

Door Dealer Accreditation

Section 3

Safety Management and OSHA Compliance



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Introduction

Workplace safety and health are fundamental elements of effective business management. Owners and managers must recognize the hazards employees encounter both routinely and intermittently, and they must ensure that appropriate policies, procedures, and controls are in place to address those risks. A comprehensive safety program requires proactive hazard identification, thoughtful planning to mitigate risks, and consistent implementation across all levels of the organization. When leadership takes an active role in managing workplace hazards, the dealership is better positioned to protect employees, reduce liability, and maintain efficient, reliable operations.

Government regulation has played an important role in shaping workplace safety, but many of the most meaningful advances have come from the private sector. OSHA and other regulatory agencies establish *minimum* requirements, but these standards should be viewed as the floor, not the ceiling, of an effective loss control program. Dealers who rely solely on regulatory compliance miss the broader purpose of safety: protecting people, preventing harm, and strengthening the long term health of the business.

In the door and access systems industry, every business should adopt a guiding principle that serves as the foundation for all safety policies:

Nothing you do for this company is worth an injury.

This philosophy helps employees make sound decisions in the field, especially when they must choose between continuing a task or stopping to address a potential hazard. More importantly, it establishes trust between employer and employee by making it clear that the safety and health of the workforce outweigh any short term operational or financial pressures. It places each individual in the organization at the highest level of importance.

Door and access systems dealers face unique safety responsibilities. Unlike many industries, dealers must consider not only employee safety but also the safety of homeowners, building occupants, and the general public. Automated doors, gates, and related systems are present in nearly every environment where people live, work, and travel. These products often go unnoticed until something goes wrong. When an injury or fatality occurs, the automated system is frequently the first suspected cause, regardless of the circumstances. This reality places a heightened burden on dealers to ensure that products are installed, serviced, and maintained with the highest level of care.

Dealers who work in commercial or industrial settings must also comply with the safety policies of their customers. Having a strong internal safety program is not enough; technicians must be prepared to adapt to site specific rules, some of which can be highly detailed and strictly enforced. Companies that require safety training for all service providers expect full compliance and have little tolerance for deviations. Professional technicians understand this and incorporate safety training and site specific compliance into their daily work habits.

Because of these factors, door and access systems dealers must maintain a level of safety awareness that exceeds that of many other business owners. This study guide cannot address every possible hazard dealers may encounter, but it provides a broad overview of workplace safety and health, public protection, regulatory compliance, and the critical importance of safety within the industry.

The responsibilities associated with selling, installing, and servicing automated door systems are significant. The objective must always be to prevent accidents before they occur. Achieving this requires a systematic approach to identifying risks, evaluating

hazards, and implementing controls to eliminate or reduce the potential for harm. Insight, expertise, and professional judgment all contribute to success, but everything begins with a foundational commitment – a sincere belief that nothing in business is worth an injury.

Section One

A Brief History of Occupational Safety

Let a man so much as scrape his finger pushing a truck in the pickle rooms, and he might have a sore that would put him out of the world; all the joints in his fingers might be eaten by the acid, one by one. Of the butchers and floorsmen, the beef-boners and trimmers, and all those who used knives, you could scarcely find a person who had the use of his thumb; time and time again the base of it had been slashed, till it was a mere lump of flesh against which the man pressed the knife to hold it. The hands of these men would be crisscrossed with cuts, until you could no longer pretend to count them or to trace them. They would have no nails, – they had worn them off pulling hides; their knuckles were swollen so that their fingers spread out like a fan. There were men who worked in the cooking rooms, in the midst of steam and sickening odors, by artificial light; in these rooms the germs of tuberculosis might live for two years, but the supply was renewed every hour. There were the beef-luggers, who carried two-hundred-pound quarters into the refrigerator-cars; a fearful kind of work, that began at four o'clock in the morning, and that wore out the most powerful men in a few years. There were those who worked in the chilling rooms, and whose special disease was rheumatism; the time limit that a man could work in the chilling rooms was said to be five years. There were the wool-pluckers, whose hands went to pieces even sooner than the hands of the pickle men; for the pelts of the sheep had to be

painted with acid to loosen the wool, and then the pluckers had to pull out this wool with their bare hands, till the acid had eaten their fingers off. There were those who made the tins for the canned meat; and their hands, too, were a maze of cuts, and each cut represented a chance for blood poisoning. Some worked at the stamping machines, and it was very seldom that one could work long there at the pace that was set, and not give out and forget himself and have a part of his hand chopped off. There were the "hoisters," as they were called, whose task it was to press the lever which lifted the dead cattle off the floor. They ran along upon a rafter, peering down through the damp and the steam; and as old Durham's architects had not built the killing room for the convenience of the hoisters, at every few feet they would have to stoop under a beam, say four feet above the one they ran on; which got them into the habit of stooping, so that in a few years they would be walking like chimpanzees. Worst of any, however, were the fertilizer men, and those who served in the cooking rooms. These people could not be shown to the visitor, – for the odor of a fertilizer man would scare any ordinary visitor at a hundred yards, and as for the other men, who worked in tank rooms full of steam, and in some of which there were open vats near the level of the floor, their peculiar trouble was that they fell into the vats; and when they were fished out, there was never enough of them left to be worth exhibiting,

– *sometimes they would be overlooked for days, till all but the bones of them had gone out to the world as Durham's Pure Leaf Lard!*

Excerpt from *The Jungle*, by Upton Sinclair, published in 1906.

Notwithstanding Mr. Sinclair's avowed socialist ideology, *The Jungle* was viewed as an accurate, if extreme, example of rancid and dangerous working conditions in the stockyards of Chicago at the turn of the 20th Century. While the link between the workplace of Lithuanian immigrant Jurgis Rudkus and a door dealer in the 21st Century may seem elusive, there actually is a direct relationship.

There once was a time when employees were considered expendable. As foreign as that is to our way of thinking today, from the end of the Civil War through the turn of the Century and the Industrial Revolution, employment was often dangerous, and little to no recourse was available to injured workers or their families. Although several states passed Employer Liability laws, injured workers still were required to file a civil suit against the employer and prove negligence. Not only were the results of such a suit uncertain, but there were also costs associated with initiating legal action. Employers could use *assumption of risk* as a defense, or claim the injury occurred due to the negligence of the injured worker or a coworker.

By 1911, the first *workmen's compensation* laws were passed in Washington and Wisconsin. What distinguished these laws from Employer Liability laws was that they represented a compromise between business and labor. Specifically, the two key components to these statutes, today known as workers' compensation, were *no fault* and *single remedy* provisions.

No fault meant the injured worker did not have to prove negligence on the part of the employer. A legitimate injury occurring in the

course of employment was presumed to be compensable.

Single remedy limited the injured worker's recourse to statutory workers' compensation benefits. The system as originally envisioned was self-executing, requiring no legal action on the part of the injured worker.

Under no-fault, single remedy workers' compensation systems, injured workers received complete medical treatment and a prescribed portion of their lost wages. Employers funded the system, but reaped the benefits of no longer needing to mount legal defenses in civil lawsuits filed against them by their own employees.

Another important benefit of the development of workers' compensation systems, which by 1948 had been adopted in all 48 states, is that it created a direct financial incentive for employers to safeguard the well-being of their employees. From the beginning, the structure of workers' compensation rewarded companies with fewer injuries through lower insurance premiums. That incentive has been strengthened and refined over the years, but even in its earliest forms it gave safety conscious businesses a competitive advantage over companies with higher incident rates. By reducing injuries, employers not only protected their workforce but also lowered operating costs, making safety both a moral responsibility and a sound business strategy.

Commensurate with the development of workers' compensation laws, labor unions were active in improving work conditions in factories and other high risk workplaces. While many of the union efforts were specific to the most active and expansive industries at the time – railroad workers were among the first to see aggressive steps towards their workplace protection from 1900 to World War I, for example – the collective focus on safety began to produce measurable reductions in deaths and injuries.

Yet accidents continued to occur. Mining accidents and highly publicized tragedies in

other high risk enterprises continued to lean on the conscience of society. And, if nature abhors a vacuum, government is nature's top competitor.

The *Williams-Steiger Occupational Safety and Health Act* was passed by Congress and signed into law by President Richard Nixon in 1970. It established the legal authority for the creation of the Occupational Safety and Health Administration (OSHA), under the U.S. Department of Labor.

When OSHA was established, the agency began developing its first set of workplace safety standards. To do this, OSHA assembled existing publications, guidelines, and standards created by organizations such as the American National Standards Institute (ANSI), the National Fire Protection Association (NFPA), and others. These documents, often referred to as consensus or proprietary standards, addressed acceptable design, construction, and installation requirements, recommended safe work practices, and task specific safety considerations across various industries.

These materials formed the foundation for OSHA's initial regulatory framework, now known as the General Industry Standards or **Horizontal Standards**, designated as 29 CFR Part 1910. They are called "general industry" standards because they apply broadly across all industries, regardless of the specific type of work performed. Examples of horizontal standards include requirements for lockout/tagout, fall protection, fire protection, machine guarding, hazard communication, and personal protective equipment.

General Types of OSHA Standards

After developing the initial set of standards, OSHA recognized that certain industries were unique enough to require their own specialized rules. These industry specific regulations became known as **Vertical Standards**. One of the most familiar examples is the Construction Industry Standards, designated as 29 CFR Part 1926. These standards are often the most

relevant to door industry operations, especially when work involves construction sites or activities defined as construction under OSHA rules. Other vertical standards apply to additional specialized industries, and employers should ensure they maintain current copies of all standards relevant to their scope of work.

Examples of vertical standard requirements for the construction industry include wearing hard hats in overhead work areas, using eye and face protection during cutting, grinding, and drilling, safely handling and storing heavy materials, following GFCI and extension cord requirements for temporary power, and using ladders, scaffolds, and fall protection according to OSHA's construction standards.

Vertical Standards exist alongside Horizontal Standards, which apply broadly across all industries. In many cases, OSHA has incorporated by reference portions of the horizontal standards into the vertical standards. This means that when a vertical standard references a horizontal requirement, or an external standard such as ANSI, NFPA, or NEC, the referenced rule becomes legally enforceable as part of the vertical standard. In practical terms, incorporation by reference ensures that the same safety principles apply consistently across related work activities, regardless of which standard is being used.

Many OSHA standards include appendices, which may be designated as mandatory or non-mandatory. A mandatory appendix is considered part of the standard and must be followed. A non-mandatory appendix provides helpful guidance, examples, or recommended practices but does not carry the force of law. Understanding whether an appendix is mandatory is essential for determining the full scope of OSHA's requirements for a particular task or work activity.

One of the more challenging aspects of using OSHA standards effectively is understanding how they are organized and written. Portions of the standards may appear vague or open ended, and this is often intentional. OSHA aims

to provide clear requirements while still allowing employers flexibility in how they achieve compliance, ensuring that no employer is unfairly disadvantaged by overly prescriptive rules.

Many of OSHA's more recent regulations are written as **Performance Standards**. Under this approach, OSHA specifies the desired safety outcome but allows employers to determine the methods used to achieve it. This flexibility can be beneficial, but it also requires employers to fully understand the intent of the standard and to select control measures that reliably meet OSHA's expectations.

Understanding the OSHA Standards

Each federal standard is promulgated under a specific title of the United States code. In the case of OSHA standards, they are found under Title 29 of the United States Code. Title 29 refers to all law, which is applicable to employment in the United States. A very small part of this title comprises the OSHA standards.

Following the title (numerical designation) you will find the abbreviation for *Code of Federal Regulations* (CFR). Following this abbreviation, there will be a four digit *Part* number which designates the particular section from within the title that is being addressed. Part 1910 happens to designate the OSHA standards for General Industry, and Part 1926 designates the OSHA standards for Construction.

Other parts will have different part numbers to differentiate them from the other sections within that title. Following the part number, there will be a decimal point. This will be followed by a three-digit number, which designates the *Subpart* from within the Part. This three-digit number is simply a means of further specifying a particular area within the Part.

