

such as a power tool, indicated that an employee is safe; when in fact the employee is unconscious or injured, and the power tool is still running. Another method of communication that has low reliability and is an unacceptable means of verification is tapping on tank walls, bulkheads, or decks.

1915.84 – Working alone (Questions and Answers)

Question 1: Section 1915.84(a) and (b) require that “whenever an employee is working alone, such as in a confined space or isolated location, the employer shall account for each employee . . . by sight or verbal communication.” Does this mean that the employer may use email responses, text messages, or transponders that require employees to press buttons to confirm communication?

Answer: No. OSHA intended “verbal” to mean “oral.” As stated in the preamble, “OSHA has determined that, when employers use verbal communication to check on employees working alone, communication must include both parties speaking.” 76 FR 24596. In sum, employers can account for their employees by talking with them (e.g., face-to-face or by radio), or by seeing them work, even if at a distance. Where an employer chooses to use a cell phone as the primary means of verbal communication, the employer must verify cell phone reception in all areas where the employee will be working alone.¹³

Question 2: The rule states, “Except as provided in 1915.51(c)(3) of this part, whenever an employee is working alone, such as in a confined space or isolated location, the employer shall account for each employee. Is documentary evidence required of the employer to demonstrate compliance?”

Answer: No. This is a performance-based requirement so each employer can develop a program that fits their workplace.

Question 3: The rule requires the employer to account for each employee by sight or verbal communication. This section appears to exclude many technologies from the accounting process such as transponder systems, and text messaging. Is this a correct interpretation?

Answer: Yes. OSHA intended “verbal” to mean “oral” and that communication must include both parties speaking. Employers can account for their employees by talking with them (such as face-to-face, or by radio), or by seeing them work, even if at a distance. Where an employee chooses to use a cell phone as the primary means of verbal communication, the employer must verify cell phone reception in all areas where the employee will be working alone.

Question 4: Does the standard apply to employees working in an office environment? Is it the standard’s intent to require checks on office employees that are working in an office environment alone?

Answer: Offices are not excluded from this provision. Therefore, employees working alone in an office setting, including after hours, or employees working on cleaning crews who may be working alone are included in this provision.

1915.85 – Vessel radar and communication systems

This section specifies the requirements to protect employees working on or near vessel radar and communication systems from radiation and other energy and mechanical hazards. If precautions are not taken, these workers may be exposed to radiation (for example, radio frequency radiation). They also may be electrocuted or struck by the antennas or other components if the system activates, energizes, or releases hazardous energy. Vessel radar and communication system components, particularly antennas and transmitters that emit radiation, may electrocute employees or may move and strike employees working-on or -near them. However, if these components cannot emit radiation at levels that could injure

¹³ This answer was developed as part of a settlement agreement with the Shipbuilders Council of America, and issued as an [interpretive letter](#) on November 20, 2012.

