

Am I Competent...or Incompetent?

A common discussion in fall protection circles is the “Competent Person”. What it takes to become one and the different definitions of one. Unlike an attorney where passing the bar is the threshold to becoming a lawyer, a competent person does not have to pass a test, training cert, or specific education. They must however meet two criteria; 1) a person must have the ability to identify hazards associated with the work and 2) have the authority to correct said hazards. If a person meets these two criteria, they are a competent person. This is a simplistic take on the definition and it does not use the exact words as all the definitions, but it works. Regarding fall protection, there are three common sources for the competent person definition; 1910.140(b), 1926.32(f), and ANSI Z359.0(2.30). You can do a word-by-word comparison to see the subtle differences, but this article is going to focus on how a fall protection program can use different competent persons for a number of different tasks.

The key to understanding a competent person is to look at the specific work. Of course, resumes, work experience and certifications play into this, but it’s the scope of work that is most often overlooked. It’s important to identify the issue or task before identifying who is (and isn’t) a competent person. Once the work is understood, the person or group best suited can be identified (or trained). Thinking all competent people are the same is the most common mistake made. It’s common for fall protection programs to have several different competent people for different fall protection tasks. One person or group may have the ability and authority over the inspection of equipment, whereas another has the ability and authority for fall protection on new projects. Another competent person could have the ability and authority for training and education and another has the ability and authority for fall protection for a specific building, trade, or work process. Obviously, the knowledge and extent of authority for an equipment inspector would be different from a process owner, but they both can be competent persons within a fall protection program.

Imagine a tool room operator at a manufacturing facility. This person is responsible for inspecting fall protection equipment as it is checked in and out. The “work” is equipment inspection and the “hazards associated with the work” is damaged or non-functioning equipment being used. For the tool room operator to be competent, the inspector must 1) have the ability to inspect each item for function and condition and 2) have the authority to remove the item from service and not allow it out anymore. The tool room operator does not need to supervise or stop work, train staff, write procedures, or determine solutions to fall hazards. The scope of this work is limited to equipment inspections, so the inspectors’ abilities and authority need to match.

Another example would be a Regional Safety Supervisor for a mechanical contractor. This person has the responsibility for fall protection at a number of worksites where their staff is contracted. The “work” is supervising staff installing or maintaining mechanical equipment at different locations. The “hazards associated with the work” is the staff’s exposure to fall hazards, including roofs, access hatches, skylights, MEWPs, fixed and portable ladders, and unprotected edges. For the Regional Safety Supervisor to be competent, the supervisor must 1) have the ability to identify all fall hazards encountered through the course of the work and 2) have the authority to take corrective actions to protect the staff. The scope of the supervisors’ work is much larger than the tool room operator. The supervisors’ ability must include understanding the means and methods of mechanical contract work, identification of fall hazards, knowledge of the occupational health and safety laws of the jurisdiction, the hierarchy of fall protection controls, and the selection and use of active fall protection systems according to anchorages and clearances available. Their authority would likely include stopping work to some degree, purchasing equipment, developing solutions, estimating clearances, educating staff and customers, or requiring and conducting additional training.

Some points to note about a Competent Person:

1. OSHA’s definition of a competent person is used in a number of different regulations. ([LINK to Competent Person References](#))
2. ANSI Z359.2 provides a definition as well as responsibilities and training requirements for a Competent Person specific to fall protection. ([LINK to ANSI Z359.2](#))

3. Only an employer can bestow the Competent Person title by giving a person the authority to work within the program. Training courses titled Competent whatever provide education to assist with recognizing hazards and what corrective action to take, but without an employer's authority, a person is, well, I guess, they would be.... incompetent.
4. A Competent Person doesn't have to be on-site or immediately present whenever fall protection is used. The fall protection program should address physical locations, type of work, organizational structure, authorized person ability, and other pertinent factors to determine adequate competent person coverage. A competent person must be accessible to authorized people as a resource and be local enough to ensure the fall protection program policies are being followed.
5. Competent Person training, like all fall protection training, needs to be specific to the scope of work. WAH believes all training efforts are beneficial, but a quick needs assessment to match the competent person training content with the expectation of the work ensures training is accurate without time or energy wasted on unnecessary material.

An employer has an incredible amount of flexibility in managing its fall protection program and can organize competent people in several different ways. WAH believes that Competent people, second only to the person setting the budget, are the most instrumental category of staff in implementing the fall protection program. They know the work and are key in providing guidance, education, and executing program policies with at-height workers, managers, legal, and engineering.

WAH provides customized training programs and services for fall protection professionals. [Fall Protection Program Builds, Competent Person, Train-the-Trainer, Equipment Inspections, and Continuing Fall Protection Education](#) are services available through WAH.

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