For example, 29 CFR 1926.103 represents the specific Respiratory Protection standards from within the subpart of Personal Protective and

Life Saving Equipment from within the Part which is the OSHA Standards for Construction.

After the Subpart, you will find a series of small alphabetical designations, which are followed by regular numerical designations, and these are followed by some small Roman numeral designations. These various designations are meant to break the *Subpart* down into more and more specific sections in order to clarify certain requirements.

Now, let's look at the structure of each Subpart in terms of its various component Parts. Many of the Subparts either start, or end with the *Scope*, a section that explains to whom the particular standards apply, and in some cases under what circumstances such standards apply.

This will be followed with or preceded by a definitions section. The definitions section contains clarification on the legal meaning of certain terms, and specification data.

The next section is *General Requirements*, which contains details that apply to all of the specific requirements sections within the Subpart. This is followed by a series of *Specific Requirements* sections for a particular type of work activity or application. The subpart is then completed by a section called *Standards Organization*, which is the recorded history of how that particular standard became a standard.

The preceding explanation of the format by which all OSHA standards are organized is meant to help in understanding the various component parts that make up the standards.

Next, let's examine some of the key terminology found in the standards to better understand their application and their implication when used to clarify particular standards. First are the words *shall* and *should*.

These two words are probably the most significant verbiage used within the OSHA standards. When they utilize the word shall in

reference to a particular standard or requirement, this means that the employer will comply with that standard or requirement, regardless of their circumstances. The word *should* means that a directive is highly recommended by OSHA. Typically, when *should* is used, the employer should take some actions relative to that directive. If the actions taken are alternatives to the specific directive in the standards, thorough documentation should be established and maintained outlining the reasons for the selection and implementation of the alternative actions.

Another issue, which has resulted in a great deal of misunderstanding in the past, is the definition of an employee. Generally, any person whose work activities are under an employer's control are considered employees. It is recommended that you review the noted references within the standards to clearly understand the possible relationship(s) that exists between the employer and the employee.

The Construction Standards address two different types of employee qualifications, which are very critical, especially in high hazard types of work activities such as excavation and trenching, lockout/tagout, confined space entry, fall protection, and others. These are *competent* and *qualified* persons.

There are a number of areas where these types of personnel are to be utilized, such as in the applications mentioned above. These personnel must not only meet the definition as previously mentioned but must also have been given a specific level of authority relative to control of the work activity for which they have been assigned. This authority can be assigned by only one entity, the direct employer. This authority must consist of total control over the work activity, up to and including the ability to stop work if necessary to correct hazards.

In many of the specialty areas where these types of personnel are required to be used, they will expand the definition of what

constitutes a competent or qualified person by adding specific knowledge components that are applicable to the type of work activity being supervised. An example of this would be in excavation and trenching where the competent person also has to know what the various soil classification types are, how to classify the soil types utilizing the acceptable field tests described in this standard, and the common hazards associated with such work.

Section Two

The Impact of Injuries and Illnesses on Operational Costs

There are two primary statistics that are affected by injury or illness: *Time and Recordable Ratio* (TRR), and the *Experience Modification* (EMR). The *EMR* is a multiplier which is assigned by your workers' compensation insurance carrier to apply to the base rate of premium.

The TRR is used for statistical analysis by the federal government, and it is used by agencies such as OSHA for regulatory activities. The EMR is an insurance industry calculation performed on a state-by-state basis, and it is used to determine each employer's annual cost for workers' compensation coverage.

The TRR is an OSHA-calculated equivalent to a frequency rate. In calculating the TRR, OSHA multiplies the number of recordable injuries and illnesses for a calendar by 200,000 man-hours, and then divides that result by the actual number of man-hours worked by all personnel for that calendar year. This calculation compares each company with others within the same industry. The Bureau of Labor Statistics (BLS) compiles these statistics each year via written notice by randomly selecting firms in each Standard Industrial Classification (SIC) code. Companies selected for this collection of data must submit the required information, which typically consists of the OSHA 300 log and associated documentation for that year.

The BLS publishes a bi-annual report of national averages of reportable injuries by SIC code and job classification.

The second calculation, the EMR, has a direct financial impact on each employer required to carry workers' compensation coverage.

The EMR is a figure of one, less than one, or more than one, and it is a multiplier which is used in calculating the workers' compensation premium a company must pay. An employer with an EMR of less than one will pay less in workers' compensation premium, whereas an employer with an EMR of more than one will pay additional premium.

Experience modifiers are based on the three previous policy years, excluding the most recent year. The data used in calculating an experience modification are based on total incurred workers' compensation losses, including reserves. This means that employers must pay close attention to open claims to minimize the long-range impact on workers' compensation premium. The impact on experience rating also provides a financial incentive for business owners and managers to provide alternative or light duty work for injured workers who are able to safely perform such tasks.

Workers' compensation premiums are based on payroll and job classification codes, other factors such as premium discounts, and finally, the EMR.

Example of Experience Rating on Employers:

Company A (EMR of 1.4)

Unmodified Premium	\$20,000
Experience Modifier	1.40

Modified Premium (20,000 X 1.4) = \$28,000

Company B (EMR of 0.8)

Unmodified Premium	\$20,000
Experience Modifier	0.80

Modified Premium (20,000 X 0.8) = \$16,000

The difference between these two otherwise equal competitors is \$12,000 per year in direct workers' compensation costs. While an additional \$1,000 per month in overhead has an obvious impact, consider the competitive advantage Company B has over Company A in the marketplace:

Average Selling Price of a Door	\$1,200
Average Net Profit Margin	8%
Average Profit per Door Sold	\$ 96

In this example, Company A must sell an additional 125 doors per year just to cover the extra cost of workers' compensation compared with Company B.

It's also worth noting that many public projects and commercial jobs are open only to companies with EMRs of 1 or less, leaving many opportunities closed to companies with unfavorable loss histories.

Section Three

Understanding OSHA

OSHA maintains an active presence throughout the United States through a network of regional, area, and state-plan offices. These offices provide coverage to every business in the country. Each federal OSHA Area Office is led by an Area Director, while each Regional Office is overseen by a Regional Administrator. In states that operate their own OSHA-approved State Plans, similar leadership roles exist within the state agency.

Most OSHA offices support two primary functions:

- **Compliance (Enforcement):** Responsible for enforcing OSHA standards through programmed and unprogrammed inspections, issuing citations, and assessing penalties.
- **Consultation (On-Site Consultation Program):** A separate, state-run service that provides free, confidential assistance to small and medium-sized employers. Consultants help identify hazards, improve safety programs, and achieve compliance, but they do *not* issue citations or penalties.

While the Compliance function is the part of OSHA most associated with inspections and enforcement, the Consultation Program is designed to help employers improve safety proactively. Because consultation visits are independent of enforcement and do not result in citations, they can be a valuable resource for strengthening safety programs and reducing the likelihood of future compliance issues.

Beyond Rules and Regulations

Your safety and health program should emphasize that protecting workers and the general public is the objective. Avoiding OSHA fines is a result of your safety policies and procedures, rather than the purpose. The

single most important aspect of any program is the goal of avoiding injury and illness to employees.

Effective managers demonstrate to employees that they are the most important part of the organization and the value of their contributions to the company and its customers far outweigh any cost associated with their well-being. This can be accomplished by showing a genuine concern for their health and welfare via implementation of a strong and positive safety and health program. Safety training and policies are about each individual in an organization. There is never a reason to emphasize the financial costs of accidents and injuries when educating employees. To do so sends the wrong message; advising workers that the financial impact of an injury is a greater concern than their lives or health.

On the other hand, a door dealer should have a complete understanding of the actual costs directly and indirectly associated with accidents and injuries. Excluding direct medical costs, work-related accidents can also, and typically do, result in:

- Administrative expense associated with the incident
- Reduction in productivity
- Hiring and training replacement personnel
- Product, equipment and property damage
- Rescheduling and inconveniencing customers
- OSHA fines
- Increased insurance premiums
- Work stoppages and other business disruption
- Legal expenses
- Loss of revenue
- Out of pocket medical expenses
- Potential third-party claims

These items do not address the human costs associated with work-related injuries. Aside from these financial impacts, a serious injury to an employee causes disruptions in the quality of life to the injured individual, family, friends and co-workers. When an on-the-job accident, resulting in injury occurs, the rest of the company does not simply go about its routine affairs. Concerned coworkers come to the aid of the injured person, phone calls go out to the family, and ongoing concern can affect the work environment for an extended period.

Meanwhile, at home, every member of the injured worker's family is deeply affected, personally and financially. Concerns faced by the family can lead to emotional stress, financial pressures, and a general fear of the future.

Although most business owners possess a genuine concern for the health and safety of workers, there are financial advantages, beyond workers' compensation savings, that come with effective loss control programs. Cost control is a benefit of effective safety and health in the workplace. Identify and monitor the broader range of costs and savings associated with an effective safety program. Create measurable objectives and desired outcomes. Work with employees and seek their input to enhance safe work procedures. Over a period of time, such an approach to safety management can be expected to have a demonstrable positive impact that applies both to employees and the company. Keys to success include proactive involvement from all levels of employees and management. A company culture of professionalism and safety is one that is genuine and shared by each member of the organization.

Section Four

The Roles of the Safety Committee and Key Personnel

Many organizations have ineffective safety and health programs because the key personnel of the organization have not been trained properly. This deficiency is critical as these personnel are at the forefront of any program, and their skills can make the difference between success and failure. The key personnel in any organization fulfill many roles and it is essential that they be prepared for these roles through skill development and management training.

There are a variety of roles related to safety and health filled by management and mid-level staff in an organization. In most door companies, a single individual may hold multiple responsibilities, but regardless of the number of personnel involved, there are critically important roles necessary for effective safety management.

Before examining some of the key company safety roles, it should be noted that commitment by the company owner towards the safety of all personnel is the first and most important prerequisite to everything that may follow. This commitment must be sincere, known, and understood by all. Employers who make clear that their concern for the well-being of each employee exceeds any other business or financial aspect are able to set the example they want others to follow. Barring this commitment by the head of the company, safety policies can be written, but it's irrational to expect a strong commitment by employees toward an objective the owner does not hold.

Communication Skills

Providing quality communication is a critical role that is fulfilled by a manager or supervisor.

It is essential that they are knowledgeable and clear in their communication efforts. This role also necessitates effective oral and written communication skills in order to facilitate information and direction in a manner that is easily understood. An important function of quality communication is the ability to listen to the concerns of others. Demonstrating openness and willingness to address employee concerns or suggestions in a timely and cooperative manner is essential.

Some of the characteristics that should be sought in managers and supervisors who will be given day-to-day responsibility for compliance in the workplace are:

- Personable in dealings with others.
- Good communication skills, both verbal and written.
- Knowledgeable towards safety, OSHA standards, and organizational policies and procedures.
- High level of commitment to safety objectives.
- Openness towards the ideas and concerns of others.

It takes time and effort to develop a good supervisor or manager, so it is recommended that you first provide them with the necessary training so that they can develop the skills needed for the position. Then, you should periodically evaluate their effectiveness through a combination of workplace observation, employee interviews, and performance evaluations. And finally, ensure that you provide them with the necessary support and resources to get the job done right.

Motivating Employees

Consider the need for some type of awards and incentives program to be essential to proper motivation of employees with regard to safety performance. Their positive efforts will pay big dividends to the organization. Incentive programs can return some of the benefit to those who are responsible for its achievement. Investments of this type often have a significant impact on employee morale, by demonstrating the company recognizes their commitment to safety.

Following is a sample policy that serves as an example of a safety incentive program:

It shall be the policy of this organization to provide for the recognition of individual employees and the organization as a whole in our safety and health efforts. Therefore, the following goals are established to provide a benchmark for achievement and the awards indicated will be available to the employee or group as they so desire.

Individual Employee Goals:

Each six-month period in which an employee completes at least 1000 man hours, and has not sustained a recordable injury or illness, they shall have their choice of awards from the current list of available choices. If an employee achieves the required time frame without a recordable injury or illness, but does not have the required man-hours, the sum total of hours will carry over into the next successive time period.

