

Employee Safety

Training ADVISOR

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Job hazard analysis

JHAs help the hazards stand out

Take time out for Fire
Prevention Week

OSHA revises NEP, updates
IERP for COVID-19

Extreme heat prompts
rules in OR, WA

Information and resources to help your employees work safely


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MESSAGE FROM THE EDITOR

JHAs help reduce, eliminate workplace hazards

More than 5,300 workers were killed at work in 2019, and over 2 million suffered nonfatal injuries and illnesses. You can help prevent workplace injuries and illnesses by looking at your workplace operations, establishing proper job procedures, and ensuring that all employees are trained properly.

One of the best ways to determine and establish proper work procedures is to conduct a job hazard analysis (JHA), which is just one component of the larger commitment of a safety and health program. A JHA is a technique that focuses on job tasks as a way to identify hazards before they occur. Using the JHA process to break up a job into its smaller tasks helps you get a clearer picture of how to make a job safer. Once you identify hazards, you can take steps to eliminate or reduce them to an acceptable risk level.



While a JHA can be conducted on many jobs in your workplace, priority should go to the following types of jobs:

- Jobs with the highest injury or illness rates;
- Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents;
- Jobs in which one simple human error could lead to a severe accident or injury;
- Jobs that are new to your operation or have undergone changes in processes and procedures; and
- Jobs complex enough to require written instructions.

This month's Training Blueprint has an outline you can use to provide employees with information and training on the use of job hazard analyses in your workplace and how they can be involved. The Employee Handout and Quiz can be used to reinforce learning. ♦



Rachel Krubsack

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TRAINING BLUEPRINT — JOB HAZARD ANALYSIS

JHAs help the hazards stand out

To discover the overall risks in a task, you have to take a close look at how the worker interacts with the job, the hazards, and the control measures. A technique called the job hazard analysis (JHA) breaks the job down into its steps so you can identify the hazardous parts and implement effective controls.

Overview

There's no general OSHA standard requiring employers to conduct JHAs, but OSHA does expect the employer to take whatever steps are necessary to ensure worker safety. Using the JHA process to break up a job into its smaller tasks helps you get a clearer picture of how to make a job safer.

Specific training elements

1. Introduce some of the benefits of JHAs.

The JHA process can result in:

- The control or elimination of hazards before they cause injuries;
- Increased job comprehension for supervisors and workers;
- Improved employee involvement, commitment, and morale; and
- Better planning for changes in operations and equipment.



2. Explain how to effectively focus JHA efforts to get the most benefit.

With dozens of different jobs in the workplace, the number of JHAs you could conduct may seem overwhelming. It's frightening to think an injury happened because the JHA for the job was still on the to-do list. Consider prioritizing jobs that:

- have the highest injury or illness rates.

- are inherently dangerous, such as those that require a permit program. One simple human error or mechanical malfunction could potentially cause severe or disabling injuries or illnesses. These jobs should be a priority even if there is no history of previous incidents or if they're performed infrequently.
- are new or have changed.
- generate employee complaints.
- are complex enough to require written instructions.

TRAINER'S NOTE: Offer suggestions for jobs that are candidates for JHAs and ask trainees to prioritize them.

3. Describe how a JHA is conducted.

Once a job has been selected for a JHA, the next step is to observe the job and to identify its steps or tasks. Remember, the JHA evaluates the job itself, not the employee's job performance.

The JHA process then analyzes each step of a job to discover the hazards. Questions to ask include:

- What can go wrong?
- What are the consequences?
- How could they happen?
- What are other contributing factors?
- How likely is it that the hazards will occur?

Once you've identified the hazards, the JHA process considers how the hazards can be eliminated, reduced, or otherwise controlled. The most effective controls are engineering controls that physically change a machine or work environment to prevent employee exposure to the hazard. If this isn't feasible, you may want to implement administrative controls that involve changing how employees do the job.

4. Review the employees' roles in the JHA process.

Employee involvement is key to the success of a JHA program. Employees understand the job, so they can help ensure a thorough, quality analysis. Include the worker who does the job should be included in all phases of the JHA from reviewing the job steps to discussing hazards and recommending solutions.

JHAs often lead to new or modified job procedures. Employees who do the job must know what they are required to do and the reasons for the changes.

TRAINER'S NOTE: Identify employees who have participated in JHAs.

5. Outline the forms used to conduct and record JHAs.

The JHA process typically uses written forms to record observations, outline the hazard analysis, and recommended control measures. There is no one standard format, but the form should provide space to write down the job's title and location, the name of the person doing the JHA, the date, the task description, the hazards, and the recommendations.

TRAINER'S NOTE: Provide blank forms for your trainees.

6. Explain how to break a job up into its steps.

JHAs depend on breaking up a job into its steps. The person conducting the JHA watches the employee perform the job and lists each of the job's basic steps. The employee doing the job should review the job steps to make sure nothing has been missed. A good way to have a record to help with future analysis is to take photos and videos of the worker performing the job.



