
MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:
MIOSHA-COM-17-2R3

DATE:
February 26, 2020

SUBJECT: Fall Prevention – State Emphasis Program (SEP)

- I. Purpose. This instruction establishes an SEP to prevent falls in the workplace, especially those that lead to fatalities.
- II. Scope. This instruction applies to the Consultation Education and Training (CET) Division, the Construction Safety and Health Division (CSHD), and the General Industry Safety and Health Division (GISHD).
- III. References.
 - A. Division Instruction, CSHD-COM-09-1, [Construction Inspection Targeting](#), as amended.
 - B. Division Instruction, GISHD-COM-16-1, [Tree Trimming Operations](#), as amended.
 - C. General Industry Safety and Health Standard [Part 2, /R408.10201 et seq., Walking-Working Surfaces](#).
 - D. General Industry Safety and Health Standard [Part 33, /R408.13301 et seq., Personal Protective Equipment](#).
 - E. [General Industry System for Programmed Inspections](#), as amended.
 - F. MIOSHA [Field Operations Manual \(FOM\)](#), as amended.
 - G. US Bureau of Labor Statistics (BLS), Databases, Tables & Calculators by Subject, One-Screen Data Search, [Nonfatal cases involving days away from work: selected characteristics \(2011 forward\)](#). Link to BLS CFOI : <https://www.bls.gov/iif/oshcfoi1.htm>
- IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.
- V. Cancellation. All previous versions of this instruction.
- VI. Next Review Date. This instruction will be reviewed after December 31, 2020.
- VII. History. History of previous versions include:

MIOSHA-COM-17-2R2, April 3, 2019
MIOSHA-COM-17-2R1, February 20, 2018
MIOSHA-COM-17-2, February 21, 2017
- VIII. Contact. [Nella Davis-Ray](#), Director, CET; [Lawrence Hidalgo, Jr.](#), Director, CSHD; and [Adrian Rocskay](#), Director, GISHD.
- IX. Originator. Barton G. Pickelman, Director

- X. Background. Falls have been a leading source of workplace fatalities in Michigan. During the last decade, over 100 workers have died from falls in Michigan. Recently, the number of fatalities from falls was 22 in 2016, 16 in 2017, 7 in 2018, and 8 in 2019. Of these 53 fatalities, 26 occurred in construction, with the highest risk jobs being roofer, construction laborer, and carpenter. In general industry, the fatalities were concentrated in tree trimming operations; work on trees accounted for eight of the fall-related deaths during 2016-2018.

In addition, falls, slips, and trips cause thousands of nonfatal injuries involving days away from work each year, according to the [US Bureau of Labor Statistics](#). These nonfatal injuries happen across the spectrum of industries from manufacturing to construction and from retail to healthcare.

Falls can occur from an elevation or at the same level. Falls from an elevation are typically referred to as “falls”, whereas falls at the same level are often referred to as “slips and trips”. Of the 53 workers who fell to their death in Michigan in 2016-2019, 47 fell from an elevation, and six fell at the same level.

In January 2018, MIOSHA revised its general industry regulations governing fall prevention in response to changes in the corresponding federal rules. Most of the revisions are found in General Industry Safety and Health Standard Part 2, Walking-Working Surfaces, and General Industry Safety and Health Standard Part 33, Personal Protective Equipment, but at least 14 other general industry standards were affected. In addition to enforcement and these standards, GISHD will continue with investigating tree trimming operations, fatalities, related to falls and certain fall related injuries.

This SEP directs more enforcement and educational resources to prevent worker injuries and deaths from falls. The SEP covers all industries, but emphasizes construction and tree trimming operations where fall fatalities are prevalent or employees have the potential to be exposed.

- XI. Significant Changes. This SEP has been extended to December 31, 2020.

- XII. Enforcement.

- A. In both CSHD and GISHD, the safety officer (SO) will continue to address fall hazards when they are within the scope of an inspection. If the inspection scope is partial, the SO can expand the scope to address any potentially serious hazard(s) in plain view or discovered during the inspection, such as fall hazards, per the [FOM](#). See [Appendix A](#) for a list of common fall hazards in construction and the associated construction safety standards. See [Appendix B](#) for a list of the general industry safety standards that have rules for fall hazards.
- B. During the SEP, the SO should be especially observant for fall hazards during the walkaround, both to identify fall hazards already within the scope of the inspection, and to expand the scope to encompass fall hazards not yet within the scope.
- C. In CSHD, when choosing subcontractors to investigate on a construction worksite, the SO should give priority to those with serious fall hazards.

