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OSHA Safety and Health Program Management Guidelines

November 2015 Draft for Public Comment

Relationship to the 1989 Guidelines and Existing Legal Requirements

These guidelines update and replace the Occupational Safety and Health Administration's (OSHA's) voluntary *Safety and Health Program Management Guidelines,* first published in 1989.[1] They build on lessons learned about successful approaches and best practices under OSHA programs such as the Voluntary Protection Programs (VPP) and the Safety and Health Achievement Recognition Program (SHARP). The guidelines are also consistent with many national and international consensus standards.[2]

To help you implement the guidelines, **Appendix A:** Implementation Tools and Resources describes several available tools and resources. OSHA will add to these resources through the guidelines website at www.osha.gov/shpmguidelines.

Appendix B: Relationship of Guidelines to Existing OSHA Standards identifies existing OSHA standards that include provisions similar or identical to action items in these guidelines. These guidelines do not change employers' obligations to comply with the requirements of any OSHA standard.

The guidelines are advisory and informational in content. They are not new standards or regulations; they also do not create any new legal obligations or alter existing obligations created by OSHA standards, OSHA regulations, or the Occupational Safety and Health Act of 1970 (OSH Act). Pursuant to the OSH Act, employers must comply with safety and health standards and regulations issued and enforced either by OSHA or by an OSHA-approved State Plan. In addition, the OSH Act's General Duty Clause, Section 5(a)(1), requires employers to provide their workers with a workplace free from recognized hazards likely to cause death or serious physical harm. Implementing a safety and health program in accordance with these guidelines can aid employers in their efforts to comply with the OSH Act.

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1   54 FR 3904–3916; January 26, 1989

2   A comparison of these guidelines, the 1989 guidelines, OSHA voluntary programs, and other consensus standards is available on the OSHA website at www.osha.gov/shpmguidelines.

Contents

INTRODUCTION

THESE GUIDELINES provide employers, workers, and worker representatives[3] with a sound, flexible framework for addressing safety and health issues in diverse workplaces. They are intended for use in any workplace, but will be particularly helpful in small and medium-sized workplaces.

The guidelines use a proactive approach to managing workplace safety and health. Traditional approaches are often reactive—that is, problems are addressed only *after* a worker is injured or becomes sick, a new standard or regulation is published, or an outside inspection finds a problem that must be fixed. These guidelines recognize that finding and fixing hazards *before* they cause injury or illness is a far more effective approach.

The concept of continuous improvement is key to the guidelines. The idea is to begin with a basic program and simple goals and grow from there. If you focus on achieving goals, monitoring performance, and evaluating outcomes, your workplace can progress along the path to higher levels of safety and health achievement.

The Benefits of Implementing These Guidelines

The main goal of safety and health programs is to prevent workplace injuries, illnesses, and deaths, as well as the suffering and financial hardship these events can cause for workers, their families, and employers.

A study of small employers in Ohio found that workers' compensation claims fell dramatically after working with OSHA's SHARP program to adopt programs similar to those described in these guidelines.[4]

average number of claims **DECREASED** **52%**

cost per claim **DECREASED** **80%**

average lost time per claim **DECREASED** **87%**

claims (per million dollars of payroll) **DECREASED** **88%**

Source: Ohio Bureau of Workers' Compensation (2011), Ohio 21(d) SHARP Program Performance Assessment.

3   For certain activities, worker participation is vital to the success of the program. In several places in these guidelines, OSHA refers not just to workers but also to their representatives, such as labor unions.

4   The Safety & Health Achievement Recognition Program (SHARP) recognizes small business employers who have used OSHA's On-site Consultation Program services and operate an exemplary injury and illness prevention program. For more information see https://www.osha.gov/dcsp/smallbusiness/sharp.html.

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Employers will find that implementing these guidelines also brings other benefits. The renewed or enhanced commitment to safety and health and the cooperative atmosphere between management and workers have been linked to:

- Improvements in product, process, and service quality.
- Better workplace morale.
- Improved recruitment and retention.
- A more favorable image and reputation (among customers, suppliers, and the community).

IMPLEMENTING
a safety & health program

can help employers avoid the

INDIRECT COSTS
that result from

WORKPLACE INCIDENTS

such as

TIME LOST due to work stoppages and investigations,

training and other costs associated with **REPLACING INJURED WORKERS**

and **LOSS OR DAMAGE** to material, machinery and property.

These **INDIRECT COSTS** have been estimated to be at least **2.7** times the **DIRECT COSTS**[5] **$**

5   Leigh, J. P. (2011), Economic Burden of Occupational Injury and Illness in the United States. Milbank Quarterly, 89: 728–772.

How to Use the Guidelines

Each guideline section describes a core program element (see Figure 1 on p. 4), followed by several action items. Each action item lists examples of steps that employers and workers can take to establish, implement, maintain, and improve their safety and health programs. You can use the checklist referenced in Appendix A: Implementation Tools and Resources to track your progress and document how you have implemented (or will implement) each action item.

While the action items are specific, they are not prescriptive. There may be several ways to implement each core element and action item. Your safety and health program can and should evolve. Experimentation, evaluation, and program changes are all part of the process.

Injuries and illnesses occur in all types of workplace settings, from manufacturing and construction sites to hospitals and healthcare facilities, offices, and other service industries. The preventive approaches described in these guidelines work equally well across all industrial sectors and for small and large organizations alike. Small employers may find that they can best accomplish the actions outlined in these guidelines using informal communications and procedures. Larger employers who have more complex work processes and hazards, or who wish to integrate their program with existing management systems for production, quality control, and environmental

protection, may require more formal and detailed processes.

You should adapt these guideline recommendations to the particular needs and resources of your workplace. Guideline implementation will likely differ from workplace to workplace due to the unique circumstances present at each site.

Drawing from lessons learned from successful programs, the guidelines emphasize the importance of worker participation. For a program to succeed, workers and their representatives must participate in developing and implementing all elements of the safety and health program. This emphasis on worker participation is consistent with the OSH Act, OSHA standards, and OSHA enforcement policies and procedures, which recognize the rights and roles of workers and their representatives in matters of workplace safety and health. Several action items described in these guidelines rely on expertise and input that can come only from workers and worker representatives.

Employers and workers on "multiemployer" worksites (where workers of more than one employer are present) will want to review "Coordination and Communication on Multiemployer Worksites," page 23. That section describes actions that host employers and contractors, subcontractors, and temporary staffing agencies (and their workers) should take.

Core Elements of the Safety and Health Program Management Guidelines

Management Leadership	• Top management demonstrates its commitment to continuous improvement in safety and health, communicates that commitment to workers, and sets program expectations and responsibilities. • Managers at all levels make safety and health a core organizational value, establish safety and health goals and objectives, provide adequate resources and support for the program, and set a good example.
Worker Participation	• Workers and their representatives are involved in all aspects of the program—including setting goals, identifying and reporting hazards, investigating incidents, and tracking progress. • All workers, including contractors and temporary workers, understand their roles and responsibilities under the program and what they need to do to effectively carry them out. • Workers are encouraged and have means to communicate openly with management and to report safety and health concerns without fear of retaliation. • Any potential barriers or obstacles to worker participation in the program (for example, language, lack of information, or disincentives) are removed or addressed.
Hazard Identification and Assessment	• Procedures are put in place to continually identify workplace hazards and evaluate risks. • An initial assessment of existing hazards and control measures is followed by periodic inspections and reassessments to identify new hazards.
Hazard Prevention and Control	• Employers and workers cooperate to identify and select options for eliminating, preventing, or controlling workplace hazards. • A plan is developed that ensures controls are implemented, interim protection is provided, progress is tracked, and the effectiveness of controls is verified.
Education and Training	• All workers are trained to understand how the program works and how to carry out the responsibilities assigned to them under the program. • All workers are trained to recognize workplace hazards and to understand the control measures that have been implemented.
Program Evaluation and Improvement	• Control measures are periodically evaluated for effectiveness. • Processes are established to monitor program performance, verify program implementation, identify program deficiencies and opportunities for improvement, and take actions necessary to improve the program and overall safety and health performance.
Coordination and Communication on Multiemployer Worksites	• The host employer and all contract employers coordinate on work planning and scheduling to identify and resolve any conflicts that could impact safety or health. • Workers from both the host and contract employer are informed about the hazards present at the worksite and the hazards that work of the contract employer may create on site.

For More Information

For more information about these guidelines, tools to help you implement them, and related topics, see OSHA's website at www.osha.gov/shpmguidelines. This Web page includes links to tools developed by OSHA and others that can help employers and workers implement these guidelines. Some of these tools and resources are listed in Appendix A: Implementation Tools and Resources.

