



# Digital Certification Card Fact Sheet<sup>1</sup>

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An MEDIC First Aid digital certification card (sample, attached) is the electronic form of an MEDIC First Aid printed certification card. “Digital” is defined as “data in the form of binary digits; for example “digital images”.<sup>2</sup> The term “certification” means verification that on the indicated class completion date the participant named on the MEDIC First Aid certification card demonstrated achievement of the required knowledge and hands-on skill performance objectives to the satisfaction of a qualified and currently authorized MEDIC First Aid Instructor or Instructor Trainer. Certification (or recertification) in an MEDIC First Aid training program is documented by the legitimate issuance of a correctly completed MEDIC First Aid print or digital certification card.

**An MEDIC First Aid digital certification card does not represent completely online training or training without hands-on skill practice and assessment by a qualified instructor.**

MEDIC First Aid does not offer or endorse online-only First aid or CPR training. MEDIC First Aid training is competency-based and certification requires evaluation and verification of a participant’s hands-on skill. Online-only First aid and CPR training does not meet the [Training Center Standards](#) of MEDIC First Aid, or the standards of the U.S. Department of Labor, Occupational Safety and Health Administration (see OSHA Letter of Interpretation, attached). Additionally, state regulatory agencies are becoming increasingly aware of “instant certification” scams and are revising rules to prevent its use. As it is clearly in the interest of public health and safety, this is a positive regulatory trend MEDIC First Aid and the Health and Safety Institute (HSI) actively encourages.<sup>3</sup>

## Relevant Facts Concerning Electronic Records

1. The Federal Occupational Safety and Health Administration (OSHA) have permitted electronic recordkeeping of employee safety training records since 1997.<sup>4</sup>
2. Just as with paper documents, electronic documents are a record. Regarding its own records management program, OSHA has stated *“The electronic data may be considered a copy of a hard copy or paper record. If a hard copy or paper record is not maintained, then the electronic copy is the record copy”*.<sup>5</sup>
3. Since 2001 U.S. Federal courts have accepted electronic records (legal filings) over the Internet via the Public Access to Court Electronic Records ([PACER](#)) system
4. Amendments to the Federal Rules of Civil Procedure require civil litigants to preserve and produce any electronically stored information as it can play an important role as evidence.<sup>6</sup> There is no doubt that electronic records have the same legal force as those produced in other formats (such as paper).
5. U.S. Food and Drug Administration (FDA) regulations permit electronic records and electronic signatures as equivalent to paper records and handwritten signatures executed on paper. FDA regulations are intended to permit the widest possible use of electronic technology, compatible with FDA's responsibility to protect the public health.<sup>7</sup>
6. Web content is rendered in two basic forms - dynamic and static. Dynamic web content consists of information that is rendered differently based on specific user input and is managed in a database associated with a server. Static content consists of information in the form of documents that are rendered identically each time they are accessed. Both static and dynamic web content are considered a permanent record and meet the requirements of the U.S. National Archives and Records Administration (NARA) Electronic Records Management (ERM) E-Gov Initiative.<sup>8</sup>

- a. MEDIC First Aid Digital Certification Cards are both static and dynamic. Each document is rendered identically in static format (PDF) and is based on the user's dynamic input of each class participant into an electronic roster.
  - b. Every Digital Certification Card is a true and accurate record of the original information received and is uniquely tracked in the HSI electronic content management system.
7. The United States Federal Government Paperwork Elimination Act (GPEA) uses *reliability, authenticity, integrity, and usability* to describe the characteristics of trustworthy records.<sup>9</sup> HSI follows best practice guidelines regarding reliability, authenticity, integrity, and usability. Consequently, an MEDIC First Aid Digital Certification Card(s):
- a. *Reliably* identifies the approved MEDIC First Aid Training Center as the record source and provides evidence that the authorized MEDIC First Aid Instructor documented achievement of the participant's knowledge and hands-on skill performance according to the program standard.
  - b. *Authentically* establishes what it purports to be. HSI's Training Center Standards, business practices, and electronic content management system controls the creation, transmission, receipt, and maintenance of the Digital Certification Card. The transaction is tied electronically to the MEDIC First Aid Training Center and authorized Instructor or Instructor Trainer.
  - c. *Integrity* is supported by HSI's Training Center Standards, business practices, and electronic content management system that prohibit alteration.
  - d. *Usability* ensures that it can be located, retrieved, presented, and directly connected to the class roster and authorized Instructor or Instructor Trainer who taught the class. The link to the Digital Certification Card remains permanently active.

