



November 30, 2010

Dear Representative Davnie:

Upon your request, the Department of Labor and Industry (DLI) established a Window Cleaning Safety Advisory Committee to develop recommendations to reduce the number of fatalities from falls in the window-cleaning industry. The committee, see attached membership list, met three times and has developed four recommendations.

The recommendations are general in nature and will require your skills as a legislator to formalize and implement them. The recommendations are:

1. Include in the OSHA Act (Minnesota Statutes §182) the following:

Safety plan – A written safety plan shall be developed jointly by the window cleaning contractor and building owner or their operating agent. It shall be used by both the contractor and the building owner or their operating agents when windows to be cleaned are located in areas where workers use suspended equipment or where workers are exposed to falls and other known hazards. The plan shall include, but is not limited to, the equipment to be used, written work procedures, roof guarding, and the identification of hazardous areas, drop zones and safety features.

The plan shall be readily available for use by the building owners or their operating agent, window cleaners, enforcing authorities and emergency personnel. The use of a written plan applies to facilities with fall hazards in excess of 24 feet from a safe surface.

2. Amend the state building code to require new buildings or existing buildings that are being renovated or reroofed to include appropriate anchoring systems that will improve the safety of external and internal maintenance activities including, but not limited to, window washing.
3. Require window washing companies to be registered with DLI if they use a lift or swing off a building or use a ladder more than 24 feet.
4. Establish a work group to determine minimum certified training for window washers that use a lift or swing off a building or use a ladder over 24 feet, taking into account:
  - a. Who is responsible for tracking the training: the employer, DLI or a combination?
  - b. Who is responsible for developing the training requirements: the employer, DLI or a combination?
  - c. Will there be different levels of operators, such as apprentice, journeyman or master?
  - d. How will this requirement be enforced?

The committee indicated that any DLI costs associated with recommendations 3 and 4 should be based on a fee-for-service model.

If you have any questions regarding these recommendations, please feel free to contact us at:  
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