Group Goals:

Each fiscal quarter that (name of your company) achieves zero recordable injuries or illnesses, a luncheon will be provided by management for all employees who have worked at least 50% of the working days in that quarter.

Following are some general guidelines that should be considered when formulating a program:

- Emphasize safety at home as well as at work.
- Practice a simple *thank you* when an employee is performing well and actively involved.
- Find awards that are attractive to employees. Do not go overboard on the price of individual items. However, make them nice enough so they are desirable as a goal.
- Develop special contests that encourage positive competition toward a company goal.
- Develop the incentive program in such a way that everyone in the company is involved.
- Keep score. Prominently post progress towards safety goals.

Adhering to these guidelines requires that the key personnel of an organization create opportunities for involvement by the employees.

Some suggested methods include:

- Asking each employee to participate in workplace inspections and training activities.
- Encouraging suggestions by employees for making a safer and healthier workplace.
- Rewarding positive participation.

Recognition goes a long way toward establishing a positive relationship and promoting willing participation by employees.

Disciplinary Action

Disciplinary action is one of the most difficult tasks faced by any manager or supervisor. Unfortunately, it is also one of the most neglected, and misunderstood of all the roles which these personnel have to fulfill. How effectively this duty is handled can make a

huge difference in daily employee performance and enhance overall attitude toward safety.

Ineffective, inconsistent, and unfair disciplinary actions may lead to inconsistent compliance performance. Double standards and inconsistent disciplinary actions are not effective in gaining the support of workers towards safety objectives.

Disciplinary policies should address the following principles:

- Clear communication to all employees of the policies.
- The actions which will be taken in the event of non-compliance.
- Disciplinary actions to correct unsafe conduct should be certain and immediate.
- Disciplinary measures should be appropriate to the nature of the violation.
- Provisions for repeat offenders in which the disciplinary action is elevated.
- Safety policy violations and actions taken must be documented.
- Policies should be fair, and applicable to all employees.
- A provision for immediate termination of employment for specific, dangerous violations.

The first objective of disciplinary policies should be to correct unsafe behavior. Actions taken to mitigate unsafe work practices should be based on the severity of the violation. Such policies should not focus on punishment, but instead to encourage willing support of safety goals by all employees.

Consistency and fairness are the keys to success when it comes to effective disciplinary action.

Safety Committee

There are no federal requirements for safety committees in private businesses. However, there are some states which require them. Regardless of whether it is mandated by law,

establishment of a safety committee is good practice and demonstrates commitment to employee safety. In addition, some workers' compensation carriers apply premium discounts for the establishment of a safety committee.

There is no prescribed number of individuals that a company should have on a safety committee. Many smaller door and access systems dealers may choose to include all employees.

Members should include management and employees. Of these members, a chairperson and a recording secretary should be selected. The chairperson should be an individual who holds responsibilities for carrying out policies and procedures related to safety. The secretary is responsible for documenting meeting discussions and maintaining records reflecting the activities of the committee.

There are guidelines that can be followed regardless of the size of the company or the number of safety committee members:

- Develop a clear definition of the job scope and function of the committee.
- Decide on the number of members.
- Larger door and access systems dealers, and those with multiple locations, may elect to have committees at each location, and a company steering committee.
- Select a chairperson and a secretary.
- Seek volunteers for the committee from among the entire workforce. If unsuccessful in recruiting volunteers, consider appointing members on a rotational schedule.
- Provide the committee with specific tasks related to the company's goals and objectives.
- Allow the committee to decide how they will best fulfill their mission.
- Establish a regular meeting schedule and have a prepared agenda at each meeting.
- Allow the committee to distribute various job tasks among its members as they see fit.

- Hold the committee accountable for the organizational performance and empower them to take corrective action whenever necessary.
- Ensure that the committee communicates regularly with all levels of employees through reporting procedures and requirements.
- Ensure that management reviews the ongoing performance and actions of the committee.

Generally, the safety committee's tasks would include:

- The development, review, and approval of a company safety program.
- Planning for the implementation of the safety plan.
- Assignment of duties necessary to carry out the plan.
- Monitoring workplace activities for compliance.
- Periodic review and approval of safety performance records, incident investigations, safety related reports, disciplinary actions taken, and awards and incentives issued.
- Monitoring outside or subcontractor personnel to ensure a safe working environment when working with or near other trades.
- Other activities as deemed necessary by upper management.

Section Five

Critical Elements of a Safety Program

How to Develop Programs and Policies

While OSHA requires certain programs, policies, and procedures to be in writing, such as Hazard Communication, Lockout/Tagout, and Emergency Action Plans, many other OSHA standards do not explicitly mandate written documentation. However, several state OSHA-approved plans do require written policies, and even when not required, maintaining written programs is considered a best practice. Written policies help ensure consistency, support training, demonstrate compliance, and provide a clear reference for both management and employees. OSHA's core expectation is that employers develop, implement, and maintain programs that comply with all applicable federal safety standards. This means a dealership must take a comprehensive, organized approach to building policies that not only meet regulatory requirements but also support effective safety management.

Developing strong programs and policies requires planning, collaboration, and ongoing review. The process should involve identifying which OSHA standards apply to the dealership's operations, determining what compliance measures are necessary, and ensuring that the resulting policies are practical, understandable, and enforceable. Effective programs are not created in isolation. They require input from multiple departments, clear communication to employees, and training that equips supervisors and workers to carry out their responsibilities. Once implemented, programs must be reviewed periodically to ensure they remain current with OSHA standards, industry practices, and changes in the dealership's operations.

The following steps can assist in planning and implementing an effective safety and loss-control program:

- Assign responsibility for program and policy development to the safety committee.
- Establish a realistic timeline for development and implementation.
- Identify which OSHA standards apply to the company's scope of work and operations.
- Develop a list of compliance requirements that must be addressed.
- Draft the necessary policies, procedures, and task descriptions.
- Circulate drafts to all departments and request feedback.
- Review input and revise the content as needed.
- Communicate finalized policies clearly to all employees.
- Ensure that resources, equipment, and support systems are in place for implementation.
- Train management and supervisory personnel so they can effectively administer the program.
- Conduct employee training to ensure understanding and compliance.
- Begin implementation according to the established plan.
- Follow up periodically to evaluate program effectiveness and ensure policies remain current with applicable standards.

Written Programs and Policies

Every dealership is legally required to provide a safe and healthy workplace. Written safety programs and policies form the foundation of that responsibility. For owners and management, these documents are more than

compliance tools. They establish expectations, guide training, and communicate the company's commitment to protecting employees. It is essential that all employees read, understand, and follow the company's safety policies.

The primary purpose of any safety program is to prevent accidents before they occur. Effective written programs help identify hazards, outline safe procedures, and ensure that employees know how to perform their work without unnecessary risk. Many companies fail to achieve the full benefit of their safety efforts because policies are incomplete, outdated, or not consistently enforced. Strong, well-maintained programs reduce injuries, control operational costs, and support a culture where safety is viewed as a shared responsibility. These efforts also improve morale, productivity, and customer satisfaction, which are key advantages in a service-driven industry.

Dealership safety and health programs should clearly explain why compliance with OSHA standards matters. The goal is not simply to avoid citations or fines, but to protect the people who make the business run. When employees understand the purpose behind the rules, they are more likely to follow them and contribute to a safer workplace. Written programs should emphasize preventing recordable injuries and illnesses, reducing liability exposure, and ensuring that the dealership meets its regulatory obligations.

A dealership's safety manual typically includes a range of core elements, such as hazard communication, PPE requirements, equipment operation procedures, emergency response, and incident reporting. Owners and managers must ensure these components accurately reflect the dealership's operations and are kept current with applicable standards. Employees should be thoroughly familiar with the policies that



apply to their work and encouraged to bring forward questions, concerns, or suggestions for improvement. The sections that follow outline the most common components of an effective safety manual and provide guidance for implementing them within a door dealership.

Statement of Accountability – Your safety program should begin with a clear Statement of Accountability that affirms ownership and senior management's responsibility for establishing, supporting, and enforcing all required safety programs and policies. This statement must communicate leadership's commitment to providing a safe and healthy workplace, allocating the resources necessary to maintain compliance, and ensuring that safety expectations are integrated into daily operations. It should also define how management will evaluate program effectiveness, respond to identified hazards, and support corrective actions.

The Statement of Accountability sets the tone for the entire safety program. It demonstrates that safety is not delegated solely to supervisors or technicians but is a core management function. This commitment must be visible through consistent enforcement, timely follow-up on safety concerns, and active participation in safety planning and review processes.

Safety Goals Statement – A Safety Goals Statement outlines the dealership's overarching objectives for maintaining a safe and healthy workplace. This statement should define measurable goals such as reducing injuries, improving hazard reporting, maintaining regulatory compliance, and strengthening safety culture. It functions as the mission statement for the safety program and provides a benchmark for evaluating performance.

Management should review these goals annually and adjust them based on injury trends, operational changes, and regulatory updates. Clear goals help align supervisors, technicians, and administrative staff around shared expectations and reinforce the

company's commitment to continuous improvement.

Safety and Health Organizational Chart –

Your safety program must include an organizational chart that clearly defines how safety responsibilities, communication, and decision-making flow through the company. This chart should identify key roles such as ownership, safety managers or coordinators, supervisors, and employee representatives. It must also show who has authority to make safety decisions, approve corrective actions, and stop unsafe work.

For management, this chart is a critical tool for assigning accountability. It ensures that employees know who to contact with safety concerns, how issues are escalated, and who is responsible for implementing and verifying corrective actions. The chart should be reviewed and updated whenever staffing or responsibilities change.

Safety Responsibilities and Task

Assignments – Your safety manual must clearly define the responsibilities of owners, managers, supervisors, and employees. For management, this includes establishing policies, providing resources, enforcing rules, conducting inspections, and ensuring training is completed. Supervisors must monitor daily work practices, correct unsafe behaviors, and communicate hazards promptly. Employees must follow established procedures, use required PPE, and report hazards or incidents.

This section should also outline task specific responsibilities such as equipment inspections, documentation requirements, and participation in safety meetings. Clear role definitions help eliminate confusion, support consistent enforcement, and ensure that all levels of the organization understand their part in maintaining a safe workplace.

Record Keeping and Documentation –

Accurate and consistent recordkeeping is essential for demonstrating compliance with OSHA requirements and supporting effective incident prevention. Your safety program must

outline procedures for maintaining injury and illness logs, inspection reports, training records, incident investigations, hazard assessments, and equipment maintenance documentation. These records must be retained for the required time periods and made available during audits or inspections.

Management is responsible for ensuring that documentation is completed promptly, stored securely, and reviewed regularly to identify trends or recurring hazards. Proper recordkeeping supports informed decision-making, helps verify that corrective actions are effective, and provides evidence of compliance in the event of an OSHA inspection or legal claim.

Access to Employee Medical and Exposure

Records – Your safety program must include clear procedures for informing employees of their right to access their own medical and exposure records, as required under OSHA's *Access to Employee Exposure and Medical Records Standard* (29 CFR 1910.1020).

Management is responsible for ensuring that employees receive written notice of these rights, typically at the time of hire and during safety training. The program must define how employees may request their records, who is authorized to respond, and the timeframe in which the company must provide access.

These records include exposure monitoring results, medical evaluations related to respirator use, hearing tests, and any documentation involving workplace-related health concerns. The program should also outline how records are stored, how confidentiality is protected, and how long each type of record must be retained. Management must ensure that employees are never denied access to their own information and that all requests are handled promptly and professionally.

Awards and Incentives Program – Some companies use awards or incentive programs to recognize employees for contributing to a strong safety culture. These programs may include acknowledgments, non-cash rewards,

or other forms of positive reinforcement that highlight safe work practices. Recognition programs are intended to support reporting and hazard awareness; cash-based incentives are generally avoided because they can unintentionally discourage employees from reporting injuries, near misses, or unsafe conditions.

