

Chancellor's University Safety Committee (CUSC) Meeting
Tuesday, January 16, 2018 - 3:00-4:00 p.m.
UNLPD Conference Room 300 N. 17th

AGENDA

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|---|----------------|
| 1. Introductions & Welcome | Kyle Hansen |
| 2. Fiscal Year 2018 (2nd Qtr.) Injury/Illness | Yoko Smith |
| 3. Safety Audit Review | Betsy Howe |
| 4. Old Business | |
| A. Follow-up: Supplier Showcase Concerns | |
| B. Reports on Progress: | |
| i. CUSC goal | |
| ii. Heads Up! campaign | |
| C. Other old business | |
| 5. New Business | |
| A. New Stormwater Plan/Permit Application | Brenda Osthus |
| B. Emergency planning & preparedness update | Mark Robertson |
| C. Zoom Meetings | Betsy Howe |
| D. Resource | Brent Freeman |
| E. Other new business | |
| 6. Adjourn | Kyle Hansen |

Upcoming Meetings (at UNLPD, 300 N. 17th St. unless otherwise specified):

- March 27, 2018 OPEN FORUM Nebraska East Union

Proposed Meetings for 2017-18

- May 15, 2018 (Injury/Illness & Safety Audit reports (January-March 2018))
- July 17, 2018 (Injury/Illness & Safety Audit reports (April-June 2018))

Goal FY 2016-17:

Develop, review, maintain lines of safety communication with the purpose of engaging the campus community, in particular by encouraging all to recognize and report "near misses" or potentially unsafe practices with this information to be used for educational purposes university-wide.

Chancellor's University Safety Committee Meeting
Meeting Minutes
January 16, 2018 • 3:00 - 4:00 p.m.
UNLPD Conference Room

The meeting was convened at 3:00 p.m. by Chair Kyle Hansen (CREC). Members present introduced themselves.

Members: Beth Whitaker (School of Biological Sciences), Eileen Bergt (Landscape Services), Mark Robertson (UPD Emergency Management), Loren Swanson (Utilities), Alan Boldt (BSE), Michael Straatmann (Libraries), Barb McCain (Housing Dining), Sara Frizzell (Research Compliance), Brent Freeman (Nebraska Unions), Pat Dussault (Chemistry), Lynn Doser (Sheldon Museum of Art), Nolan Golgert (College of Architecture), Mike Livingston (Agronomy & Horticulture), Jody Wood (Office of Institutional Equity and Compliance), Kim Phelps (University Services), Brenda Osthus (EHS) Betsy Howe (EHS support), Yoko Smith (EHS support)

Remote attendance via Zoom: Whitney Fritzinger (Veterinary Diagnostic Center), Gabe Hampton (FMP-BSM), Christine Weitzel (UNOPA)

Guest: Local television station media member filming the meeting.

FY 2017-2018 (2nd Quarter) INJURY INCIDENT REPORT

There were thirty-eight (38) First Reports of Injury (FRIs) received by Environmental Health & Safety (EHS) for injuries occurring between October 1 and December 31, 2017. Nineteen (19) or 50% were OSHA-Recordable, considered potentially more serious. Twelve (32%) of the OSHA-Recordable incidents resulted in lost time, that is, that required employees to be off work, transferred to a different job, or have restricted duties. Injury reporting included a breakdown of OSHA-Recordable incidents by age, a breakdown by Event/Exposure and Worker Type, and an overview of OSHA-Recordable injuries and illnesses including department/date/specifics of the incident.

Statistics on the Number of Incidents by Event/Exposure were provided for the calendar years 2015 – 2017 to compare number and type of incidents across recent years. The total number of injuries in 2017 was up slightly over 11%, with the highest number of incidents occurring from “Overexertion in Lifting” or “Struck By/Against.”

Yoko Smith also provided information on ladder-related injuries at UNL over the past several years. Ladder injuries occur across the entire university. In 2016, the National Safety Council reported nearly 20,000 workers in the U.S. were injured and 133 workers died due to a fall from a ladder.

Discussion by the committee focused on departmental guidelines for use of ladders/step stools and the need to inspect ladders before use, replacing any ladders not in good condition. The EHS Safe Operating Procedure, **Ladder Safety**, was available and the committee was reminded of the web-based training, **Portable Ladder Safety**.