D. Targeting.

1. CSHD. In 2020, CSHD will focus resources on the residential sector construction activities. The residential sector employers typically have a smaller size of employees that may not have a fully coordinated safety program and/or the requisite knowledge of resources to perform tasks in compliance of the standard(s). This does not preclude enforcement activities to occur on commercial and industrial jobsites.
 - a) CSHD will continue to use its current targeting system as described in the CSHD Instruction CSHD-COM-09-1, [Construction Inspection Targeting](#), as amended. This SEP applies to programmed safety inspections only. MIOSHA anticipates inspecting over 500 construction jobsites with an emphasis where at least one employee is exposed to a serious fall protection violation, over the duration of the SEP.
 - b) When scheduling programmed inspections, the SO will give priority to those jobs with greater potential for falls.
 - c) During the SEP inspections, the SO will interview employees questioning them about their knowledge and training regarding fall protection.
2. GISHD.
 - a) GISHD will continue to use its current targeting system as described in the [General Industry System for Programmed Inspections](#) to randomly select establishments for planned programmed inspections. The industries targeted by the system have slip, trip, and fall hazards, and the hazards are investigated during a wall-to-wall inspection.
 - b) The SO will continue to self-initiate inspections of tree trimming operations per GISHD Instruction GISHD-COM-16-1, [Tree Trimming Operations](#), as amended.

- XIII. Outreach. The outreach plan includes communication, educational resources, training, and outreach activities for both general industry and construction. [Appendix C](#) is a copy of the outreach plan.

As part of the outreach plan, CET will conduct training sessions across the state of Michigan to discuss fall protection requirements to employers. This will increase the public trust with MIOSHA and offer free resources to employers that have compliance needs. CET will use these opportunities to seek additional specific training with interested employers. Some training sessions will be in conjunction with the Home Builders Association of Michigan (HBA).

- XIV. Coding in OIS. In CET (21d) and GISHD, the SO will designate inspections conducted under this SEP with the SEP code “Fall.” In CSHD, the SO will select “Construction” and “Fall” for inspections conducted under this SEP. This code is found in the

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“Inspection” tab in the “Inspection Emphasis Programs” section in the drop-down menu at “State Emphasis Program.” See below.

The screenshot displays the 'Inspection Type' tab in a software application. The interface includes several sections:

- Inspection Types:** Contains 'Initiating Type' (set to 'Program Planned'), 'Secondary Types' (set to 'Select One Or More'), and 'Other Initiating Type'.
- Inspection Emphasis Programs:** This section is expanded to show a list of programs. The 'State Emphasis Program' dropdown menu is open, displaying a scrollable list of options. A red arrow points to the 'FALL (Fall)' option. Other options include 'ACCOMMODATIONS (Accommodations)', 'ALLIANCE (Alliance)', 'AWARD (Award)', 'Agriculture (Agriculture)', 'BEV and TOB PRODUCTS (Beverage and Tobacco Products)', 'CET CONSTRUCTION (CET Construction)', 'CONSTRUCTION (Construction)', 'CONSTRUCTION FATALITIES (Construction Fatalities)', 'CRUSHED BY/CAUGHT BETWEEN (CRUSHED BY/CAUGHT BETWEEN)', 'ELECTROCUTION (Electrocution)', 'ENF TARGETED (Enforcement Targeted)', 'FABRICATED METAL PRODUCT (Fabricated Metal Products)', 'Government (Government)', and 'HIGH HAZARD (High Hazard Industry)'. A 'Coding Table' button is located to the right of the dropdown.
- Inspection Category*:** Set to 'S'.
- Sampling Performed*:** Set to 'C'.
- Scope of Inspection*:** Set to 'C'.
- SVEP:** Set to 'C'.
- Is an Imminent Danger Notice included in this case?:** Set to 'C'.
- Date Imminent Danger Notice was issued:** Set to 'FALL (Fall)'.
- Strategic Plan Activity:** Contains 'Federal Strategic Initiative Program' and 'State Strategic Initiative Program', both set to 'Select'.