TRAINER'S NOTE: Describe a job in your workplace and ask the trainees to break the job up into smaller tasks. Record these on a blank JHA form.

7. Discuss how to identify hazards.

A big part of the JHA is to identify the hazards in each step of the job.

Here's an example of a hazard scenario: In the metal shop (environment), while changing a machine's tool (trigger), a worker's hand comes close to a rotating pulley on another machine (exposure). If the employee's hand was pulled into the machine, it would likely fracture his fingers (consequences).

The hazard scenarios describe:

- Where it is happening (environment),
- What causes the hazard (trigger),
- Who or what it is happening to (exposure),
- The outcome that could occur should it happen (consequence), and
- Any other contributing factors.

How likely is it that the hazard will occur? This determination requires some judgment. If there have been "near misses" or injuries, the likelihood of a recurrence would be considered high. If the pulley is exposed and easily accessible, that also is a consideration. In the example, the likelihood that the hazard will occur is high

because there is no guard to prevent contact with the pulley, and the operation is performed while the machine is running.

TRAINER'S NOTE: Have trainees suggest hazard scenarios based on the job steps in your previous example. Record the hazards on the JHA form.

8. Explain how hazard controls are recommended.

Hazard controls considered in the following order:

- Engineering controls,
- Administrative and work practice controls, and
- Personal protective equipment (PPE).

Engineering controls eliminate or minimize the hazards through such actions as changing the equipment or process to remove the hazard, substituting materials to lessen the hazard, or enclosing (guarding) the hazard.

Administrative and work practice controls include such actions as establishing safe procedures, limiting exposure times, adjusting staffing levels, providing warning signs or alarms, and conducting training.

The last control, using PPE (such as respirators, hearing protection, protective clothing, goggles, and hard hats), is acceptable as a control method when engineering controls are not feasible or do not totally eliminate the hazard, or when administrative and safe work practices do not provide sufficient additional protection.

TRAINER'S NOTE: Let the trainees decide on hazard controls for your example. Record the recommendations on the JHA form.

9. Summarize the need to follow recommendations and to periodically review JHAs.

Following the recommendations will make the job safer, even if not every recommendation can be implemented right away. Sometimes the recommendations have to be prioritized for when they can be put into place.

It's also a good practice to periodically review JHAs to be sure they remain accurate and effective. Even if the job or the person doing it hasn't changed, a review might uncover hazards that were not identified in the initial analysis. It's especially important to review the JHA if an illness or injury occurs. ♦



Key to remember: Conducting a job hazard analysis can help identify and reduce or eliminate hazards, which benefits both employees and employers.



Employee Handout — The JHA program needs YOU

No one likes someone looking over their shoulder as they work, but sometimes being observed is a good thing.

The job hazard analysis (JHA) process helps to reduce workplace injuries and illnesses by:

- Taking a very close look at the steps involved in the job,
- Identifying the hazards in each job step, and
- Recommending ways to eliminate or control the hazards.

Count the steps

Breaking up a job into smaller steps may not be as easy as it sounds. It's important that you, as the person who does the job, provide detailed information on how the job is done. Each step should be focused on a single action that represents a part of the job.

Identify the hazards

Hazard identification is key to a JHA. The following are examples of some of the hazards you may find if you're helping to conduct a JHA:

- Noise levels that can cause hearing loss or make it difficult to hear warnings or instructions;
- Materials that can strike someone (falling objects, flying chips, moving machine parts, etc.);
- Fall hazards that can cause someone to fall from a height or fall to the same level (slippery surfaces, tripping hazards, exposed ledges, etc.);
- Direct contact with hazardous chemicals or something toxic in the air;
- Electrical shock or electrocution hazards from contact with exposed energized parts (such as when a metal ladder may touch a power line);



- Ergonomic conditions that cause strains, sprains, or other problems due to overexertion, awkward positions, or repetitive motion; or
- Fire hazards from hot work, flammable liquids, electrical hazards, etc.

Recommend solutions



Engineering controls use methods such as changing the equipment, substituting materials, or enclosing the operation to eliminate or minimize the hazards.



Administrative and work practice controls include changing procedures, modifying schedules, posting warnings, and providing training.



Personal protective equipment (PPE) may also be necessary to control exposures to a hazard. Examples of PPE include respirators, hearing protection, protective clothing, goggles, and hard hats. ♦

Quiz — The JHA program needs YOU

For each question, show if you think the statement is **True** or **False**.

- | | | |
|--|------|-------|
| 1. A JHA helps determine if a worker is being productive. | True | False |
| 2. Breaking up a job into smaller steps helps identify the hazards. | True | False |
| 3. Part of a JHA is recommending ways to eliminate hazards. | True | False |
| 4. Chemical exposures and electrocution risks are hazards identified by a JHA. | True | False |
| 5. Changing procedures is an engineering control. | True | False |

NAME: _____

DATE: _____



Take time out for Fire Prevention Week

The week of October 3-9, 2021, is a great time for some fire safety training. Whether you talk with your employees about home or workplace fire safety, everyone can benefit from a reminder of the devastating hazards of a fire emergency.