OSHA's On-site Consultation Program offers free and confidential safety and health services to small and medium-sized businesses in all states and territories across the country, with priority given to high-hazard worksites. On-site Consultation services are separate from enforcement and do not result in penalties or citations. Consultants from state agencies or universities work with employers to identify workplace hazards, provide advice on compliance with OSHA standards, and help establish and improve their safety and health programs. To locate the OSHA On-site Consultation Program nearest you, call 1-800-321-6742 (OSHA) or visit www.osha.gov/dcsp/smallbusiness/consult.html.

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MANAGEMENT LEADERSHIP

MANAGEMENT provides the leadership, vision, and resources needed to implement an effective safety and health program. Management leadership means that business owners, CEOs, managers, and supervisors at all levels:

- Are fully committed to continuously improving workplace safety and health performance.
- Make worker safety and health a core organizational value.
- Provide sufficient resources to implement the safety and health program.
- Visibly demonstrate and communicate their safety and health commitment to workers and others.
- Set an example through their own actions, such as wearing protective equipment where it is required.
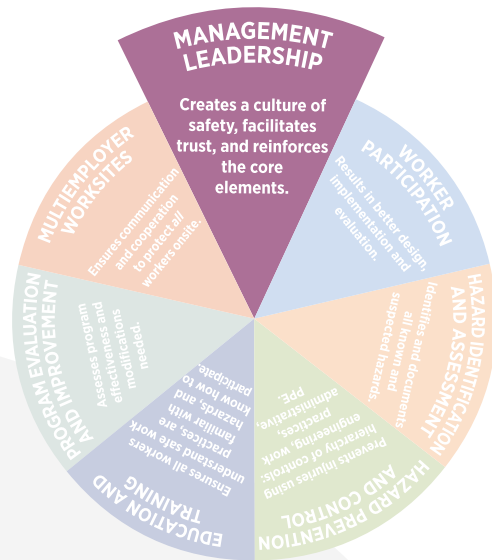
Action item 1: Communicate your commitment to a safety and health program

A clear, written policy helps you communicate that safety and health is a primary organizational value and is as important as productivity, profitability, product or service quality, and customer satisfaction.

How to accomplish it

- Establish a written policy signed by top management describing the organization's commitment to safety and health and pledging to establish and maintain a safety and health program.

- Communicate the policy to all workers and relevant stakeholders, including, as applicable:
  - Contractors, subcontractors, and temporary workers at your worksite(s).
  - Labor unions.
  - Suppliers and vendors.
  - Other tenants in a multi-tenant building.
  - Visitors.
  - Customers.

Action item 2: Define program goals and expectations

By establishing specific goals and objectives, management sets expectations for workers and for the program overall. The goals and objectives should focus on specific actions that will improve workplace safety.

How to accomplish it

- Establish realistic, attainable, and measurable goals that demonstrate progress toward improving safety and health.
- Develop plans to achieve the goals by assigning tasks and responsibilities to particular individuals, setting time frames, and determining resource needs.

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- Communicate the goals and plans to your workers, as well as contractor, subcontractor, and temporary staffing agency workers.

Action item 3: Allocate resources

Management provides the resources needed to implement the safety and health program, pursue program goals, and address program deficiencies when they are identified.

How to accomplish it

- Integrate safety and health into planning and budgeting processes and align budgets with program needs.
- Estimate the resources needed to establish and implement the program.
- Allow time in workers' schedules for full participation in the program.
- Provide and direct resources (money and staff time) to operate and maintain the program, meet safety and health commitments, and pursue program goals.

- Make arrangements to ensure that resources such as first-aid and medical treatment are available if a worker is injured at work or suffers a work-related illness.

Note: Resource needs will vary depending on your organization's size, complexity, and starting point in program development. Resource needs may include capital equipment and supplies, staff time, training, access to information and tools (e.g., vendor information, Safety Data Sheets, injury/illness data, checklists, online databases), and access to safety and health experts, including OSHA's free On-site Consultation Program (see "For More Information" in the "Introduction" section of these guidelines).

Action item 4: Expect performance

Management leads the program effort by establishing roles and responsibilities, setting a good example, and providing an open environment for communicating about safety and health.

How to accomplish it

- Define and communicate responsibilities and authorities for implementing and maintaining the program and hold people accountable for performance.

- Ensure that top leadership and local management share the same safety and health performance goals and priorities.
- Set an example for workers by following the same safety procedures you expect them to follow.
- Establish ways for management and all workers to communicate freely and often about safety and health issues, without fear of retaliation.
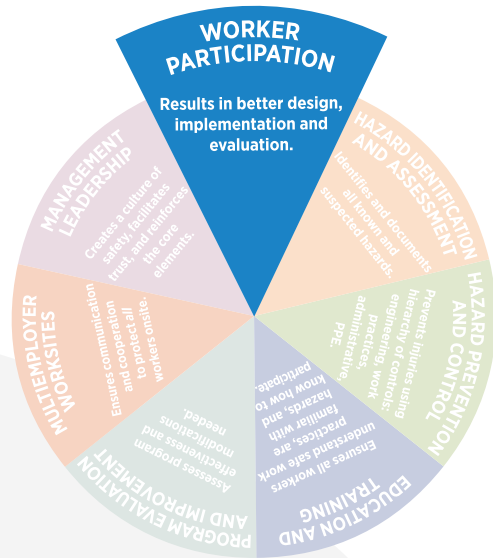
WORKER PARTICIPATION

WORKERS have much to gain from a successful safety and health program and the most to lose if the program fails. Workers often know the most about their jobs and any potential hazards. A safety and health program will be ineffective without meaningful participation of workers and (if applicable) their representatives in establishing and operating the program.[6]

Worker participation means that all workers, including contractors, subcontractors, and temporary staffing agency workers:

- Have opportunities to participate throughout program design and implementation.

- Have access to information they need to participate effectively in the program.

- Are encouraged to participate in the program and feel comfortable reporting safety and health concerns.

In addition, management identifies and eliminates barriers to worker participation in the program.

Note: It is a violation of Section 11(c) of the OSH Act for an employer to "discharge or in any manner discriminate against any employee because such employee has filed any complaint or instituted any proceeding under or related to [the OSH] Act or has testified or is about to testify in any such proceeding or because of the exercise of such employee on behalf of himself or others of any right afforded by [the OSH] Act."

Note: Incentive programs for workers or managers that tie performance evaluations, compensation, or rewards to low injury and illness rates can discourage injury and illness reporting. Point systems that penalize workers for reporting injuries, illnesses, or other safety or health concerns have the same effect, as can mandatory drug testing after reporting injuries. Effective safety and health programs recognize positive safety and health activities, such as reporting hazardous conditions or suggesting safer work procedures.

Action item 1: Encourage workers to report safety and health concerns

Workers are often best positioned to identify safety and health concerns and program deficiencies, such as emerging workplace hazards, unsafe conditions, close calls/near misses, and actual incidents. By encouraging reporting and following up promptly on all reports, employers can address issues before someone gets hurt or becomes ill.

How to accomplish it

- Establish a process for workers to report injuries, illnesses, close calls/near misses, and other safety and health concerns; respond to reports promptly. Reporting processes may have an anonymous component to reduce any fear of reprisal.

- Empower all workers to temporarily suspend or shut down any work activity or operation they feel is unsafe.

- Involve workers in finding solutions to reported issues.

- Emphasize that management will use reported information only to improve workplace safety and health, and that no worker

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6   For certain activities, worker participation is vital to the success of the program. In several places in these guidelines, OSHA refers not just to workers but also to their representatives, such as labor unions.

WORKER PARTICIPATION

will experience retaliation for bringing such information to management's attention.

Action item 2: Encourage workers to participate in the program

By encouraging workers to participate in the program, management signals that it values worker input into safety and health decisions.

How to accomplish it

- Acknowledge and provide positive reinforcement to workers who actively participate in the program.

- Maintain an open door policy that invites workers to talk to managers about safety and health.

- Encourage workers to make suggestions about safety and health.

Note: At many worksites, contractors, subcontractors, and temporary workers work alongside regular workers. It is important to encourage such workers to fully participate in the safety and health program. This will allow all workers at the site to benefit from the program and to contribute their insights to make the program more effective.

Action item 3: Involve workers in all aspects of the program

Including worker input at every step of program design and implementation improves your ability to successfully identify the presence and causes of workplace hazards, creates a sense of program ownership among workers, enhances workers' understanding of how the program works, and helps sustain the program over time.

How to accomplish it

Provide opportunities for workers to participate in all aspects of the program, such as:

- Developing the program.

- Reporting hazards and developing solutions that improve safety and health.