Disciplinary Action Policies – Your safety manual must include a clearly defined disciplinary policy that outlines how safety rules will be enforced across all levels of the organization. This policy should specify the types of violations that may result in disciplinary action, such as failure to use required PPE, bypassing lockout/tagout procedures, or ignoring established safety protocols. It must also describe the progressive steps the company will take, which may include verbal warnings, written warnings, suspension, or termination depending on severity.

Management is responsible for applying these policies consistently and documenting all disciplinary actions. Supervisors must be trained to recognize violations, intervene appropriately, and communicate expectations clearly. A well-designed disciplinary policy reinforces accountability, supports compliance, and ensures that safety rules are taken seriously throughout the dealership.

Incident Investigation Policy and Procedures – The program must include a structured process for investigating workplace incidents, including injuries, near misses, property damage, and equipment failures. The policy should define which events require investigation, who is responsible for conducting the investigation, and the steps involved in identifying root causes. Investigations should focus on fact finding, not fault finding, and must examine contributing factors such as equipment condition, work practices, environmental conditions, and training adequacy.

Management must ensure that corrective actions are identified, assigned, and completed within a reasonable timeframe. The program

should also outline how investigation findings are documented, communicated to affected employees, and used to prevent recurrence. Incidents that meet OSHA’s recordkeeping criteria must be logged on the OSHA 300 form, and serious injuries may require immediate reporting to OSHA.

Outside Contractor Management Program – When contractors perform work on company property or alongside dealership employees, their activities can significantly affect overall risk. Your safety program must include procedures for selecting contractors, verifying their safety qualifications, and communicating your company’s safety expectations before work begins. This may include reviewing contractor safety manuals, insurance certificates, training records, and incident history.

The program should define how contractors will be oriented to site-specific hazards, emergency procedures, PPE requirements, and any customer-specific rules. Management must ensure that contractor work is monitored, that unsafe practices are corrected immediately, and that coordination procedures are followed when multiple employers share a worksite. Clear documentation of contractor oversight helps protect the dealership from liability and ensures a consistent standard of safety across all operations.

OSHA Inspection Policies and Procedures – This section outlines how the company will respond to an OSHA inspection. This includes identifying who is authorized to meet with the inspector, accompany them during the walk-around, and provide requested documents. The policy should define how employees should interact with OSHA representatives, including answering questions truthfully, avoiding speculation, and directing complex inquiries to management.

Management must ensure that required records, such as injury logs, training documentation, and written programs, are readily accessible. After the inspection, the company must follow established procedures

for reviewing findings, responding to citations, implementing corrective actions, and communicating outcomes to employees. A well-prepared inspection process reduces confusion, ensures compliance, and demonstrates professionalism.

Hazardous Work Permits - Hazardous work permits are required for tasks that involve elevated risks, such as hot work, confined space entry, chemical exposure, or work near energized equipment. This program must define when permits are required, who is authorized to issue them, and what conditions must be met before work begins. This includes verifying atmospheric testing (if applicable), ensuring required PPE is available, confirming fire watch procedures, and documenting all necessary approvals.

Management must ensure that employees and contractors understand the permit process and that permits are completed accurately and retained for the required period. The program should also outline how work is monitored while the permit is active and how the permit is closed out once the task is complete. Proper permit management helps prevent serious injuries and ensures compliance with OSHA and industry standards.

Customer Safety and Health Standards – Many commercial, industrial, and institutional customers maintain their own safety requirements that exceed OSHA's minimum standards. Your safety program must include procedures for reviewing customer specific rules, communicating them to employees, and ensuring compliance during onsite work. This may include requirements for PPE, lockout/tagout, fall protection, hot work permits, or site-specific training.

Management must ensure that employees understand how to access customer safety information, who to contact with questions, and how to document compliance. Failure to follow customer safety rules can result in removal from the site, contract penalties, or reputational damage. A structured approach ensures that

dealership employees work safely and professionally in all customer environments.

Drug Free Workplace Policy – These policies outline expectations for employee conduct, testing requirements where applicable, and procedures for addressing impairment on the job. The policy should define prohibited substances, rules regarding prescription medication that may affect alertness or coordination, and the company's stance on alcohol use during work hours or while operating company vehicles. It must also specify when testing may occur, such as pre-employment, post-incident, reasonable suspicion, or random testing if permitted by law or contract.

Management is responsible for ensuring that supervisors are trained to recognize signs of impairment, document observations, and follow established procedures for removing an employee from duty when safety is compromised. The policy should also outline how employees can confidentially report concerns about impairment and how the company will respond. A well-designed Drug Free Workplace Policy helps prevent accidents, protects employees and customers, and reduces liability exposure.

Personal Protective Equipment – Company safety programs must identify the specific types of protective equipment required for routine and specialized tasks performed by technicians, installers, warehouse personnel, and other employees. This includes eye protection, hand protection, hearing protection, respiratory protection, fall protection, and any task-specific PPE such as cut-resistant gloves or arc-rated clothing. The program must outline how PPE is selected based on hazard assessments, how it is issued, and how employees can obtain replacements.

Management must ensure that employees receive training on proper PPE use, limitations, inspection procedures, and maintenance requirements. Damaged or worn PPE must be replaced promptly, and employees must understand their responsibility to report issues.

The program should also define how PPE compliance is monitored and how non-compliance is addressed. A strong PPE program ensures that employees have the equipment needed to perform their work safely and consistently.

Bloodborne Pathogens Exposure Control Plan – If your dealership has employees who may be exposed to blood or other potentially infectious materials, such as when providing first aid or responding to workplace injuries, you must maintain an Exposure Control Plan. This plan must identify which employees are designated responders, outline required PPE, and define procedures for safe cleaning and disposing of contaminated materials. It must also include procedures for post-exposure evaluation and follow-up, including medical consultation and documentation.

Management must ensure that designated responders receive appropriate training, vaccinations when required, and access to necessary protective equipment. The plan should also define how contaminated waste is handled, how exposure incidents are reported, and how records are maintained. Even if your dealership designates all employees as voluntary responders, the plan must clearly outline expectations and limitations to ensure compliance and protect employee health.

Fork Truck Operators

Training Program – Any employee who operates a forklift or powered industrial truck must complete a formal training program that meets OSHA's *Powered Industrial Truck Standard* (29 CFR 1910.178). This program must include classroom instruction, hands-on training, and a practical evaluation to ensure the operator can safely maneuver the equipment in your specific work environment. Training must cover load handling, stability principles, inspection procedures, and safe operation in warehouses, loading areas, and customer facilities.



Management must maintain documentation of all operator certifications, ensure that only authorized employees operate forklifts, and conduct refresher training when required, such as after an incident, near miss, or observed unsafe behavior. The program should also outline daily inspection requirements, maintenance procedures, and reporting expectations for damaged equipment. Proper forklift training reduces the risk of serious injuries and property damage.

Hearing Conservation Program – If noise levels during employee duties reach or exceed OSHA's action level of 85 dBA as an 8 hour time-weighted average, you must implement a Hearing Conservation Program. This program must include noise monitoring, identification of high noise areas or tasks, and the provision of appropriate hearing protection. Employees must be trained in the proper use, care, and limitations of hearing protection devices.

Management must ensure that affected employees participate in baseline and annual audiometric testing to monitor hearing health. The program should also outline procedures for evaluating test results, notifying employees of changes in hearing, and implementing corrective actions such as engineering controls or task modifications. A well-maintained Hearing Conservation Program helps prevent long term hearing loss and ensures compliance with OSHA requirements.

Respiratory Protection Program – When employees may be exposed to airborne hazards such as dust, fumes, vapors, or chemical mists, your dealership must implement a Respiratory Protection Program. This program must include hazard assessments, respirator selection, medical evaluations, fit testing, and training. Employees must be medically cleared before wearing a respirator and must be fit-tested annually or whenever a change in facial structure could affect the seal.

Management must ensure that respirators are properly maintained, stored, and inspected, and that employees understand how to use

them safely. The program must also outline procedures for voluntary respirator use, including required medical disclosures and training. A compliant Respiratory Protection Program protects employees from respiratory hazards and ensures that respirators are used correctly and effectively.

Lockout/Tagout Program and Policies –

Every company's safety manual includes procedures for controlling hazardous energy during service and maintenance. These procedures must identify each piece of equipment covered by the program, the energy sources involved, and the specific steps required to isolate, lock, and verify de-energization. The program must also define the roles of "authorized" and "affected" employees and outline the training requirements for each group.



Management must ensure that lockout devices, tags, and hardware are available and that employees follow procedures consistently. The program should also include periodic inspections of LOTO procedures, documentation of compliance, and coordination requirements when contractors are involved. Proper lockout/tagout practices prevent serious injuries caused by unexpected energization or release of stored energy.

Assured Equipment Grounding Conductor Program – If your dealership uses extension cords, cord-and-plug tools, or temporary power systems, an AEGCP may be required to ensure electrical safety. This program must include procedures for inspecting and testing grounding conductors, color-coding or tagging equipment to indicate testing status, and documenting all inspections. The program must be used in conjunction with required Ground Fault Circuit Interrupter (GFCI) protection to reduce the risk of electrical shock.

Management must ensure that employees understand how to identify compliant

equipment, report damaged cords or tools, and remove unsafe equipment from service. The program should also outline responsibilities for maintaining inspection logs and ensuring that testing is performed at required intervals.

Employee Emergency Action Plan – Your Emergency Action Plan must outline procedures for evacuating the workplace safely during emergencies such as fires, chemical spills, severe weather, or medical incidents. The plan must identify evacuation routes, designated assembly areas, communication procedures, and responsibilities for accounting for employees after evacuation. If fall protection systems are used, the plan must also include rescue procedures for retrieving an employee suspended in a harness.

Management must ensure that employees are trained on the EAP, that drills are conducted as needed, and that the plan is reviewed and updated whenever facility layouts or staffing change. Clear emergency procedures help ensure a rapid, organized response that protects employees and reduces confusion during critical events.

Hazardous Materials and Toxic and Hazardous Substances -

If your dealership handles hazardous materials, such as flammable liquids, adhesives, solvents, batteries, or chemical cleaners, your safety program must identify applicable OSHA standards and define the controls required to protect employees. This includes proper storage, ventilation, spill response, fire prevention measures, and exposure controls. The program must also outline training requirements for employees who work with or around these substances.



Management must ensure that hazardous materials are properly labeled, stored in approved containers, and handled according to manufacturer instructions and regulatory requirements. Documentation such as inventories, exposure monitoring results, and training records must be maintained. A structured approach to hazardous materials

management reduces risk and ensures compliance with OSHA's toxic and hazardous substances standards.

Chemical and Material Safety Policies – Your safety program must include clear policies and procedures for managing hazardous chemicals and materials in accordance with OSHA's *Hazard Communication Standard* (29 CFR 1910.1200). This includes maintaining a complete and up-to-date chemical inventory for all products used in service vehicles, warehouses, and customer locations. For every hazardous chemical, you must keep the manufacturer provided Safety Data Sheet (SDS) readily accessible to employees during their work shift. Employees must be trained to understand the hazards, required PPE, safe handling practices, and emergency response measures associated with the chemicals they may encounter.

All hazardous chemical containers must be properly labeled with the product identifier and hazard information consistent with the Globally Harmonized System (GHS). Secondary containers used in the field must also be labeled unless they meet OSHA's narrow "immediate use" exemption. Your program should define procedures for safe storage, transport, and disposal of chemicals, including flammables, adhesives, solvents, lubricants, and battery-related materials commonly used in garage door operations. When contractors or other employers are present, each employer must exchange hazard information and ensure their own employees are trained on the chemicals they may be exposed to.

Heat Safety and Heat-Illness Prevention Policies – The safety program must include a written Heat Illness Prevention Plan that outlines how employees will be protected from heat-related hazards during hot weather, particularly when working outdoors, in non-conditioned warehouses, or in customer garages where temperatures can rise rapidly. When temperatures exceed 80°F, you must provide employees with access to potable drinking water, adequate shade, and rest

breaks to prevent heat exhaustion and heat stroke. Employees should be encouraged to drink water frequently, take cool-down rests when needed, and recognize early symptoms of heat illness in themselves and others.

