MIOSHA

Michigan Occupational Safety and Health Administration (MIOSHA)
Department of Labor and Economic Opportunity (LEO)

AGENCY INSTRUCTION

DOCUMENT IDENTIFIER:	DATE:
MIOSHA-STD-23-2R2	August 24, 2026

SUBJECT: Fall Prevention – National Emphasis Program (NEP)

I. Purpose. This instruction adopts the federal Occupational Safety and Health Administration (OSHA) National Emphasis Program (NEP) to prevent falls in the workplace, especially those that lead to fatalities.

II. Scope. This instruction applies to the Construction Safety and Health Division (CSHD), the General Industry Safety and Health Division (GISHD) and the Consultation Education and Training (CET) Division.

III. References.

A. Agency Instruction MIOSHA-SHMS-12-1, MIOSHA Safety and Health Management System (SHMS), as amended (SHMS instruction).

B. Agency Instruction MIOSHA-SHMS-13-3, Personal Protective Equipment (PPE) for MIOSHA Personnel, as amended.

C. Bureau of Labor Statistics (BLS) Survey of Occupational Injuries and Illnesses.

D. Division Instruction CSHD-COM-09-1, Construction Inspection Targeting, as amended (Construction Inspection Targeting instruction).

E. Division Instruction GISHD-COM-16-1, Tree Trimming Operations, as amended (Tree Trimming Operations instruction).

F. MIOSHA Field Operations Manual, as amended (FOM).

G. OSHA Instruction CPL 03-00-025, May 1, 2023, National Emphasis Program - Falls.

IV. Distribution. MIOSHA Staff; Federal OSHA; S-drive Accessible; MIOSHA Messenger; and Internet Accessible.

V. Cancellations. This instruction cancels all previous versions of this agency instruction.

VI. Next Review Date. This instruction will be reviewed one year from the date of issuance.

VII. History. History of previous versions includes:

MIOSHA-STD-23-2R1, February 6, 2025
MIOSHA-STD-23-2, September 21, 2023

VIII. Contact. Adrian Z. Rocskay, Director, GISHD, Dan W. Maki, Director, CSHD and Augustine Syrovy, Acting Director, CET Division

IX. Originator. Barton G. Pickelman, Director

X. Background. In 2023, OSHA implemented CPL 03-00-025 - National Emphasis Program on Falls. Nationally, despite the balanced application of the agency's outreach,

enforcement, and compliance assistance efforts, fatalities caused by falls continue to be a leading cause of death for all workers. A comparison of the BLS and OSHA Information System (OIS) data between 2014 and 2021 revealed that falls to a lower level accounted for 13% (5,369) of the 40,531 fatalities in all industries during this period. In addition, falls to a lower level accounted for 32% (2,480) of the 7,861 construction fatalities during this period, and falls to a lower level accounted for 7% (2,178) of the 32,670 non-construction fatalities during this period. (Source BLS)

Falls have been a leading cause of workplace fatalities in Michigan. During the last decade, between 2014-2023, 93 workers have died from falls in Michigan.

Recently, the number of fatalities from falls in Michigan was 23 in 2016, 16 in 2017, 7 in 2018, 12 in 2019, 7 in 2020, 5 in 2021, 10 in 2022, 5 in 2023, 11 in 2024, and 8 in 2025.

Of the 50 fatalities between the years 2019-2024, 26 occurred in construction, with the highest risk jobs being roofer, construction laborer, painter, and carpenter.

In general industry between the years 2016-2024, 12 fatalities were concentrated in tree trimming operations or work on trees.

In addition, falls, slips, and trips cause thousands of nonfatal injuries involving days away from work each year, according to BLS. These nonfatal injuries happen across industries, from manufacturing to construction and from retail to healthcare. Falls can occur from an elevation or at the same level.

Falls from an elevation are typically referred to as “falls,” whereas falls at the same level are often called “slips and trips.”

Of the 93 workers who fell to their death in Michigan between the years 2014-2023, 85 fell from an elevation, and 8 fell at the same level.

This NEP directs more enforcement and educational resources to prevent worker injuries and deaths from falls. This NEP covers all industries.