- Analyzing hazards in each step of routine and non-routine jobs, tasks, and processes.

- Defining/documenting safe work practices.

- Conducting site inspections.

- Developing and revising safety procedures.

- Participating in incident and close call/near miss investigations.

- Serving as trainers for current coworkers and new hires.

- Developing, implementing, and evaluating training programs.

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WORKER PARTICIPATION

Action item 4: Give workers access to safety and health information

Sharing relevant safety and health information with workers fosters trust and helps organizations make more informed safety and health decisions.

How to accomplish it

Give workers information they may need to understand safety and health hazards.

- Some OSHA standards require employers to make specific types of information available to workers:
    - Safety Data Sheets.
    - Injury and illness data (may need to be aggregated to eliminate personal identifiers).

- Results of environmental exposure monitoring conducted in the workplace.

- Other useful information for workers to review:
    - Chemical and equipment manufacturer safety recommendations.
    - Workplace inspection reports.
    - Incident investigation reports.
    - Workplace job hazard analyses.

Action item 5: Remove barriers to participation

To participate meaningfully in the program, workers must feel that their input is welcome and their voices will be heard. Participation will be suppressed if there is fear of retaliation—for example, if investigations focus on blaming individuals rather than the underlying conditions that led to the incident.

How to accomplish it

- Ensure that workers from all levels of the organization can participate regardless of their skill level, education, or language.

- Ensure that other policies and programs do not discourage worker participation (see note on page 8 on incentive programs).

- Authorize sufficient resources to facilitate worker participation; for example, hold safety and health meetings during workers' regular working hours.

HAZARD IDENTIFICATION AND ASSESSMENT

A PROACTIVE, ongoing process to identify and assess hazards in order to fix them is a core element of any effective safety and health program. Failure to identify or recognize hazards is frequently one of the "root causes" of workplace injuries, illnesses, and incidents and indicates that the safety and health program is ineffective. Hazard assessment can lead to opportunities to improve program performance.

Hazards identified using the processes described here will be addressed under the hazard prevention and control section of these guidelines.

Hazard identification and assessment means that you:

- Collect and review information about the hazards likely to be present in the workplace.

- Periodically inspect the workplace to identify new or recurring hazards.

- Investigate injuries, illnesses, incidents, and close calls/near misses to identify the underlying hazards.
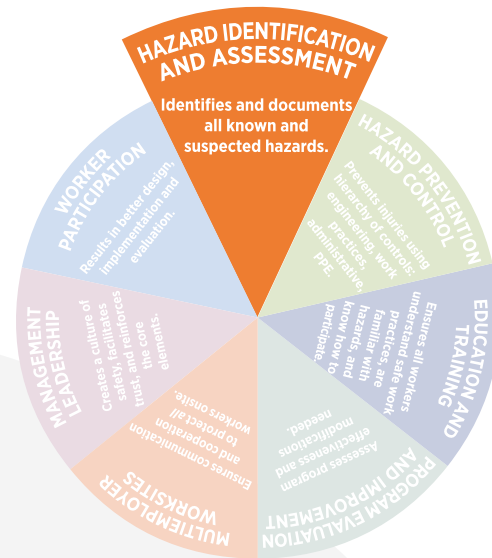
- Identify and address any trends in injuries, illnesses, and hazard reports.

- Consider hazards associated with emergency or non-routine situations.

- Determine the severity and likelihood of incidents that could result from each hazard identified and use this information to prioritize corrective actions. Note, however, that employers have an ongoing obligation to control serious, recognized hazards.

Action item 1: Collect existing information about workplace hazards

Information may already be available (from both internal and external sources) from which employers and workers can learn about workplace hazards.

How to accomplish it

- Collect, organize, and review information to determine what types of hazards are present and which workers may be exposed or potentially exposed.

- Information available in the workplace may include:

    ◦ Equipment and machinery operating manuals.

    ◦ Safety Data Sheets provided by chemical manufacturers.

    ◦ Inspection reports from insurance carriers, government agencies, and consultants.

    ◦ Previous injury and illness records, such as OSHA 300 and 301 logs, and incident investigation reports.

    ◦ Results of medical reports/consultations (e.g., nurse reviews or medical surveillance).

    ◦ Input from workers.

HAZARD IDENTIFICATION AND ASSESSMENT

- Information about hazards may be available from outside sources, such as:
    - Existing corporate and/or site written safety and health programs.
    - OSHA and National Institute for Occupational Safety and Health (NIOSH) websites.

- Trade associations.
- Labor unions.
- Safety and health consultants.

Action item 2: Inspect the workplace

Hazards can be introduced over time as the workflow or work processes change, equipment or tools become worn, maintenance is neglected, or housekeeping practices decline. Setting aside time to regularly inspect the workplace for hazards can help identify problems so that they can be addressed before an incident occurs.

How to accomplish it

- Conduct regular worksite inspections to observe the workflow, inspect equipment and materials, and talk with workers. Be sure to document inspections so you can later verify that hazardous conditions are corrected. Photograph or video-record problem areas to facilitate later discussion and brainstorming and for use as a learning aid.
- Include ancillary activities in these inspections, such as facility and equipment maintenance; purchasing and office functions; and on-site contractor, subcontractor, and temporary employee activities.
- Use checklists that highlight things to look for. Typical hazards fall into several major categories:
    - Chemical agents
    - Biological agents
    - Physical agents
    - General housekeeping

- Equipment operation
- Equipment maintenance
- Fire protection
- Fall protection
- Work and process flow
- Work practices
- Lack of emergency procedures

- Before changing workflows, making major organizational changes, or introducing new equipment, materials, or processes, evaluate the planned changes for potential hazards. In construction, conflicting work schedules may create hazards. Consider initiating a thorough hazard review whenever you:
    - Consider any facility modifications.
    - Introduce a new chemical.
    - Purchase or install new equipment.
    - Change a work practice.
    - Change equipment during maintenance activities.
    - Schedule construction activities that may expose other workers to hazards.
    - Receive new safety and health information.

Note: Many hazards can be identified using common knowledge and available tools. For example, you can easily identify and correct hazards associated with broken stair rails and frayed electric cords. You may

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HAZARD IDENTIFICATION AND ASSESSMENT

need to devote more time and resources to identifying and understanding more complex hazards, such as chemical exposures, excessive noise levels, and confined spaces. Workers can be useful internal resources. Small businesses can also obtain free and confidential safety and health advice through OSHA's On-Site Consultation Program (see www.osha.gov/dcsp/smallbusiness/consult.html).

Note: OSHA requires that construction employers designate a competent person to conduct regular, frequent inspections at 1926.20(b)(2).

Note: See Appendix A: Implementation Tools and Resources for tools that help identify hazards.

Action item 3: Conduct incident investigations

Workplace incidents, including injuries, illnesses, close calls/near misses, and reports of other concerns, clearly indicate where hazards exist. By thoroughly investigating incidents and reports, you will identify hazards that are likely to cause future harm. The purpose of the investigation must always be to identify the "root causes" (and there are generally more than one) of the incident or concern to prevent future occurrence. If it is perceived that the purpose is to assign blame and assess punishment, the investigation will not result in complete, objective information.

How to accomplish it

- Develop a clear plan and procedure for conducting incident investigations so an investigation can begin immediately after an incident occurs. The plan should cover items such as:
  - Who will be involved.
  - Lines of communication.
  - Materials, equipment, and supplies needed.
  - Reporting forms and templates.
- Investigate with a team that includes both management and worker representation.

Train investigation teams on incident investigation techniques and on remaining objective and open-minded throughout the investigation process.

- Investigate close calls/near misses—that is, situations that *could have* resulted in death, injury, or illness. Close calls/near misses are caused by the same conditions that produce more serious injuries or illnesses. They signal that hazards are not being adequately controlled or that new hazards have arisen. Develop reporting procedures for close calls/near misses and encourage all workers to report them.
- Conduct root cause analysis to identify underlying program deficiencies that allowed the incident to happen.
- In responding to incidents that result in injury or illness, take the following steps:
  - Provide first-aid and emergency care for injured worker(s).
  - Take any measures necessary to prevent additional incidents.
  - Report incidents as required to internal and external authorities.

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- Interview any witnesses separately.

- Preserve the scene.

- Collect physical evidence.

- Conduct interviews.

- Collect and review other information.

- Assemble and analyze all available evidence.

- Document your findings and recommendations to address the root causes.

- Develop a corrective action plan and identify those responsible for

implementing the plan by following the action items listed under "Hazard Prevention and Control."

- Communicate the results of the investigation and recommended corrective actions to affected workers and their supervisors for training purposes.

