



Update to the General Industry Walking-Working Surfaces and Fall Protection Standards

Falls from heights and on the same level (a working surface) are among the leading causes of serious work-related injuries and deaths. OSHA has issued a final rule on Walking-Working Surfaces and Personal Fall Protection Systems to better protect workers in general industry from these hazards by updating and clarifying standards and adding training and inspection requirements. The rule affects a wide range of workers, from painters to warehouse workers. It does not change construction or agricultural standards.

The rule incorporates advances in technology, industry best practices, and national consensus standards to provide effective and cost-efficient worker protection. Specifically, it updates general industry standards addressing slip, trip, and fall hazards (subpart D), and adds requirements for personal fall protection systems (subpart I). OSHA estimates that these changes will prevent 29 fatalities and 5,842 lost-workday injuries every year.

Benefits to Employers

The rule benefits employers by providing greater flexibility in choosing a fall protection system. For example, it eliminates the existing mandate to use guardrails as a primary fall protection method and allows employers to choose from accepted fall protection systems they believe will work best in a particular situation - an approach that has been successful in the construction industry since 1994. In addition, employers will be able to use non-conventional fall protection in certain situations, such as designated areas on low-slope roofs.

As much as possible, OSHA aligned fall protection requirements for general industry with those for construction, easing compliance for employers who perform both types of activities. For example, the final rule replaces the outdated general industry scaffold standards with a requirement that employers comply with OSHA's construction scaffold standards.

Final Rule Coverage

The final rule applies to all general industry workplaces and covers all walking-working surfaces, which include horizontal and vertical surfaces such as floors, stairs, roofs, ladders, ramps, scaffolds, elevated walkways, and fall protection systems.

The final rule covers a wide variety of general industry firms including building management services, utilities,

warehousing, retail, window cleaning, chimney sweeping, and outdoor advertising.

Increased Worker Protection

The final rule increases worker protection in many ways. The final rule:

- Eliminates the hazard of workers climbing extended heights on fixed ladders without fall protection by phasing out the use of qualified climbers in outdoor advertising;
- Phases in a requirement that fixed ladders (over 24 feet) be equipped with ladder safety or personal fall protection systems to prevent workers from falling or arresting their fall before contact with a lower level;
- Provides performance criteria for personal fall protection equipment in general industry, similar to the criteria that have been in OSHA's construction industry rules since 1994;
- Requires the use of body harnesses, and prohibits body belts, in personal fall arrest systems to distribute fall arrest forces over a larger area of a worker's body; and
- Requires workers who use personal fall protection and other equipment the standard covers be trained, and retrained as necessary, in fall and equipment hazards before they work at elevated heights or use that equipment, including fall protection systems.

Timeline

Most of the rule became effective January 17, 2017, 60 days after publication in the Federal Register, but some provisions have delayed effective dates, including:

- Ensuring exposed workers are trained on fall hazards (May 17, 2017),
- Ensuring workers who use equipment covered by the final rule are trained (May 17, 2017),
- Inspecting and certifying permanent anchorages for rope descent systems (November 20, 2017),
- Installing personal fall arrest or ladder safety systems on new fixed ladders over 24 feet and on replacement ladders/ladder sections, including fixed ladders on outdoor advertising structures (November 19, 2018),
- Ensuring existing fixed ladders over 24 feet, including those on outdoor advertising structures, are equipped with a cage, well, personal fall arrest system, or ladder safety system (November 19, 2018), and

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Injury Tracking Application

Electronic Submission of Injury and Illness Records to OSHA

Click on [Launch ITA](#) to provide OSHA your 2016 OSHA Form 300A information. OSHA also published a [notice of proposed rulemaking](#) to extend the date by which certain employers are required to submit the information from their completed 2016 Form 300A electronically from July 1, 2017 to December 1, 2017.

Who: Establishments with 250 or more employees that are currently required to keep OSHA injury and illness records, and establishments with 20-249 employees that are classified in [certain industries](#) with historically high rates of occupational injuries and illnesses.

What: Covered establishments with 250 or more employees must electronically submit information from OSHA Forms 300 (Log of Work-Related Injuries and Illnesses), 300A (Summary of Work-Related Injuries and Illnesses), and 301 (Injury and Illness Incident Report). Covered establishments with 20-249 employees must electronically submit information from OSHA Form 300A.