A blue instruction text on the right side of the interface reads: "Enter the Primary Emphasis Program that initiated the inspection".

APPENDIX A

COMMON FALL HAZARDS IN CONSTRUCTION

1. **FALL PROTECTION** – Serious hazards associated with [Construction Safety and Health Standard Part 45](#), Fall Protection. For example:
 - No guardrails (6’ or greater in height)
 - No personal fall arrest systems (6’ or greater in height)
 - Wall/window/floor openings not guarded or covered
2. **SCAFFOLDS** – Serious hazards associated with [Construction Safety and Health Standard Part 12](#), Scaffolds and Scaffold Platforms. For example:
 - No guardrails (10’ or greater in height)
 - Single or damaged scaffold planks/platforms
 - No personal fall arrest system (ladder jack scaffolds)
 - Scaffold is not designed with a 4 times safety factor
 - Rough terrain forklift work platform (not tied off, platform not secured)
3. **LADDERS** – Serious hazards associated with [Construction Safety Part 11](#), Fixed and Portable Ladders. For example:
 - Extension ladder is not extended 3’ above the roof or other surface
 - Extension ladder is not tied off (using ladder to access the roof)
 - Standing on the top step or cap of a step ladder
 - Damaged/broken ladders
 - Not providing a ladder for access to heights greater than 19’
4. **AERIAL WORK PLATFORMS** – Serious hazards associated with [Construction Safety Part 32](#), Aerial Work Platforms. For example:
 - No or improper fall protection in work platforms that require it (reference standard and manufacturer instructions)
 - Modifying the aerial lift without manufacturer approval
 - Not maintaining proper footing on the inside of the aerial lift

APPENDIX B

GENERAL INDUSTRY STANDARDS FOR FALL HAZARDS

Part Number	Name of Standard	Fall from Elevation	Slips and Trips
1	General Provisions		X
2	Walking-Working Surfaces	X	X
5	Powered Platforms for Building Maintenance	X	X
6	Fire Exits	X	X
14	Conveyors	X	X
17	Refuse Packer Units	X	X
18	Overhead and Gantry Cranes	X	X
19	Crawler, Locomotive and Truck Cranes	X	
20	Underhung Cranes & Monorail Systems	X	
21	Powered Industrial Trucks	X	X
22	Tractors	X	
24	Mechanical Power Presses		X
25	Manlifts		X
26	Metalworking Machinery	X	X
27	Woodworking Machinery		X
33	Personal Protective Equipment	X	X
39	Design Safety Standards for Electrical Systems		X
42	Forging		X
44	Foundries	X	
50	Telecommunications	X	
51	Logging		X
52	Sawmills	X	X
53	Tree Trimming and Removal	X	X
57	Oil and Gas Drilling and Servicing Operations	X	X
58	Aerial Work Platforms	X	
62	Plastic Molding	X	X
63	Pulp, Paper and Paperboard Mills	X	X
71	Laundry and Dry Cleaning Machinery and Operations		X
72	Automotive Service Operations		X
74	Fire Fighting	X	X
75	Flammable Liquids		X
77	Grain Handling Facilities	X	
81	Baking Operations	X	X
86	Electric Power Generation, Transmission and Distribution	X	
90	Permit-Required Confined Spaces	X	
94	Textiles	X	

APPENDIX C

INITIATIVE OUTREACH PLAN

Name of Initiative: Fall Prevention Campaign 2020

Initiative Liaison: Nella Davis-Ray **Telephone:** 517.284.7712 **Date Submitted:** 2/26/2020

Check all that Apply: New/Revised Standard New Targeted Industry Targeted Hazard

Divisions Involved: Administration Appeals CET Division
 CSHD GISHD TSD

Lead Division: CET Division

Purpose/Scope: While the agency has seen an overall decrease in Michigan worker deaths since 2011, Michigan experienced 22 fall-related worker deaths in 2016, 16 fall-related deaths in 2017, 7 fall related-deaths in 2018 and 8 fall-related deaths in 2019. To address this, MIOSHA is continuing a fall prevention campaign in calendar year 2020 to educate, raise awareness, and perform outreach to targeted audiences on the importance of fall prevention. This plan identifies MIOSHA activities that will be completed from TBD, through December 31, 2020 to educate MIOSHA staff, employers and employees about fall hazards.