Note: OSHA has special reporting requirements for work-related accidents that lead to serious injury or fatality at 1904.39. OSHA must be notified within eight hours of a work-related fatality and within 24 hours of an amputation, eye loss, or in-patient hospitalization of one or more employees.

Note: See Appendix A: Implementation Tools and Resources for tools to help with incident investigations.

Action item 4: Identify hazards associated with emergency and non-routine situations

Identify foreseeable emergency scenarios and understand the hazards they may present. Also assess the hazards of non-routine or infrequent tasks, including maintenance and startup/shut-down activities. Develop plans and procedures for responding appropriately and safely in such situations.

How to accomplish it

- Identify and assess foreseeable emergency scenarios and non-routine tasks, taking into account the types of material and equipment in use and the location within the facility. Examples of foreseeable scenarios may include:

  - Fires and explosions.

  - Chemical releases.

  - Hazardous material spills.

- Startups after planned or unplanned equipment shutdowns; verification of lockout/tagout.

- Non-routine tasks, such as infrequently performed maintenance activities.

- Natural disasters.

- Weather emergencies.

- Medical emergencies.

- Conduct emergency planning "table-top" exercises to help you plan and test your response to emergency and non-routine situations.

Note: Several OSHA standards require emergency plans. See the section on "Hazard Prevention and Control" for more details on OSHA requirements.

Note: See also Appendix A: Implementation Tools and Resources for tools to identify hazards that can arise in emergency situations.

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HAZARD IDENTIFICATION AND ASSESSMENT

Action item 5: Characterize the nature of identified hazards, determine the controls to be implemented, and prioritize the hazards for control

Assess and understand the hazards you have identified and the types of incidents that could result from worker exposure to those hazards. Use this information to determine which controls to implement and to set priorities for implementing them.

How to accomplish it

- Evaluate each hazard by considering the severity of potential outcomes, the likelihood that an event or exposure will occur, and the number of workers exposed.

- Prioritize the hazards so that those presenting the greatest risk are addressed first. Note, however, that employers have

an ongoing obligation to control all serious recognized hazards and to protect workers.

- Use interim control measures to protect workers until more permanent solutions can be implemented.

Note: Risk can be reduced by controlling or eliminating the hazard or by reducing the potential for exposure. Under the "hierarchy of controls" (see "Hazard Prevention and Control") hazard elimination is preferable because exposure reduction may involve less reliable measures, such as administrative controls or use of personal protective equipment (PPE).

Note: See also Appendix A: Implementation Tools and Resources for tools that employers can use to assess hazards.

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HAZARD PREVENTION AND CONTROL

EFFECTIVE controls protect workers from work-place hazards generally; prevent injuries, illnesses, and incidents; minimize or eliminate safety and health risks; and help employers provide workers with safe and healthy working conditions. The processes described here will help you prevent and control the hazards you identified in the previous section of these guidelines.
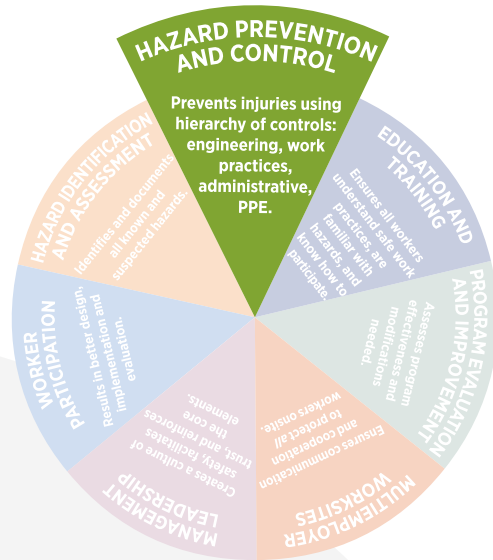
Hazard prevention and control means that you:

- Identify and evaluate options for controlling hazards.

- Use a hazard control plan to guide the selection and implementation of controls.

- Develop plans with measures to protect workers during emergencies.

- Evaluate the effectiveness of controls to determine whether additional or different controls may be more effective. New technologies may be more protective, reliable, or less costly to operate.

Action item 1: Identify control options

Investigate options for controlling each hazard, making use of available information.

How to accomplish it

- Review sources such as manufacturers' literature, OSHA standards and guidance, industry consensus standards, NIOSH publications, and engineering reports to identify potential control measures.

- Investigate control measures used in other workplaces and determine whether they would be effective.

- Get input from workers who may be able to suggest solutions based on their knowledge of the facility, equipment, and work processes.

- For complex hazards, consult with safety and health experts, including OSHA's On-Site Consultation Program.

Action item 2: Select controls

Select controls that are most feasible, effective, and permanent.

How to accomplish it

- Plan to eliminate or control all serious hazards (that is, hazards that are causing or are likely to cause death or serious physical harm) immediately.

- Use interim controls, if needed, while you are developing and implementing permanent controls.

- Select controls according to a hierarchy that emphasizes engineering solutions (including elimination or substitution) first, followed by safe work practices, administrative controls, and finally PPE.

HAZARD PREVENTION AND CONTROL

- Use a combination of control options when no single method fully protects workers.

- Consider how selected controls may impact training needs.

Action item 3: Develop and update a hazard control plan

A hazard control plan describes the steps you will take to prevent and control the hazards you have identified. An effective plan will address serious hazards first. Interim controls may be necessary, but the overall goal is to ensure effective long-term hazard control. Track your progress towards completing your control plan and periodically verify that controls remain effective.

How to accomplish it

- List hazards that need controls in order of priority.

- Assign responsibility for installing/implementing the controls to a specific person or persons who have the power or ability to implement the controls.

- Establish a target completion date.

- Plan how you will track progress toward completion.

- Plan how you will verify the effectiveness of controls after they are installed or implemented.

Action item 4: Select controls to protect workers during non-routine operations and emergencies

Plan to protect workers during non-routine operations and foreseeable emergencies, such as fires and explosions, chemical releases, hazardous material spills, unplanned equipment shutdowns, natural disasters, and weather and medical emergencies.

How to accomplish it

- Develop procedures to control hazards that may arise during non-routine operations.

- Develop or modify plans to control hazards that may arise in emergency situations.

- Procure any equipment needed to control emergency-related hazards.

- Assign responsibilities for implementing the emergency plan.

- Conduct emergency drills to ensure that procedures and equipment provide adequate protection during emergency situations.

Note: Authorities such as local fire and emergency response departments, state agencies, the U.S. Environmental Protection Agency, and OSHA have regulations that require emergency planning (see Appendix B).

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HAZARD PREVENTION AND CONTROL

Action item 5: Implement selected controls in the workplace

Once you have selected hazard prevention and control measures, implement them according to the hazard control plan.

How to accomplish it

- Implement hazard control measures according to the priorities established in the hazard control plan.
- When resources are limited, implement measures on a "worst-first" basis according to the hazard ranking priorities established during hazard identification and assessment. (Note, however, that irrespective of limited resources, employers must protect workers from recognized, serious hazards.)
- Quick fixes include general housekeeping, removal of obvious tripping hazards (e.g., electrical cords), and basic lighting, regardless of the level of hazard they control.

Action item 6: Follow up to confirm that controls are effective

To ensure that control measures remain effective, track progress in implementing controls, inspect controls once they are installed, and follow routine preventive maintenance practices.

How to accomplish it

- Conduct regular inspections (and industrial hygiene monitoring, if indicated) to confirm that engineering controls are operating as designed.
- Confirm that work practices, administrative controls, and PPE use policies are being followed.
- Conduct routine preventive maintenance of equipment, facilities, and controls to help prevent incidents due to equipment failure.
- Track progress and verify implementation by asking the following questions:
  - Have all control measures been implemented according to schedule?
  - Have engineering controls been properly installed and tested?
  - Have workers been appropriately trained so they understand the controls, including safe work practices and PPE use requirements?
  - Are controls being used correctly and consistently?
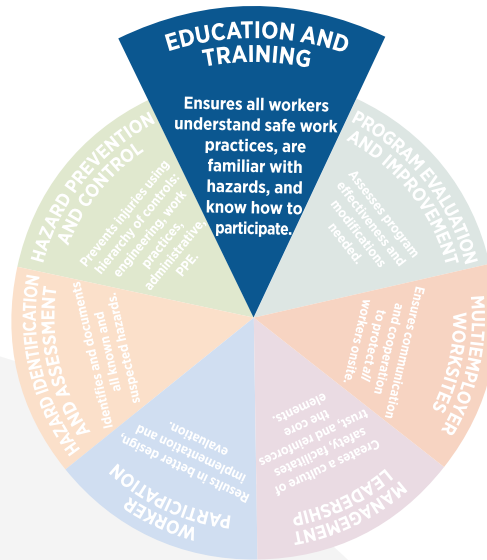
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EDUCATION AND TRAINING

WORKERS who know about workplace hazards and the measures in place to control them can work more safely and be more productive.