FY 2017-2018 (2nd Quarter) SAFETY AUDIT HIGHLIGHT

Safety and compliance audits are conducted of all spaces at UNL on a schedule, based on identified hazards and regulatory requirements. Audited in full or in part by EHS staff members during the quarter October 1 – December 31, 2017 were 66 buildings (list provided). Ladder/step stool deficiencies were noted in all space usage types.

Betsy Howe provided information on Ladder and Step Stool Safety, emphasizing that the American Ladder Institute has designated March as “Ladder Safety Month.” Information provided focused primarily on step stool safety as workers tend to not consider step stools in the same category as ladders, with requirements for safe use and maintenance. A number of ladder/step stool safety resources were provided by both Betsy and Yoko.

OLD BUSINESS

Safety Concerns Identified at October Supplier Showcase

The concerns conveyed to the CUSC members staffing a booth at the fall Procurement-sponsored Supplier Showcase have been resolved to the extent possible. Parking & Transit Services removed one parking space near the East Campus Rec Center that was obstructing drivers’ view of pedestrians attempting to use the crosswalk.

The exit from campus to Holdrege near the Dental College is still a concern as drivers ignore the “right turn only” directions and either turn left or go straight ahead across Holdrege. A suggestion was made to ask the city to consider installing flexible pylons to increase the arc of the turn to make it clear cars need to turn right, and at the same time making progression straight ahead or left turns very difficult to accomplish.

Report on Progress: CUSC Goal

Goal: “Develop, review, maintain lines of safety communication with the purpose of engaging the campus community, in particular by encouraging all to recognize and report “near misses” or potentially unsafe practices with this information to be used for educational purposes university-wide. “

Beth Whitaker reported that Manter Hall is working on an Emergency Building Plan. They are at the phase of identifying floor monitors. It is difficult to identify people who are more likely to be in an area at a given time.

Mark Robertson (Emergency Management Coordinator) reminded the group that in any emergency situation if someone/anyone authoritatively tells people to evacuate/shelter in place/whatever is the recommended procedure for the specific threat, people to follow such direction. In the case of UNL buildings, this might be the designated floor/area coordinator, but need not necessarily be.

Reports on Progress: *Heads Up!* Marketing Campaign

Follow up from last meeting determined that “Heads Up!” graphics are being displayed on residence hall display boards. Mark Robertson indicated that ASUN (Association of Students of the University of Nebraska) seems to be safety aware and either he or Kyle should be able to contact them about participating in this campaign.

There was no other Old Business.

NEW BUSINESS

New Stormwater Management Plan/Permit

Brenda Osthus (EHS Director) reported that the University of Nebraska-Lincoln developed a Stormwater Management Plan (SWMP) in compliance with the university's Municipal Separate Storm Sewer System (MS4) Permit. This permit requires that all permit holders meet stormwater pollutant reductions to improve the health of surface waters. Stormwater Management documents and resources are online, under the Resources heading on the EHS web site (<https://ehs.unl.edu/stormwater-management>). One requirement of the new permit is to solicit public comments. Submitting comments is very easy. Simply click the “Submit Comments” button to proceed. All comments will be responded to and addressed.

Emergency Planning & Preparedness Update

Mark Robertson spoke to the Faculty Senate about including Alertus on classroom computers as a pop-up to display UNL Alerts. The group voted in January that this project proceed with installation occurring over spring break of March 2018. There was discussion about criteria for sending UNL Alerts and building lockdowns. The goal of UNL Alert is to provide awareness for faculty, staff and students so they can make informed safety decisions.

Mark indicated that the Police Department conducted more presentations on situational awareness the past quarter then over the entire past year. Of prime

interest is information on how to handle active shooter situations but the presentations cover a variety of emergency situations, both natural and man-made.

ZOOM Conference Meetings

The new conference tool adopted by UNL, ZOOM, seems to be working well as per feedback by the remote attendees. Attendees were able to hear well and verbally share if attending from a device with a microphone. Betsy Howe worked with the Police Department IT prior to the meeting to determine that functionality was in place for an optimal remote attendance experience. She will work with each of the Unions' IT staff prior to the March and September Open Forum meetings. It was suggested that at the next meeting the group might discuss trying the EHS training room as a meeting venue. The EHS training room is optimized for remotely attended meetings, has 27 seats (classroom style) with additional space around the room perimeter with three "A" parking lots within 2 blocks.

