



# WRITTEN SAFETY PLANS:

Your Top Questions Answered



# WHY KEEP WRITTEN SAFETY PLANS?

Federal OSHA requires written safety plans for a wide range of general industry and construction standards. While many of these standards may not directly apply to your operations, you should still be aware of them. Several states require employers to develop written safety plans, with some insurance carriers even going so far as to offer premium discounts as an incentive for doing so.

Written safety plans are the cornerstone of an effective safety and health program.

REQUIRED WRITTEN SAFETY PLANS FOR GENERAL INDUSTRY	29 CFR:
Assured equipment grounding conductor program	1910.304
Chemical hygiene plan (for laboratories)	1910.1450
Commercial diving operations safety practices manual	1910.420
Dispute resolution procedures for mechanical power presses	1910.217 App. C
Emergency action plan (EAP)	1910.38
Emergency action plan (powered platforms for building maintenance)	1910.66
Energy control procedure (lockout/tagout)	1910.147, .269
Exposure control plan (for bloodborne pathogens)	1910.1030
Fall protection plan (for residential roof work)	1910.28
Fire prevention plan (FPP)	1910.39
Fire brigade organizational statement	1910.156
Grain handling facility housekeeping program	1910.272
Hazard assessment (for personal protective equipment)	1910.132
Hazard communication program	1910.1200
HAZWOPER emergency response plan	1910.120
HAZWOPER safety and health program	1910.120
HIV/HBV research lab and production facility biosafety manual and entry and exit policies and procedures	1910.1030
Hot tap operation procedures	1910.147
Permit-required confined space program	1910.146
Procedures for work on/near exposed de-energized parts	1910.333
Process safety management (PSM) program	1910.119
Respiratory protection program	1910.134
Rim manual (or charts)	1910.177
Acrylonitrile compliance program, plus emergency situations plan	1910.1045
Asbestos compliance program	1910.1001
Benzene compliance program	1910.1028
Beryllium exposure control plan	1910.1024
1,3-butadiene compliance plan, plus exposure goal program, emergency situations plan	1910.1051
Cadmium compliance program, plus emergency situations plan	1910.1027
Coke oven emissions compliance program, plus inspection and cleaning, charging, emissions control, and maintenance and repair procedures	1910.1029
Cotton dust compliance program, plus dust minimization work practices program	1910.1043
1,2-dibromo-3-chloropropane compliance program, plus emergency situations plan	1910.1044
Ethylene oxide compliance program	1910.1047
Formaldehyde corrective actions description	1910.1048
Inorganic arsenic compliance program, plus housekeeping and maintenance plan	1910.1018
Lead compliance program	1910.1025
Methylenedianiline compliance program, plus emergency situations plan	1910.1050
Respirable crystalline silica exposure control plan	1910.1053
Vinyl chloride compliance program, plus emergency situations operational plan	1910.1017

Having a plan in writing also serves several purposes beyond meeting regulatory requirements. While not necessarily required in all instances, written safety plans direct your health and safety efforts, define individual roles and responsibilities, and provide your company and employees with measurable goals and clear expectations. In addition to helping ensure compliance, effective written plans can also help lower the direct and indirect costs of injuries, illnesses, and property damage.

REQUIRED WRITTEN SAFETY PLANS FOR CONSTRUCTION	29 CFR:
Assured equipment grounding conductor program	1926.404
Emergency action plan (EAP)	1926.35
Fall protection plan	1926.501, .502, 1926 Subpart M App. E
Fire prevention plan (FPP) for methylenedianiline	1926.60, 1910.39
Hazard communication program	1926.59, 1910.1200
HAZWOPER emergency response plan	1926.65
HAZWOPER safety and health program	1926.65
Permit-required confined space program	1926.1203 - .1204
Process safety management (PSM) program	1926.64, 1910.119
Respiratory protection program	1926.103, 1910.134
Site-specific steel erection plan	1926.752, .757, 1926 Subpart R App. A
Acrylonitrile compliance program, plus emergency situations plan	1926.1145, 1910.1045
Benzene compliance program	1926.1128, 1910.1028
Beryllium exposure control plan	1926.1124
Cadmium compliance program, plus emergency situations plan	1926.1127
1,2-dibromo-3-chloropropane compliance program, plus emergency situations plan	1926.1144, 1910.1044
Ethylene oxide compliance program	1926.1147, 1910.1047
Formaldehyde corrective actions description	1926.1148, 1910.1048
Inorganic arsenic compliance program, plus housekeeping and maintenance plan	1926.1118, 1910.1018
Lead compliance program	1926.62
Methylenedianiline compliance program, plus emergency situations plan	1926.60
Respirable crystalline silica exposure control plan	1926.1153
Vinyl chloride compliance program, plus emergency situations operational plan	1926.1117, 1910.1017



## WRITTEN SAFETY PLANS

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## WRITTEN SAFETY PLAN FAQs

To assist you in building your own full-service safety program, our trusted team of in-house subject-matter experts have compiled the ten questions they're most frequently asked regarding written safety plans below.