Education and training means that employers, managers, supervisors, and workers:

- Have the knowledge and skills needed to work safely and avoid creating hazards that could place themselves or others at risk.
- Demonstrate awareness and understanding of workplace hazards and how to identify, report, and control them.
- Receive specialized training when their work involves unique hazards.

In addition, all workers receive specialized training when they are assigned specific roles in managing or operating the safety and health program. This training is essential for ensuring that workers can fully participate, as described in the "Worker Participation" section of the guidelines.

Action item 1: Provide program awareness training

Provide workers and managers with a basic understanding of the program's structure, plans, and procedures. This knowledge ensures that everyone can fully participate in program development and implementation.

How to accomplish it

- Provide training to all managers, supervisors, and workers, as well as contractor, subcontractor, and temporary agency workers, on:
  - Safety and health policies, goals, and procedures.
  - Safety and health program functions.
  - What to do in an emergency.
  - Employer responsibilities under the program.
  - How workplace safety- and health-related information will be communicated.
  - Workers' rights under the OSH Act.
- Ensure that training is provided in a language and at a literacy level that all workers can understand.
- Emphasize that the program can only work when everyone participates and feels comfortable discussing concerns, making suggestions, and reporting injuries, incidents, and hazards.
- Confirm, as part of the training, that all workers have the right to report injuries, incidents, hazards, and concerns and to fully participate in the program without fear of retaliation.

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EDUCATION AND TRAINING

Action item 2: Train workers on their specific roles and responsibilities in the safety and health program

Additional training may be needed to ensure that managers and workers can incorporate safety and health program responsibilities into their daily routines and activities.

How to accomplish it

- Instruct workers with specific roles within the safety and health program on how they should carry out those responsibilities.

- Provide opportunities for workers to ask questions and offer feedback during and after the training.

- As the program evolves, institute a more formal process for determining the training needs of workers responsible for developing, implementing, and maintaining the program.

Action item 3: Train workers on hazard identification and controls

Providing workers with a basic understanding of hazard recognition and control and actively involving them in the process can help you eliminate hazards before an incident occurs.

How to accomplish it

- Train managers and workers on techniques for identifying hazards, such as job hazard analysis (see OSHA Publication 3071).

- Have workers demonstrate that they can recognize hazards they may encounter in their own jobs, as well as more general workplace hazards.

- Ask workers to show that they recognize the measures being used to control hazards in the workplace, they understand why the controls are important, and they know why the controls must stay in place or be used.

- Provide additional training, as necessary, when a worker is assigned a new task or given a new assignment.

- Provide training where required by specific OSHA standards, such as Hazard Communication, Lockout/Tagout, Confined Space, or Bloodborne Pathogens. Appendix B: Relationship of Guidelines to Existing OSHA Standards lists examples of commonly applicable OSHA standards that require training.

Note: Provide supplemental training when there has been a change in facilities, equipment, materials, or work organization that could increase hazards.

PROGRAM EVALUATION AND IMPROVEMENT

PERIODICALLY step back and evaluate what works and what does not, and whether you are on track to achieve your program goals. Evaluate the program initially to verify that it has been implemented as intended and on a regular basis once it is established. Whenever you identify opportunities to improve the program, make adjustments, and monitor how well it performs as a result. Share the results of your monitoring and evaluation within the workplace to help drive further improvement.

Program evaluation and improvement means that you:

- Establish, report, and track metrics that indicate whether the program is effective.
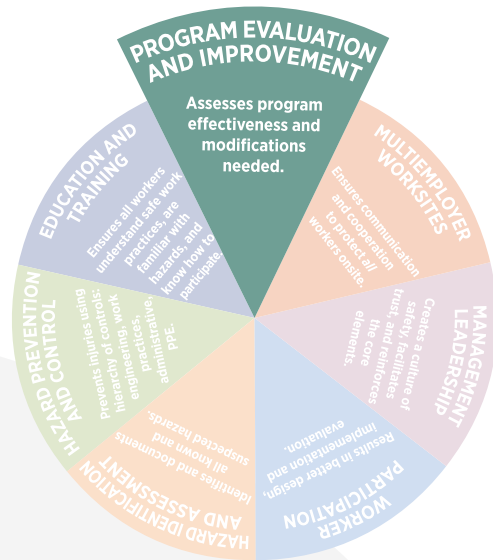
- Evaluate the overall program, initially and periodically, to identify deficiencies and opportunities for improvement.

Action item 1: Monitor performance and progress

Define appropriate metrics and indicators to measure performance. Establish and follow procedures to collect, analyze, and review performance data.

Progress or performance indicators should include both *leading* and *lagging* indicators. Lagging indicators generally track worker exposures and injuries that have already occurred. Leading indicators reflect the potential for injuries and illnesses that have not yet occurred.

How to accomplish it

- Develop and track measures or indicators of progress toward established safety and health goals.
  - ○ Track *lagging indicators*, such as:
    - Number and severity of injuries and illnesses.
    - Results of worker exposure monitoring.
    - Amount paid to workers' compensation claims.
  - ○ In addition, track *leading indicators*, such as:

- Level of worker participation in program activities.
- Number of hazards and close calls/near misses reported, as well as amount of time taken to respond to reports.
- Number and frequency of management walkthroughs.
- Number of hazards identified during inspections.
- Number of workers who have completed required safety and health training.
- Number of days needed to take corrective action after a workplace hazard is identified or an incident occurs.
- Conformance to planned preventive maintenance schedules.
- Worker opinions about program effectiveness.
- Keep track of monitoring activities and results and analyze trends over time.

PROGRAM EVALUATION AND IMPROVEMENT

- Share results with all workers and provide ways for all workers to suggest how to further improve performance.

Note: Indicators can be either quantitative or qualitative. Select indicators that are measurable and that reflect the program goals and identified areas of concern.

Action item 2: Verify the program is implemented and is operating

At least once a year, evaluate the entire program to ensure that it operates as intended, controls identified hazards effectively, and drives progress toward established safety and health goals and objectives.

How to accomplish it

- Verify that the program's core elements have been fully and effectively implemented.
- Verify that the following key processes are in place and operating as intended:

  ◦ Reporting injuries, illnesses, incidents, hazards, and concerns.
  ◦ Conducting workplace inspections and incident investigations.
  ◦ Tracking progress in controlling identified hazards and ensuring that hazard control measures remain effective.
  ◦ Collecting and reporting the data needed to monitor progress and performance.

Action item 3: Correct program deficiencies and identify opportunities to improve

Whenever a problem is identified in any part of the safety and health program, take prompt action to correct the problem and prevent its recurrence.

How to accomplish it

- If you discover program deficiencies, take actions needed to correct them.
- Proactively seek input from managers, workers, supervisors, and other stakeholders on how you can improve the program.
- Determine whether changes in equipment, facilities, materials, key personnel, or work practices trigger any need for changes in the program.
- Determine whether the metrics and goals are still relevant and how you could change them to more effectively drive improvements in workplace safety and health.

Note: The scope and frequency of program evaluations will vary depending on the scope, complexity, and maturity of the program and on the types of hazards it must control.

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COORDINATION AND COMMUNICATION ON MULTIEMPLOYER WORKSITES

Does This Element Apply to Me?

Most employers occasionally have other employers' workers present in their workplace such as janitorial staff, temporary clerical support, or specialized service workers such as electricians or mechanics. These workers, like those you employ, can be exposed to safety or health hazards present in your workplace. For example, maintenance contractors might enter mechanical rooms where asbestos-containing material is present, or access roofs where skylights can pose a hidden fall hazard. Contractor employers might also create hazards in your facility due to the work that they perform. For example, welding can create a fire hazard; wet-mopping floors can create a slipping hazard.