Supervisors and employees must be trained to identify environmental risk factors (temperature, humidity, radiant heat, enclosed garage spaces), personal risk factors, early warning signs of heat illness, and emergency response procedures. Your plan should define how you will monitor weather conditions, adjust workloads, rotate tasks, and respond to heat advisories. Employees who show signs of heat illness must be removed from the hot environment and provided prompt first aid and medical evaluation.

Heat-related illnesses that result in medical treatment beyond first aid, lost workdays, restricted duty, or loss of consciousness must be recorded on the OSHA 300 log in accordance with OSHA's injury and illness recordkeeping requirements. Your program should also outline procedures for incident reporting, post-incident review, and corrective actions to prevent recurrence.

Workplace Violence Prevention – Your safety program should include a Workplace Violence Prevention policy that outlines how employees will be protected from threats, intimidation, and acts of violence in the workplace. Garage door technicians and sales personnel may work alone, enter unfamiliar customer locations, handle disputes over service or billing, or encounter emotionally escalated individuals. Your program should define procedures for recognizing early warning signs, de-escalating confrontations, and reporting concerns before they escalate.

Employees must be trained to identify behaviors of concern, maintain situational awareness, and follow safe work practices when entering customer homes or businesses. The program should establish clear reporting channels for threats, aggressive behavior, or domestic violence related concerns that may spill into the workplace. Supervisors must take

all reports seriously, respond promptly, and ensure that employees are never retaliated against for raising safety concerns.

Your policy should also outline procedures for emergency response, including when to disengage, leave the area, contact law enforcement, or activate internal emergency communication protocols. Incidents involving physical injury, medical treatment beyond first aid, or lost workdays must be recorded on the OSHA 300 log in accordance with OSHA's injury and illness recordkeeping requirements. Post-incident reviews should be conducted to identify contributing factors and implement corrective actions to prevent recurrence.

Wildfire Smoke, Extreme Heat, and Flood Hazard Planning – The safety program should include procedures for emerging environmental hazards that may affect employees working outdoors, in customer garages, or in non-conditioned facilities. These hazards - wildfire smoke, extreme heat events, and flooding - are becoming more frequent and can create significant health and safety risks if not properly managed.

Wildfire Smoke: When outdoor air quality deteriorates due to wildfire smoke, employers must monitor local Air Quality Index (AQI) levels and implement protective measures when particulate concentrations reach harmful thresholds. Your program should outline how AQI will be checked, when work must be modified or suspended, and when respiratory protection or relocation to filtered indoor environments is required. Employees should be trained to recognize symptoms of smoke exposure and understand the limitations of voluntary-use respirators.

Extreme Heat Events: In addition to your Heat Illness Prevention Plan, your program should address extreme or prolonged heat waves that may require enhanced controls. These may include adjusting work schedules, increasing mandatory rest periods, relocating tasks to cooler environments, or temporarily suspending work during peak heat conditions. Supervisors must monitor weather advisories

and implement additional precautions when heat indices reach hazardous levels.

Flood and Severe Weather Hazards: Your program should include procedures for identifying flood-prone areas, monitoring weather alerts, and determining when work must be delayed or stopped due to flash-flood risks, lightning, or severe storms. Employees should be trained on safe evacuation routes, avoiding electrical hazards in standing water, and recognizing unstable structures or saturated soils that may pose collapse risks. Service vehicles should be equipped with emergency communication tools and guidance for safely navigating flooded roadways.

These environmental hazard procedures should be reviewed annually and updated as regulatory requirements evolve. Post-incident reviews should be conducted after any smoke-related exposure, heat emergency, or flood-related event to identify improvements and ensure employee safety.

Recordkeeping and Documentation

When a recordkeeping system is properly organized and designed, the amount of paperwork needed to support an effective program should not take more than 10 to 15 minutes per day on behalf of most managers and supervisors. As with all regulatory requirements, it is essential that the appropriate records are created and maintained to reduce the risk of citations and fines. Good recordkeeping also plays a major role in reducing liability exposure in the event of civil or criminal litigation.



Among the single most important records are injury and illness records, commonly known as the OSHA 300 Log, and its associated documents, the Federal 101 forms. These documents are to be kept on a calendar year basis and maintained for a period of five years

after the calendar year to which the record applies. Other medical records related to employees, such as physical exams, specialized tests such as fitness to wear a respirator, and environmental monitoring results such as air quality testing are required to be maintained for thirty years past the date of termination of employment. The only exception to this requirement is for employees with less than one year of employment. The records of these employees can be released to them upon termination of employment.

Other records and documents are also important to maintaining an effective overall program, such as current copies of all organizational policies, programs, and procedures. These documents should be accessible to all employees during normal working hours and should be periodically reviewed for accuracy and compliance with current standards. It is recommended that you establish a periodic schedule for program and policy review and approval and assign this responsibility to the safety and health committee within your company.

Certainly, any type of training that is provided should be thoroughly documented and each trainee's personnel file should be updated to reflect their current training status as additional programs are completed.

In many areas of the standards, OSHA requires that periodic inspections of equipment, tools and procedures be accomplished to ensure their adequacy relative to current standards and performance criteria. These types of inspections should always be documented and maintained on file for the necessary time periods as called for in the standards. Any time that a hazard assessment or job safety analysis is accomplished, this process should be documented. Important aspects of this documentation are the reasons why the specific safety and health controls were selected, and the content of the standard operating procedure(s). Disciplinary actions should be thoroughly documented.

The maintenance and repair logs relating to equipment systems and tools that are addressed within the OSHA standards should be accurately maintained for appropriate periods. This will help to support any deficiencies which may come into question should there be an incident which involves equipment failure and that also results in injury or illness to an employee. Any correspondence that is received from OSHA or outside subcontractor entities should be maintained for future reference. This is especially important when such correspondence is relative to fulfillment of regulatory requirements.

It is important to maintain manufacturer specifications, data and recommendations for proper use and maintenance of equipment and tools. Any time that environmental monitoring is conducted you should maintain a copy of such results and annotate the individual records of each employee who was exposed to any contaminants and hazards. If your company utilizes hazardous work permits, copies of such should be maintained after completion of the work activity. While this represents only a few of the areas where good recordkeeping and documentation can enhance compliance and reduce liability, there probably are many other areas where appropriate records should be established and maintained. You and your company should look carefully at establishing and maintaining a strong recordkeeping and documentation system in support of your programming. Remember that the quality and flow of information can be critical to the successful operation of your program.

Medical Recordkeeping

It is important that managers and supervisors understand what constitutes a recordable injury or illness as these are the primary targets in your efforts to reduce or eliminate such events. Every recordable injury or illness is very costly to an organization, and it should be the primary objective of every program to eliminate or reduce these events.

OSHA defines a recordable injury or illness as:

- Any work-related occupational injury or illness which results in a fatality or lost time.
- Injuries which require transfer to another job or result in termination of employment.
- Injuries which require medical treatment, other than first aid.
- Cases which involve the loss of consciousness.
- Injuries resulting in the restriction of work or motion.
- Occupational illnesses.

OSHA defines first aid as: *Any one-time treatment and any follow-up visit for the purpose of observation of minor cuts, scratches, burns, splinters, etc., which do not ordinarily require medical care.* If such treatment is rendered by a qualified physician or other such provider, it remains first aid assuming the above-mentioned criteria apply.

OSHA defines medical treatment as: *Any treatment (other than first aid) that is administered by a physician or other registered professional under the standing orders of a physician.*

OSHA defines lost workday cases as: *Any case where the employee is affected by the condition beyond the day of onset, and during which the employee would have worked but could not do so because he/she could not perform their normal duties for any or all of the qualifying workday as a result of the qualifying condition.* This applies only to regularly scheduled workdays.

The OSHA Form 300 Log of Work Related Injuries and Illnesses

The *OSHA 300 Log of Work-Related Injuries and Illnesses* is used to classify and record the extent and severity of each recordable injury or illness that occurs in the workplace. When an incident occurs, the employer must evaluate the case and determine whether it meets OSHA's criteria for recordability. If your

company operates more than one location, separate OSHA 300 Log must be maintained for each location.

The OSHA 300A Summary of Work-Related Injuries and Illnesses provides the annual totals for each category. At the end of the calendar year, the totals from the OSHA 300 Log must be transferred to the 300A Summary. The 300A must be certified by a company executive and posted in a visible location from February 1 through April 30. Only the 300A Summary is posted - never the OSHA 300 Log itself.

Employers must determine whether an injury or illness is recordable within seven calendar days of receiving information that a case has occurred. Once a case is determined to be recordable, it must be entered on the OSHA 300 Log within that same seven-day period. Only recordable injuries and illnesses - those that meet OSHA's criteria for medical treatment beyond first aid, restricted duty, lost time, loss of consciousness, significant diagnosed conditions, or specific injury types - are to be entered on the log. Each entry must be supported by a corresponding incident report.

For each recordable case, employers must complete an OSHA 301 Injury and Illness Incident Report or an equivalent form. Some state workers' compensation forms may be used as substitutes if they contain all required OSHA 301 information. First-aid-only cases should still be documented for internal hazard analysis purposes, but these records must be maintained separately from the OSHA 300 Log and its associated documentation.

In lost-workday cases, only the days the employee was scheduled to work and could not perform their duties due to the injury or illness are counted. The day of the incident is not counted as a lost workday. Personnel responsible for maintaining the OSHA 300 Log must be trained in OSHA's recordkeeping definitions and classification requirements to ensure accuracy and compliance.

A recommended filing system for injury and illness records includes:

- The last three years of OSHA 300 Logs in descending order.
- The last three years of OSHA 301 or equivalent incident reports in descending order.
- Individual case files, alphabetized, for all entries appearing on the OSHA 300 Logs for the past three years.

In addition to recordkeeping, OSHA requires employers to report certain serious incidents directly to OSHA. Any work-related fatality must be reported within 8 hours of the employer learning of the event. Any inpatient hospitalization, amputation, or loss of an eye must be reported within 24 hours. These reporting requirements apply regardless of employer size or industry classification. Certain establishments must also submit their injury and illness data to OSHA electronically on an annual basis.

Note: Some exemptions exist for employers with 10 or fewer employees and for certain low-hazard industries; however, the reporting requirements for fatalities, hospitalizations, amputations, and loss of an eye apply to all employers.

All of this underscores the importance of effective Injury and Illness Management. Beyond accurate OSHA recordkeeping, this function includes several critical areas that reduce risk and support compliance, such as:

- Policies for reporting injuries and illnesses
- Procedures for dispensing first aid supplies
- Triage and treatment protocols
- Designated health care providers (subject to state law)
- Workers' compensation case management and follow-up
- Incident investigation procedures
- Enforcement of safety policies through disciplinary action
- Integration with the company's Emergency Action Plan

Here are some suggestions that can enhance your organization's approach to these various issues. First, make compliance with, and understanding of your entire safety and health program a condition of employment. This provides a basis for further action and enforcement if necessary. In regard to the reporting of injuries and illnesses, your policy should be that all injuries and illnesses are reported immediately, no matter how minor they seem. This policy will provide you with the earliest possible opportunity for intervention and ensure that the appropriate level of care is provided. It should also help to keep some of these events at the level of first aid, as opposed to medical treatment, which would therefore make it recordable, and result in substantial cost impact to the organization. A related item involves the timely and accurate reporting of the injury or illness by the supervisor via a written report. This information is critical to appropriate injury/illness classification and associated recordkeeping requirements.

Next, your organization should implement policies that strictly control the dispensing of first aid supplies. This can be done by either requiring that the user sign out each item, or by requiring that the supervisor evaluate the need for such use prior to the dispensing of first aid supplies. This is necessary because most employers are not truly qualified to do an appropriate job of triage or treatment decision making. Therefore, they assume that a particular course of action is appropriate, which may turn the injury or illness into a recordable event simply because of the way in which they choose to perform such treatment. Another related issue is that many times it is required, via the applicable standards, that only items that have been approved by the medical provider (the physician selected by the employer to provide advice and consultation on such matters) shall be available in the first aid kits. You should always check with your medical provider and your first aid material suppliers for further clarification on these issues.