### DOES OSHA REQUIRE WRITTEN SAFETY PLANS?

OSHA has over 35 written plan, program, procedure, or manual requirements throughout OSHA 29 CFR 1910 for general industry. Over 20 more are found in 29 CFR 1926 for construction. While that's a lot of written plans, it's unlikely that all of them apply to your establishment. You'll want to review the requirements one-by-one to see which ones apply.

### DO WRITTEN PLAN REQUIREMENTS STILL APPLY IF OUR ESTABLISHMENT HAS ONLY A FEW EMPLOYEES?

For most written safety plans it makes no difference how many employees your establishment has. However, the emergency action plan and the fire prevention plan each have a small employer exemption. If applicable, these two plans are required to be in writing for an establishment UNLESS that location only has 10 or fewer employees that work or congregate at the location at any given time. In that case, you may communicate your plans orally to employees. Those are the only two plans with that option. All other applicable plans are required to be in writing if you have one or more employees.

### WHAT IS THE DIFFERENCE BETWEEN A WRITTEN PLAN AND A WRITTEN PROGRAM?

Plans and programs both document your establishment's overall approach to protecting employees from a safety or health hazard. The words plan and program are often used interchangeably. OSHA calls for a written exposure control plan for bloodborne pathogens, but when it comes to communicating chemical hazards, the agency wants a written hazard communication program. You may also document procedures, which are step-by-step instructions for safely performing a task. OSHA has many requirements for procedures, but not all of them are required to be in writing.



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## MAY WE USE A PLAN TEMPLATE?

You can certainly use a template when writing your plan, but you must tailor your plan to your own site and its operations, employees, and hazards. If the plan has not been tailored to your site, it likely won't be effective.

## WHAT ARE SOME TIPS TO HELP AVOID PROBLEMS WITH WRITTEN PLANS?

- ✓ **Include required elements**—A written plan should contain all the elements OSHA requires. In most cases, OSHA provides at least some instruction on the written plan requirements. For example, 29 CFR 1910.134 lists nine required elements for the written respiratory protection program.
- ✓ **Do what you say**—If you go beyond the basic regulatory requirements, be sure that you follow through on any additional elements. You don't want to document something that your establishment is not actually carrying out in practice.
- ✓ **Leave room for discretion**—For instance, if a plan has a detailed inspection checklist, it may create the impression that your establishment will only follow that checklist. This can prevent the flexibility necessary to ensure a thorough inspection is conducted when other safety issues or concerns arise during a walkthrough.



# 5 IMPLEMENTATION ESSENTIALS

## 1 MAKE YOUR PLAN AVAILABLE

Your written plan will ultimately prove ineffective if it's not implemented throughout relevant areas of your company. Put simply, employees can't be expected to follow specific policies and procedures if they are unclear or inaccessible.

## 2 BUILD YOUR TRAINING AROUND YOUR PLAN

Incorporate relevant rules and procedures into your training so safety becomes second nature to employees.

## 3 GET MANAGEMENT BUY-IN

Your employees will be less inclined to follow a written safety plan if they notice their leaders aren't also doing so. Securing executive buy-in early not only ensures you have the necessary resources for implementation but allows management to lead by example.

## 4 ASSIGN RESPONSIBILITIES

Employees are often more receptive to written safety plans if they are able to assist in their development and implementation. Everyone affected by a plan should have some responsibility for certain elements of it, so you'll want to review your organizational structure when assigning specific duties.

## 5 DON'T EXPECT IMMEDIATE RESULTS

You may not get quick and dramatic results within days of implementing a written plan—and that's okay. It takes time for processes and procedures to become routine.