If you **never** host other employers' workers at your worksite and your own workers are never assigned to a worksite controlled by another employer, this section may not apply to you. However, if you intermittently or frequently operate in a multi-employer work environment, then this section is important. Many of the action items presented here are similar to those discussed earlier in these guidelines. Here you will find guidance on how to implement those action items effectively, taking into account the unique situations that can arise in a multiemployer work environment.
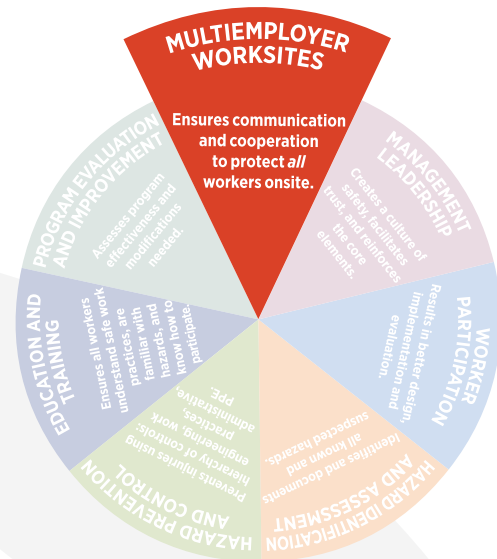
AT MANY WORKSITES today, workers of more than one employer work alongside or interact with each other. Typically, some workers are employed by a host employer (which may be an owner or general contractor) and others by a contractor, subcontractor, or temporary staffing agency. In these settings, employers must establish mechanisms to coordinate their efforts and communicate information to ensure that all workers on site and their representatives can participate in efforts to prevent and control injuries and illnesses, and that workers are afforded equal protection against hazards.[7]

Action item 1: Management Leadership

In a multiemployer work environment, the host employer and the contractor, subcontractor, or temporary staffing agency commit to a program that will provide the same level of safety and health protection to temporary and contract workers as to permanent workers. Before the start of any on-site work, the host employer and contractor, subcontractor, or temporary staffing agency establish their respective safety and health responsibilities and obligations, as well as procedures for coordinating these responsibilities and communicating safety and health information. (See also "Management Leadership," p. 6.)

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7   For certain activities, worker participation is vital to the success of the program. In several places in these guidelines, OSHA refers not just to workers but also to their representatives, such as labor unions.

COORDINATION AND COMMUNICATION ON MULTIEMPLOYER WORKSITES

How to accomplish it

- Communicate to temporary and contract employers and workers the commitment to provide the same level of safety and health protection.

- Provide a copy of the safety and health policy to all contractors, subcontractors, and temporary staffing agencies.

- Before beginning on-site work (including, where appropriate, as part of requests for proposals, bids, and contracts), clarify each employer's responsibilities and obligations with respect to safety and health, such as:

    ◦ Providing necessary training to workers.

    ◦ Selecting, providing, and maintaining any PPE.

    ◦ Providing any required medical surveillance or assessments.

    ◦ Recording and reporting any injuries or illnesses.

- Outline the procedures and processes for coordinating safety and health responsibilities, as well as and the procedures for communicating between the host employer and contractor, subcontractor or temporary staffing agency. Document these in writing.

Action item 2: Worker participation

The safety and health programs at multiemployer worksites ensure that all workers, whether permanent or temporary, receive the same information and have the same opportunity to participate in program activities.

How to accomplish it

The strategies for ensuring effective worker participation in a multiemployer work environment are the same as those described earlier for all employers (see "Worker Participation," p. 8). You simply extend your actions to include those workers at your site who are employed by contractors, subcontractors, and temporary staffing agencies. This means that you:

- Provide opportunities for them to participate in all aspects of the program.

- Provide them access to safety and health information.

- Encourage them to raise safety and health concerns; inform them about how and to whom to report injuries, illnesses, hazards, and incidents.

- Identify and remove any obstacles or barriers to their participation or to reporting.

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COORDINATION AND COMMUNICATION ON MULTIEMPLOYER WORKSITES

Action item 3: Hazard identification and assessment

The work environment at multiemployer worksites creates a need for additional measures to ensure hazards are identified and assessed and that injuries, illnesses, and incidents involving temporary and contract workers are reported and investigated. (See also "Hazard Identification and Assessment," p. 11.)

How to accomplish it

Hazard Assessment:

- The host employer performs a worksite hazard assessment before assigning any temporary or contract workers and shares the results of the hazard assessment with the contractor, subcontractor, or temporary staffing agency and any workers they supervise.

- The contractor, subcontractor, or temporary staffing agency performs a pre-job hazard assessment of the work they will perform to identify and address hazards they may create and shares it with the host employer.

- The host employer and contractor, subcontractor, or temporary staffing agency provide timely notice to each other of any unsafe conditions or potential hazards that are identified.

- The host employer allows the contractor, subcontractor, or temporary staffing agency to conduct site visits and inspections and provides access to injury and illness records and other relevant safety and health information.

Reporting of Injuries, Illnesses and Incidents:

- The host employer and contractor, subcontractor or temporary staffing agency establish procedures for recording and reporting injuries, illnesses, hazards, and incidents involving temporary or contract workers. Such procedures:

  - Identify which employer controls the worksite and is responsible for recording the injuries and illnesses of temporary and contract workers on the OSHA 300 log.

  - Identify how and to whom temporary and contract workers should report injuries, illnesses, hazards, and incidents.

  - Provide for timely notification and communication between the host employer and contractor, subcontractor, or temporary staffing agency of any injuries, illnesses, incidents, or exposure to hazards involving temporary or contract workers.

Investigations:

- The host employer and contractor, subcontractor, or temporary staffing agency establish procedures for investigating injuries, illnesses, incidents, or reports of hazards involving temporary or contract workers. Such procedures:

  - Give the contractor, subcontractor, or temporary staffing agency access to the worksite to conduct or participate in such investigations.

  - Allow the host employer and contractor, subcontractor, or temporary staffing agency to communicate and share investigation results with their workers.

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COORDINATION AND COMMUNICATION ON MULTIEMPLOYER WORKSITES

Action item 4: Hazard prevention and control

The safety and health programs at multiemployer worksites ensure that the host employer and contractor, subcontractor, or temporary staffing agency are familiar with each other's hazard control plan and understand their respective responsibilities for controlling hazards. (See also "Hazard Prevention and Control," p. 16.)

How to accomplish it

- Before beginning on-site work, the host employer gives the contractor, subcontractor, or temporary staffing agency information about the measures, programs, and procedures to be used to control temporary and contract workers' exposure to hazards while on site, and to comply with applicable standards.

- Before beginning on-site work, the contractor, subcontractor, or temporary staffing agency gives the host employer similar information about measures, programs, and procedures to be used to control hazards associated with their workers' work, and to ensure they comply with applicable standards.

- As discussed under "Management Leadership" above, identify the employer(s) responsible for:
  - Selecting, providing, and maintaining PPE.
  - Providing required medical assessments and surveillance.

Action item 5: Education and training

The safety and health programs at multiemployer worksites ensure that temporary and contract workers receive appropriate safety and health training and information that will enable them to perform their work safely alongside permanent workers.

How to accomplish it

The strategies for ensuring effective education and training at multiemployer worksites are the same as or similar to those described earlier for all employers (see "Education and Training," p. 19). These actions include the following:

- The host employer and contractor, subcontractor, or temporary staffing agency identify any safety and health qualifications and certifications needed by on-site workers and ensure they meet such requirements.

- Temporary and contract workers receive relevant general and appropriate hazard- and standard-specific training before starting their assignment. This training also explains:
  - The host employer and contractor, subcontractor, or temporary staffing agency responsibilities for safety and health.
  - Procedures for reporting hazards, injuries, illnesses, and incidents.
  - Their right to be protected against discrimination or retaliation for exercising safety and health rights and for reporting injuries, illnesses, and hazards or raising other concerns.

The safety and health program should identify whether the host employer or contractor, subcontractor, or temporary staffing agency (or both) will be providing such training and information.

COORDINATION AND COMMUNICATION ON MULTIEMPLOYER WORKSITES

Action item 6: Program evaluation and improvement

Safety and health programs at multiemployer worksites are evaluated periodically to ensure that they operate as intended and to identify improvement opportunities. All employers and their workers participate in these evaluations.

How to accomplish it

The strategies for ensuring effective program evaluation and improvement in multiemployer worksites are the same as those described earlier for all employers (see "Program Evaluation and Improvement," p. 21). You simply extend your actions to include those workers at your site who are employed by contractors, subcontractors, and temporary staffing agencies. This includes:

- Exchanging data on metrics each employer has tracked and using this data to evaluate the program's effectiveness at identifying and eliminating or controlling hazards.

- Evaluating coordination and communication effectiveness at the worksite and agreeing on any changes that will improve these program aspects.

- Sharing the results of the periodic evaluation with all involved contractors, subcontractors, and temporary staffing agencies who then inform the affected workers of the evaluation results.

APPENDIX A:
IMPLEMENTATION TOOLS AND RESOURCES

OSHA has developed several tools and resources that can help you implement, operate, and improve your safety and health program. These are available on the *Safety and Health Program Management Guidelines* website at www.osha.gov/shpmguidelines.

The following describes tools and resources from OSHA and others that were available at the time of publication of these guidelines. Additional tools and resources will be developed and posted, so please check the website periodically to see what is new.

