



**International Window Cleaning Association
Position Statement on OSHA Walking Working Surfaces Subpart D**

February 14, 2017

The IWCA recommends that professional window cleaning contractors begin instituting plans to comply with the new OSHA Walking Working Surfaces Subpart D regulations which were published on November 17, 2016 and became effective January 20, 2017.

These regulations were developed for general industry, which includes our occupation. Professional window cleaners will benefit because these regulations address the following: fall protection on any walking and working surface, the use of portable ladders, rope descent systems (RDS) and their anchorage points and most importantly, the training and re-training of workers in all these areas. These four items are very important topics for window cleaners across the country and throughout the world.

It is stated in the official record that OSHA drew many provisions in the regulations from national consensus standards, including the ANSI/IWCA I-14.1-2001, Window Cleaning Safety Standard. OSHA agreed with affected parties that national consensus standards represent industry best practices and reflect advancements in technology, methods, and practices.

There are several important regulations which include deadlines for compliance. First, professional window cleaning contractors are required to train their workers with identifying and avoiding all fall hazards while on a walking or working surface. Additionally, workers are to be trained in the use, care and inspection of all the equipment outlined in the new regulations. To insure continued safety, workers are to be retrained in these areas on a regular basis. This training is to be accomplished by May 17, 2017.

Secondly, window cleaning contractors using rope descent systems (RDS) are required to obtain written confirmation from a building owner that the anchorage points used for rigging such systems have been identified, tested, certified and maintained so they are capable of support 5000lbs in any direction they are loaded per each worker attached. The enforcement of this regulation, which is a shared responsibility between the contractor and building owner, shall begin on November 20, 2017.

A copy of the Final Rule can be obtained at: <https://www.osha.gov/walking-working-surfaces/>