

## Follow Up to Confirm That Controls Are Effective

### Ready for Level 2?

|  | YES<br>(✓)               | NO<br>(X)                                 |
|--|--------------------------|---|
| You have begun inspecting and evaluating controls regularly, updating them as needed | <input type="checkbox"/> | Visit Follow Up on Effectiveness (1HPC_6) |
| You are routinely monitoring hazard control systems                                  | <input type="checkbox"/> | Visit Follow Up on Effectiveness (1HPC_6) |
| You are training workers and involving them in monitoring                            | <input type="checkbox"/> | Visit Follow Up on Effectiveness (1HPC_6) |

### To-Do

- With workers, conduct observations and inspections to evaluate control effectiveness.
- Establish a formal monitoring system to identify and modify controls that have degraded.

### Focus on continual improvement

A good safety and health program is one that you keep making better. Your organization is always looking for ways to improve quality and productivity. You should consider safety and health in the same way. Always be looking for ways to improve hazard prevention and control strategies. You likely have some ideas from your work implementing program evaluation and improvement processes.

The first part of continual improvement is ensuring controls have been properly implemented and are effective. The second part is establishing an ongoing process to monitor controls. All controls tend to degrade over time. Methods and processes can improve, leaving procedures and training out of date. Safety devices and equipment and personal protective equipment (PPE) can wear out.

This means you need a monitoring system to identify controls that have degraded, then modify, repair, or replace them. Many of the hazard identification processes you've already put in place will help you identify controls that have degraded. Explore how you can improve these controls, including by switching to other ones or by adding controls. Keep in mind that controls work together, often providing overlapping protections. A

single control (such as engineering, procedures, training, or PPE) for a particular hazard or hazardous situation may depend on the other controls to work.

## Tips for making sure controls are effective

- Collaborate with workers on hazard identification processes such as regular inspections and observations.
- Ask workers if the controls are appropriate for how work is actually done.
  - A control might not be working because it needs frequent adjustment. For example, local exhaust might need to be moved often, based on where welding is done. Making the local exhaust larger or adding ducts may make the job easier and ensure that contaminants don't enter the workers' breathing zones.
  - Identify and address any new hazards that may have arisen when a new control was introduced.
- Conduct industrial hygiene monitoring as needed. Track worker reports of injuries, illnesses, and incidents related to the controls and control effectiveness.
- Establish a formal preventive maintenance system for equipment, facilities, and controls. This system should:
  - Include a schedule (manufacturer's manuals may have inspection and maintenance instructions)
  - Account for the effectiveness, reliability, and durability of equipment
  - Adjust the frequency of inspections and preventive maintenance based on findings
  - Provide for facility shutdowns for preventive maintenance
- Ensure that administrative controls (e.g., training, work procedures) and PPE are monitored and updated as needed.
- Make sure that workers, managers, and supervisors can recognize maintenance needs and perform or order that maintenance. (Some of these needs will call for special measurement devices, disassembly of equipment, access to machinery above floor level, etc. They might also require special knowledge and skill.)
- Get input from other parts of your program, such as performance evaluations, incident investigations, or inspections. These might indicate the need to re-evaluate hazardous situations and change controls.
- Track the progress of your hazard controls, both the implementation and your reviews of them. Document that progress with notes or using a tracking system.
- Consider automated notifications, such as reminders sent to specific people about regular inspections of controls and periodic maintenance.

## Activity: Establishing a process to monitor controls

Use the space below each step to take notes as you do this activity.

1. **Utilize the team that's been working on program development.** Make sure maintenance personnel are involved along with other workers, a supervisor, your safety champions, and others who know the hazards in your workplace and the controls in place to address them.

2. **Choose several hazards from your hazard control plan** (see Update and Implement Your Hazard Control Plan [2HPC\_3]). List the most common types of controls found on the implementation plan. Put them in the appropriate level of the hierarchy of controls. Your list will look something like this:

- **Elimination:** Buy equipment that is not noisy. Move work to ground level to eliminate fall hazard.
- **Substitution:** Switch to a less hazardous material. Switch to a process that uses less force, speed, temperature, or electricity.
- **Engineering controls:** Ventilation systems, machine guards, interlocks, light curtains, safeguarding, guard rail systems on platforms, noise enclosures, cranes and hoists, lift equipment for ergonomics.
- **Administrative controls:** Limit access to machinery or areas of the workplace. Rotate jobs.
- **Personal protective equipment (PPE):** Safety glasses, face shields, gloves, hard hats, hearing protection, respirators, personal fall protection systems.

3. **Are your current hazard identification processes enough to monitor all controls?** Review the list of your organization's hazard identification processes, improvements needed, and other hazard identification processes needed (see Implement Inspections and Other Hazard Identification Processes [2HI\_2]). For each hazard control, identify which hazard identification processes are used to monitor it. For example, a ventilation system can be monitored by workers using a velometer as part of their daily checks, by the supervisor and/or safety champion in periodic inspections, by audits and industrial hygiene assessments, and through preventive maintenance. List each hazard control and its associated hazard identification processes here:

4. **Document any areas of concern.** For example, a hazard identification process may monitor the control but not often enough, or the people doing the monitoring may not be fully trained or experienced.

5. **Plan to make improvements.** After documenting opportunities for improvement, make sure you assign tasks and set target deadlines.

**Do this exercise at least once a year to make sure processes are in place to monitor all controls.**

DRAFT - UNDER DEVELOPMENT