It is imperative that your policies regarding the handling of, and response to, injuries and illnesses provide qualified decision making as mistakes can lead to costly impact. You should also review your Employee or Site Emergency Action Plan in order to adequately cover such policies and ensure that appropriate actions are outlined so as to prevent unnecessary mistakes due to lack of guidance.

It is important to have an organizational policy regarding the requirement that no matter what other medical provider an employee may choose to consult, they must also be examined by the company doctor for verification of diagnosis and medical treatment plan. This is essential due to the large number of physicians who knowingly or unknowingly facilitate fraud and abuse in an effort to generate revenue or over-protect any liability exposure they might have. This will also provide you with more ammunition in evaluating and accepting or denying a particular claim. Along these lines, you should establish consistent policies for the ongoing management and follow up of active worker compensation cases.

It is always a good idea to return the injured worker to active duty as soon as possible without causing potential for re-injury or additional onset of illness, even if the employee is in a limited duty status. Your company should have established policies regarding how a worker will be allowed to return to work after being sick or injured, along with an established light or restricted duty policy.

Another critical activity that supports many of these areas is the need for accident investigation related to all recordable injuries and illnesses. Accomplishing this activity will provide you with information about the classification and management of a particular injury or illness.

Finally, your historical record relating to disciplinary action and enforcement of existing standards should be consistent, and should also report on your policies and management position.

Section Six

Hazard Assessment

One of the most valuable tools any manager or supervisor can have in safety and health management is the ability to recognize, evaluate, and control hazards in the workplace. Many people make the mistake of assuming that only the hazards specifically addressed in OSHA standards need to be controlled. This is not true. **All hazards**, whether or not OSHA has issued a specific standard for them or not, must be addressed in terms of elimination and control. This responsibility stems from the employer's obligation to provide a workplace free from known or recognized hazards.



This obligation stems from the employer's general duty *to provide a workplace free from recognized hazards that are likely to cause death or serious physical harm*. During frequent and periodic inspections, supervisors should approach the workplace with this mindset: ***If you observe a hazard, take action to eliminate it.*** If it cannot be eliminated, implement appropriate control measures to minimize exposure to all affected employees. In other words, if it can get someone hurt or sick – do something about it. The General Duty Clause reinforces the need for proactive hazard recognition and control, particularly for hazards for which no specific OSHA standard exists.

Understanding the traditional methodology behind hazard assessment and job safety analysis should help you to be more effective in fulfilling these responsibilities.

Eliminating and Controlling Hazards

Effectively managing hazards requires understanding the full range of options available to reduce or remove risk. When a

hazard is identified, the goal is always to apply the most effective method of control possible. OSHA's hierarchy of controls provides a structured way to approach this process, beginning with the most effective strategies and progressing to those used when higher-level controls are not feasible.

The primary methods used to eliminate or reduce hazards include:

1. Elimination
2. Substitution
3. Engineering Controls
4. Administrative Controls, including:
 - Job Safety Analysis (JSA)
 - Standard Operating Procedures (SOP)
5. Personal Protective Equipment (PPE)

Elimination is the most effective control method and was introduced in the previous section. When a hazard can be removed entirely, exposure is eliminated and the risk of injury or illness is reduced to zero. Managers or supervisors should always consider whether a hazard can be eliminated before moving to other control strategies.

Substitution involves replacing a hazard with something less hazardous. Examples may include using a less toxic chemical, selecting a safer tool design, or choosing materials that reduce risk. While substitution opportunities vary by task, they should be considered whenever elimination is not possible.

Engineering Controls are mechanically or physically oriented and are intended to prevent employees from encountering the hazard. Examples include installing guards on machines or tools, adding ventilation to maintain air quality, or roping off a safe work area.



If engineering controls are not suitable or do not fully address the hazard, **Administrative Controls** should be considered next. These controls change the way work is performed by establishing policies, procedures, and work practices that reduce employee exposure. Administrative controls may include restricting access to certain areas, adjusting how tasks are performed, or providing instructions and warnings to guide safe behavior. Examples include:

- To develop a policy related to a particular hazard, such as establishing the work area as a *Limited Access Zone* to control which employees are allowed in that area.
- Establishing policies that require an employee get assistance when lifting items above a specific weight.
- Lockout/Tagout policies and procedures.
- Placing hazard warning signs in appropriate locations.



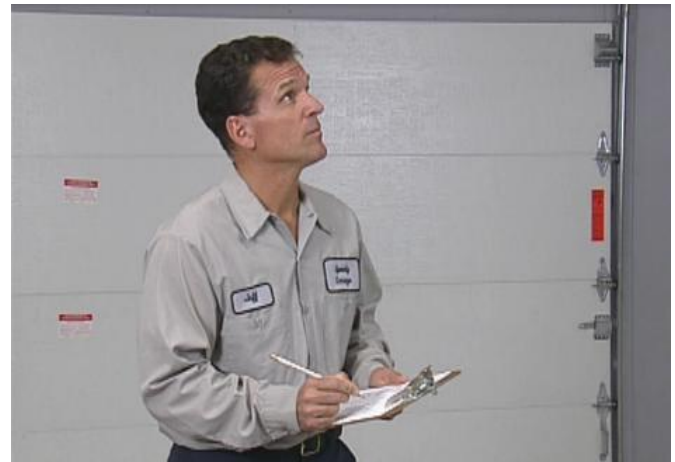
If elimination, substitution, engineering controls, or general administrative controls are not sufficient to address a specific hazard, the next step is to apply **Job Safety Analysis (JSA)** and develop **Standard Operating Procedures (SOPs)**. Although JSA and SOPs fall under administrative controls, they deserve special emphasis because they provide a structured, standardized method for performing work tasks safely and consistently.

From a management perspective, this standardization is essential. The more your safety program relies on individual employees to determine what is safe or unsafe, the greater the likelihood of inconsistent practices, misinterpretation, and increased risk of injury, illness, or property damage. A well-developed SOP ensures that all employees perform the task the same way, every time, reducing variability and improving both safety and operational control. This consistency also supports better cost control and risk reduction for the employer.

Developing an SOP begins with conducting a **Job Safety Analysis (JSA)**. In practical terms, this means thinking through the work activity in advance to identify hazards or unsafe conditions that could arise during the task. These conditions may introduce new hazards, worsen existing ones, or otherwise increase the likelihood of injury or illness.

A JSA can be completed by an individual or, for more complex tasks, by a team. Regardless of who performs it, the process remains the same:

1. Break the task into basic job steps. Keep the steps simple and specific.
2. Identify the hazards associated with each step. Consider injuries, illnesses, exposures, or unsafe conditions that could result.
3. Determine safe work practices or controls for each step. Identify all feasible methods to eliminate or reduce the hazards you identified.



Once the JSA is complete, focus on steps one and three to develop the SOP. Select the safe work practices that provide the highest level of protection, comply with applicable standards, and remain practical and cost effective for your organization. Then document the procedure by listing each job step and describing exactly how it must be performed using the selected safe work practice.

An SOP should also include a brief description of the task, the worker classifications authorized to perform it (if applicable), required

PPE, any necessary hazardous work permits, the tools and equipment needed, and the date of the last revision or evaluation.

Certain tasks and environments – such as Critical Operations Tasks and Limited Access Zones – are inherently higher hazard and are strong candidates for JSA and SOP development. OSHA also requires written procedures in several areas, including Lockout/Tagout, Permit-Required Confined Space Entry, Bloodborne Pathogens (spill cleanup), non-routine tasks covered by Hazard Communication, Fall Protection, and Emergency Action Plans. It is also wise to develop SOPs for tasks where multiple injuries or illnesses have occurred.

Personal Protective Equipment (PPE) is the final method of hazard control and should be used only when elimination, substitution, engineering controls, and administrative controls cannot fully remove or reduce the hazard. PPE often provides an important additional layer of protection, but it must never be selected as the first or only control simply because it is convenient or inexpensive. Preventing an object from falling off a scissor lift is always more effective than relying on a hard hat to protect the technician below.

PPE is the least effective control method because it does not eliminate the hazard itself. Instead, it relies on the employee to wear the equipment correctly, consistently, and at the right time. PPE can also be easily misused or rendered ineffective. Common examples of misuse include hard hats worn backwards, safety glasses left on a workbench, or hearing protection hanging around an employee's neck. When PPE is not worn properly, it provides no protection at all and may create a false sense of security.

When selecting PPE, always consider the severity, duration, and frequency of employee exposure. These factors play a critical role in determining whether PPE is appropriate and what type is required. PPE must be selected based on the findings of the hazard assessment and must comply with applicable

OSHA standards, manufacturer instructions, and company policies.

PPE should be used in combination with other control methods whenever possible. For example, engineering controls may reduce exposure to a safer level, while PPE provides additional protection for tasks that still involve residual risk. Using multiple control methods together often provides the most effective and reliable protection.

PPE programs must include proper training, fit, inspection, maintenance, and enforcement. Employees must understand when PPE is required, how to wear it correctly, how to inspect it for damage, and how to maintain or replace it. Supervisors must monitor compliance daily and correct improper use immediately.

Documenting hazard assessment and control selection process is always good practice. If OSHA questions your decisions during an inspection, documentation demonstrates due diligence and provides evidence that you evaluated the hazard and selected controls thoughtfully. Using multiple control methods in combination is common and often represents the most effective approach.

Ongoing training is essential to maintaining an effective safety program. Your training plan should include regularly scheduled, documented instruction that is directly relevant to the tasks employees perform and the hazards they may encounter. This includes both initial training for new hires and periodic refresher training to reinforce expectations and address changes in equipment, procedures, or regulations. Many suppliers, equipment rental companies, PPE vendors, insurance carriers, and local safety organizations offer high quality training resources, often at no cost, which can supplement your internal program and help ensure employees remain knowledgeable, competent, and prepared to work safely.

Some examples include:

- A local fire department is an excellent resource for training in how to use a fire extinguisher.
- An equipment supplier may provide training in regard to the equipment that you rent or buy from them.
- A PPE supplier can train your personnel in how to properly wear and care for the personal protective equipment you have purchased.
- Insurance companies, specifically workers' compensation carriers, offer loss control services that include training in these and other areas.

Before scheduling these sessions, review your training plan to ensure the content meets your needs and is not simply a sales presentation. Daily monitoring of work areas for compliance, enforcement of standards, and correction of hazards is also necessary to maintain a safe and effective workplace.

Section Seven

Employee Training

How to Develop a Training Program

Safety training efforts must be well organized and thoroughly planned in order to be effective. The following will outline some basic steps that can be taken to better prepare your organization to develop a training system that accomplishes the necessary goals and objectives.

Develop a training agenda and schedule that allows for regular safety training meetings for all levels of personnel. Typically, sessions are 15 to 30 minutes in length, but the time allocation should be based on need, not the clock.

Initial safety training must be comprehensive, and the time allocated should not be limited, and all aspects of a company's policies must be fully understood. Ongoing training typically is focused on a specific topic for emphasis based on priorities and relevance.

Other types of training are also required to maintain compliance and ensure employee competency. This includes periodic retraining for equipment specific certifications such as man-lift or forklift operation, as well as refresher training for programs like Hazard Communication and Lockout/Tagout. These requirements are defined in the applicable OSHA standards, and your training calendar should reflect the mandated intervals so that no required training is missed. Scheduling these sessions in advance helps ensure that employees remain qualified, hazards are properly controlled, and the company maintains continuous compliance with regulatory expectations.

