



Understanding OSHA 1910.146

Training vs. Employer Authorization

UNDERSTANDING EMPLOYER RESPONSIBILITY

INFORMATION AND CHECKLIST FOR EMPLOYERS TO CONSIDER FOR CERTIFICATION OR AUTHORIZATION OF EMPLOYEES AS QUALIFIED TO ENTER A CONFINED SPACE OR TO BE PART OF A CONFINED SPACE ENTRY OR RESCUE TEAM

Under OSHA 29 CFR 1910.146 (Permit-Required Confined Spaces), training is required—but **training alone does not equate to the actual authorization** or certification of a person to enter a confined space or to be part of a confined space entry team.

A common misconception is that once an employee completes a confined space course—especially a non-entry rescue or awareness-level class—they are automatically “certified” or authorized to perform confined space work. That is not accurate.

What third-party training does:

- Provides foundational knowledge of confined space hazards
- Covers regulatory requirements and safe work practices
- Introduces equipment, procedures, and roles (entrant, attendant, supervisor, rescue)
- Builds awareness of non-entry rescue concepts and limitations

What third-party training does NOT do:

- Validate site-specific competency
- Evaluate performance in your actual work environment
- Confirm proficiency with your company’s equipment and procedures
- Authorize an employee to enter a confined space or perform rescue

What OSHA actually requires:

The **employer** is responsible for ensuring that each employee:

- Has the **knowledge AND skills** necessary to safely perform assigned duties
- Can properly use equipment in real-world conditions
- Understands **site-specific hazards and procedures**
- Is formally **designated (authorized)** for their role

In short:

Training is the foundation—but employer evaluation and authorization is the standard.

Employer Responsibility: Authorization & Competency

Before an employee is designated as:

- Authorized Entrant
- Attendant
- Entry Supervisor
- Non-Entry Rescue Team Member

The employer must verify that the individual can **actually perform the work safely and correctly**, not just understand it in theory.

Practical Employer Checklist: Confined Space Competency Validation

Use this as a step-by-step internal process:

1. Training Verification

- Employee completed a recognized confined space training program
- Training included relevant role (entrant, attendant, supervisor, rescue)
- Training is current and documented

2. Site-Specific Hazard Review

- Employee understands **specific confined space situations**
- Identifies hazards (atmospheric, engulfment, mechanical, etc.)
- Knows your company's permit system and procedures
- Familiar with emergency protocols and communication methods

3. Equipment Proficiency (Hands-On)

- Proper use of gas monitors (calibration, bump testing, interpretation)
- Ventilation equipment setup and limitations
- PPE selection and correct use

- Retrieval systems (tripods, winches, harnesses)
- Lockout/Tagout integration with confined space entry

4. Practical Skills Demonstration

- Performs a simulated or real entry setup correctly
- Completes a permit accurately
- Demonstrates hazard assessment
- Uses equipment safely and effectively
- Responds appropriately to simulated emergency scenarios

5. Role-Specific Competency

Authorized Entrant

- Recognizes hazards and symptoms of exposure
- Maintains communication with attendant
- Properly uses PPE and retrieval systems

Attendant

- Maintains continuous monitoring of entrant(s)
- Recognizes behavioral/physical warning signs
- Initiates emergency response without entering

Entry Supervisor

- Verifies permit completion
- Confirms acceptable entry conditions
- Cancels or suspends entry when required

Non-Entry Rescue Team

- Can operate retrieval systems effectively
- Understands limitations of non-entry rescue
- Coordinates with emergency services if needed

6. Supervised Field Evaluation

- Employee performs duties under supervision in real or realistic conditions
- Performance is observed and documented
- Deficiencies are corrected with additional training

7. Formal Authorization

- Employer documents competency evaluation
- Employee is formally designated for role
- Authorization is recorded (permit system, training file, or designation form)

8. Ongoing Evaluation & Refresher

- Periodic retraining scheduled with both external training providers and via internal training means and opportunities.
- Re-evaluation after incidents, near misses, or procedural changes
- Continuous improvement based on field performance

9. Flowchart Flow

Training → Site-Specific Review → Hands-On Practice → Skills Demonstration → Supervised Field Evaluation → Employer Authorization → Ongoing Reassessment

Key Point

Third-party training is a critical first step—but OSHA places the responsibility squarely on the employer to ensure real-world competency and to formally authorize employees for confined space work.