Establishing Who's Who in Your Fall Protection Program

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Why you should designate authorized, qualified, and competent persons in your safety plans.

The importance of fall protection training cannot be understated. Falls are a leading cause of injury and death for construction and general industry workers. Nearly two to three workers die every day from falling from heights, and most of those deaths occur at a height of 20 feet or less. Establishing fall protection programs with proactive measures and effective training can help prevent injury and save lives.

Fall protection programs are communicated, upheld, and maintained mostly through training. The Occupational Safety and Health Administration (OSHA) requires employers to provide fall protection training to all employees who might be exposed to fall hazards. However, changes to the workplace, new equipment, and new hires require continuing education to become a staple in your fall protection program. This article will explore the significance of fall protection training, highlight best practices to ensure compliance, delve into OSHA's regulations, and discuss how to choose a competent person for your fall protection program and designate authorized users of the equipment.

The Significance of Fall Protection Training

Besides OSHA's mandate to provide fall protection training, the standard does not provide much clarity into the content of

those trainings nor who is qualified to deliver these trainings. Enter the American National Standards Institute (ANSI). The ANSI Z359 code is a voluntary consensus standard that aims to keep fall protection manufacturers consistent and helps users with a more in-depth guide on implementing fall protection equipment.

It might be helpful to consider OSHA the "where, when, and why" fall protection is required, and ANSI can guide the "what and how" when selecting equipment and advising proper use. It's important to remember that OSHA's mandates are law, while ANSI's mandates are voluntary guidelines. ANSI Z359 is a resource to guide the development of fall protection programs and is crucial in establishing an effective training program. It

is essential to refer to both standards to create the safest work environment.

OSHA 1926.503 states that employers must provide training for employees exposed to fall hazards. This training should make authorized users aware of fall hazards and train them on procedures and practices to help minimize their risk of injury. Noncompliance with OSHA's fall protection training requirements can have dire consequences, including penalties and citations. More critically, it puts employees at risk of severe injuries or even death due to falls.

Who's Who in Your Program?

The OSHA 1926.32 standard even defines certain roles regarding your fall protection program. But when OSHA describes an authorized, competent, or qualified person, what does that mean? The code attempts to provide definitions for these roles. According to the standard, an authorized person is approved or assigned by the employer to perform a specific type of duty at specific locations on the jobsite; a competent person is capable of identifying existing and predictable hazards in the surroundings that could be dangerous to employees, and has authorization to take prompt corrective measures to eliminate them; and a qualified person is someone who, by possession of a recognized degree, certificate, or professional standing, has successfully demonstrated their ability to solve or resolve problems relating to the subject matter.

Let's further define and discuss what these roles mean to your program and their significance.

AUTHORIZED PERSON

This is a self-explanatory user title but an important one. While everyone in the company can support fall protection programs, not every employee will be trained as thoroughly, depending on how often they must work at heights. Employers must be sure that users who have been authorized to use the equipment and are properly trained are the only individuals who use fall protection equipment. It's important to recognize that the organization actively designates who is authorized to use fall protection equipment and who is not based on who receives fall protection training. As previously mentioned, only a competent person can provide this training and authorize users for the equipment. Employers must designate this competent person as well.

COMPETENT PERSON

To put it concisely, the competent person is someone specified by OSHA, designated by the employer, and trained by the ANSI standard. Their importance in a fall protection program should not be neglected, as they can carry a strong influence on the effectiveness and adaptability of the program. An individual who goes through an ANSI-accredited competent person training program will learn the extensiveness of the ANSI code, discover how to meet minimum OSHA requirements, and guide how to establish policies that can help minimize fall hazards in the workplace. In the spirit of encouraging continuous education, ANSI requires competent person certifications to be refreshed every two years.

Designating a competent person should be one of the first steps in establishing a fall protection program, because ANSI Z359.2 guidelines fully describe the duties and responsibilities the competent person role plays in the program. The competent person is responsible for approving equipment to use in the fall protection program, facilitating training to authorized users of the equipment, and ensuring workers are adhering to OSHA mandates and ANSI guidelines for best practices. The competent person is also responsible for the annual inspection of all fall protection equipment to ensure daily pre-use inspections are being performed. Note that construction trades are subject to biannual equipment inspection because of the anticipated greater wear and tear that can occur on equipment in construction environments.

QUALIFIED PERSON

When it comes to your fall protection program, a qualified person is simply another term for a professional engineer. A qualified person can help certify anchor points that might not meet the standard 5,000-pound strength requirement per OSHA 1926.502. Qualified persons are also required when it comes to inspecting and testing certified anchor points and designing certain overhead horizontal lifeline fall protection systems, and they are typically involved in investigating fall incidents if they occur.

Continuing Education to Support Compliance

Fall protection training is an efficient method for two-way communication regarding fall hazards and regulations. During trainings, safety leadership should discuss the core principles of their fall protection program, review recent incidents or near-misses as learning opportunities, and encourage participants to discuss any potential hazards they've recently experienced. This communication can provide valuable information to the safety department to proactively protect workers as hazards arise, instead of reactionary measures taken in response to a potentially tragic incident.

Establishing and maintaining a fall protection program can be an encompassing effort, and the efforts to ensure user compliance are ongoing. Reach out to a safety partner for resources to give further guidance on navigating the OSHA/ANSI relationship, building a robust safety culture and making sure your sites are meeting minimum OSHA requirements.

About the Author

Philip Jacklin is continuing education program manager for Diversified Fall Protection. Since 2018, Jacklin has been training workers nationwide on best practices when using their fall protection and advising safety managers; environmental, health, and safety (EHS) leaders; plant maintenance managers and other safety professionals on how to create more efficient fall protection programs.

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