

Safety & Health Programs

Recommended Practices for Safety and Health Programs—Crosswalk to Existing OSHA Standards



This crosswalk serves two purposes. First, OSHA standards that apply to your workplace may contain requirements that are similar to the action items described in the Recommended Practices for Safety and Health Programs (requirements that overlap with the core elements of Management Leadership, Worker Participation, Hazard Identification and Assessment, Education and Training, etc.). As a result, if you are complying with existing standards you are probably already doing some of the things you would need to do to implement a safety and health program. Second, establishing a safety and health program as described in these recommended practices will help you more effectively comply with those 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 finding solutions, and conducting reviews to ensure controls are working and safety and health is improving.

(It is important to note, however, that complying with existing standards is not evidence that an effective Safety and Health Program is in place. While regulatory compliance is important, the program described in the recommended practices goes beyond compliance to become the overarching framework for identifying and controlling hazards, ensuring participation and communication, and achieving both safety and health and other organizational goals.)

This crosswalk identifies overlapping requirements in existing standards that you can build on as you begin implementing these recommended practices. Standards that are “programmatic” in nature contain considerable overlap. 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 the recommended practices.

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 may 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 Space: 1910.146
- Lockout/Tagout: 1910.147
- Welding, Cutting and Brazing: 1910.251 – 255 (Subpart Q)
- Bloodborne Pathogens: 1910.1030
- Hazard Communication: 1910.1200

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 Subpart Aa

The tables that follow – one for General Industry and one for Construction – identify specific paragraphs of some of the most widely applicable existing standards and regulations that may be relevant when implementing each core element of the Recommended Practices for Safety and Health Programs. 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’s. More information about State Plans is available at: <http://www.osha.gov/dcsp/osp/index.html>

Table A. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Standard & Overview	Relationship to Recommended Practices Core Elements						
	Management Leadership	Employee Participation	Hazard Identification, Assessment	Hazard Prevention, Control	Education, Training	Program Evaluation, Improvement	Multiemployer Worksites
Injuries and Illnesses <u>1904</u> Recording and reporting of occupational injuries and illness	1904.32(b)(3)	1904.35					
Ladders <u>1910.25 - 27</u> 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)			
Process Safety Management <u>1910.119</u> To prevent or minimize 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), (i)(2)(iv), (j)(3),	1910.119(e) (6), (f)(3), (m)(5), (o)	1910.119(h), (l)(3), (m)(3),

Table A. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Standard & Overview	Relationship to Recommended Practices Core Elements						
	Management Leadership	Employee Participation	Hazard Identification, Assessment	Hazard Prevention, Control	Education, Training	Program Evaluation, Improvement	Multiemployer Worksites
<p>Chemical Emergencies 1910.38 <i>Emergency Action Plans</i> applies to emergency evacuation;</p> <p>1910.120(q) <i>HAZWOPER Emergency Response</i> applies when employees will be directed to respond to uncontrolled chemical releases</p>			1910.38(b) 1910.120(q)(1)&(2)	1910.120(q)(3)	1910.38(e) 1910.120(q)(4) – (8)	1910.120(q)(2)(x)	1910.120(q)(3), (5)
<p>Personal Protective Equipment (PPE) Subpart I (1910.132 – 138) to ensure PPE (gloves, footwear, hardhats, etc.) is properly selected and used. (See separate table entry below for <i>Respiratory Protection</i>)</p>			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)		

Table A. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Standard & Overview	Relationship to Recommended Practices Core Elements						
	Management Leadership	Employee Participation	Hazard Identification, Assessment	Hazard Prevention, Control	Education, Training	Program Evaluation, Improvement	Multiemployer Worksites
Respiratory Protection <u>1910.134</u> to ensure protection from inhalation hazards and safe use of respirators			1910.134(d)	1910.134(a), (c), (e) – (j)	1910.134(k)	1910.134(l)	
Confined Space Entry <u>1910.146</u> to protect 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)
Lockout/Tagout <u>1910.147</u> to prevent 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 <u>1910.178</u> applies design, maintenance and use of forklifts and similar vehicles			1910.178(q)(7)	1910.178(e) – (k), (m) - (q)	1910.178(l)		