Safety and Health Compliance Management Training

The first step in implementation of a safety and health program is properly educating key personnel regarding applicable standards, company policies and procedures. As with any type of training, possessing technical knowledge is only part of the talent needed to be an effective trainer. Those who will be conducting training must have training skills, which can be learned or enhanced by attending the IDEA Train-the-Trainer course. Among the technical competencies required for effective safety training are:

- Understanding how to read and interpret OSHA standards, company policies, and written procedures, and being able to translate regulatory language into practical workplace expectations.
- Applying regulatory and policy requirements to real world job tasks, ensuring that employees understand not only what the rules are but how they affect daily operations.
- Recognizing how OSHA standards apply to the full scope of the company's business activities, including service work, installation practices, customer sites, and contractor interactions.
- Training and motivating employees effectively, using instructional techniques that promote engagement, retention, and consistent safe behavior in the field.
- Understanding how training influences cost containment and liability risk, including how well-trained employees reduce injuries, prevent equipment damage, and strengthen the company's overall safety and compliance posture.

General Employee Safety and Health Orientation Training

Once the key staff personnel have been prepared, conduct an employee safety and health orientation training session in order to establish ground rules for the program's implementation. These would typically include the roles and performance expectations for this first step important to the overall training effort. To be effective, safety training must have buy-in from workers in all positions within the company. Safety performance must involve both individual and group support. This requires clear communication regarding the company's commitment to safety and its goals and objectives. Some of the general items that should be shared with the workforce at an initial safety training orientation meeting include:

- The content and structure of your organization's Awards and Incentives program, and your Disciplinary Action Policies.
- Standard personal protective equipment requirements and how such equipment should be obtained.
- Introduction of your safety and health committee members, and other key staff in your organizational structure, related to the safety program.
- A review of your company policies relating to Access to Employee Medical Records. You should also get them to sign an acknowledgement form that verifies that they have been given this information.
- A brief explanation of the additional training that will be provided.

An employee orientation should begin with an appearance by a top management person, or a representative of ownership to emphasize the company's priority regarding the safety of all members of the organization. This statement should demonstrate the value that the company places on the health and welfare of employees. This position statement should also strive to encourage employee involvement in the safety and health program, and the need

for everyone's cooperation and positive support.

Ongoing Employee Training System

Training must be ongoing. Safety training, in particular, must be frequent and structured to the needs of the workers, as well as the company. Utilize an employee training system that includes regular training sessions. Utilize training aides as necessary. Involve workers in the sessions. Seek support from suppliers, local resources, and equipment/tool rental firms for specialized training sessions. Workers' compensation providers offer safety services which typically include on-site training when requested. Local fire departments may offer free training in fire safety, first aid, and home safety. PPE suppliers will train employees on the use and care of the personal protective equipment you have purchased.

How to Prepare for a Training Session

Here are some basic tips that will significantly enhance your training efforts and provide for better comprehension and retention by the employees being trained. This should, in turn, lead to better workplace application and understanding.

- The instructor should be thoroughly prepared. This is best accomplished by reviewing the training agenda and associated materials in advance of the training session, then reviewing the company policies related to the subject matter.
- Utilize examples from your workplace and get employees to relate their personal experience with the subject matter. If you don't have compelling firsthand stories to share, make some up and claim they are true. People can learn and retain more effectively when the information being given can be illustrated in the form of a story.

- Select a training location and time that is conducive to effective training.
- Employ practical demonstration whenever possible.
- Control the training session by staying on point. Do not permit discussions that venture beyond the purpose of the session.

All training must be documented, according to the date of the session, name of the trainer, the topic covered and the attendees present.

Section Eight

Shop and Jobsite Inspections

Regular inspections of the shop, job sites, work activities, equipment, and tools are essential to maintaining a safe workplace. OSHA also requires that certain work practices and procedures, such as those associated with Lockout/Tagout, be inspected at defined intervals, typically annually. Where OSHA specifies an inspection frequency, those intervals should be added to your safety calendar and incorporated into your loss control and safety management planning. All inspections should be thoroughly documented for both compliance and liability management purposes, and records should be retained for the required period or, if not specified, for a standard three year retention period.

In most cases, OSHA states that inspections must be conducted “regularly” and “frequently,” without prescribing a specific interval. This means inspections must occur as often as necessary to eliminate or adequately control the hazards present in the workplace. For many types of equipment and tools, OSHA requires users to perform a visual inspection on a daily basis. Even when OSHA does not mandate an inspection, conducting them routinely is a best practice that helps control costs, reduce liability risks, and improve compliance performance. Regular inspections also help prevent unnecessary losses and promote a higher level of safety awareness throughout the organization.

Self-Inspection Guidelines

Self-inspection is an essential component of an effective loss control and safety management program. These efforts help preserve resources, protect employees, and improve



overall operational performance. The primary purpose of inspections is to identify hazards and eliminate or control them. When inspections are properly planned and executed, they reduce the frequency and severity of unplanned interruptions to business operations. They also improve efficiency, increase productivity, and help control costs.

To gain the full benefit of self-inspection, the process must extend beyond hazards that pose an immediate risk of injury. The goal is to identify and correct any condition or practice that interferes with the efficient use of time, materials, equipment, or personnel. Effective inspections consider work methods, employee behavior, facility layout, maintenance practices, critical operations, and the materials used. Every part of the system that contributes to productivity and profit should be inspected on a planned basis to detect hazards and correct them before they result in an unplanned event.

Each company should conduct regular self-inspections. Experienced workers can play a key role in this process by following these guidelines:

- Follow a company policy of planned inspections covering all operations, methods, work areas, and equipment.
- Assign responsibility, authority, and accountability for administering and operating the inspection program.
- Develop inspection procedures that outline specific duties for supervisors and others involved in hazard identification and correction.
- Establish clear lines of authority and communication for hazard correction and maintain appropriate recordkeeping documents.
- Provide training on how to plan and conduct inspections effectively.

The progress and value of the inspection program can be measured by tracking changes in the following areas before and after implementation:

- Lost time due to injuries
- Property damage to equipment, tools, or materials
- Productivity levels
- Quality improvements and reduction in callbacks
- Equipment repairs and breakdowns
- Employee morale
- Overall operating costs
- Profit margin
- Increased business opportunities resulting from a proactive safety program
- Customer satisfaction ratings

To conduct effective inspections, the following points should be considered:

- Know what you are looking for. The purpose of planned inspections is to identify and correct hazards before they result in an unplanned interruption or injury.
- Review past accident records to understand where and how injuries have occurred.
- Review previous inspection reports to identify recurring issues or unresolved problems.
- Be familiar with company policies and procedures so you can recognize when work is not being performed correctly.
- Know the company's rules and performance standards for employee behavior.
- Develop a personal checklist of what to look for, where to look, and when inspections should occur.
- Review maintenance work orders to identify operations or equipment that require more frequent observation due to breakdowns or other issues.

General Workplace Environmental Concerns

The physical environment of the workplace plays a critical role in preventing accidents and injuries. This is especially true for door technicians, whose work environment changes with each installation and service call. The following areas should be carefully evaluated during inspections to help ensure a safe and efficient workplace:

- **Floor space and storage:** Materials should be stored in areas that do not encroach on aisles or designated workspaces. Aisles must be wide enough to allow safe movement of equipment and vehicles. Storage racks and shelving must be structurally sound and capable of supporting their maximum intended loads. Load capacities for elevated floors and storage systems should be clearly posted, and storage areas should be clearly marked with their intended use and rules of conduct.
- **Floor surfaces:** Floors must be designed and maintained to safely support expected loads. They should be kept in good repair to prevent slip, trip, and fall hazards, as well as hazards to equipment and vehicles. Good housekeeping must be maintained at all times.
- **Stairs and steps:** Treads should be of adequate width and depth, with slip resistant surfaces. Proper handrails must be installed and maintained.
- **Ladders:** Ladders must be appropriate for the task and maintained in safe working condition.
- **Electrical safety:** The facility should be inspected for electrical shock hazards, proper grounding of permanent and temporary power sources, and adequate safeguarding of electrical components.
- **Housekeeping:** Overall housekeeping should remain a constant priority. Sufficient time should be allotted each day to clean up and remove unnecessary debris and waste.

- **Material handling:** Material handling equipment and work practices should be monitored and regularly inspected to prevent unnecessary handling, equipment damage, or unsafe conditions.
- **Traffic control:** Vehicle and pedestrian traffic patterns should be evaluated to ensure safe and efficient movement throughout the facility.
- **Seasonal considerations:** Weather related hazards, such as ice, snow, wind, and rain, should be taken into account when evaluating the premises, equipment, and work areas.

- Machine guarding (maintained in safe condition)
- Personal fall arrest systems and related fall-protection equipment (inspection before each use)
- Aerial lifts (inspection before use)
- Welding, cutting, and burning equipment (inspection before use)
- Personal protective equipment (inspection before use; employer must ensure serviceability)
- Safety equipment such as eyewash stations and emergency showers
- Emergency exits and exit routes (kept clear and maintained)
- Housekeeping conditions required to prevent slip, trip, and fire hazards

Required and Recommended Inspections

Regular inspections are a critical part of maintaining a safe, compliant, and efficient workplace. Some inspections are explicitly required by OSHA, while others are strongly recommended best practices that support hazard control, reduce liability, and improve overall operational performance. Understanding the difference, and implementing both, is essential for a comprehensive safety and health program.

OSHA mandates inspections for certain equipment, procedures, and work practices. These inspections must be performed at the intervals specified in the applicable standard, and documentation must be maintained as required. OSHA required inspections include:

- Temporary and permanent firefighting equipment and emergency alarm systems
- Cords, cord-and-plug-connected tools, and portable electrical equipment (inspection before use)
- Operational and safety controls on powered industrial trucks (daily or before each shift)
- Fork trucks and other powered industrial trucks
- Annual inspection of the Lockout/Tagout (LOTO) procedure
- Portable and fixed ladders (inspection before use)

These inspections are required because they directly affect employee safety and are tied to specific OSHA standards.

In addition to OSHA mandated inspections, employers should conduct regular inspections of other workplace conditions and equipment that may not be explicitly required by OSHA but are essential for controlling hazards, reducing liability, and maintaining operational efficiency.



Recommended inspections include:

- Operational and safety controls on vehicles not classified as powered industrial trucks
- Lift-operations equipment such as hoists, jacks, and rigging components
- Emergency evacuation procedures and employee response actions
- General material handling equipment

- Overall housekeeping beyond OSHA's minimum requirements
- Traffic control systems and pedestrian/vehicle flow
- Seasonal or weather related hazards affecting the premises or equipment

These inspections help identify unsafe conditions early, prevent equipment failures, reduce downtime, and support a proactive safety culture.

A strong inspection program blends OSHA required and recommended inspections into a single, organized system. Doing so:

- Reduces the likelihood of injuries and equipment damage
- Improves productivity and operational efficiency
- Minimizes liability exposure and regulatory risk
- Supports a culture of safety and professionalism
- Ensures hazards are identified and corrected before they cause harm
- By incorporating both required and recommended inspections into your safety program, your organization can maintain compliance, protect employees, and operate more effectively.

Field Operations Risk Management

Effective field operations require a systematic approach to identifying, controlling, and communicating hazards before work begins. Access systems installation and service work involves driving, lifting, material handling, and exposure to dynamic job site conditions. This section covers the core risk management practices expected of all field personnel.

Vehicle Safety and Driver Training

Driver Qualification and Training: All employees who operate company vehicles must hold a valid driver's license appropriate

for the vehicle class. They should complete company approved driver safety training and demonstrate understanding of defensive driving principles. It's important they maintain a clean driving record consistent with company policy. Employees should also receive training on the following topics:

- Pre-trip inspections
- Safe following distances
- Backing and blind spot awareness
- Weather related driving adjustments
- Load securement and weight distribution
- Emergency procedures (breakdowns, collisions, roadside hazards)

Pre-Trip and Post-Trip Inspections:

Technicians must inspect their vehicle at the start and end of each shift, verifying:

- Tire condition and pressure.
- Lights, signals, and mirrors.
- Brakes and steering.
- Fluid levels.
- Secure storage of tools, chemicals, and materials.
- Proper functioning of backup cameras or alarms.

Any defect must be reported immediately and the vehicle removed from service if unsafe.