EXISTING TOOLS

Safety and Health Program Management Goals and Metrics. These tools can help you set goals for your program, establish metrics, and monitor your performance.

- Cal-OSHA VPP Presentation "Identifying Measurable Safety Goals."

- Ohio Bureau of Workers' Compensation "Safety Goals and Measurement."

- Campbell Institute Transforming EHS Performance Measurement Through Leading Indicators.

Hazard Identification Tools. These tools help you identify hazards in the workplace:

- OSHA "Hazard Identification Training Tool."

- OSHA Small Business Handbook.

- OSHA Job Hazard Analysis (booklet).

- National Day Laborer Organizing Network "Hazard Identification and Prevention" (pamphlet).

Incident Investigation Tools. These tools help you investigate workplace incidents:

- OSHA "Incident Investigation" (Web page).

- OSHA "Employee's Report of Injury Form."

- OSHA "Hazard Identification Training Tool."

- National Safety Council "Incident Investigation Manual."

- Cal-OSHA Guide to Developing Injury and Illness Prevention Programs – Accident Investigation.

"**Protecting Temporary Workers**" (Web page). OSHA Guidance and resources to ensure a safe work environment for temporary workers.

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APPENDIX A:
IMPLEMENTATION TOOLS AND RESOURCES

FUTURE TOOLS

Safety and Health Program Management Implementation Checklist. Use this checklist to track action items you have completed and as a reminder of what you have left to do.

Safety and Health Program Management Self Evaluation. Use this questionnaire to determine how closely your existing policies, programs, and practices conform to good safety and health program management design.

Safety and Health Program Management Audit Tool. Use this tool when conducting periodic reviews of your program. Record findings and recommendations for changes to improve the program.

Model programs. Examples of actual or hypothetical program documentation.

Model training programs. Examples of actual or hypothetical training programs.

Case studies. Case studies of successful program implementation (SHARP, VPP, 18001, hospitals).

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APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

THIS APPENDIX serves two purposes. First, it describes how you may already be implementing the core elements of the guidelines. OSHA standards that apply to your workplace may contain requirements that are similar to the action items described in the guidelines--requirements that overlap with the guideline's core elements of management leadership, worker participation, hazard identification and assessment, hazard prevention and control, education and training, etc. In fact, complying with any OSHA standard and the general duty clause of the OSH Act requires hazard identification and control, as well as management leadership to provide the resources necessary to control identified hazard(s). As a result, if you are complying with existing standards, you are already doing some of the things you need to do to integrate the core elements of a safety and health program with the existing business management systems in your workplace.

Second, this appendix indicates ways in which the guidelines can help you comply with existing standards. Establishing a safety and health program, as described in these guidelines, will help you to proactively identify and control workplace hazards and therefore more effectively comply with the safety and health standards that apply to you. This will occur as you implement, as part of your program, effective procedures for identifying and mitigating hazards, involving workers in identifying hazards and finding solutions, planning and setting goals for safety and health, and conducting reviews to ensure that controls are working and goals are being met, resulting in improved safety and health.

NOTE: Complying with existing safety and health standards is the minimum, and does not mean that an effective safety and health program is in place. Integrating the program elements described in these guidelines with existing compliance

assurance mechanisms will provide a sound basis for identifying and controlling hazards before someone gets hurt, ensuring worker participation and communication at all levels of the organization, and achieving both safety and health and other organizational goals.

This appendix identifies requirements in existing OSHA standards that you can build on as you begin implementing these guidelines. Standards that are "programmatic" in nature contain considerable overlap with the guidelines. For example, the Construction General Provisions standard (1926.20) requires employers to maintain "accident prevention programs" that include "frequent and regular inspections of the job sites, materials, and equipment" by "competent persons." The related training provisions (1926.21) require employers to instruct employees in the "recognition and avoidance of unsafe conditions" and in the "regulations applicable to his work environment" to "control or eliminate any hazards or other exposure to illness or injury." These align closely with action items identified under the *hazard identification* and *education and training* core elements in these guidelines. If you are covered by such standards, you may find implementing a safety and health program easier and more intuitive. While not a comprehensive list, examples of such standards include:

General Industry Standards

- Process Safety Management of Highly Hazardous Chemicals: 1910.119
- Hazardous Waste Operations and Emergency Response: 1910.120
- Respiratory Protection: 1910.134
- Confined Spaces: 1910.146
- Lockout/Tagout: 1910.147
- Welding, Cutting and Brazing: 1910.251 – 255 (Subpart Q)
- Bloodborne Pathogens: 1910.1030

APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

- Hazard Communication: 1910.1200
- Occupational Noise Exposure: 1910.95

Construction Standards

- General Provisions: 1926.20 – 34 (Subpart C)
- Hazard Communication: 1926.59
- Lead In Construction: 1926.62
- Process Safety Management: 1926.64
- Hazardous Waste Operations and Emergency Response: 1926.65
- Respiratory Protection: 1926.104
- Welding and Cutting: 1926.350 – 354 (Subpart J)
- Fall Protection: 1926.501 – 503 (Subpart M)
- Asbestos: 1926.1101
- Confined Spaces: 1926.1203 – 1212 Subpart AA

While compliance with any OSHA standard requires some degree of management leadership and hazard identification and control, the tables that follow—one for General Industry (Table B-1) and one for Construction (Table B-2)—identify specific paragraphs of some of the most widely applicable existing OSHA standards and regulations that are relevant when implementing each core element of these guidelines. Referring to these paragraphs and identifying the steps you have already taken to comply with them will help you determine what additional steps you need to take to fully implement each core element.

Note: State Plans have and enforce their own occupational safety and health standards that are required to be at least as effective as OSHA standards. More information about State Plans is available at www.osha.gov/dcsp/osp/index.html.

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APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

Table B-1. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Relationship to Safety and Health Program Management Guidelines Core Elements

Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Injuries and Illnesses 1904 applies to recording and reporting of occupational injuries and illness.	1904.32(b)(3)	1904.35					
Ladders 1910.25 - 27 describes inspection and safe use requirements for portable wooden ladders, portable metal ladders, and fixed ladders.			1910.25(d)(1)(x) 1910.26(c)(2)(vi) 1910.27(f)	1910.25 1910.26(c) & (d) 1910.27(f)			
Emergency Action Plans describes requirements when an emergency plan is required by another OSHA standard.			1910.38(b)		1910.38(e)		
Occupational Noise Exposure ensures protection from hazardous noise exposure		1910.95(e),(f), (l)	1910.95(d)	1910.95(b), (i), (j)	1910.95(e), (k), (l)		
Process Safety Management 1910.119 prevents or minimizes the consequences of a catastrophic chemical release; applies to chemicals above specified threshold quantities and extremely flammable gases or liquids not used for fuel.	1910.119(l)(2)(v)	1910.119(c), (e)(4), (m)(3)	1910.119(d), (e), (i), (j)(4), (j)(6)(ii), (l), (m), (n)	1910.119(e)(3)(iii), (e)(5), (f), (j)(5), (k), (m)(5)	1910.119(g), (h)(3)(i), (l)(2)(iv), (j)(3)	1910.119(e)(6), (f)(3), (m)(5), (o)	1910.119(h), (l)(3), (m)(3)

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APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

Table B-1. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Relationship to Safety and Health Program Management Guidelines Core Elements

Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Emergency Response 1910.120(q) *HAZWOPER Emergency Response* applies when employees will be directed to respond to an uncontrolled release of hazardous material			1910.120(q)(1) & (2)	1910.120(q)(3)	1910.120(q) (4)–(8)	1910.120(q)(2) (x)	1910.120(q)(3), (5)
Personal Protective Equipment (PPE) Subpart I (1910.132–138) ensures PPE (gloves, footwear, hardhats, etc.) is properly selected and used. (See separate table entry below for "Respiratory Protection.")			1910.132(d) 1910.137(c)(2) (ii) & (xii) 1910.138(b)	1910.133 1910.134 1910.135 1910.136 1910.137(c) 1910.138	1910.132(f)		
Respiratory Protection 1910.134 ensures protection from inhalation hazards and safe respirator use.			1910.134(d)	1910.134(a), (c), (e)–(j)	1910.134(k)	1910.134(l)	
Confined Space Entry 1910.146 protects employees entering spaces that may contain a hazardous atmosphere or other serious hazard.	1910.146(d) (8) & (e)	1910.146(l)	1910.146(c)(1), (c)(2), (c)(4), (c) (6), (d)(2), (d) (5)	1910.146(c)(3), (c)(4)	1910.146(g), (h)(1), (i)(1) & (2), (k)(2)	1910.146(d)(13) & (14)	1910.146(c)(8) & (9)

