

# Fall Protection: OSHA GOES RETRO

**D**SHA announced that as of June 16, 2011, it would remove interim guidelines regarding residential fall protection and begin to enforce the existing standards it put in place in 1994. These regulations are contained in Subpart M at 29 CFR 1926.501(b)(13), and require fall protection (usually conventional fall protection, i.e., guardrail systems, safety net systems, or personal fall arrest systems) for work 6 feet or more above lower levels.

Further, OSHA is modifying its interpretation of "residential construction" under this standard. They are combining two elements—both of which must be satisfied for a project to fall under this provision: "(1) the end-use of the structure being built must be as a home, i.e., a dwelling; and (2) the structure being built must be constructed using traditional wood frame construction materials and methods." It is important to note, however, that under this definition the use of cold-formed steel studs and limited structural steel does not disqualify the structure from being considered residential.

This change in policy and enforcement will have a significant impact on residential construction. The interim compliance policy, in place since December 1995, permitted employers engaged in certain residential construction activities to use specified alternative procedures instead of conventional fall protection. These alternative procedures could be used, "without a prior showing of infeasibility or greater hazard, and without a written, site-specific fall protection plan." In essence it removed the teeth out of the original rule.

In its press release announcing the change, OSHA stated, "The National Association of Home Builders (NAHB) recommended rescinding the 1995 directive, as did OSHA's labor-management Advisory Committee for Construction Safety and Health; the AFL-CIO; and the Occupational Safety and Health State Plan Association." OSHA contends, "personal fall arrest systems generally can be used safely and effectively in residential construction, including for roofing work. OSHA is convinced that fall arrest systems can be used with commercially-available anchors that can be installed without increasing the duration of exposures to fall hazards or impeding production schedules."

With a return to the original standard, OSHA will allow the use of a fall restraint system in lieu of a personal fall arrest system. OSHA explains in the announcement, "a fall restraint system may consist of a full body harness or body belt that is connected to an anchor point at the center of a roof by a lanyard of a length that will not allow a worker to physically reach the edge of the roof."



by Sean D. Shields

This creates a serious concern for the structural building components industry, given that the anchor point of choice for most framers will be the peak point of roof trusses. In fact, OSHA even states explicitly in its announcement that, "fall restraint systems can be used effectively to prevent falls by tethering workers to structural members, such as braced trusses and studs." Further, OSHA encourages the use of personal fall restraint systems in situations in which it might be problematic to use personal fall arrest systems.

Under this standard, employers can use guardrail systems or safety net systems, as well as having their personnel work from ladders, scaffolds, or aerial lifts in lieu of complying with the requirements of 1926.501(b)(13). However, it remains to be seen how cost-effective these solutions will be on residential jobsites compared to personal fall arrest systems.

As a consequence, the Structural Building Components Association (SBCA) will review the fall protection guidelines contained in B11 Summary Sheet, "Fall Protection & Trusses," as part of the *Building Component Safety Information Guide to Handling, Installing and Bracing of Metal Plate Connected Wood Trusses (BCSI)*. B11 will continue to stress the fact trusses alone are not designed to support fall protection anchors or to resist the lateral impact loads associated with roof anchors and tether devices attached to them without adequate lateral restraint. It will also stress that in order for peak anchors or other fall protection devices to be used with roof trusses, a group of trusses must first be installed and diagonally braced or fully sheathed using a method that does not require fall protection attached to the trusses under the OSHA standard.

It is also important to note that under 29 CFR 1926.503, the employer must ensure each employee who might be exposed to fall hazards on the residential jobsite has been trained by a "competent" person. In addition, the employer must verify the training of each employee by preparing a written certification record which OSHA inspectors will require at the time of a jobsite inspection.

For more information and guidance on how framers can comply with the "new" fall protection requirements, OSHA has created an educational website: [www.osha.gov/doc/residential\\_fall\\_protection.html](http://www.osha.gov/doc/residential_fall_protection.html). The BCSI B11 Summary Sheet can be found on the SBCI website: [www.sbcindustry.com/B11](http://www.sbcindustry.com/B11). **SBC**

# STRUCTURAL BUILDING **COMPONENTS**

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THE FUTURE OF FRAMING

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