

Understanding Competent vs. Qualified and Training in Fall Protection

Background

This bulletin has been created to provide a high-level understanding of key portions of OSHA regulations 29 CFR 1910.140, 1926.32 and ANSI Z359.2 standard as they relate to definitions commonly used in fall protection applications. This bulletin does not represent a complete statement of the resources referenced, but a general summary of those resources as in effect on the date of this bulletin. The regulations and standards noted in this bulletin address the responsibilities and capability requirements of individuals involved in fall hazard mitigation.

The **Occupational Safety and Health Administration** (OSHA) has established the regulations identified below as part of the minimal requirements that employers are required to comply with for those workers exposed to hazards of working at heights.

Construction Industry 29 CFR

1926.32(d)

"Authorized person" means a person approved or assigned by the employer to perform a specific type of duty or duties or to be at a specific location or locations at the jobsite.

1926.32(f)

"Competent person" means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

1926.32(m)

"Qualified" means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

General Industry 29 CFR

1910.140(b)

Definitions. The following definitions apply to this section:

Competent person means a person who is capable of identifying existing and predictable hazards in any personal fall protection system or any component of it, as well as in their application and uses with related equipment, and who has authorization to take prompt, corrective action to eliminate the identified hazards.

Qualified describes a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, the work, or the project.

The **American National Standards Institute** (ANSI) is a private non-profit organization that oversees the development of voluntary consensus **standards** for products, services, processes, systems, and personnel in the United States.

ANSI Mission Statement:

To enhance both the global competitiveness of U.S. business and the U.S. quality of life by promoting and facilitating voluntary consensus standards and conformity assessment systems and safeguarding their integrity.

ANSI Z359.2-2017 Minimum Requirements for a Comprehensive Managed Fall Protection Program

4.3 Qualified Person

- 4.3.1 The qualified person shall, through education, professional certification in a related field or both, have knowledge and understanding of applicable fall protection regulations, standards, equipment and systems, physical sciences, engineering principles, and mandatory requirements for fall protection equipment and systems used by the employer.
- 4.3.2 The qualified person shall supervise the design, selection, installation, use and inspection of certified anchorages and horizontal lifelines.
- 4.3.3 When supervising the design, installation or selection of an active fall protection system, a qualified person shall ensure the requirements of ANSI/ASSP Z359.6, Specifications and Design Requirements for Active Fall Protection Systems, are met.
- 4.3.4 The qualified person shall participate in the investigation of all incidents related to falls from heights.
- 4.3.5 The qualified person shall meet the requirements of a competent person.

4.4 Competent Person

- 4.4.1 The competent person shall be responsible for the immediate supervision, implementation and monitoring of the fall protection program.
- 4.4.2 The competent person shall conduct a fall hazard survey to identify all potential fall hazards before the authorized persons are exposed to those hazards.
- 4.4.3 The competent person shall identify, evaluate and impose limits on the workplace activities to control fall hazard exposures including swing falls. These limitations shall be communicated to all employees who are authorized to utilize the fall protection systems.
- 4.4.4 The competent person shall have the authority to stop the work immediately, and take prompt corrective measures to mitigate fall hazards, if it is determined that it is unsafe to proceed with the workplace activities.
- 4.4.5 The competent person shall prepare, update, review and approved written fall protection procedures as directed by the program administrator. The competent person shall review these procedures as workplace activities change to determine if additional practices, procedures or training need to be implemented before workplace activities continue. The competent person shall ensure a written rescue plan has been developed for all fall arrest systems.

- 4.4.6 The competent person shall specify in written fall protection procedures the selected fall protection systems, including anchorage locations, connecting means, body supports and other fall protection equipment that authorized persons are required to use when they are exposed to fall hazards.
- 4.4.7 The competent person shall supervise the selection, installation, use and inspection of non-certified anchorages in consultation with the program administrator and qualified person(s).
- 4.4.8 The competent person shall verify that fall protection systems have been installed and inspected in compliance with this standard, manufacturer's instructions and applicable federal, state and local regulations.
- 4.4.9 Prior to working at height, the competent person shall verify authorized person training is complete and applicable fall protection and rescue procedures have been reviewed.
- 4.4.10 The competent person shall verify that available fall clearance is adequate before authorized persons work at height in the workplace.
- 4.4.11 The competent person shall ensure that prompt rescue of authorized persons can be performed by implementing and monitoring rescue procedures.
- 4.4.12 The competent person shall participate in the investigation of all incidents related to falls from heights.
- 4.4.13 The competent person shall immediately remove from service all personal fall protection systems and components that are damaged or impacted.
- 4.4.14 The competent person shall inspect or ensure inspection occurs for damaged equipment in accordance with manufacturer's instructions.
- 4.4.15 The competent person shall, at a minimum, inspect and document all fall protection equipment annually and as required by the manufacturer and applicable regulations.

4.5 Authorized Person

- 4.5.1 Where fall protection is required, the authorized person shall be trained to follow the employer's policy and procedures and the instructions of the competent person regarding the use of fall protection and rescue systems and equipment used.
- 4.5.2 The authorized person shall be trained on how and when to bring to the competent person's attention all unsafe or hazardous conditions, actions or unsafe work practices that may cause injury to either themselves or others before proceeding with the workplace activities.
- 4.5.3 The authorized person shall properly use, inspect all fall protection equipment for defects or damage; shall notify the competent person of any defect or damage; and shall avoid using such equipment.

4.6 Competent Rescuer

- 4.6.1 The competent person rescuer shall develop written rescue procedures and methods before the authorized persons start workplace activities at heights.
- 4.6.2 The competent person rescuer shall verify that all authorized rescuers have been adequately trained and are proficient at performing rescue.
- 4.6.3 The competent rescuer shall identify the resources necessary to conduct a safe and effective rescue from heights and verify that those resources are available for a prompt rescue event.
- 4.6.4 The competent rescuer shall identify hazards associated with rescue from heights and the required procedures necessary to mitigate the hazards within the area of the rescue.
- 4.6.5 The competent rescuer shall verify that rescue equipment is protected against damage by the workplace conditions.
- 4.6.6 The competent rescuer shall verify that rescue procedures are evaluated at least annually through rescue drills.

4.8 Trainers

- 4.8.1 Trainers shall conduct training according to ANSI/ASSP Z490.1, Criteria for Accepted Practice in Safety, Health and Environmental Training, and the requirements of this standard.
- 4.8.2 Trainers shall be familiar with the typical fall hazards, regulations, standards and the equipment used in the industry they are instructing. Training provided shall be customized to the industry and/or employer according to the needs assessment.
- 4.8.3 Trainers shall evaluate the fall protection knowledge and skills of trainees through written testing and performance assessments.

It is important to understand that ANSI standards are voluntary, and compliance is not mandatory unless a specific ANSI standard has been adopted and referenced by a governing regulatory body. In many instances, the ANSI standards may provide information or guidance that exceed the minimum requirements established by OSHA. These additional resources may provide beneficial information to professionals working as safety and structural engineers, safety officers, training personnel, employers and employees. Always adhere to your local, state, governmental, jurisdictional, employer requirements and manufacturer's user instructions.