



NFFE Forest Service Council
Safety Committee Update – Working Alone
 June 4, 2015



Please share the following with your Bargaining Unit Employees (BUEs).

Local Union Officials:

Topic - Working Alone

Prepared by Forest Service Council (FSC) Safety Committee Chair Randy Meyer

Issue - Occasionally I'm asked whether the Forest Service (FS) has or should have a Work Alone Policy to protect employees in the field and those that may work isolated jobs whether in an office, shop or work center. By working alone I mean performing a job, in isolation, without the prospect of being able to receive immediate help in case of injury, illness or threat. This briefing attempts to provide some clarity.

Background - Within 5 USC Chapter 71, section 7106(a)(2)(B) (http://www.fra.gov/statute_7106) management has the right to assign work, to make determinations with respect to contracting out, and to determine the personnel by which agency operations shall be conducted. Management's right must work within the confines of FS policy, primarily the Health and Safety Handbook - FSH 6709.11 - <http://www.fs.fed.us/im/directives/fsh/6709.11/FSH6709.pdf> and the Occupational Safety & Health Administration (OSHA) Regulations/Standards found at 29 CFR [1910](#), [1926](#), [1960](#) and [OSH Act of 1970, SEC. 5. Duties](#).

Forest Service Handbook (FSH) 6709.11:

Chapter 10 section 11.2 Back Country Travel states to "Never travel or work alone in isolated areas without preparing and discussing a detailed JHA that includes emergency evacuation procedures and a communication plan (sections 11.21.(1) (g)/21.14) and reminds that terrain and weather may make aid and rescue an impossibility for several days. A minor accident can have serious consequences due to time and exposure. Thoroughly review section 11.21 for detailed Personal Protective Equipment (PPE) information.

Chapter 20 section 21.14 outlines the requirements of line officers, supervisors and employees to build/approve a comprehensive Job Hazard Analysis (JHA) that evaluates and mitigates known hazards to the greatest extent possible. **"If there is a significant potential hazard to a lone worker, assign additional personnel."** Remember the importance of conducting and documenting tailgate sessions tied to the specific project/task safety/work alone concerns and requirements.

Chapter 20 section 21.2 outlines the first-aid training/cardiopulmonary resuscitation (CPR)/first-aid supply minimum requirements;

21.21 "Each field crew shall have at least one person currently certified by a nationally recognized organization to render first aid and perform CPR (29 CFR 1910.151, 1910.1030, and 1926.50)."

21.22 "Ensure that first aid/body fluid barrier kits (also referred to as a first aid kit) are available at each work site, whether in the field or office."

21.22(2). Ensure that a competent person checks first aid supplies and equipment at regular intervals and restocks as needed, paying particular attention to those items with expiration dates.

21.22(3). Select first aid supplies for the worksite based on the remoteness from medical facilities and anticipated types of injuries that can occur. For sites with chain saw operations, as a minimum, supply Type IV (belt) first aid kit(s).

Chapter 50 section 51 outlines procedures for management and employees to share the responsibility to provide for safety in the work place.

51.1(2) Each unit shall develop a site-specific Job Hazard Analysis (JHA), Form FS-6700-7, or equivalent, for all facilities and tasks that involve employees' working alone or with the public. Ensure that the JHA is reviewed by law enforcement personnel and/or by local and Federal law enforcement agencies. Minimum components of the plan include:

- a. Check-out/check-in (CO-CI) systems (such as sign out board), which shall be located and utilized for internal use only.
- c. Provisions for the safety of employees working alone in public contact centers and facilities.

51.1(3) Field units shall maintain current field emergency evacuation plans, which include the following pertinent information:

- a. Field evacuation procedures.
- b. Accident incident reporting procedures and guidelines.
- c. Emergency telephone numbers.

Occupational Safety Health Administration (OSHA)

OSHA does not have a specific requirement to develop and implement a work alone policy. But failure to have a policy could be considered a General Duty OSHA requirement and has been cited by OSHA in the past under the General Duty statute.

Under the OSH Act, employers are responsible for providing a safe and healthful workplace. OSHA's mission is to assure safe and healthful workplaces by setting and enforcing standards, and by providing training, outreach, education and assistance. Employers must comply with all applicable OSHA standards. Employers must also comply with the General Duty Clause of the OSH Act, which requires employers to keep their workplace free of serious recognized hazards.

In all general industry work situations, the medical services and first aid requirements set forth in paragraph[s] 1910.151[(b) and 1910.151(c)] apply. Title 29 CFR 1910.151(b) states: "In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available." When an employee has no immediate means to summon medical aid or assistance while working alone and this has been an identified hazard the OSH Act General Duty Clause could apply.

Key Points:

Management's right must work within the confines of FS policy and the Occupational Safety & Health Administration (OSHA) Regulations/Standards.

FS policy located within the Health and Safety Handbook - [FSH 6709.11](#) - Chapters 10, 20 and 50 contain the guidance on JHAs, first-aid training/first-aid supplies, Cardiopulmonary Resuscitation (CPR) and Check-Out Check-in (CO-CI).

Although OSHA does not have a specific requirement for a work alone policy guidance under the [OSH Act General Duty Clause](#) could apply.

General Duty Clause Citation Criteria.

- There must be a hazard.
- The hazard must be recognized.
- The hazard causes or is likely to cause serious harm or death.
- The hazard must be correctable.

It may be acceptable for employees to work alone (unless OSHA prohibits it). Many times these employees are not really alone. For example, our employees work among the public most of the day, or usually have communication devices in the event of an emergency, a reasonable protection should something go wrong in most instances. Plan Ahead and return home.

Please Stay Safe,

/s/ Randy Meyer

RANDY MEYER, Chair
 NFFE FSC Safety Committee

~ The End ~

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