Safety Committee Resource

The presentation of a safety-related resource idea this month was postponed so the meeting would not continue past 4:00 p.m.

There was no other New Business.

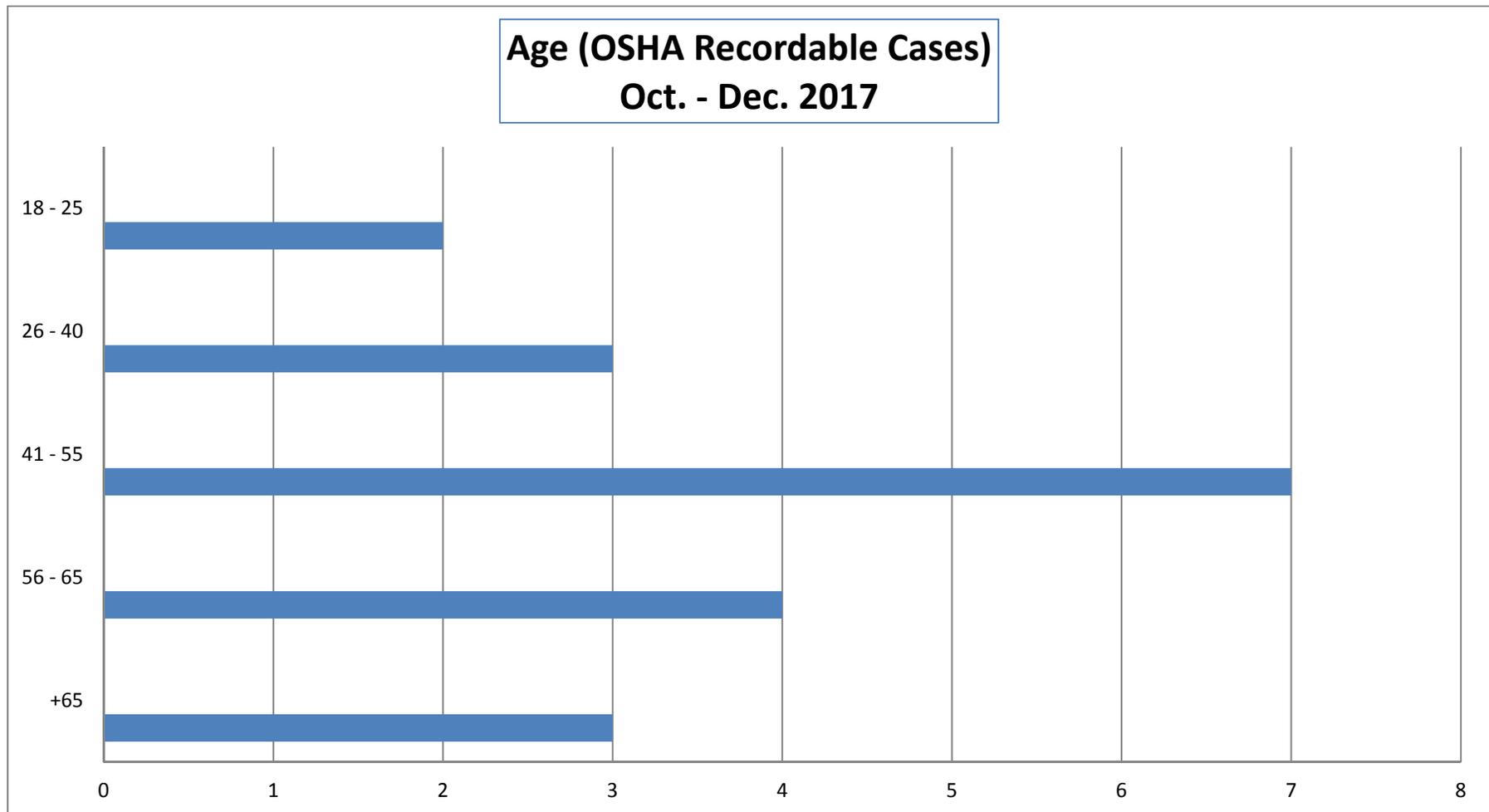
CLOSING REMARKS

The next meeting will be on March 27, 2018, from 3:00 – 4:00 p.m. at the Nebraska East Union. This is an Open Forum meeting. Chair Kyle Hansen adjourned the meeting at 4:05 p.m.