XI. Action. With this instruction, MIOSHA adopts the OSHA NEP for fall prevention, CPL-03-00-025, apart from the difference in the inspection targeting systems.

XII. Significant Changes. Updated statistics in the background section. See Section X. Background.

XIII. Enforcement Activities.

A. The safety officer/industrial hygienist (SO/IH) must never expose themselves to a hazard while conducting an inspection; they will observe and take pictures and videos from a safe distance. Supervisors shall ensure SO/IHs comply with all safety and health guidance and requirements developed in the SHMS instruction and Agency Instruction MIOSHA-SHMS-13-3, Personal Protective Equipment (PPE) for MIOSHA Personnel, as amended, to prevent falls.

B. SO/IHs are authorized to initiate inspections whenever they observe someone working at heights. These observations may occur during the SO/IH’s normal workday travel or while enroute to or during other MIOSHA inspections. If a

potential imminent danger exists, the SO/IH shall initiate an inspection per the FOM Chapter 4. Inspections related to falls will also be initiated as a result of incidents, referrals, and complaints.

C. When SO/IHs observe fall hazards but cannot begin an immediate inspection (e.g., because they are responding to an incident, etc.), they shall notify their supervisor of their observations.

D. Fall hazards brought to MIOSHA's attention shall be evaluated and inspected as appropriate.

E. Whenever an inspection is initiated under this NEP, the SO/IH shall include a description of the circumstances that prompted the inspection in the case file field narrative.

F. During all inspections, SO/IHs shall observe the surrounding area for potential fall hazards and conduct an inspection under this NEP if any are present.

G. During the NEP inspections, the SO/IH will interview employees, questioning their knowledge and training regarding fall protection.

H. The scope of inspections initiated under this NEP shall be conducted in accordance with the FOM and shall normally be limited to evaluating worker exposure to hazards associated with falls. However, a SO/IH may expand the scope of an inspection under this NEP if there is evidence of other potential safety and health hazards or violations at the worksite, from injury and illness records, plain view hazards, or employee interviews. SO/IHs shall follow the guidelines in the FOM when expanding the scope of any inspection (Chapter V., Section I.A.2).

I. At the end of each NEP inspection, the SO/IH will provide the employer with information concerning MIOSHA fall protection requirements and protective measures that should be implemented. For example, the SO/IH may give the employer the website address for MIOSHA's fall prevention standards and related outreach materials or provide copies of MIOSHA publications.

XIV. Targeting.

A. CSHD.

1. CSHD will focus on residential construction. Residential sector employees may be at greater risk of falls because their employers are typically smaller, have fewer resources available for safety, and have less knowledge about safety and MIOSHA standards. This does not prohibit enforcement activities to occur on commercial and industrial jobsites.

2. CSHD will continue to use its current targeting system as described in the Construction Inspection Targeting instruction.

3. When scheduling programmed inspections, the SO will give priority to those jobs with greater potential for falls.

B. GISHD.

1. GISHD will continue to use its current targeting system as described in the FOM to randomly select establishments for planned programmed inspections. The industries targeted by the system have slip, trip, and fall hazards, and the hazards will be investigated during a wall-to-wall inspection.

2. The SO will continue to self-initiate inspections of tree trimming operations per the Tree Trimming Operations instruction.

XV. Outreach Plan.

A. MIOSHA's consultation program will use the same strategic approach as the enforcement division for targeting workplaces and activities for reducing fall hazards covered by this NEP.

B. CET will make the public aware of the NEP through social media as well as notifications in newsletters when updated.

XVI. Coding in OSHA Information System (OIS).

A. All enforcement activities (i.e., inspections, complaints, and referrals, etc.) and onsite compliance interventions conducted under this NEP must be coded with "FALL" under the NEP Code field.

B. Enforcement and onsite consultation activities related to fall hazards discovered under other emphasis programs must be coded for all the emphasis programs. For example, onsite consultation activities related to fall hazards conducted under the Silica NEP must be coded "RCS-NEP" as well as "FALL." Likewise, if fall hazards are observed during an inspection initiated under procedures outlined under the current targeting system as described in the Construction Inspection Targeting instruction, the "CTARGET" code must also be used as well as "FALL."