

# Hazard Prevention and Control

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## Follow Up to Confirm That Controls Are in Place and Effective

To make sure control measures are working, employers should keep track of the controls they put in place, inspect and evaluate them regularly, and perform preventive maintenance. Remember that most controls will require some maintenance, adjustment, or modification to be consistently effective.

### To-Do

- Ensure proper installation/implementation and testing of controls.
- Conduct inspections to monitor the proper use of controls.
- Keep track of how well controls reduce exposures and prevent injuries and illness.
- Conduct routine preventive maintenance.
- Train workers and involve them in monitoring efforts.

As you implement your hazard control plan, keep in mind that controls degrade over time. Physical controls require preventive maintenance, workers need refresher training, procedures need updating, and PPE requires maintenance or replacement. In addition, work processes are constantly changing as products and services change. Production pressures to “do more with less” can also influence the effectiveness of controls over time.

For these reasons, you’ll need to monitor controls to make sure they stay effective. Involve workers in these assessments and ask for their suggestions on how to best monitor controls. Suppliers can provide information on proper use and maintenance of safety devices and PPE.

As you follow up to confirm that controls are in place and effective, ask yourself the following questions:

#### 1. Have the controls been implemented according to schedule?

Refer to the schedule in your hazard control plan (Worksheet 4).

**2. Have engineering controls been properly installed and tested according to manufacturers' instructions and applicable regulations?**

Many controls are "off the shelf" solutions that come with instructions. Always follow these and make sure others are aware of them too. OSHA standards or other regulations may specify how controls must be used and/or maintained.

**3. Are workers using controls correctly and consistently?**

- Arrange for workers to be included in regularly conducted inspections to confirm that:
  - Controls are operating as designed and have not been ignored or removed. When this happens, it is often because the control is making the job more difficult or even impossible to perform. Get feedback from your workers.
  - Procedures and practices, administrative controls, and PPE policies are up to date and being observed.
  - Workers have been trained so they do they understand the controls, including safe work practices, limitations, and PPE requirements.

**4. Are the controls effective?**

Monitor them to see if:

- The controls decrease exposure to the hazard and manage risk as intended.
- There are fewer injuries and illnesses (as well as close calls/near misses) related to the hazards being controlled.
- Workers think the controls are effective. The controls fit well with how work is normally performed, and don't interfere with or make the job harder.

**5. Are equipment, facilities, and controls undergoing routine preventive maintenance?**

Engineering-based controls usually require preventive and routine maintenance to work well. Figure out what this involves and whether you are able do it adequately. Consider getting someone trained so they can monitor and maintain controls or get help from an outside service.

**6. Have the control measures created any new hazards?**

If so, make sure those hazards are properly controlled.

**Some tools you can use to monitor effectiveness of controls**

- Surveys or other ways to get worker feedback/input
- Physical inspections and measurements
- Exposure assessments
- Equipment monitors and sensors
- Observations
- Injury and illness tracking
- Injury/incident investigation reports
- Occupational health assessments

If any controls—new or old—are ineffective, determine why and address the problem. For example, provide preventive maintenance if that is needed, or provide better training if workers aren't using the control properly. You also might find that you need a different control (for example, because of changes in work procedures or product design). In that case, review other controls you might have identified when you developed your hazard control plan (Worksheet 4) and decide which to implement instead.

Remember to recognize any worker who brings attention to an ineffective control or poorly controlled hazard. Consider all feedback to adjust the control measures and update your hazard control plan.

## Activity

Follow up on a control you have already implemented. Ask your team of safety champions, along with workers who use that control, to answer the questions discussed in this worksheet to see if the control is effective, and if any changes are needed. Fill in the blanks below and make any changes to your hazard control plan (Worksheet 4) that you find are needed.

**Was the control been implemented according to schedule?**  Yes  No

If no, what caused the delay?

**If the control is an engineering control, has it been properly installed and tested according to manufacturers' instructions and applicable regulations?**  Yes  No

If no, what needs to be done?

**Are workers using controls correctly and consistently?**  Yes  No

If no, why not? For example, does the control make the job harder to perform? Do workers need better training?

**Are the controls effective in preventing injuries, illnesses, and near misses?**  Yes  No

List any information you have to support your answer.

**Are equipment, facilities, and controls undergoing routine preventive maintenance?**  Yes  No

If yes, describe; if no, what is needed?

**Have the control measures created any new hazards?**  Yes  No

If yes, how will you control those hazards?

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