CUSC Workers Compensation Incident Report (Oct. – Dec. 2017)

As of December 31, 2017, thirty-eight (38) FRIs were received for injuries occurring between October 1 and December 31, 2017.

- Fifteen (15) or 39 % were “report only” (no medical treatment sought).
- Four (4) or 11 % were not OSHA-recordable, meaning they were minor in nature (requiring only one visit to clinic without prescription medication).
- Nineteen (19) or 50 % were classified as recordable, and are considered potentially more serious. Of those recordable incidents, twelve (12) or 32 % were lost time incidents that required the employees to be off work, to be transferred to a different job or to be under restricted duties.



OSHA Recordable Incidents from October - December 2017 Event/Exposure by Worker Type

	Food Service	Building Maintenance	Shop/ Mechanic	Custodial	Lab	Office	Sports/coach	Totals
Overexertion in lifting/ carrying	3 (Inadequate procedure, deviation from protocol)		1 (Location problem)					4
Bending, climbing, crawling, reaching, twisting				1 (Fatigue/ stress)				1
Fall	1 (Unfamiliar with surrounding)	1 (Engineering control available but not used)		1 (Environment – location problem)		3 (Inattention, uneven terrain)		6
Slips, trips without fall					1 (Housekeeping)			1
Struck by /struck against		3 (PPE not available, inadequate procedure, equipment failure)		1 (PPE available but not used)				4
Transportation related						2 (Unable to identify causes)		2
Assaults (animals or persons)							1 (Location/ position problem)	1
Totals	4	4	1	3	1	5	1	19

Number of Incidents by Event/Exposure (OSHA Recordable Only)				
Event/Exposure	Calendar 2015	Calendar 2016	Calendar 2017	Average for the Three Years
Fall	27	31	26	28
Slip, trip, loss of balance without fall	7	7	10	8
Struck by/against	41	22	29	31
Caught in/crushed by	4	4	6	5
Other contact with objects	1	2	1	1
Overexertion in lifting	8	12	16	12
Overexertion in holding/carrying	2	8	4	5
Overexertion in pushing/pulling	4	0	5	3
Bending, climbing, crawling, reaching, twisting	4	4	7	5
Repetitive motion	6	7	5	6
Other bodily reaction	2	4	0	2
Exposure to harmful substance or environment	5	4	9	6
Transportation related	3	0	6	3
Assault by animals	3	11	3	6
Walking	2	0	2	1
Totals	119	116	129	121

Total Number of All First Report of Injury/Illness					
Unit	Calendar 2013	Calendar 2014	Calendar 2015	Calendar 2016	Calendar 2017
<i>UNL Overall</i>	<i>201</i>	<i>191</i>	<i>246</i>	<i>247</i>	<i>249</i>
Housing	32	32	30	42	45
Facilities	33	23	52	38	66
University Services	4	3	3	2	3
Extension Centers	29	35	28	49	27
Unions	4	2	5	1	4
Agronomy	10	4	5	7	3
Animal Science	7	8	8	12	12
Campus Recreation	0	4	9	5	5
Athletics	13	9	9	8	8
All Others	69	71	97	83	76

Ladder Safety

There have been eighteen (18) injuries related to ladder deficiency at UNL since late 2009. Some of the more serious incidents are summarized below.

- December 17, 2009. A maintenance worker fell from a 16-inch step ladder while handling sheet rock and fractured their hip.
- August 3, 2011. A maintenance worker jumped off a roof access ladder that terminated about 3-4' above the floor and sprained their right foot.
- May 21, 2012. A custodial worker fell while descending a ladder. The worker was holding items while descending. The worker strained left hip, shoulder and foot.
- August 8, 2012. A custodial worker was cleaning a pool wall while on a ladder. Water had been drained from the pool. The ladder slipped and the worker fell to the pool floor, spraining their left shoulder.
- January 3, 2014. A material handler was descending an access ladder at a building dock. The worker slipped off a step and fell on their back.
- August 26, 2014. An office worker was on an old wooden ladder when the ladder broke. The worker fell and suffered a contusion in groin area.
- November 18, 2014. An office worker lost balance and fell from a step stool, hitting their left elbow on the floor.
- July 1, 2015. An office worker used a chair to reach overhead items and fell, bruising their right hand.
- May 15, 2017. A retail worker missed the last step of a step ladder and fell. The worker bruised and strained right leg, left foot and left shoulder.