*To learn more about digital certification cards, watch our webinar entitled [It's All in the Cards - Using and Issuing Digital Certification Cards](#).*

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#### About MEDIC First Aid /HSI

MEDIC First Aid emergency care training programs are developed and administered by the [Health and Safety Institute](#) (HSI). HSI is a large privately held emergency care and response training organization, joining together the training programs of ASHI, MEDIC First Aid, 24-7 EMS, 24-7 Fire, First Safety Institute, GotoAID, and EMP Canada.

*If you have questions please contact us at 800-447-3177*

**Disclaimer:** Governmental entities may or may not be authorized, empowered, or required by law to accept electronic records. This Fact Sheet cannot address all the possible implications, applications, or exceptions to acceptance of electronic records, including Digital Certification Cards. MEDIC First Aid Training Centers and their Authorized Instructors and Instructor Trainers must be completely familiar with the state licensing regulations and occupational requirements of persons to whom they offer training and certification. Training Centers and their Authorized Instructors and Instructor Trainers assume the responsibility for the appropriate and lawful use of any MEDIC First Aid program.

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<sup>1</sup> Last reviewed/updated: December 7, 2012

<sup>2</sup> <http://www.merriam-webster.com/dictionary/digital>

<sup>3</sup> For more information, request our 2012 presentation *Help Stop Online Sham CPR and First Aid Certification* or read our blogs about the issue; <http://info.hsi.com/Blog/?Tag=Fraud>

<sup>4</sup> [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=INTERPRETATIONS&p\\_id=22461](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=22461)

<sup>5</sup> [http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_id=1474&p\\_table=DIRECTIVES#CHAP5](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=1474&p_table=DIRECTIVES#CHAP5)

<sup>6</sup> <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title28/html/USCODE-2010-title28-app-federalru-dup1-rule34.htm>

<sup>7</sup> <http://www.fda.gov/RegulatoryInformation/Guidances/ucm125067.htm>

<sup>8</sup> <http://www.archives.gov/records-mgmt/initiatives/web-content-records.html>

<sup>9</sup> <http://www.gpo.gov/fdsys/pkg/PLAW-105publ277/pdf/PLAW-105publ277.pdf>



MEDIC First Aid International  
1450 Westec Drive  
Eugene, OR 97402  
800-447-3177

Friday, December 07, 2012  
Sally Student

Dear Sally

Congratulations on successfully completing your MEDIC First Aid International PediatricPlus (CPR,AED and First Aid for Children,Infants and Adults class. In an effort to be more environmentally friendly your MEDIC First Aid Approved Training Center has chosen to issue your certification card electronically.

The digital certification card below is identical to a printed version of the card and documents that a properly authorized MEDIC First Aid Instructor evaluated your knowledge and hands on skills in accordance with the program standard. You may duplicate this page as needed to provide proof of your training.

Go online to access your MEDIC First Aid Passport and take advantage of the additional training resources available to you:

- Digital download of Student Handbook
- LearningLinks™ Refresher Scenarios
- Mobile Application Downloads
- E-mail Renewal Notification
- Rate Your Program Survey

Register now at [www.hsi.com/passport/](http://www.hsi.com/passport/). Use the registration code 7337 to register.

Bigger Test Training  
1450 Westec Drive  
Eugene, OR 97402

**Certification Card** **PediatricPlus** **G2010**  
*CPR, AED, and First Aid  
for Children, Infants, and Adults*

**Sally Student**

has successfully completed and competently performed  
the required knowledge and skill objectives for this program.



