



Property Manager Guide: Fall-Protection Inspection & Certification Requirements

Purpose: This guide gives commercial property managers a clear, practical overview of rooftop fall-protection inspection requirements, including annual inspections, 10-year certification, documentation expectations, and how to avoid unnecessary vendor lock-in.

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1. Why This Matters

Fall-protection compliance is more than a paperwork requirement; it directly affects building risk, service costs, contractor access, and the manager's ability to respond quickly when rooftop work is needed.

- **Risk Management:** Proper inspection records help protect owners, managers, tenants, and contractors by confirming that rooftop access systems are reviewed before use.
- **Budget Control:** Understanding the difference between annual inspections, 10-year certification, repairs, and optional recommendations helps managers avoid unnecessary services and compare proposals accurately.
- **Contractor Access:** Clear documentation reduces delays when window cleaning, façade maintenance, pressure washing, roofing, weatherproofing, or other elevated work must be scheduled.



- **Local Support:** Working with a responsive Arizona-based partner gives managers faster coordination, clearer communication, and practical support when compliance questions arise.

2. Executive Summary for Property Managers

Building owners and managers are responsible for ensuring that rooftop anchors, davits, sockets, tie-backs, and related façade-access systems are properly inspected, tested, maintained, and documented before contractors use them. OSHA requires written confirmation that each anchorage has been identified, tested, certified, and maintained, based on annual inspection by a qualified person and certification as necessary at least every 10 years.

Compliance reference: In accordance with OSHA 29 CFR 1910.27, OSHA 29 CFR 1910.66, ANSI/IWCA I-14.1, and ASME A120.1, building owners should ensure façade-access equipment, including roof anchors, davits, sockets, tie-backs, and related systems, is inspected, tested, maintained, and documented by qualified personnel before use.

The key point is simple: property managers are required to use qualified professionals, but they are not required to use the original installer, original manufacturer, or the same inspection company every year.

3. What OSHA Requires

For rope descent systems and suspended maintenance work, OSHA requires building owners to provide written information confirming that each anchorage is capable of supporting at least 5,000 pounds in any direction for each employee attached.

That information must be based on proper inspection, testing, certification, and maintenance records. OSHA does not grant exclusive inspection rights to the original installer or any single vendor.

OSHA 29 CFR 1910.27(b)(1)(i) requires anchorage information to be based on annual inspection by a qualified person and certification of each anchorage by a qualified person as necessary and at least every 10 years.

4. Annual Inspection Requirements

Annual inspections are typically visual and functional reviews performed to confirm that anchors, davits, sockets, bases, tie-backs, labels, access conditions, and related components remain suitable for use.

- Annual inspections must be performed by a qualified person with the training, knowledge, and experience to identify hazards and determine whether corrective action is needed.



- A Professional Engineer stamp is not required for a standard annual inspection unless the system condition, engineer of record, manufacturer, or local requirement calls for engineering review.
- Annual inspections do not require load testing under most circumstances.

5. When an Annual Inspection Requires Early Recertification

Under OSHA 29 CFR 1910.27(b), building-owner anchorage documentation must be based on annual inspection by a qualified person and certification of each anchorage by a qualified person as necessary and at least every 10 years. In practical terms, a system is not always allowed to wait until the next scheduled 10-year cycle if the annual inspection identifies conditions that call the prior certification into question.

A 10-year recertification or proof-load test may be triggered early when the annual inspection identifies structural concerns, building changes, misuse, missing documentation, environmental damage, or unsafe use conditions that could affect the system's original load rating, installation basis, or safe use for rope descent systems.

Conditions That Can Trigger Early 10-Year Recertification

- **Structural concerns:** Corrosion on anchor bolts, cracked welds, deformation of anchor plates, loose or missing fasteners, water intrusion into concrete, or spalling and cracking around the anchor may invalidate the prior load-test basis and require immediate recertification.
- **Changes to the building structure:** Roof replacement, parapet modification, HVAC or mechanical additions, new penetrations near anchors, or added rooftop equipment that changes load paths may compromise anchor integrity and require new engineering review or proof-load testing.
- **Evidence of overloading or misuse:** Anchors used for non-rope-descent purposes, lifting materials, incompatible equipment, or multiple workers tied into a single anchor may void the previous certification and require immediate re-testing.
- **Missing or invalid documentation:** If the building owner cannot produce the last 10-year load test, last annual inspection, engineer's certification, or anchor layout map, the system may need immediate inspection and recertification if the prior certification cannot be verified.
- **Environmental or weather damage:** UV degradation, rust or oxidation, water pooling around anchors, freeze/thaw damage, or chemical exposure from roof cleaners, HVAC discharge, or bird waste may compromise anchor strength and require re-testing.