Other minor injuries have occurred in laboratories, agriculture and food service related departments. Ladder safety is important to all UNL departments. In 2016, nearly 20,000 workers were injured and 133 workers died due to a fall from a ladder in the U.S. (source: <http://www.nsc.org/learn/safety-knowledge/Pages/Ladder-Safety-One-Rung-at-a-Time.aspx>)

Discussion

1. Does your department use a ladder/step ladder, or other engineering control to access high areas? Or are your workers using chairs to access overhead?
2. Have your employees who use ladders taken EHS "Portable Ladder" training? It is available on EHS web site at <https://ehs.unl.edu/web-based-training#PortableLadder> . EHS also has SOP "Ladder Safety" (<https://ehs.unl.edu/sop/s-ladder.pdf>)
3. Are the ladders in your department in good condition? If not, replace the ladder as soon as possible.

Safety Audit Overview (October 1 – December 31, 2017)

Safety & Compliance Audits are conducted of all spaces at UNL on a schedule, based on identified hazards and regulatory requirements. A 'space' is defined as an area on the official GIS map with a number and/or word designation and includes areas such as secondary rooms, corridors, storage areas, etc. During this past quarter, areas within 66 buildings were audited:

Abel Residence Hall	Landscape Services Metal Building
Ag Hort Greenhouse 1	Life Sciences Annex
Ag Hort Greenhouse 2	Loeffel Meat Laboratory
Ag Hort Greenhouse 3	Love Hall (City Campus)
Ag Hort Greenhouse 4	Manter Hall
Animal Sciences Complex	Morrison Life Sciences Research Center
Arsenal	Nebraska East Union
Baker Hall	Nebraska Vet Diagnostic Center
Beadle Center	Othmer Hall
Bessey Hall	Plant Pathology Greenhouse
Bob Devaney Sports Center	Plant Sciences Hall
Biosciences Greenhouses - Beadle	Plant Science Teaching Greenhouse
Cather (Willa S.) Dining Complex	Richards Hall
Campus Renewable Energy System Building	Selleck Food Service Bldg L (J 1 st flr)
Chase Hall	Selleck Quadrangle-Bldg D, E, F, G, H, J, K
East Thermal Energy Storage	Scott Engineering Center
Entomology	Smith Residence Hall
Entomology Greenhouse 2	Starr St 3332
Entomology Greenhouse 3	Teaching Greenhouse East
Facilities Implement Building	Teaching Greenhouse West
Facilities Management C	The Courtyards
Filley Hall	The Village
Food Industry Complex	Theodore Jorgensen Hall
Food Innovation Center	U Street Apts
Greenhouse Innovation Center	University Suites
Hamilton Hall	Utility Plant – City Campus
Hardin Hall	Utility Plant – East Campus
Harper Dining Center	Utility Response Facility
Hazardous Material Facility	Veterinary Basic Science Building
Kauffman Academic Residential Center	Vine Street Apts - East
Knoll (The Robert E.) Residential Center	Vine Street Apts - West
Landscape Services East	Watson Building
Landscape Services Equipment Building - East	Woods Art Building

Ladder and Step Stool Safety

Ladders or step stools should be structurally sound, of the appropriate rated capacity for intended use/user, in good condition, appropriate type for intended use.

Ladders and step stools are used in all work space types: General, Kitchen, Laboratory and Shop and the Arts. Workers who do not use a ladder and/or step stool daily often are unaware of, forget, or tend to minimize the hazards of working at height.

The main hazard associated with portable ladders and step stools is falls. Falls are the leading cause of unintentional injury deaths nationwide and 43% of fatal falls in the last decade have involved a ladder. Approximately 20% of fall injuries involve ladders.

Falls occur when:

- The ladder/step stool is in poor condition or is improper type/height for the task at hand.
- The ladder/step stool is poorly located and/or incorrectly positioned in relation to task that needs completion.
- The surface on which the ladder/step stool is located is slippery or uneven.
- Proper techniques are not observed when using the ladder/step stool.