Safe Driving Expectations: Employees who operate company vehicles must follow these safe driving expectations:

- Obey all traffic laws and posted speed limits.
- Avoid distracted driving (no texting, eating, or device use while moving).
- Use seat belts at all times.
- Maintain safe distances from other vehicles.
- Use spotters when backing in tight areas.
- Park in well-lit, stable areas away from overhead hazards.

Safe Lifting and Material Handling Procedures

Garage door and gate components can be heavy, awkward, or unbalanced. Improper lifting is a common cause of injuries in the industry.

Employees should follow these recommended lifting principles:

- Assess the load before lifting.
- Keep the load close to the body.
- Bend at the knees and not the waist.
- Lift with the legs and not the back.
- Avoid twisting while carrying heavy loads.
- Use team lifts for awkward or heavy items.

Use mechanical assistance whenever possible, such as forklifts, dollies, carts, hoists, etc. If a load exceeds safe lifting limits or requires awkward positioning, a second technician must assist.

Material handling in service vehicles requires special attention. Store heavy items low and centered, and secure all materials to prevent shifting during transit. Use proper tie-downs for long or oversized components. Keep service van pathways clear to avoid trip hazards.

Site-Specific Hazard Assessments

Garage environments often contain customer-provided hazards outside of a door company's control. Field risks may be encountered from things like stored flammables, poor ventilation, cluttered work areas, unstable shelving, improperly installed electrical outlets, etc.

Before beginning work, technicians must conduct a **Job Safety Analysis (JSA)** to identify and control hazards unique to the jobsite.

Technicians should begin with a pre-work walkthrough by inspecting the jobsite to evaluate the following risks:

- Ground conditions (ice, mud, uneven surfaces).
- Overhead hazards (low beams, exposed wiring, stored materials).
- Customer vehicles, equipment, or pedestrian traffic.
- Confined spaces or restricted access areas.
- Lighting and visibility.
- Presence of chemicals, dust, or fumes.
- Wildlife or pets that may interfere with work.

Technicians must request that hazards be corrected or adjust work methods to maintain safety. Depending on the hazards identified, it may be necessary for a technician to use control measures to limit hazards. These control measures should be specific to the hazards identified. Some examples include:

- Barricading the work area
- Using wheel chocks
- Improving lighting
- Wearing additional PPE
- Adjusting lifting methods
- Relocating materials to a safer area

A JSA should be completed at the start of each job, when conditions change, and when performing non-routine tasks. Documentation ensures traceability and reinforces consistent hazard-recognition habits. Work should be delayed until hazards are mitigated.

Risk management is not a one-time step. Technicians must reassess hazards throughout the job. They should communicate changes amongst team members and stop work if conditions become unsafe. Report near-misses and incidents for continuous improvement.

Section Nine

OSHA Inspections

Preparing for an OSHA Inspection

One of the most important things to remember about OSHA inspections is that the time to prepare for them is not when they are knocking on the door of your facility or site. Preplanning is the key and educating key personnel on the procedural steps that will be followed is imperative.

Each organization should develop policies and procedures regarding OSHA inspections. These are necessary, as they are the basis for specific actions that can be taken to minimize the potential impact of the inspection.

Generally, OSHA has priorities in conducting inspections:

First are imminent danger situations. These are any situation where there is a high probability of immediate danger to the exposed employee(s) and there is also a distinct likelihood that a severe injury, illness or fatality will result from such exposure. Examples of these situations would be an unprotected excavation which is 10 feet deep and there are four employees down in the excavation, or having unqualified employees perform lockout/tagout, or having employees perform elevated work without appropriate fall protection, etc. Next are work-related fatalities and/or catastrophes.

All work-related fatalities are investigated by OSHA. A catastrophe is defined as any event that results in the hospitalization of three or more employees, anytime within 30 days of exposure. Any of these events must be reported to the nearest OSHA office within 8 hours of the employer's knowledge that such an event has occurred.

Complaints are the methodology OSHA has provided for employees to report unsafe

working conditions. Your employees should have firsthand knowledge of how to report such hazardous conditions, and their rights and responsibilities under the law. The federally mandated OSHA poster must be posted at all locations. However, companies with a genuine commitment to the well-being of employees are more likely to deal with reported hazards as they are identified.

Finally, there are *programmed inspections*. These inspections are the result of a random annual selection of organizations from within each Standard Industrial Classification Code over which OSHA has regulatory authority. These organizations are then scheduled for inspection in order that OSHA can evaluate the general state of that industry relative to compliance. This process is also used to gather statistical data in order to target high problem industries.

The Inspection

Your company policy should start with a designation of who will verify the credentials and identity of OSHA personnel. A designated person from within your organization should be responsible for calling the applicable regional office to verify the officer's identity.

As an employer, it is your right to request a warrant, and in fact, many firms have a standing policy to do so. This policy is not recommended. Demanding a warrant will likely deepen an inspector's interest in your facilities and workplaces. You are better off being prepared for an inspection through your company policies and procedures. And, the inspector will return with a warrant, and any hopes of demonstrating good faith on the part of the company, in the event citations are issued, will be severely compromised.

Inspection Procedures

It should be noted that in cases where there are multiple employers at a facility or site, such as during a construction project, the controlling contractor will usually be the point of contact by the OSHA inspector. A subcontractor has the right to be a part of the inspection or leave. However, the subcontractor does not have the right to remain on the worksite and refuse to be a party to the inspection. This determination should be a part of a company's policies and procedures, and addressed in the work contract.

Company representatives should be pre-designated and there should be alternates in case someone is absent. All affected employers and employee groups have the right of representation during the inspection process.

During an OSHA inspection, employees have the right to designate a representative to accompany the Compliance Safety and Health Officer (CSHO) during the walkaround portion of the inspection. Under OSHA's Walkaround Rule, employees may choose either a fellow employee or a qualified third-party representative, such as an individual with specialized safety knowledge, technical expertise, or language skills. OSHA clarified that third-party representatives do not need formal credentials, but the CSHO must determine that their presence is reasonably necessary to support an effective and thorough inspection.

Employers must allow the selected representative to participate unless their involvement would compromise safety, disrupt operations, or unreasonably impede the inspection. Employers may still maintain control over site-specific safety requirements, trade-secret areas, and escort procedures, provided these controls do not interfere with OSHA's ability to conduct the inspection.

This rule ensures that workers can involve individuals who can help identify hazards, communicate effectively with inspectors, or provide relevant expertise during the inspection process.

The first step in the inspection process is the *opening conference*. At this time, the inspecting officers are to explain the reasons why your organization was selected for an inspection. If this was due to an employee complaint, you should receive a copy of said complaints, with the name of the submitting employee omitted.

The OSHA official should also explain the purpose and scope of the inspection. While the purposes could vary significantly, there are two standard possibilities relative to the scope of the inspection. These are: *limited scope* inspections, which are limited to specific areas or concerns, and *full scope* inspections, which can involve all aspects of the workplace.

Next, inspectors will explain which OSHA standards apply to your scope of work, and your rights and responsibilities. This is the time to ask questions about the process that will be followed during the inspection.

Following the opening conference, there will be an administrative review, during which the inspectors will review requested documentation, programs, and policies that are required to be in place. They may also look into other areas where specific documentation, programs, and policies are required. Normally, if there is a need to examine other records or documents, they will ask for them prior to performing the field level inspection.

Requests for additional documentation are likely the result of deficiencies identified during the inspection.

After the Administrative Review, the inspector will either choose to end the inspection, or continue on into the *field level inspection*. This is where the inspectors physically go into the workplace and inspect the facility or site for violations of applicable standards.

There are a few simple suggestions that will help to minimize the potential impact of the inspection, and maximize your chances of

successfully defending any citations which might be issued as a result of the inspection.

Take a picture of everything OSHA takes a picture of. One of the common practices of OSHA is the use of the video camera to ensure complete coverage of the workplace. This allows them to thoroughly review any and all violations present, even though they may not have noticed them at the time of the inspection. Any violation that is on the video can be cited, even though it may not have been covered in the closing conference.

Immediately correct minor violations. This will help to establish good faith, and it's an obvious simple step that can prevent an injury. For example, if they find a bad extension cord, tag it as deficient, and remove it from service immediately.

Be cooperative and proactive. Employers are required to answer all questions asked by the inspector. There is no purpose served by being uncooperative. And, while employers are under no obligation to bring deficiencies to the attention of an OSHA officer, it can be helpful to draw attention to the positive safety efforts of the company.

Be honest and direct employees to be truthful. It is important to emphasize to all personnel that if they are asked questions during an inspection they should answer truthfully to the best of their knowledge. However, they should also be directed to limit their responses to the things they know. Conjecture and speculation should be prohibited.

A common mistake made by management and supervisory personnel during an inspection is to feel as if they have the right to be present during an employee interview. This is not true, and many inspectors will conduct interviews individually. If an employee requests that their supervisor or manager be present during the interview, the inspector can decide to allow this to occur.

After completing the field level inspection, there will be a *closing conference*. At this

conference, the inspectors will explain any violations that were found and any proposed citations that may be issued. The inspectors do not decide on which citations will be issued, or what the level of fine will be relative to any particular citation. This is the job of the regional supervisor, the area director. This is why it is virtually impossible to say that a particular hazard will or won't be cited. The inspector is responsible only for gathering information related to any specific violations based on their interpretation of the applicable standards, and other enforcement guidelines that have been provided such as those in the Field Inspections Reference Manual (FIRM). If there are any further actions needed to complete the inspection, the OSHA official will explain their intentions. They will likely explain the employer's appellate rights within the system and how to contest any citations.

Post Inspection

There are activities that should be addressed after the inspection has been completed.

Assemble all of the documentation, film, and any other records that were developed during the inspection. These items should be assigned to the control of one individual to ensure that no essential information is lost or misplaced. Next, an assessment team should be assembled to evaluate the inspection and make decisions related to the organization's position on any issues in contention. Just prior to this team being assembled, some key personnel should develop a summary draft of the events during the inspection for use by the evaluation team.

The assessment team should concentrate on evaluating the violations that were covered during the closing conference, and any other deficiencies that are known to exist but may not have been discovered during the inspection. The team should decide what corrective actions are needed to bring these items into compliance and appropriate responsibilities should be assigned for the completion of these tasks. Document the

evaluation process and corrective actions, along with a schedule for completion of the corrective actions.

The main issues the team should address are:

- Were the proposed citations applied properly and was the organization in fact in violation of the applicable standards?
- Where does the organization stand relative to the three major reduction factors, which are company size, company history, and good faith?
- Which citations will be contested?
- Was the violation the result of outside or subcontractor activity?

In regard to reduction factors, OSHA is required to evaluate each citation for reduction of the proposed fine in regard to these three factors. In each category an organization can receive up to a certain percentage of reduction of the fine based on quantitative or qualitative criteria. Company size is based on the total number of employees, company history is based on your last three years of citation history, and good faith is based on a company's overall attitude toward compliance, and whether or not you have done diligence relative to training, recordkeeping, program and policy development, and other criteria. A show of good faith and an honest attempt to due diligence will go a long way toward relieving the potentially devastating results of citations.

Generally, it is not necessary to involve an attorney until after the informal conference, or formal hearing. If the employer is aware of how the system works, they are much more likely to be successful in their attempts to get the fine reduced or vacated on their own accord without an attorney or other outside party acting on their behalf.

Contesting Citations

There are basically two means by which an organization can attempt to reach a resolution

with OSHA relative to any citations issued. The first is an informal conference that should be requested by your organization at the time the citations are received. OSHA should give you an appointment within 15 days, or provide for an automatic extension of the time period pending the outcome of the informal conference. This allows you to access the formal system, should you not be able to arrive at an agreed upon resolution during the informal conference.

This process involves key personnel from your organization going to the nearest OSHA area office to meet with the area director in an attempt to resolve the citations issued. If an acceptable resolution cannot be reached, employers have the right to a formal hearing with an administrative law judge.

At the formal hearing, you will be given an opportunity to present your side of the issue and OSHA will present their side. If you should disagree with this ruling, there are additional avenues of appeal, which should be discussed with the company's legal counsel.



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