MIOSHA

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

DIVISION INSTRUCTION

DOCUMENT IDENTIFIER:	DATE:
CSHD-STD-14-1R3	September 3, 2026

SUBJECT: Headache Ball Compliance

I. Purpose. This instruction establishes criteria for permitting connectors to ride the headache ball when accessing a work area as specified in Construction Standard Part 28, Personnel Hoisting in Steel Erection, Rule 408.42809(2).

II. Scope. This instruction applies to Construction Safety and Health Division (CSHD) safety staff.

III. References.

A. 1926 Subpart CC - Cranes and Derricks in Construction.

B. Construction Standard Part 10, Cranes and Derricks.

C. Construction Standard Part 26, Steel Erection.

D. Construction Standard Part 28, Personnel Hoisting in Steel Erection (Part 28).

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

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

V. Cancellation. This division instruction cancels all previous versions of this division instruction.

VI. Next Review Date. To be reviewed in five (5) years from date of issuance.

VII. History. History of previous versions include:

CSHD-STD-14-1R2, September 15, 2021
CSHD-STD-14-1R1, August 31, 2017
CSHD-STD-14-1, February 18, 2014

VIII. Contact. Dan W. Maki, Director, Construction Safety and Health Division.

IX. Originator. Dan W. Maki, Director, Construction Safety and Health Division.

X. Significant Changes. There are no significant changes.

XI. Background.

For several years, MIOSHA has had regulations that allowed ironworkers performing initial steel erection to "ride the headache ball" of cranes under certain situations. In 2007, Part 28 was promulgated as a "stand alone" standard that included additional provisions which made "riding the headache ball" more protective.

In 2010, OSHA amended 1926 Subpart CC - Cranes and Derricks in Construction which included an option for employees to use a boatswain chair while engaged in specific

operations without having to prove infeasibility or greater hazard. OSHA asked MIOSHA to consider whether Part 28 was still needed.

MIOSHA has received no reports of any accidents or injuries in Michigan and has not inspected or issued citations resulting from ironworkers "riding the headache ball" since Part 28 became effective in 2007. In order to determine if "riding the headache ball" was still being used by ironworkers to access a work area and whether the industry wanted to keep this option available, MIOSHA mailed surveys to the affected industries and posted the survey online to gather feedback and comments.

A Part 28 Advisory Committee was convened in July 2013, to discuss the results of the survey and to provide a recommendation to MIOSHA on whether to keep or rescind Part 28. The advisory committee unanimously agreed that "riding the headache ball" as specified in Part 28 was a necessary option for connectors to use when the work area is "inaccessible or hazardous to reach by other means," as indicated in the standard. This instruction establishes criteria permitting connectors to "ride the headache ball" when accessing a work area as specified in Part 28, Rule 408.42809(2).

MIOSHA adopted 1926 Subpart CC - Cranes and Derricks in Construction, as Construction Standard Part 10, Cranes and Derricks in 2016.

XII. Riding the Headache Ball Criteria

A. Rule 408.42809(2) states:

"Riding the headache ball is prohibited except **when the work area is inaccessible or hazardous to reach by other means**, a maximum of 2 connectors may ride the headache ball to and from the workstation with the knowledge and consent of the employer or the employer's designated representative. The connector or connectors may be lifted to the workstation only when all of the following conditions exist… (See subrules a– m)."

B. The intent of Rule 408.42809(2) is to limit, "riding the headache ball" to only very unique and limited circumstances when determined by the affected parties that the work area is inaccessible or hazardous to reach by other means.

XIII. Preplanning.

A. Rule 408.42809(2)(b) states:

"The connector or connectors and his or her immediate supervisor, who shall be a competent person, and the **operator** who will perform the lift shall verbally agree and certify in writing that using the load line standing platform is the safest alternative. They shall plan the lift together…"

B. Prior to riding the headache ball, the affected **connector(s)**, their immediate **supervisor**, and the **operator** are required to do all of the following:

1. Evaluate all factors to determine if riding the headache ball is the safest means of access to the work area.

2. Unanimously agree that riding the headache ball is the safest means of access to the work area.

3. Document these factors in the site-specific erection plan. A sample plan is located in Appendix A.

C. A standing platform as prescribed in Rule 408.42809(2)(c) provides a more stable, slip resistant means for safe footing when riding the headache ball. The shackle alternative should only be used as a last resort or in emergency situations.

XIV. Citation Policy.

A. When an employer is found to have/had employee(s) riding the headache ball, safety officers (SOs) are to check compliance between the following standards:

1. Construction Standard Part 10, Cranes and Derricks. Specifically, 1926.1431 Hoisting Personnel (a-s).

2. Construction Standard Part 26, Steel Erection. Specifically, applicable rule(s) in;

a) 1926.752 Site layout, site-specific erection plan and construction sequence.

b) 408.42609 Hoisting and Rigging.

c) 408.42655 Special Training.

3. Construction Standard Part 28, Personnel Hoisting in Steel Erection.

4. Any other applicable standard or consensus standard.

B. All subrules within Part 28, Rule 408.42809(2) will be grouped when issuing a citation.

C. The SO will follow the guidance in the FOM when determining citation classification, citation grouping, violation probability and severity, and the penalty calculation.

Appendix A

Headache Ball Site-Specific Plan

{Company Name}

A headache ball site-specific plan has determined that riding the headache ball is the safest means of access to one or more work area(s) that are inaccessible or hazardous to reach by other means on this job site. This site-specific plan is restricted to the following project:

Project Name: _____

Project Address: _____

Date the plan was prepared/modified: _____

Plan verbally approved and documented by the following:

Connector #1_____

Connector #2: _____

Crane Operator : _____

Crane Operator Card Number: _____

Supervisor/Competent Person: _____

Plan prepared by: _____

Plan supervised by: _____

Inaccessible or Hazardous to Reach by Other Means Evaluation

Document the reasons/factors why riding the headache ball is the safest alternative to access the work area.

_____
_____
_____
_____
_____

Location(s) where “Riding the Headache Ball” will be used:

Describe site conditions where the crane will be set-up and where the employees are to be transported.

_____
_____
_____
_____

Communication System 408.42809(2)(f)

Describe the communication system between the connector(s) and the crane operator.

_____
_____
_____

Trial Lift

Document the trail lift(s) and the location it was performed.

_____
_____
_____
_____
_____