



WINTER 2025

UPDATE

MNOSHA: EDUCATION FACILITIES

AWAIR PROGRAM UPDATE



In a Feb 3, 2025 notice, DLI proposed to add elementary and secondary education to the (OSHA) AWAIR list. If rule change goes into effect, all K12 schools will be subject to the law.

An employer must comply within six months (September 2025) of its NAICS code being placed on the list and rule approved.

- See details on following page

IEA ASSISTED WITH 7 CLIENT OSHA INSPECTIONS FALL 2024-WINTER 2025

IEA has been a technical resource for OSHA building and program inspections, closeout meetings, contestation process and hazard abatement. Minnesota OSHA has focused on educational facilities throughout the state in 2024 and early 2025.

The information below provides the top facility focus items from these recent inspections.

MNOSHA Safety Grant Priorities Change on April 16, 2025

- **Excavation and trenching** – equipment that safeguards workers from cave-in
- **Grain-handling facilities**
- **Residential construction** – fall protection equipment
- **Stuck-by and crushed-by prevention** – back-up cameras
- **Workplace violence prevention** – public sector
- **Health hazard reduction** – equipment that reduces employee exposure to health hazards, such as ventilation or other engineering controls

EDUCATION FACILITY INSPECTIONS: OSHA ITEMS OF NOTE

Fall Protection: Most inspectors interviewed staff regarding work on roof, aerial lift platforms, harness usage and training. Also measured ladder dimensions and need for handrails.

Chemical Labeling/Storage: Inspectors reviewed flammable cabinets, storage conditions and secondary container labeling.

Safety Committee: Inquired about establishment, frequency & recent injuries

Eyewash Stations: Verified functionability, inspection frequency and proximity to chemicals.

Garage Doors: Verified that garage doors have safety stop and/or signage.

Industrial Areas: Questioned frequency of dust removal, grinder guards, checked point of operation guards on saws.

Hoists and Jack Stands: Verified load limit decals

OSHA 300 / ERK: Reviewed logs (one inspector requested last 3 years). Review of ERK program/training and SDS management.

OSHA reported seeing more falls in general industry specific to Ladders & Step Ladders

Focus on your ladder safety!



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What is required of an AWAIR program

See [MNOSHA Compliance: AWAIR program](#) & [An employer's guide to developing A Workplace Accident and Injury Reduction \(AWAIR\) program](#)

Written AWAIR program

- This program must include policies and procedures to identify, evaluate, and reduce workplace hazards.
- It should outline roles and responsibilities, including how staff are trained on safety issues.

Actively implement the program

- This isn't just a document to keep on file—it must be reviewed and followed consistently across your education facilities.
- Staff need to be trained on safety practices, reporting procedures for injuries, and how to handle workplace hazards. AWAIR must be added to the annual training.

Track and review workplace injuries

- Your District/Campus will need a system to log, investigate, and address workplace accidents. This may already be occurring through the HR department and/or safety committee
- Patterns of injuries must be reviewed at least annually, and adjustments to the safety program should be made based on findings.

You must involve employees in workplace safety

- Staff should have a clear process to report safety concerns without fear of retaliation.
- Regular communication about workplace safety (such as staff meetings, safety drills, or newsletters) will be expected. This may require development of a communications plan.



IEA Can Assist With AWAIR Program Development and Implementation

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