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APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

Table B-1. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Relationship to Safety and Health Program Management Guidelines Core Elements

Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Lockout/Tagout 1910.147 prevents accidental startup or release of stored energy during machine or equipment servicing.	1910.147(c) (4)(ii)(C), (f)(3)(ii)(A)	1910.147(c) (6)(i), (c)(8) & (9)	1910.147(c)(4)(ii)(D), (c)(6)	1910.147(c)(4), (d), (e) & (f)	1910.147(c) (1), (7)	1910.147(c)(6)(i)	1910.147(f)(2)
Powered Industrial Trucks 1910.178 applies to design, maintenance, and use of forklifts and similar vehicles.			1910.178(q)(7)	1910.178(e)–(k), (m)–(q)	1910.178(l)		
Welding/Hot Work Subpart Q 1910.251–255 prevent fires or injury due to use of welding or torch cutting equipment.	(2) (iv), (vi)(A) & (xiv), (x)(iii)(B)		(iv) 1910.253(e)(6) (iv) 1910.255(e)	1910.253 1910.254 1910.255	(iii)(B) & (xiii)(C), & (c)(1) (iv) 1910.253(a) (4) 1910.254(a) (3) 1910.255(a) (3)		(2)(xiii)(D)
Electrical 1910.331 – 335 describe requirements for working on de-energized or energized electrical equipment, including training for exposed and qualified persons.				1910.333(a)(1), (b)(2), (c)(2) 1910.334 1910.335	1910.332(b) (2) 1910.332(b) (3)		

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Table B-1. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Relationship to Safety and Health Program Management Guidelines Core Elements

Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Asbestos 1910.1001 and 1926.1101 describe requirements applicable to maintenance of buildings constructed before 1980 that may contain asbestos.			1910.1001(j) (2), (j)(8) 1926.1101(k)(9)(vi)	1910.1001(k)(7)	1910.1001(j) 1926.1101(k) (2) (ii), (k) (9)		1926.1101(d)
Bloodborne Pathogens 1910.1030 describes safe practices for workplaces with reasonably anticipated contact with blood.		1910.1030 (c)(1)(v)	1910.1030(c)(2) & (d)(2)(xiv)(B)	1910.1030(c), (d)	1910.1030(g) (2)	1910.1030 (c)(1)(iv)	
Chemical Hazard Communication 1910.1200 requires sharing chemical hazard information.			1910.1200(e)(1) & (h)(3)(ii)	1910.1200(h) (3)(iii)	1910.1200(h)		1910.1200 (e)(2)

*This table includes commonly applicable OSHA standards that contain elements related to safety and health program management (e.g., ladders). It also includes less commonly applicable standards that follow a more robust program management model (e.g., process safety management).

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APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

Table B-2. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Relationship to Safety and Health Program Management Guidelines Core Elements

Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Injuries and Illness 1904 applies to recording and reporting of occupational injuries and illness.	1904.32(b)(3)	1904.35					
General Provisions Subpart C describes general obligations of employers to identify hazards and ensure safe working conditions and training.			1926.20(b)(2)	1926.20 1926.25 1926.26 1926.28 1926.34 1926.35	1926.20(b) (4), (f)(2) 1926.21(b) 1926.35(e)		
Health and Environmental Controls Subpart D addresses control of health hazards such as noise and lead. This section contains several regulations requiring a comprehensive program. Many of these are highlighted below.							
Medical Services and First Aid 1926.50 applies at sites more than 3 to 4 minutes from emergency care. Where this standard applies, the Blood-borne Pathogens rule also applies (see 1910.1030 in Table B-1 on general industry).					1926.50(c)		

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Standard & Overview	Relationship to Safety and Health Program Management Guidelines Core Elements						
	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Chemical Hazard Communication 1926.59 and 1910.1200 require sharing chemical hazard information.			1910.1200(e) (1) & (h)(3)(ii)	1910.1200(h) (3) (iii)	1910.1200(h)		1910.1200 (e)(2)
Lead 1926.62 applies to construction activities where workers may be exposed to lead.		1926.62(o)	1926.62(d), (e) (2)(iii), (m)	1926.62(e), (f), (g), (h), (i),	1926.62(l)	1926.62(e)(2) (v),(3)	1926.62(e)(2) (ii)(H)
Process Safety Management 1926.64 prevents or minimizes the consequences of a catastrophic chemical release; applies to chemicals above specified threshold quantities and extremely flammable gases or liquids not used for fuel.		1926.64(c)	1926.64(d), (e), (i), (l), (n), (o)	1926.64(e), (f), (j), (k), (m)(5)	1926.64(g)	1926.64(l)	1926.64(h)
Hazardous Waste Operations and Emergency Response 1926.65 applies to clean-up operations at hazardous waste sites.	1926.65(b)(1) (ii), (b)(2)(ii)		1926.65(c), (l), (m)	1926.65(d), (g), (j), (k), (m), (n)	1926.65(e)	1926.65(o)	1926.65(i)

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Table B-2. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Standard & Overview	Relationship to Safety and Health Program Management Guidelines Core Elements						
	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Personal Protective and Lifesaving Equipment Subpart E ensures PPE (footwear, lifelines, hardhats, etc.) is properly selected and used.			1926.97(c)(2) 1926.106(b)	1926.95 1926.97(c) 1926.102 1926.104 1926.106			
Respiratory Protection 1926.104 and 1910.134 ensure protection from inhalation hazards and safe respirator use.			1910.134(d)	1910.134(a), (c), (e) – (j)	1910.134(k)	1910.134(l)	
Welding and Cutting Subpart J prevents fires or injury due to use of welding or torch cutting equipment.			1926.350(f)(3), (g)(2) 1926.352(e), (i) 1926.354(a)	1926.350(d) 1926.351(d)	1926.350(d) 1926.351(d) 1926.352(e)		
Electrical Subpart K addresses electrical safety requirements for safeguarding employees. Highlights relating to installation requirements and safe work practices are noted here.			1926.403(b), (g), (h), (j)(2)(ii) 1926.404(a)(1), (b)(1), (d)(2)(ii) 1926.405(b)(3) 1926.416(a)(3) 1926.417	1926.402–408 1926.416 1926.417	1926.404(b)(1) (iii)(B) 1926.417		
Scaffolds Subpart L specifies safety requirements for scaffolds and aerial lifts, as well as training, with highlights presented here.			1926.451(d)(3) (i), (d)(10), (d)(12)(iv), (f)(3) 1926.452(t)(2) 1926.453(b)(2) (i)& (xii)	1926.451 1926.452 1926.453	1926.451(a) (6), (f)(7) 1926.454		

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APPENDIX B: RELATIONSHIP OF GUIDELINES TO EXISTING OSHA STANDARDS

Table B-2. Relationship of Guidelines to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Standard & Overview	Relationship to Safety and Health Program Management Guidelines Core Elements						
	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multiemployer Worksites
Fall Protection Subpart M specifies that employers have a duty to provide fall protection, such as guard rails, covers, or lifelines, for employees working 6 or more feet above an unprotected side or edge.			1926.501(a)(2) 1926.502(b)(15), (c)(4)&(5), (d)(19)&((21), (e)(9), (k)(10)	1926.501 1926.502	1926.503	1926.502(k)(10)	
Stairways and Ladders Subpart X specifies inspection and safety use requirements for portable and fixed ladders.			1926.1053(b)(15)	1926.1051 1926.1053(b)	1926.1060		
Toxic and Hazardous Substances Subpart Z protects employees from health hazards. ***Asbestos*** 1926.1101 applies to construction activities where workers may be exposed to asbestos.	1926.1101(o)	1926.1101(f)(6)	1926.1101(f), (k)(6) – (8),	1926.1101(e), (g), (h), (i), (j), (l)	1926.1101(g)(5)(v), (k)(9), (o)(4)		1926.1101(d), (k)(2) – (4)
Confined Spaces Subpart AA protects employees entering spaces that may contain a hazardous atmosphere or other serious hazard.	1926.1204(h) 1926.1205 1926.1206(g)	1926.1204(h) 1926.1212	1926.1203(a), (b) 1926.1204(b), (e) 1926.1206	1926.1203 1926.1204(a), (c), (d), 1926.1205 1926.1206	1926.1204(h) 1926.1207 1926.1208(a)	1926.1204 (m), (n) 1926.1205(f)	1926.1203(h) 1926.1204(k)

*This table includes highlights of selected commonly applicable OSHA standards that contain elements related to safety and health program management (e.g., ladders). This also includes less commonly applicable standards that serve as an example of robust program management (e.g., process safety management).