Sponsored by the National Fire Protection Association (NFPA), this year's Fire Prevention Week is themed "Learn the Sounds of Fire Safety!" The campaign's goal is to educate everyone about the different sounds smoke and carbon monoxide alarms make and what actions to take.

Your instruction can include:

- Holding classes at the trainees' designated head count locations, and having follow-up training with any employees who can't find you;
- Displaying maps of your facility showing the evacuation routes, and emphasizing that everyone should always be aware of at least two exit routes from wherever they are in the building;

- Reminding workers not to use elevators to evacuate, and reviewing the locations of any applicable areas of refuge;
- Practicing procedures you have in place to help persons with disabilities evacuate safely;
- Identifying workers who serve as evacuation wardens and conducting refresher training for them;
- Conducting fire drills on each shift and placing fire wardens at some exits to indicate they're blocked so workers must use alternate routes;
- Emphasizing how and when workers are to report a fire and demonstrating how the fire alarm sounds; and
- Explaining your policy for portable fire extinguisher use and holding separate classes for employees who are allowed to use them. ♦



OSHA revises NEP, updates IERP for COVID-19

Following an evaluation of inspection and illness data, OSHA has revised the list of targeted industries in its National Emphasis Program (NEP) for COVID-19 and removed the list of Secondary Target Industries.

OSHA launched the original NEP on March 12, 2021, to focus on companies that put the greatest number of workers at serious risk of contracting COVID-19, and on employers that retaliate against employees who complain about unsafe or unhealthful conditions or exercise other rights under the Occupational Safety and Health Act.



Inspections in non-healthcare establishments will follow procedures outlined in OSHA's Updated Interim Enforcement Response Plan (IERP) published July 7, 2021. The updated IERP replaces the memorandum dated March 12, 2021. Updates include:

- Enforcing protections for workers in non-healthcare industries who are unvaccinated or not fully vaccinated;

- Where respirator supplies and services are readily available, OSHA will stop exercising enforcement discretion for temporary noncompliance with the Respiratory Protection standard based on employers' claims of supply shortages due to the COVID-19 pandemic;
- OSHA will no longer exercise enforcement discretion for the same requirements in other health standards, where full compliance may have been difficult for some non-healthcare employers due to the COVID-19 pandemic;
- Updated instructions and guidance for OSHA area offices and compliance officers for handling COVID-19-related complaints, referrals, and severe illness reports; and
- Ensuring workers are protected from retaliation.

OSHA says the IERP is intended to identify exposures to COVID-19 hazards, ensure appropriate control measures are implemented, and address violations of OSHA standards (other than the Emergency Temporary Standard) and the General Duty Clause. The updated IERP will remain in effect until further notice and is intended to be time-limited to the current COVID-19 public health crisis. ♦

Extreme heat prompts rules in Oregon and Washington

Extreme heat has prompted Oregon to adopt an emergency rule and Washington State to file an emergency rule, strengthening heat protection requirements for exposed workers.

Oregon's rule took effect July 8 and stays in place for 180 days. The requirements expand worker access to shade and cool water and include regular cool-down breaks, training, communication, emergency planning, and other measures. The temporary rule applies to any workplace — outdoors and indoors — where heat dangers are caused by the weather. Oregon continues to work on adopting a permanent heat stress prevention rule with an eye to adopting it this fall.

Washington State's rule took effect July 13 and is in addition to existing rules that are in place annually from May through the end of September. The emergency Outdoor Heat Exposure rule clarifies proactive steps that employers must take to prevent outdoor workers, including those in agriculture, construction, and other outdoor industries, from suffering heat-related illness. The state's Department of Labor & Industries will file an official notification for permanent rulemaking. ♦



Answers to quiz on page 5:

1. False; 2. True; 3. True; 4. True; 5. False



Next Month's Topic: Safe lifting

Injuries caused by overexertion during manual lifting activities continue to be a leading occupational health and safety issue. Although no approach totally eliminates injuries caused by lifting, an effective training program, along with ergonomically designed work tasks and equipment, will help to prevent injuries.

Expert Help: Questions of the Month

Question: Does OSHA require employers to conduct a job hazard analysis?

Answer: No, OSHA does not require a job hazard analysis (JHA) in the traditional sense of the term. However, OSHA does view them as a best practice, and they can be a part of your overall worksite analysis.



Question: What jobs are appropriate for a job hazard analysis?

Answer: While a job hazard analysis can be conducted on many types of jobs, priority should go to the following types:

- Jobs with the highest injury or illness rates,
- Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents,
- Jobs in which one simple human error could lead to a severe accident or injury,
- Jobs that are new to your operation or have undergone changes in processes and procedures, and
- Jobs complex enough to require written instructions. ♦

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Policyholders with as
near perfect protection,
as near perfect service
as is humanly possible,
and to do so at the
lowest possible cost.”***

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