Guidelines for portable extension and step ladders and mobile ladder stands are available within the Environmental Health and Safety (EHS) Safe Operating Procedure and Web-Based Training referenced below.

Step stools are widely used at UNL. Guidelines are similar to those for portable extension and step ladders. A ladder-type step stool is a self-supporting, foldable, portable ladder that is non-adjustable in length, 32-inches or less in height, with flat steps and without a pail shelf. It is designed so that the ladder top cap, as well as all steps, can be climbed on. The side rails may continue above the top cap. It is intended for use by one person.

Proper Use

A ladder-type step stool requires level ground support for all four of its side rails. If this work site condition does not exist, a ladder-type step stool should not be selected for the job.

A ladder-type step stool must not be used unless its base is spread fully open and the spreaders locked. Ladder-type step stools are not to be used as single ladders or in the partially open position.

In order to prevent tipping the step stool over sideways due to over-reaching, the user must climb or work with the body near the middle of the steps or top cap. The step stool should be set-up close to the work. Never attempt to move the step stool without first descending, relocating the step stool, and then re-climbing. Do not attempt to mount the step stool from the side or step from one ladder or step stool to another unless the step stool is secured against sideways motion.

When ascending or descending the step stool, always face the step stool.

The braces on the rear of a step stool are not intended for climbing or standing and must not be used for that purpose.

The anti-slip feet at the bottom of the step stool side rails must be present and in good condition prior to use. The step stool must not be used on ice, snow or slippery surfaces unless suitable means to prevent slipping is employed.

A step stool must never be placed upon other objects such as boxes, barrels, scaffolds, or other unstable bases in an effort to obtain additional height.

Proper Care

A thorough inspection must be made when the step stool is initially purchased and each time it is placed into service. Clean the climbing and gripping surfaces if they have been subjected to oil, grease or slippery materials. Working parts, bolts, rivets, step-to-side rail connections, and the condition of the anti-slip feet (safety shoes) shall be checked. If structural damage, missing parts, or any other hazardous defect is found, the Step Stool must be removed from service and either discarded or competently repaired.

Step stools exposed to excessive heat, as in the case of fire, may have reduced strength. Similarly, step stools exposed to corrosive substances such as acids or alkali materials may experience chemical corrosion and a resulting reduction in strength. Remove these step stools from service.

Step stools with bent or broken side rails must be destroyed.

In the event a step stool is discarded, it must be destroyed in such a manner as to render it useless. Another person must not be afforded the opportunity to use a step stool that has been deemed unsafe.

Do not store other materials on the step stool while it is in storage.

Resources:

- EHS Safe Operating Procedure **Ladder** <http://ehs.unl.edu/sop/s-ladder.pdf>
- EHS Web-Based Training **Portable Ladder Safety** <http://ehs.unl.edu/web-based-training#ElectricalSafety>
- American Ladder Institute <http://www.americanladderinstitute.org/>
- NIOSH (National Institute for Occupational Safety and Health) "Falls in the Workplace" <https://www.cdc.gov/niosh/topics/falls/>

LADDER SAFETY

The scope of this SOP is limited to portable extension and step ladders and mobile ladder stands. Other EHS SOPs or authoritative sources must be consulted regarding permanently installed ladders, scaffolding, aerial lifts, and other devices or conditions that present a fall hazard (e.g., platforms, roofs; floor openings where it would be possible to fall from one level to another; etc.).

EHS encourages you to consult our web-based training module for [Portable Ladder Safety](#) for more information.

The main hazard associated with use of portable ladders is falls. Falls occur for a number of reasons, including the following:

- The ladder is in poor condition or is improper for the task at hand.
- The ladder is poorly located and/or incorrectly positioned.
- The surface on which the ladder is located is slippery or uneven.
- Proper techniques are not observed when using the ladder.

The following guidelines, most of which evolve from Occupational Safety and Health Administration (OSHA) regulations, are intended to minimize the risk of falls when using portable ladders.