How an Annual Inspection Can Cause a System to Fail

An annual inspection is typically visual and functional rather than load-tested. However, it can still fail a fall-protection system if the inspector identifies defects, unsafe conditions, missing documentation, or incompatibilities that prevent safe use.

- **Anchor hardware failure:** Bent, cracked, or corroded hardware, missing bolts, improper torque, or weld separation can cause immediate system failure.
- **Improper installation:** Wrong fasteners, incorrect embedment depth, anchors installed in non-structural material, or anchors installed too close to edges may invalidate the original certification.
- **Non-compliance with current standards:** Older systems may fail inspection if anchor spacing is insufficient, load ratings are unknown, documentation is missing, or required rescue planning and safe-use documentation are not available.
- **Unsafe conditions for rope descent systems:** Sharp edges, electrical hazards, obstructions, unsafe drop zones, or inadequate tie-back anchors can make the building non-compliant for RDS work until corrected.
- **Missing labels or identification:** Anchors that are not labeled, numbered, mapped, or documented may be treated as uncertified because the user cannot verify which anchor was inspected, tested, or approved.
- **Incompatible or damaged equipment:** Wrong connectors, damaged self-retracting lifelines, non-ANSI equipment, or improper tie-back methods can prevent safe use of the system.

6. 10-Year Certification and Load Testing

At required intervals, commonly at least every 10 years, rooftop anchorages and façade-access equipment may require certification or recertification involving proof-load testing, engineering review, structural verification, and formal documentation.

- 10-year certification should be performed or overseen by a properly qualified engineering professional or licensed engineering firm.
- The engineering firm does not have to be the original installer, original manufacturer, or prior certification provider.
- The final report should clearly document the equipment reviewed, test results, compliance basis, deficiencies, and any corrective recommendations.

7. What Can Cause Failure During a 10-Year Fall-Protection Inspection

A 10-year inspection, also called a proof-load test or recertification, is the most rigorous



evaluation of a building's fall-protection system. It is used to confirm whether anchors, davit bases, sockets, tie-backs, and supporting structures can safely support the required loads and remain suitable for use.

Under OSHA 29 CFR 1910.27(b)(1), building owners must provide written information before rope descent systems are used confirming that each anchorage has been identified, tested, certified, and maintained to support at least 5,000 pounds in any direction for each attached employee. ASME A120.1 and ANSI/IWCA I-14.1 are also commonly referenced for façade-access systems, powered platforms, davits, and window-cleaning safety practices.

Common 10-Year Inspection Failure Conditions

- **Structural failure or degradation:** Cracked or spalled concrete, corroded anchor bolts or embedded hardware, weld cracks, weld separation, deformed anchor plates, loose or missing fasteners, water intrusion around anchor points, or rust expansion causing concrete cracking may mean the anchor cannot be trusted to hold the required load.
- **Failure to meet proof-load requirements:** Failure occurs if the anchor shifts, rotates, pulls out, or if a davit base deflects beyond tolerance or the supporting structure shows visible stress or cracking during testing.
- **Improper installation discovered:** Incorrect embedment depth, wrong fasteners or hardware, anchors installed in non-structural material, anchors installed too close to edges, or missing reinforcement or backing plates can cause failure because the installation does not meet the engineering basis for the system.
- **Changes to building structure:** Roof replacement, parapet changes, added rooftop equipment, new penetrations near anchors, or structural retrofits may compromise load paths and require engineering review before the system can be certified.
- **Environmental damage:** UV damage, chemical exposure from HVAC discharge or roof cleaners, corrosion from moisture, freeze/thaw cycles, or bird waste corrosion may affect system strength and lead to failure.
- **Missing or invalid documentation:** If the owner cannot produce the previous 10-year certification, engineer's stamped report, anchor layout map, or annual inspection records, the system may need to be treated as uncertified until properly evaluated.
- **Non-compliance with current standards:** Older systems may fail if anchor spacing is insufficient, load ratings are unknown, tie-back anchors are missing, rescue planning is absent, or engineering documentation is incomplete.

What Is Required on a 10-Year Certification

A compliant 10-year certification should provide enough detail for a property manager,



contractor, engineer, or compliance reviewer to understand what was inspected, what was tested, who certified it, and when the certification expires.

