

# Competent Person Fall Protection Training

*What should you look for? Your options range from online courses to CDs and classroom instruction lasting up to 40 hours.*

By Kevin Denis | Nov 01, 2009

Training should represent the workplace, but without the risk.

One of the questions most frequently asked is, "What kind of training do I need to be a Competent Person in regard to fall protection?" Although it seems like a straightforward question, the answer can be a little tricky. Many people believe the singular requirement to achieve Competent Person status is completion of a fall protection course, but it's just not that simple.

OSHA defines a Competent Person as "one who is capable of identifying existing and predictable conditions in the surroundings and work areas which are unsanitary, hazardous or dangerous and who has authorization to take prompt corrective action." The definition is a little nebulous, but it does provide the two key expectations for a Competent Person: The ability to predict local hazards and the authority to make changes.

To satisfy these criteria, it is imperative that the workers' skills and knowledge are evaluated to determine the appropriate training they require to complete the scope of work expected by their employer. Employers also must examine their organizational structure to allow the Competent Person to exercise the authority to make changes. Only after these elements have been considered and Competent Persons identified should training be evaluated and selected. There are dozens of ways to conduct Competent Person training. Before investing in or creating a training program, employers should understand what they are getting so their needs are met.

## Key Elements of Fall Protection Training

The end result of effective training is a Competent Person who can control fall hazards at the local level, resulting in a higher level of safety and compliance. Competent Person training should focus on this end goal. Having a certificate recognizing an employee as a Competent Person is not enough if the training does not accomplish these goals.

Training should include several key elements to get the job done. When selecting training for your Competent Person, always ask the following questions:

### 1. Does your fall protection training include observations of performance on each fall protection system and for each skill set that you expect your Competent Person to have?

Fall protection requires several physical skills. As a result, hands-on training is paramount. The student, legal departments, other agencies, or OSHA can challenge training formats that do not include observations of performance, so it must be included. Training formats that do not include observations of performance provide a document with the student's name on it but do little to prove the student's ability or to withstand the test of litigation. There is a general misconception that, as long as a topic was discussed, demonstrated, and documented with a test or roster, the training was acceptable and adequate. Observations of performance take it one step further by requiring the students to demonstrate their skills to a qualified instructor. This is key.

The majority of learning takes place when the student physically participates in hands-on exercises. It is one thing to watch a video of someone using a ladder safety system; it is quite another to don a harness, attach yourself to the system, and climb. Inadequate training may instruct students on how to don a harness but use videos or presentations to illustrate how the rest of the fall protection system works. Or instructors may demonstrate how to use the fall protection system but not have the students physically participate. It takes time (and money) to provide each student with an opportunity to use each component. Also, a structure where hands-on training can be provided is not always readily available. Observations of performance are often the first thing eliminated from training when time and money considerations are put before the quality of the program.

The International Association of Continuing Education and Training (IACET) and the Criteria for Accepted Practices in Safety, Health, and Environmental Training (ANSI Z490.1-2009) provide guidance for how observations of performance should be used to gauge and evaluate desired skill sets and training outcomes. ANSI/ASSE Z359.2 (Minimum Requirements for a Comprehensive Managed Fall Protection Program) also supports observations of performance by calling for "physical demonstrations by trainees." Although training formats that do not include observations of performance may provide excellent information, they fall short. Imagine enrolling your teenager in a driver's education program where he/she is issued certification without ever getting behind the steering wheel of a car.

### 2. Does your fall protection training allow enough time for all students to use each item of equipment and develop each skill set?

The amount of time required for Competent Person training varies. Again, it is dependent on the scope of work the competent person is expected to perform. For example, imagine a sign company whose employees work from aerial lifts to perform work on storefronts. The fall protection needs of these workers will be limited. The knowledge and skill sets required from their Competent Person will also be limited. For this application, Competent Person training can be minimal.

On the other hand, training for a Competent Person at an oil refinery may include instruction on horizontal lifelines, vertical lifelines, self-retracting lifelines, five different harness styles, two dozen anchorage connectors, contractor equipment, an emergency response team, and the assessment of 200 different fall hazard locations. Training for this application would be longer in duration and significantly different from the training for the sign company's Competent Person.

