history and status of individuals, sections, departments and the company as a whole. The site also provides descriptions of all the courses offered by The Learning Center as well as the status of training programs currently being run by TLC. Course descriptions provide a listing of equivalent courses, which include eLearning training modules.
- Training Coordinators who have been authorized by the Learning Center can also access the eTrain system from the Learning Center's site. The eTrain system is the primary tool of training and registration coordinators. It is the means by which these coordinators enroll employees in courses run by TLC, access employees' training histories, update the records of employees' Non-Classroom and Out-of-House training, add or delete items to employees' designated tasks, track employees' compliance with company-mandated training and regulatory-driven training.
- Each department must designate and identify personnel as training coordinators who, along with the managers, supervisors, and the department's EH&S staff, are responsible for ensuring that their workers have satisfied all training requirements prior to performing their job functions. These designated individuals may be assigned at either the facility or department level (i.e., at least one employee at each facility or at least one employee responsible for all facilities within the department). At multi-tenant facilities such as the Astoria facility, where several operating departments of Con Edison maintain operations, each department must have its own designated employee(s). Each operating department must identify a DOJT Coordinator who is responsible for developing an implementation plan, and for evaluating its DOJTs, in accordance with Corporate Instruction 510-1, Documented On-the-Job Training (DOJT).
- Corporate Auditing and EH&S are responsible for evaluating the training program through periodic audits and observation of courses at TLC. It is recommended that the adequacy of training be evaluated by trainers, EH&S managers, training coordinators and/or Safety Administrators.
- Each operating department is responsible for updating training records for non-classroom training and placing such entries in eTrain system; specifically, all training-related information (tailboard safety talks, general communications courses, hands-on training, and documented

on-the-job training sessions given by field organizations) will be entered into the eTrain system.

4.3 OPERATING DOCUMENT GUIDANCE

To ensure a consistently high level of quality in the delivery of both classroom and non-classroom training, a set of performance-based objectives that can be flexibly applied for developing, maintaining, and implementing training courses, materials and programs must be provided and adhered to. These objectives will include adherence to standards for an established written format and a formalized approval process in accordance with the company's operating document guidance manual. To ensure that employees' training needs are being met, new and existing training documents must be periodically evaluated. It is recommended that the training scope, recommended frequency, and delivery mechanisms be consistent with the complexity and importance of any procedural change and be provided before the date of the change in question.

4.4 TRACKING AND RECORDING TRAINING

Company compliance training is recorded and tracked using the eTrain system. Environmental, health and safety activities and responsibilities that require training are identified by the operating organizations with guidance from TLC for title and specific functional responsibilities within each operating department. Operating organizations determine what training the individual employee requires based on defined titles and tasks and operational needs. Training compliance and training deficiencies can be identified by utilizing the eTrain system. The system has the capability to generate reports for training courses that are required but have not been successfully completed in the appropriate time periods. Other reports are available in the system which can be used to track training compliance.

4.5 MEASURING EFFECTIVENESS OF TRAINING

- Follow-up Field Visits – The Learning Center's instructors are required to conduct periodic visits to Con Edison work locations to evaluate whether the lessons learned from the training programs are effectively implemented on the job.
- Benchmarking – The Learning Center benchmarks other utility companies and industries in search of the best training practices that can be implemented by Con Edison.
- Examinations – The effectiveness of training may be measured through the administration of technically accurate, up-to-date, and relevant examinations, where applicable.
- Validation of Comprehension Methods and Tools for DOJT - DOJT Facilitator Guides identifies the recommended method for ensuring that the students have understood and can execute the tasks discussed in the DOJT. The various methods that could be selected to validate comprehension include, but may not be limited to, the following:
 - Direct verbal feedback: Students must effectively communicate an understanding of what they have been taught.
 - Demonstration: Students must physically demonstrate understanding of the skill or task being taught.
 - Post-training observation: An evaluation in the field so that the first-line supervisors can "rate" (a) the *retention of information provided during training* and (b) *performance improvements* of the crews.