- **Professional Engineer certification:** The final certification should include the licensed Professional Engineer's name, license number, state of licensure, signature, date of certification, and engineering stamp where required.
- **Building information:** Include the building name, address, owner or management company, roof levels inspected, and system type, such as anchors, davits, sockets, or tie-backs.
- **Anchor or davit inventory:** Include anchor ID numbers, locations, type, quantity, and a layout map or diagram so each inspected component can be matched to the report.
- **Proof-load test results:** For each tested component, document the test load applied, duration of load, pass/fail status, movement or deflection observed, and any anomalies or concerns.
- **Engineering evaluation:** The engineering review should confirm whether the supporting structure is adequate, whether damage occurred during testing, and whether the system is suitable for rope descent systems or suspended access equipment as applicable.
- **Compliance statement:** The report should state the compliance basis used, such as OSHA 29 CFR 1910.27(b), ASME A120.1, ANSI/IWCA I-14.1, manufacturer requirements, and project-specific engineering criteria.
- **Validity period:** Include the certification date, expiration date, and conditions that may void the certification, such as structural changes, damage, misuse, repairs, or modifications.
- **Inspector credentials:** Include the inspector's name, company, qualifications, and contact information.
- **Photos and supporting documentation:** Photos of each anchor, proof-load testing, deficiencies, roof access points, and an updated anchor map are not always explicitly required by regulation, but they are a strong industry documentation practice.

8. Understanding Certification vs. Warranty

A fall-protection certificate is not a warranty. It confirms the documented condition of the inspected equipment at the time of inspection or testing; it does not guarantee future performance, prevent later damage, or cover misuse, weathering, structural changes, or modifications after the inspection date.



Manufacturers may offer product warranties, but those warranty terms are separate from OSHA compliance documentation. A compliance certificate should not be treated as a vendor-owned asset or an exclusive right to future inspections.

9. Common Vendor-Lock-In Claims

Property managers may hear claims that only the original installer or the current compliance vendor can inspect, certify, or maintain a system. These claims should be reviewed carefully against the actual standard, contract terms, warranty language, and engineering documentation.

- OSHA requires qualified inspection and documented compliance; it does not require exclusive use of one vendor.
- Competitive bidding is appropriate when the inspection provider is qualified and follows applicable OSHA, ANSI/IWCA, ASME, manufacturer, and engineering requirements.

10. Manager Checklist

- Confirm whether the service is an annual inspection, 10-year certification, repair review, or full engineering evaluation.
- Verify the inspector's qualifications and determine whether engineering involvement is required.
- Request a clear written report with equipment IDs, locations, findings, deficiencies, photos, test results if applicable, and the date of certification.
- Keep all inspection, testing, maintenance, and corrective-action records in the building compliance file.
- Question any vendor claim that suggests another qualified company cannot inspect or certify the system.

11. Annual Inspection vs. 10-Year Certification

Topic	Annual Inspection	10-Year Certification / Load Testing
Primary purpose	Confirm visible and functional condition for continued use.	Verify capacity, compliance, and structural performance through testing and engineering review.
Typical provider	Qualified fall-protection inspector or qualified person.	Qualified engineering firm or licensed Professional



		Engineer.
PE stamp	Not typically required for standard annual inspection.	Typically required for final engineering certification.
Load testing	Not typically included unless specifically required.	Included when proof-load testing is required.
Original installer required?	No.	No.
Documentation	Inspection report, condition findings, photos, deficiencies, and certification date.	Engineering report, test results, capacity verification, deficiencies, and stamped certification where required.

12. How Commercial Panes Supports Property Managers

Commercial Panes helps property managers maintain defensible compliance records by providing clear inspection coordination, practical documentation review, vendor-neutral guidance, and transparent recommendations for annual inspections, 10-year certification needs, and corrective follow-up.

Our approach is straightforward: identify what is required, explain why it matters, document the condition clearly, and help managers make informed decisions without unnecessary pressure or vendor lock-in.

13. Citations and Standards Referenced

The following standards and regulatory references are commonly used when evaluating rooftop anchors, rope descent systems, suspended access equipment, powered platforms, davits, sockets, tie-backs, and related façade-access systems for commercial building maintenance.

- **OSHA 29 CFR 1910.27 — Scaffolds and Rope Descent Systems:** Requires building owners to provide written information before use confirming that each anchorage has been identified, tested, certified, and maintained to support at least 5,000 pounds in any direction for each employee attached. The information must be based on annual inspection by a qualified person and certification as necessary and at least every 10 years.
- **OSHA 29 CFR 1910.66 — Powered Platforms for Building Maintenance:** Addresses permanently installed powered platform systems used for building maintenance, including owner assurance, field testing, engineering verification, and documentation requirements for applicable installations.
- **ANSI/IWCA I-14.1 — Window Cleaning Safety Standard:** Provides window-cleaning



industry safety guidance and is commonly referenced by building owners, property managers, engineers, manufacturers, contractors, and OSHA in relation to façade access and window cleaning operations.

- **ASME A120.1 — Safety Requirements for Powered Platforms and Traveling Ladders and Gantries for Building Maintenance:** Establishes safety requirements for powered platforms, traveling ladders, and gantries used for window cleaning and related building maintenance activities, including suspended equipment used at heights above 35 feet.