When evaluating training options, employers will find dozens of Competent Person training programs varying in duration and format. There are four-hour courses offered online and courses on CDs that can be purchased. Instructor-lead programs can range from 16 to 40 hours. In any case, each student must be given enough time to learn how to use each piece of equipment and understand the skills presented. Any online, correspondence, or CBT training is ineffective if the Competent Person is expected to use fall protection equipment. Each student also must have an opportunity to demonstrate how to use the equipment properly under the supervision of a qualified instructor and time to ask questions or practice these skills. There is no easy way around this; it just takes time. A 40-hour, instructor-lead program is the industry norm for Competent Person training when the Competent Person is expected to use a variety of fall protection systems, evaluate hazards, write procedures, and supervise others.

### 3. Does your training program protect the student?

Obviously, training at heights, whether fall protection or rescue, needs to be conducted safely. The level of protection provided for students during training must be more than the minimum required by OSHA. As much risk as possible must be removed from the training environment.

Mistakes happen. Students may be using fall protection systems incorrectly or training exercises may be their first exposure to the equipment. A student may simply slip and fall during training. Accidents and lost-time incidents are damaging enough; imagine having one happen during training. Training should represent the workplace, but without the risk. When vertigo, apprehension, nervousness, fear, uncertainty, or a fall occurs during fall protection and rescue training, provisions must be in place to ensure the safety of the student.

This is essential during observation of performance exercises. The instructor should balance the authenticity of the exercises with the risk associated with them. For example, using a Y-lanyard to climb a tower structure is acceptable according to OSHA requirements. But if a fall accident should occur during training and a student is using a Y-lanyard only, he/she is going to fall several feet and swing into the structure. During training, the students should be connected to a belay line or a self-retracting lifeline to offer the highest degree of safety while still allowing them to climb. This principle has been understood for decades by many organizations. SCUBA diving is taught in a pool or shallow water. CPR is conducted on a mannequin. Driver's education cars have an extra set of brake pedals. Fall protection training must also be evaluated to remove as much risk as possible. Training facilities provide a safer environment because they can provide certified anchorages, reduce swing falls, afford an environment that is conducive to learning, and limit heights to facilitate prompt rescue if necessary.

### 4. Does your training provide a Competent Person with the resources he/she needs at the conclusion of the course?

Most recognized Competent Person training programs are 24 to 40 hours in length and present a lot of information for any person to retain without the benefit of a manual or guide to serve as a resource after training. Presentations, videos, and other media used during training programs are great, but what does the Competent Person walk away with?

Resource materials should be in-depth and include more information than what is covered in the course so students can continue their education. We know students won't retain 100 percent of what they learned, so training materials should be comprehensive enough that the students can refer to them later to refresh their memories. Providing students with fall protection regulations and equipment catalogs alone is inadequate. Without explanation and other resources, these do little for the student after course completion. Effective resource materials will include explanations of the intent behind fall protection regulations. They should also explain hardware compatibility, how to calculate free fall distances, and hundreds of other relevant topics.

### 5. Is your training conducted by a qualified instructor/ agency?

When selecting an instructor or agency, it is important to ensure that the instructor has experience delivering adult education programs. Just as Competent Persons must have work experience related to the tasks expected of them, instructors must have experience conducting training. A common mistake is the assumption that any person with the Competent Person title can conduct training.

You wouldn't assume that licensed automobile drivers are capable of teaching driver's education just because they have a driver's license. Again, when choosing an instructor, employers should list the tasks that are expected of their Competent Persons before looking at training options. If delivering training is a required skill set, employers must make sure their instructor has experience to assess, evaluate, and document student performance.

The ANSI Z359 Fall Protection Code is one of the best resources for employers. Section 3.3.4 of ANSI/ASSE Z359.2 (Minimum Requirements for a Managed Fall Protection Program) includes guidance for employers on how to train their Competent Person(s). There are several other considerations for Competent Person training that have not been discussed here that are detailed in this document. The requirements included in the ANSI Z359 Fall Protection Code can be applied to your internal training program or used as a measuring stick for outside training sources. Either way, it will help employers take the steps toward more effective Competent Persons.

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#### About the Author

*Kevin Denis is Training Manager for Gravitec Systems Inc. of Bainbridge Island, Wash.*