- **DOJT Plan** – In accordance with CI 510-1, each Vice President shall designate an individual who will be responsible for general oversight of an organization's DOJT process and activities. In addition, this individual shall create and maintain a DOJT plan that includes the following specific elements:
 - DOJT development process including conversion of existing materials to the specified DOJT format.
 - DOJT review period to ensure that revisions to specifications and procedures are reflected in existing DOJTs.
 - Periodic evaluation process to confirm the effectiveness of the DOJT. This must include observing the delivery of the DOJT and follow up field visits to verify that the employee understood the material presented.

5.0 DEFINITIONS

Competent Person: A person who is properly trained and capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.

Documented On-the-Job Training (DOJT): DOJT is required training conducted at a workout location, yard, or jobsite. It is the responsibility of each employee to attend the DOJT in its entirety, to fully understand the material presented, and to question the presenter/facilitator if any uncertainty exists. The DOJT presenter/facilitator must use appropriate techniques to allow employees to demonstrate comprehension of presented material. The following training is classified as DOJT:

- Environmental, health, and safety information that EH&S or any organizations deems as essential to ensure compliance with operating procedures and/or regulations.
- A procedure or specification that an organization identifies as core to the job responsibilities for a particular job title and for which the organization wants to formalize and document the training. The organization's designated individual should first verify that the material in the DOJT has not been previously covered by The Learning Center's training curriculum. Once the DOJT has been developed, the organization's TLC Team Advisor will assign the DOJT a course number for tracking in the Learning Management System.

eTrain System: The primary tool of training and registration coordinators. It is the means by which these coordinators enroll employees in courses run by TLC, access employees' training histories, update the records of employees' Non-Classroom and Out-of-House training, add or delete items to employees' designated tasks, track employees' compliance with company-mandated training and regulatory-driven training.

General Communications (GEC), Tailboard Talks (TBT), and Hands-on-Training (HOT): These are **not** classified as Documented On-the-Job Training; for example:

- A GEC can be disseminated when a specific incident or an event occurs, and a department may need to share information to prevent further occurrences or to communicate a work change practice associated with the event. A GEC also could be used for items regarding

company-wide issues, such as the ombudsman's reports of *The Excellence Files*. Local operating areas may share information regarding operating or environmental incidents using a GEC.

- A TBT is usually informational in nature and covers topics not specific to performing a job function or task, such as slips, trips, and falls; safe driving tips; weather conditions; safe lifting; etc. Also known as “safety talks,” these informal instructional gatherings are generally short in duration and function as reminders given by supervisory personnel. The purpose of these talks is to refresh the workers’ understanding and/or awareness of a safety-related condition or procedure. While attendance may be taken and questions entertained, there is generally no written test given during a TBT.
- A HOT is used to convey basic job skills that may or may not support a core job responsibility or a new task. A HOT usually consists of field instruction and/or observation conducted by peers or supervisor to confirm proficiency. An employee or local supervisor may capture the content of this instruction and/or field observations using a checklist or other qualification document.

Qualified Employee: An employee, who by possession of a recognized degree, license, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, work, or project.

6.0 REFERENCES

A complete list of federal, state and local laws and regulations pertaining to EH&S-related training can be found in the EH&S Training Compendium of Regulations.

CI-510-1 “Documented on the Job Training (DOJT)”

REVISION HISTORY

<u>Revision Date</u>	<u>Revision #</u>	<u>Summary of Change</u>	<u>Author</u>
04/01/2014	12	<p>Periodic review with the following changes</p> <ol style="list-style-type: none"> 1. Removed references to the EH&S Training Committee; 2. Updated reference from the old The Training System (TSS) and The Profile System to the eTrain system, which covers all of Con Edison's training registration and recordkeeping needs; 3. Updated Training Compendium review process to include Law and TLC. 4. Changed DOJT Implementation Plan to DOJT Plan and updated language in accordance to CI-510-1, Documented On-The-Job Training (DOJT) in Section 4.5 <i>Measuring Effectiveness of Training</i>; 5. Updated the definition of DOJT to include additions from CI-510-1, added eTrain System to the Definition section. 	S. Ng
09/08/2016	13	Added language to provide a means for extending the due date on general OSHA training for employees scheduled on a block training basis. Such extensions are granted via specific approval from the Director of Safety, and in accordance with existing allowances in the applicable OSHA standards.	G. Slintak