OSHA Mandatory Emergency Exit Plans

According to OSHA Standard 1910.38, Means of Egress, Emergency Action Plans, an employer must have an emergency action plan, in writing, if they have 10 or more employees.

At a minimum, the plan must include:

- Procedures for reporting a fire or other emergency; (1910.38 (c)(1))
- Procedures for emergency evacuation, including type of evacuation and exit route assignments; (1910.38 (c) (2))
- Procedures to be followed by employees who remain to operate critical plant operations before they evacuate; (1910.38(c)(3))
- Procedures to account for all employees after evacuation; (1910.38(c)(4))
- Procedures to be followed by employees performing rescue or medical duties; (1910.38(c)(5))
- The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. (1910.38(c)(6))

What is often overlooked is foreseeing that the employees will need to have access to coats, jackets or other outerwear if there is inclement weather, and also will need to have their wallet, car keys and cell phones if the emergency requires them to move their vehicles, communicate or evacuate the premises. **If your procedures do not cover this, your plans could fail as employees crowd into the locker room to get their “things.”** A discussion about availability of outerwear, wallets, keys and also cell phones - if they are forbidden on the shop floor- will be needed to make your plan valid and actionable.

Also required under this standard:

- An employer must have and maintain an employee alarm system. The employee alarm system must use a distinctive signal for each purpose.
- An employer must designate and train employees to assist in a safe and orderly evacuation of other employees.
- An employer must review the emergency action plan with each employee covered by the plan:
  - When the plan is developed, or the employee is assigned initially to a job;
  - When the employee’s responsibilities under the plan change;
  - When the plan is changed.

OSHA 1910.38 - Emergency action plans

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