1. Select ladders based on anticipated use and rated load capacity.
 - Load ratings, safe working height, and other safety information must be posted on the ladder by the manufacturer. This information should be replaced if it becomes worn or defaced. The rated capacity must be sufficient to accommodate the weight of the person and everything that they are carrying.
 - Portable ladders are not suitable for all situations. Depending on the task at hand, an aerial lift or other device may be the better choice. For example, a portable ladder is not a good choice when it is necessary for a person to carry heavy loads or shift their center of gravity while conducting work at an elevated height; the resting point for the top of the ladder is weak or marginally secure (e.g., guttering); three points of contact cannot be maintained (two feet and one hand)ⁱ; the foundation/surface upon which the ladder will be placed is uneven, slippery, angled, or will otherwise make the ladder unstable; etc.

- Remember the full height of extension and step ladders is not available for use. For example, multi-section extension ladders must maintain a minimum overlap distance and extend a minimum of 3' past the top of the landing point. The top step and next two rungs down on a step ladder are not intended for climbing.
 - Do not use portable ladders when working near (<20') live electrical lines. Do not use metal ladders when working on or near electrical devices (e.g., changing light fixtures, etc.) as the ladder could become energized.
 - Read and adhere to the manufacturer's instructions.
 - Do not attempt to fabricate your own ladder.
2. Keep the ladder, safety feet, and auxiliary equipment in good condition at all times, and inspect before each day's use and after it tips over.
- Keep dry and free of oil, grease, mud, etc.
 - Verify that the joint between the steps and side rails is tight, all hardware and fittings are securely attached, and movable parts operate freely without binding or undue play; rivets are secure; and side rails and rungs are free of excessive denting or other signs of wear.
 - Lubricate metal bearings of locks, wheels, and pulleys frequently.
 - Replace frayed or badly worn rope.
 - Safety feet and other auxiliary equipment shall be kept in good condition to insure proper performance.
 - Immediately remove damaged ladders from service and discard or label them as "Danger! Out-of-Service" and notify the appropriate supervisor.
 - Do not use ladders as guys, braces, skids, gin poles, or for other than their intended purpose.
3. Position the ladder appropriately and maintain a safe stance while on the ladder.
- Use a ladder of the proper height, as designed by the manufacturer. Do not splice or improvise to gain additional height.
 - Wear proper footwear; closed-toe, sturdy, and clean.
 - Inspect the area to be sure that it is free of electrical lines.
 - Do not position a ladder in an area where it can be bumped or dislodged (e.g., doorway, passage, window opening, etc.). If a ladder must be located where it can be struck or displaced, secure the area by locking doors, placing barricades, having someone stand watch, or other appropriate action.
 - The foundation upon which the ladder will be placed must be even, firm, level, and not subject to skidding/slippage. Do not use blocks, rocks, boxes, or other items to "level up" or gain height. Do not use a ladder in strong winds.
 - Observe the proper placement angle for extension ladders. The base of the ladder should be one-foot (1') out from the wall for every 4 feet of height. The side rails of an extension ladder that is used to access a higher landing must extend a minimum of 3' beyond that landing.

- Secure extension ladders with tie downs or blocking of the base. If using step ladders, ensure that the ladder is fully opened and locked in place. If using a mobile ladder stand, be sure to engage the locking mechanism before climbing.
 - Face the ladder while climbing and descendingⁱⁱ. Maintain three points of contact at all times on step and extension ladders. Maintain at least two points of contact (one foot and one hand) on mobile ladder stands.
 - Do not lean sideways out of the ladder's width. Do not lean so far that the naval passes outside of the ladder's rails.
 - Do not attempt to move, shift, or otherwise reposition a ladder while anyone is on it.
 - Do not place any object on a mobile ladder stand in an attempt to gain additional height.
4. Properly transport, store, and maintain ladders.
- Ladders should be secured while being transported in a vehicle.
 - Get assistance when carrying large ladders to the work area.
 - Store ladders in a sheltered area where they will not fall unexpectedly, and will not block access to hallways and fire exits.
 - Wooden ladders are affected by exposure to heat and dampness. Therefore, they should be stored in a dry, well-ventilated area.
 - Never paint a wooden ladder as it can hide structural defects.
 - Ladders should be stored horizontally on racks or hooks with support points at the top, middle and bottom of the ladder to prevent sagging and warping.

ⁱ Two points of contact (one hand and one foot) must be maintained for mobile ladder stands.

ⁱⁱ Some mobile ladder stands are designed for forward decent. Only face forward if so designed.