Table A. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Standard & Overview	Relationship to Recommended Practices Core Elements						
	Management Leadership	Employee Participation	Hazard Identification, Assessment	Hazard Prevention, Control	Education, Training	Program Evaluation, Improvement	Multiemployer Worksites
Welding/Hot work Subpart Q (1910.251 – 255) to prevent fires or injury due to use of welding or torch cutting equipment	1910.252(a)(2) (iv), (vi)(A)&(xiv), (x)(iii)(B)		1910.252(a)(2) (iv); 1910.253(e)(6) (iv) 1910.255(e)	1910.252 1910.253 1910.254 1910.255	1910.252(a)(2) (iii)(B) & (xiii)(C), & (c)(1) (iv); 1910.253(a)(4); 1910.254(a)(3); 1910.255(a)(3)		1910.252(a) (2)(xiii)(D)
Electrical 1910.331 – 335 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)		
Asbestos 1910.1001 and 1926.1101 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)

Table A. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in General Industry Workplaces*

Standard & Overview	Relationship to Recommended Practices Core Elements						
	Management Leadership	Employee Participation	Hazard Identification, Assessment	Hazard Prevention, Control	Education, Training	Program Evaluation, Improvement	Multiemployer Worksites
Bloodborne Pathogens 1910.1030 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 that relate to 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).

Table B. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Relationship to Recommended Practices Core Elements							
Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multi employer 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 This subpart addresses control of health hazards such as noise and lead. This section contains a number of regulations requiring a comprehensive program. Many of these are highlighted below. Medical Services and First Aid 1926.50 applies at sites more than 3-4 minutes from emergency care. Where this standard applies, the Blood-borne Pathogens rule also applies (see 1910.1030 in General Industry Table).					1926.50(c)		

Table B. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Relationship to Recommended Practices Core Elements							
Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multi employer Worksites
Chemical Hazard Communication 1926.59 / 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)
Lead 1926.62 applies to construction activities where workers may be exposed to lead Process Safety Management 1926.64 To prevent or minimize the consequences of a catastrophic chemical release, applies to chemicals above specified threshold quantities, and extremely flammable gases or liquids not used for fuel 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)	1926.62(o) 1926.64(c)	1926.62(d), (e)(2)(iii), (m) 1926.64(d), (e), (i), (l), (n), (o) 1926.65(c), (l), (m)	1926.62(e), (f), (g), (h), (i), 1926.64(e), (f), (j), (k), (m)(5) 1926.65(d), (g), (j), (k), (m), (n)	1926.62(l) 1926.64(g)	1926.62(e)(2)(v),(3) 1926.64(l) 1926.65(o)	1926.62(e)(2)(ii)(H) 1926.64(h) 1926.65(i)
Personal Protective and Lifesaving Equipment Subpart E to ensure 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			

Table B. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Relationship to Recommended Practices Core Elements							
Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multi employer Worksites
Respiratory Protection 1926.104 / 1910.134 to ensure protection from inhalation hazards and safe use of respirators			1910.134(d)	1910.134(a), (c), (e) – (j)	1910.134(k)	1910.134(l)	
Welding and Cutting Subpart J to prevent 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 This subpart specifies safety requirements for scaffolds and aerial lifts, and 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		

Table B. Relationship of Recommended Practices to Selected Existing OSHA Standards Applicable in Construction Workplaces*

Relationship to Recommended Practices Core Elements							
Standard & Overview	Management Leadership	Employee Participation	Hazard Identification & Assessment	Hazard Prevention & Control	Education & Training	Program Evaluation & Improvement	Multi employer Worksites
Fall Protection Subpart M Employers have a duty to provide fall protection such as guard rails, covers, or lifelines for employees working six 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 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 to protect 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 ; to protect 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 that relate to 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).