When: The requirement becomes effective on January 1, 2017. The new reporting requirements will be phased in over two years. In 2017, all covered establishments must submit information from their completed 2016 Form 300A by July 1, 2017. In 2018, covered establishments with 250 or more employees must submit information from all completed 2017 forms (300A, 300, and 301) by July 1, 2018, and covered establishments with 20-249 employees must submit information from their completed 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, covered establishments must submit the information by March 2.

How: OSHA will provide a secure website that offers three options for data submission. First, users will be able to manually enter data into a web form. Second, users will be able to upload a CSV file to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (application programming interface). We will provide status updates and related information here as it becomes available.

[View the CSV instructions](#)

[Download a CSV file template](#)

[Download a CSV sample file](#)

[View the API technical specifications](#)

ITA Job Aids: These instructions are available to support users through the submission process.

[Getting Started in ITA](#)

- [Create an establishment](#)
- [Add 300A summary data](#)
- [Submit establishment data](#)
- [Upload a file](#)
- [View API token](#)
- [View an establishment or edit an establishment](#)
- [Edit 300A summary data](#)
- [Edit an ITA account](#)
- [Reset Password](#)

Frequently Asked Questions

- [Are the electronic reporting requirements based on the size of the establishment or the size of the firm?](#)
- [How should the data be submitted and how long will it take?](#)
- [If my establishment is selected to respond to the Bureau of Labor Statistics' Annual Survey, do I have to give the same information to both Agencies?](#)
- [My company operates multiple facilities on a campus setting. Each facility has less than 250 employees, but the campus has more than 250 employees. How should I count my employees to determine if I have to electronically provide OSHA my injury and illness records?](#)
- [If a case occurs in one year but results in days away during the next calendar year, do I record the case in both years?](#)
- [May a firm with multiple establishments make a single submission of the data from the multiple establishments?](#)
- [May a third party submit data for an establishment or firm?](#)
- [Do I need special software to electronically submit the data to OSHA?](#)
- [My firm has multiple establishments that do different things. Which determines whether I have to submit data for those establishments, the industry classification of the firm or the industry classification of the establishment?](#)

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A New State Partnership Will Provide Enhanced Education Opportunities and More Job Marketability to Those on the Verge of Leaving Incarceration

Governor Dannel P. Malloy today announced that a new partnership between the Connecticut Department of Labor (CTDOL) and the Department of Correction (DOC) will create a new 10-hour construction safety and health training class to persons in DOC custody who are nearing the end of their sentences and preparing to seek employment. The federally-approved course, often referred to as the “OSHA-10,” is a new initiative that has the goal of increasing the education and skills of those leaving incarceration so they become more marketable to prospective employers.

Held over the course of five weeks in two-hour segments, the course will be provided by staff from CTDOL’s Division of Occupational Safety and Health (CONN-OSHA). Participants who successfully complete the training will receive a course completion card from the federal OSHA Region 1 Training Institute Education Center.

The Governor stressed that these efforts aim to continue reducing the state’s historically low crime rate by providing those who are soon-to-be released with the tools needed to become productive members of society and prevent recidivism.

“By working with people before they are released from custody, we can improve their chances to be successful at obtaining employment upon their release, thereby making a real impact that drives our crime rate even lower and end-

ing the cycle of crime and poverty,” Governor Malloy said. “If we are to truly work toward ensuring that those housed in our prisons do not return, then we need to be a society that makes the kind of smart investments that produce real, positive results for the residents of our state.”

“OSHA-10 provides the general knowledge an entry-level construction worker needs for recognizing and preventing hazards on a construction site, and offers an educational advantage to those leaving our correctional system,” CTDOL Commissioner Scott D. Jackson said. “We are pleased to be working with Commissioner Semple on this new initiative – this is a way to provide those deserving a second chance with better opportunities when they begin their job search and transition from inmates to productive and contributing resident of their communities.”

“Past practice has demonstrated that offenders who participate in employment-related educational programs significantly reduce their chances of reoffending and returning to prison,” DOC Commissioner Scott Semple said. “We are honored to partner with the Department of Labor on this important initiative which will ultimately result in reducing recidivism.”

More than 100 people in DOC custody have already expressed interest in the course and are registered to begin the classes, which started on June 21 at the DOC’s Cybulski Community Reintegration Center in Enfield.

