

Fall Protection in Residential Construction

The United States Department of Labor's Occupational Safety and Health Administration (OSHA) has issued a directive rescinding the Interim Fall Protection Compliance Guidelines for Residential Construction (STD 03-00-001).

Prior to the issuance of this new directive, STD 03-00-001 allowed employers engaged in certain residential construction activities to use specified alternative methods of fall protection (e.g., slide guards or safety monitor systems) rather than the conventional fall protection (guardrails, safety nets, or personal fall arrest systems) required by the residential construction fall protection standard (29 CFR 1926.501(b)(13)). Employers could use the alternative measures described in STD 03-00-001 without first proving that the use of conventional fall protection was infeasible or created a greater hazard and without a written fall protection plan.

With the issuance of the new directive, all residential construction employers must comply with 29 CFR 1926.501(b)(13).

- Residential construction employers generally must ensure that employees working six feet or more above lower levels use guardrails, safety nets, or personal fall arrest systems. A personal fall arrest system may consist of a full body harness, a deceleration device, a lanyard, and an anchor point. (See the definition of "personal fall arrest system" in 29 CFR 1926.500).
 - Other fall protection measures may be used to the extent allowed under other provisions of 29 CFR 1926.501(b) addressing specific types of work. For example, 1926.501(b)(10) permits the use of warning lines and safety monitoring systems during the performance of roofing work on low-sloped roofs.
 - OSHA allows the use of an effective fall restraint system in lieu of a personal fall arrest system. To be effective, a fall restraint system must be rigged to prevent a worker from reaching a fall hazard and falling over the edge. 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.

- If the employer can demonstrate that use of conventional fall protection methods is infeasible or creates a greater hazard, it must ensure that a qualified person:
 - Creates a written, site-specific fall protection plan in compliance with 29 CFR 1926.502(k); *and*
 - Documents, in that plan, the reasons why conventional fall protection systems are infeasible or why their use would create a greater hazard.

The new directive interprets "residential construction" as construction work that satisfies both of the following elements:

- The end-use of the structure being built must be as a home, i.e., a dwelling.
- The structure being built must be constructed using traditional wood frame construction materials and methods. The limited use of structural steel in a predominantly wood-framed home, such as a steel I-beam to help support wood framing, does not disqualify a structure from being considered residential construction.
 - Traditional wood frame construction materials and methods will be characterized by:
 - *Framing materials*: Wood (or equivalent cold-formed sheet metal stud) framing, not steel or concrete; wooden floor joists and roof structures.
 - *Exterior wall structure*: Wood (or equivalent cold-formed sheet metal stud) framing or masonry brick or block.
 - *Methods*: Traditional wood frame construction techniques.

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