## J. J. KELLER SAFETY MANAGEMENT SUITE'S MOST POPULAR WRITTEN TEMPLATES INCLUDE:

- ✓ Accident Reporting and Investigation
- ✓ Aerial Lift Safety
- ✓ Bloodborne Pathogens Exposure Control
- ✓ Combustible Dust Safety
- ✓ Emergency Action
- ✓ Energy Control (Lockout/Tagout)
- ✓ Hazard Communication (HazCom)
- ✓ Permit-required Confined Space
- ✓ Respiratory Protection
- ✓ Temperature Extreme Management
- ✓ Toxic and Hazardous Substances Compliance
- ✓ And many more

### CAN WE USE JOB TITLES, INSTEAD OF NAMES, IN OUR PLANS?

When you have employee turnover, plans with names must be updated, but if you have job titles, updates may not always be needed. Most plan requirements do not require names, but instead mandate the designation of the responsible person. That could be the job title only, name only, or both. Names do have one benefit though—they may be easier for you and your employees to recognize. Regardless, always check the regulations to see what OSHA requires in a given plan.

### DO WRITTEN PLANS NEED TO BE TRANSLATED INTO LANGUAGES OTHER THAN ENGLISH?

While OSHA does not require it, translating plans is a good idea if you have employees who don't read English. In some cases, it may be critical, such as for lockout/tagout procedures. Your programs should be in a language all employees can understand and follow.

OSHA allows a written plan to be kept in either paper or electronic format, as long as it meets all other requirements of the standard in question.

### CAN WE KEEP WRITTEN PLANS ELECTRONICALLY?

Yes, OSHA allows a written plan to be kept in either paper or electronic format, as long as it meets all other requirements of the standard in question. Where the OSHA standard requires that the written plan be made available to employees, you must ensure that employees know how to access the document and that there are no barriers to employee access. If you keep plans electronically, consider how they will be made available to employees and to any OSHA inspector who knocks on your door. Printing a copy is usually acceptable for OSHA inspectors.

### IF OSHA DOES NOT REQUIRE A GIVEN PLAN, MAY WE SIMPLY COMMUNICATE IT ORALLY?

Potentially yes, but keep in mind that an industry consensus standard may call for written plans even if OSHA does not. For instance, federal OSHA requires lockout/tagout procedures to be in writing, but not the entire energy control

program. However, ANSI Z244.1, the consensus standard for lockout/tagout, does mandate a written program for hazardous energy control. Other benefits to putting non-required plans into writing include consistent and streamlined safety efforts, defined safety roles and responsibilities, lower injury and illness rates and costs, increased profit and competitiveness, and clear evidence of your commitment to safety.

## HOW OFTEN SHOULD WE REVIEW AND UPDATE OUR WRITTEN PLANS?

It's a good idea to review and update your written plans as often as necessary. Many regulations will call for updates as necessary. But some plans also require annual reviews and/or updates. For example, under the Bloodborne Pathogens Standard, the exposure control plan must be reviewed and updated at least annually, but also as necessary to include new or modified tasks and procedures.

## CONCLUSION

Written safety plans are the cornerstone of an effective safety and health program. Not only do they help reduce injuries and lower workers' compensation costs, but over time, they've also been shown to improve morale, boost productivity, and elevate a business's overall profitability.

You can count on J. J. Keller—the most trusted name in safety and regulatory compliance—to assist you in developing, implementing, and maintaining your written safety plans.

### BENEFITS TO PUTTING NON-REQUIRED PLANS INTO WRITING

- ✓ Consistent and streamlined safety efforts
- ✓ Defined safety roles and responsibilities
- ✓ Lower injury and illness rates
- ✓ Lower costs
- ✓ Increased profit and competitiveness
- ✓ Clear evidence of your commitment to safety



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## ABOUT THE AUTHOR

### TRICIA HODKIEWICZ, EDITOR J. J. KELLER & ASSOCIATES, INC.

Tricia Hodkiewicz has been an Editor on the Environmental, Safety, & Health (EH&S) Publishing Team for over 25 years, specializing in OSHA and EPA regulations. Her areas of expertise include written safety plans, signs/labels, HAZWOPER, hazard communication, bloodborne pathogens, oil spill prevention, and EPCRA. In addition to her editorial work on the [Compliance Focus](#) newsletter, [OSHA Compliance for General Industry manual](#), [Safety Signs Handbook for Managers and Supervisors](#), and the [OSHA Construction Safety Handbook](#), Ms. Hodkiewicz writes content for webcasts, online tools and training, videos, instructor guides, employee handbooks, posters, safety signs/labels, and whitepapers.

As technical advisor and contributing writer, she participated in the rollout of an employee training video program, “Bloodborne Pathogens: Safety in the Workplace,” which captured a Telly Award in the category of “training for corporate use.” Her feature articles have appeared in trade journals, including *Occupational Health & Safety*, *Industrial Safety & Hygiene News*, *Safety+Health*, *Occupational Hazards*, *BIC Magazine*, *Fleet Maintenance*, *Plant Safety & Maintenance*, *Workplace HR & Safety*, and *New North B2B*, among others.



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