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- Replacing cages and wells (used as fall protection) with ladder safety or personal fall arrest systems on all fixed ladders over 24 feet (November 18, 2036).

States with OSHA-approved state plans have six months to adopt standards that are at least as effective as Federal OSHA standards. Many state plans adopt standards identical to OSHA, but some state plans may have different or more stringent requirements. CONN-OSHA (public sector enforcement) is in the process of adopting the update.

If you’re not sure how the new final rule applies to you, CONN-OSHA can help. It is understandable that many employers are going to require clarification and assistance. Please contact CONN-OSHA at 860-263-6925 for a free consultation and information about how we can help you meet the requirements of the new final rule.

Free One-Day Symposium for CT Business Leaders with 50 or more employees who want to learn more about the Opioid Crisis and Connecticut’s Workforce

Pre-Registration Required:

<https://goo.gl/forms/AOoLnFLykdZbxKt22>

When: October 4, 2017

Where: Middlesex Community College

Space is limited, so don’t wait!!

Fatality & Casualty Reporting

State & Town: CONN-OSHA (860) 263-6946 (local) or 1-866-241-4060 (toll-free)
Private Employers: Report to Federal OSHA at 1-800-321-OSHA(6742)

Hazard Corner...

Temporary Worker Falls from a Fixed Ladder and Dies of Blunt Force Injury to Head and Chest

The victim was a 58-year-old laborer who was employed by a staffing agency. He had been working with a superintendent of a commercial general contractor for the two months leading up to the incident at a suburban open-air shopping area that was comprised of five buildings, totaling 193,000 square feet of space and 32 retail units. A contract between the staffing agency and host employer stated that the victim was being placed as a laborer to do light cleaning, such as sweeping, dusting, and light debris removal within a single floor location.

On the morning of the incident, one of the first tasks the victim and the superintendent were to perform was to service a restaurant's ventilation scrubber unit which was located on the building's roof. To access the roof an 18 ½ foot vertical fixed ladder that had a 90 degree pitch was to be used.

To get the ventilation scrubber filters to the roof, the host employer's superintendent told the victim to climb the fixed ladder; the superintendent would climb up a few rungs and pass the victim the filters who would place them on the roof. Once all of the filters were on the roof, they would both climb onto the roof and install the filters into the ventilation scrubbers. When he fell, the victim was standing on the fixed ladder, near the top, approxi-

mately 17 feet high. The superintendent was picking up more filters when he heard a loud crash; he turned around to see the victim lying on the ground behind. The victim had landed within three feet of the base of the fixed ladder.

CONTRIBUTING FACTORS

Occupational injuries and fatalities are often the result of one or more contributing factors or key events in a larger sequence of events that ultimately result in the injury or fatality. The Fatality Assessment and Control Evaluation (FACE) team identified the following contributing factors in this incident.

- Access to the roof was only by a fixed ladder
- No mechanism to get materials up to the roof
- Lack of training on ladders by the host employer
- Lack of a comprehensive contract between the staffing agency and the host employer



CONN-OSHA~ Training Update...

OSHA Recordkeeping *September 13 and December 5, 2017 from 9:00 a.m. to noon* This interactive session will discuss the rules and ensure confidence that you have properly recorded and reported occupational injuries and illnesses, including how to fill out the OSHA 300 Log of Work-Related Injuries and Illnesses accurately and correctly.

Walking Working Surfaces in General Industry *November 7, 2017 from 10:00 a.m. to noon*

Falls are among the most common causes of serious work-related injuries and deaths. During this training we will examine best practices for elimination or controlling hazards associated with walking and working surfaces in the workplace.

Breakfast Roundtable This discussion group meets the third Tuesday of every month from 8:15 am to 9:45 am. Pre-registration is required. Visit our web page for more information: <http://www.ctdol.state.ct.us/osha/Breakfast/index.htm> To be placed on the e-mail distribution list, contact John Able at john.able@ct.gov

Classes are free and are held at 200 Folly Brook Boulevard, Wethersfield, CT in Conference Room A/B (unless otherwise noted). To register, contact Catherine Zinsser at catherine.zinsser@ct.gov Pre-registration is required. A Photo I.D. is also required to allow entry into a public building. For more training information, visit the CONN-OSHA web site www.ConnOsha.com