

Residential Roofing Fall-Protection Plan Development Tool



OSHA's new instruction, fully effective on March 16, 2013, requires roofing contractors to use conventional methods of fall-protection for workers exposed to fall hazards of 6 feet or greater. Other methods of fall-protection may be used only under provisions of a written, site-specific fall-protection plan that contains mandatory elements set out in the OSHA regulation [29 CFR 1926.502(k)]. The following sets out the necessary elements with a brief explanation of the information that a roofing contractor must provide in order to comply with the OSHA requirements for a residential fall-protection plan. In order to be in compliance, a roofing contractor must address the content requested in each of the following sections specific to a particular job-site.

- I. **Name of the qualified person preparing the plan.** *(OSHA requires that a residential fall-protection plan be developed by a qualified person. A qualified person is one who by possession of a recognized degree, certificate, or professional standing or by extensive knowledge, training and experience has successfully demonstrated ability to solve or resolve problems relating to the subject matter, work or project. A qualified person should have knowledge and understanding of the OSHA fall protection regulations and an awareness of the fall hazards encountered on the specific jobsite and means to control those hazards.)*
- II. **Location where conventional fall-protection methods cannot be used.** *(This may be the entire building or structure and the plan would note the address, city and state; or, it may entail only portions of the structure and those portions must be described adequately by using, for example, north, south, east and west directions or other means that clearly describe the roof area involved, for example, the front doghouse dormer.)*
- III. **Reasons that conventional fall-protection is infeasible or creates a greater hazard.** *(OSHA presumes that a conventional fall-protection system—guardrails, safety nets or personal fall-arrest systems (PFAs)—will be feasible and not create a greater hazard. In this portion of the fall-protection plan, the qualified person must set out specific reasons that conventional fall-protection is not feasible—OSHA implies in its instruction that feasibility relates to technological aspects. In other words, is, for example, the structural framing capable of supporting anchor points, guardrail post connections or safety net brackets? The technological reasons that a conventional system cannot be used must be set out in this section. As an alternative, the qualified person may conclude that conventional fall-protection creates a greater hazard to workers, that is, implementation of one of the three conventional systems will expose workers to greater risks of falls, tripping hazards or other injuries. The qualified person must detail those greater hazards with respect to each location set out in II. above.)*
- IV. **Other fall-protection measures to reduce or eliminate fall hazards.** *(In this section, the qualified person preparing the fall-protection plan must discuss other fall-protection methods that will be put in place to protect workers who are not protected by a conventional fall-protection system. OSHA notes that scaffolds, ladders or aerial lifts are examples of other measures. Slide guards or other methods would be suitable to discuss in this section as well.)*
- V. **Use of a safety monitor if no other alternative fall-protection implemented.** *(If no alternative means of fall-protection are described or set out in Paragraph IV above, a safety monitoring system must be*

implemented that complies with the provisions of 29 CFR 1926.502(h). This section should address whether a safety monitoring system will be used and the requirements for such a system [from 502(h)]should be set out as well.)

- VI. Classify each location where conventional fall-protection cannot be used as a controlled access zone.** *(Locations described in the plan as areas where conventional fall-protection cannot be used must be classified as controlled access zones under 29 CFR 502(g). A control line or other means that restricts access to those areas must be put in place. In residential roofing applications, a control line ordinarily will not be an effective means of restricting access to roof areas where conventional fall-protection is not being used. It may be necessary to restrict access to ladders or other roof access through use of barricades, signage or other means that alert non-designated workers that they are not permitted to access the roof area. The qualified person should note in this section the locations that are classified as controlled access zones and also describe the means that will be used to restrict access to those areas by non-designated workers.)*
- VII. Names of designated employees who may work in controlled access zones.** *(In this section, the qualified person must identify each employee who is authorized to work in the controlled access zone where conventional fall-protection is not being used. No other workers may enter that area. If names are not used, other identifiers must be set out in this section. For example, workers with XYZ Roofing Company safety vests or company uniforms.)*
- VIII. Person responsible for plan implementation.** *(This section should list the competent persons who may have responsibility for implementation of the fall-protection plan at the jobsite. OSHA defines a competent person as one who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous or dangerous to employees and has the authority to take prompt corrective measures to eliminate them.)*
- IX. Plan changes and maintaining plan.** *(Changes or revisions to the site-specific plan must be approved by a qualified person and the plan must be maintained up to date. This section should set out the date of the plan and the dates of any subsequent revisions with the name of the qualified person who approved the revisions. An up-to-date copy of the plan must be kept at the job-site.)*
- X. Accident investigation.** *(This section should set out the requirement under the plan that an accident investigation will be conducted by the roofing contractor to determine if the fall-protection plan must be revised in light of any accident or near miss incident. Revisions that might include new practices, procedures or training must be implemented in order to avoid a recurrence of an accident or near miss. Revisions must follow the protocol outlined in Paragraph IX.)*

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