**Irene Instructor**

Authorized Instructor (Print Name)

**876543**

Registry No.

**12/06/2012**

Class Completion Date

**541-344-7099**

Training Center Phone No.

**12/06/2014**

Expiration Date

**II2345**

Training Center I.D.

This card certifies the holder has demonstrated the required knowledge and skill objectives to a currently authorized MEDIC First Aid Instructor. Certification does not guarantee future performance, or imply licensure or credentialing. Course content covers all age groups and conforms to the 2010 AHA Guidelines for CPR and ECC, and other evidence-based treatment recommendations. Certification period may not exceed 24 months from class completion date. More frequent reinforcement of skills is recommended.

U.S. Department of Labor

Occupational Safety and Health Administration  
Washington, D.C. 20210

Reply to the Attention of:

DEP/GIAE/TWM - 20864



AUG 2 2012

Mr. Ralph M. Shenefelt  
Vice President, Strategic Compliance  
Health and Safety Institute  
1450 Westec Drive  
Eugene, Oregon 97402

Dear Mr. Shenefelt:

Thank you for your letter dated July 28, 2011, to the Occupational Safety and Health Administration (OSHA) for a clarification of OSHA's standards pertaining to basic first aid and cardiopulmonary resuscitation (CPR). This constitutes OSHA's interpretation only of the requirements discussed and may not be applicable to any question not delineated within your original correspondence.

Your question is paraphrased and our response follows.

**Question:** Does OSHA consider online training only (computer-based training without a hand-on skill component or verification of competent skill performance by a qualified trainer) acceptable for meeting the intent of the basic first-aid and CPR requirements of OSHA standards at 29 CFR 1910.151 (medical services and first aid), 1910.146 (permit-required confined spaces), 1910.266 (logging operations), 1910.269 (electric power generation, transmission, and distribution), 1910.410 (qualifications of dive team), and 1926.950 (power transmission and distribution)?

**Reply:** Online training alone would not meet the requirements of these training standards. The word "train" is defined as "[t]o make proficient with special instruction and practice," *Webster's II New Collegiate Dictionary*, 1995, p. 1,169. These standards require training in physical skills, such as bandaging and CPR. The only way these physical skills can be learned is by actually practicing them. OSHA's *Best Practices Guide: Fundamentals of a Workplace First-Aid Program*, 2006, p. 11, states that a first-aid training program should have trainees develop hands-on skills through the use of mannequins and partner practice. The guide may be accessed at [www.osha.gov](http://www.osha.gov). Doctors and nurses receive hands-on training.

However, the standards cited above do not require verification of competent performance, except as follows. The general industry confined space standard provides at 29 CFR 1910.146(k)(1)(i):

(k) Rescue and emergency services.

(1) An employer who designates rescue and emergency services, pursuant to paragraph (d)(9) of this section, shall:

(i) Evaluate a prospective rescuer's ability to respond to a rescue summons in a timely manner, considering the hazard(s) identified;

The logging standard provides at 29 CFR 1910.266 in mandatory Appendix B that training "... shall be conducted using the conventional methods of training such as lecture, demonstration, practical exercise, and examination (both written and practical)" (emphasis added). The diving standard at 29 CFR 1910.410(a)(3) provides that training of dive team members shall be "... (American Red Cross standard course or equivalent)." Since the American Red Cross standard courses include verification of competent skill performance, this provision requires likewise.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. Please be aware that OSHA's enforcement guidance is subject to periodic review and clarification, amplification, or correction. Such guidance could also be affected by subsequent rulemaking. In the future, should you wish to verify that the guidance provided herein remains current, you may consult OSHA's website at [www.osha.gov](http://www.osha.gov). If you have any further questions, please feel free to contact the Office of General Industry and Agriculture Enforcement at (202) 693-1850.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Galassi".

Thomas Galassi, Director  
Directorate of Enforcement Programs