1. Policy/Procedure

- New or revised MIOSHA policies, procedures, instructions or interpretations – New or revised agency instruction on General Industry standards will be made available on the MIOSHA website.

2. Communication (Check all that apply.)

- Media Release – statewide media release announcing the Governor’s 2020 proclamation for Fall Prevention Month in May.
- MIOSHA News.
- MIOSHA Website – Continue dedicating resources on the Fall Prevention web page that will include links for construction and general industry information.

Use www.michigan.gov/stopfalls for the page.

- MIOSHA Messenger – When SEP is continued, announce to MIOSHA staff.
- GovDelivery Message – Throughout the year use Govdelivery messaging to announce/promote fall prevention events such as:
 - Governor’s proclamation for Fall Prevention Month in May
 - US OSHA’s National Safety Stand-Down To Prevent Falls in Construction
 - MIOSHA Fall Prevention SEP
 - Fall prevention training materials
 - MIOSHA Take A Stand Day (August 12, 2020: *Falls Emphasis*)
 - CET grantees – fall prevention training

5. Staff Training

- MIOSHA staff training. (For example: a new/revised rule, measures to implement the rule, hazard(s) that initiated need for the rules and/or MIOSHA policy or procedures affected by the rules.) Insert details for this recommendation.

6. Outreach Activities (Check all that apply.)

- Develop, revise, and conduct training program.
- Targeted consultation.
- Alliances/partnerships with public or private organizations. MIOSHA will proactively outreach to key stakeholders and interested parties, including alliance members, partnerships, members of other cooperative programs, and trade publications to raise awareness about fall hazards and the importance of fall prevention. Opportunities include having alliance groups reprint MIOSHA articles or authoring articles for print and electronic publications and providing fall prevention training sessions for alliance/partnership members.
- Targeted enforcement – GISHD and CSHD will have Fall Prevention SEP. Both divisions will address serious safety hazards of fall protection associated with construction (CSHD) and manufacturing activities (GISHD).

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- Social Media - Throughout the year use social media messaging to announce/promote fall prevention events. MIOSHA will utilize the @MI_OSHA Twitter account (https://twitter.com/MI_OSHA) and [Facebook](#) to promote the campaign by sharing the following:
 - Press releases
 - Positive news stories
 - Fact sheets
 - PSAs
 - Video
 - Other resources

Other

• Tagline/Logo – Continued use on fall prevention materials, website and stickers.

Other

• 2020 Take a Stand Day – continued focus on fall prevention.
• During enforcement inspections, CSHD and GISHD will distribute fall protection literature to employers and/or employees and will provide CET's contact information.

3. Educational Resources (Check all that apply.)

- New DVDs for lending library and MIOSHA staff use.
- New reference materials for MIOSHA staff use.
- New or revised MIOSHA publications/fact sheets. CET construction safety consultants to review existing fall prevention publications and make updates to the existing Fall prevention page and the hard copy "toolkits" for distribution. CET GI consultants will create and/or revise existing housekeeping/ladder/PPE materials for the Fall Prevention page based on walking/working surface standard requirements.
- MIOSHA presentations/training CET will continue to provide the following MTI classes that address fall hazards & prevention:
Part 45 Fall Protection
Part 12 - Scaffolds and Scaffold Platforms
Part 2 Walking-Working Surfaces
Schedule some of these 3 fall-related MTI classes in conjunction with the Home Builders Association of Michigan (HBA) chapters throughout the state.

Other

Include fall prevention in 2021 Request for Proposals for CET grantees.

4. Workgroup

Create a workgroup to develop and implement outreach plan

7. Data Generated (Check all that apply.)

- Number of training seminars conducted.
- Number of employees trained.
- Number of consultation activities conducted (and what type).
- Number of compliance inspections conducted.

Anticipated Launch Date:

Length of Initiative:

Until 12/31/2020

Submit the completed form to the division director for approval. Division director will forward to Administration for approval. Revised: February 26, 2020.