



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
WASHINGTON, D.C. 20314-1000

CESO-E

15 June 2012

MEMORANDUM FOR RECORD

SUBJECT: Clarification of USACE Crane Operator Certification/Qualification Options for Contractor Operators, Physical Examination Requirements and Appropriate Submittals as Proof

1. Presented here is a description of USACE crane operator certification/qualification options available for Contractor crane operators. Paragraph 2 below details requirements presented in Section 16.B of EM 385-1-1, Interim Change #6 which was effective 5 July 11 and paragraph 3 below details those requirements in Section 16.B of EM 385-1-1, 2008 which was effective January 2009.

2. 2008 EM 385-1-1, CHANGE #6 Crane Operator Requirements:

a. All the requirements in 16.B.01 and 02 apply to all operators regardless of manner in which they become certified and include successful completion of a written examination and practical examination.

b. Paragraph 16.B.03 states that the EMPLOYER is required to ensure his/her operators are designated as qualified and/or certified operators for whatever they are operating (Type, Class and Capacity).

c. Paragraph 16.B.03.a, Option 1 allows cranes operator to become qualified via an accredited crane operator testing organization. This means the testing organization must be accredited by a nationally recognized accrediting agency based on that agency's determination that industry recognized criteria for written testing materials, practical examinations, test administration, grading, facilities/equipment and personnel have been met.

- This option has not changed from 2008 EM 385-1-1 requirements except for the fact that the last statement in 16.B.03.a (6) requiring equipment type and capacity on the license is not capable of being met at this time. **Explanation:** Those testing agencies (i.e., NCCCO, NCCER, CIC, and others) that have achieved accreditation by the nationally recognized accrediting agencies do not list the class or capacity of equipment on the license. Instead, they list the type (TSS – Telescopic Boom Fixed Cab; TLL – Telescopic Boom Swing Cab; LBC – Lattice Boom Crawler Mounted; LBT – Lattice Boom Truck Mounted, etc). Coordination with these testing agencies is being worked to see if USACE can impact their decision to ultimately list that information on the license. OSHA is going to issue an interpretation on the “capacity” issue but until that time, *based on the written and practical examinations that the operator has taken and passed, the operator is determined to be qualified by the employer (in writing) to operate DESIGNATED equipment (type, class and Capacity).*

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- Paragraph 16.B.03.a(6) "NOTE:" states "if no accredited testing agency offers certification examinations for a particular type and/or capacity of equipment, an operator will be deemed qualified to operate that equipment if the operator has been certified for the type/capacity that is most similar to that equipment and for which a certification examination is available.". What does this mean? As an example, let's say a contractor has a floating hydraulic pedestal mounted crane. There is no accredited organization that tests on floating cranes. So if the operator has chosen Option 1 for certification, he/she would take the written/practical examination that most closely represents this equipment. In this instance, he would take the TLL or TSS (depending on specific equipment) that he will operate. Once he successfully passes a written and practical exam on this type of equipment (which will be presented on a land-based crane in a land-based mode), the employer still needs to designate him as a qualified operator of this floating crane – meaning they know he can operate this floating crane successfully/safely. The employer will probably want to provide further hands-on training, and practical operational testing on this equipment to insure he truly is capable of operating it safely. Employer then designates this operator as a designated, qualified/certified operator for that specific type and class equipment.

d. Paragraph 16.B.03.b: Option 2 allows contractors to use a Qualified Person (QP) to qualify their operators as long as the program is an audited program and this documentation is submitted.

- 1) The QP can be either an in-house or a 3rd party resource;
- 2) The QP may be used in lieu of a Certified Auditor until 14 Nov 2014 because a nationally accredited certified auditor program has not yet been developed;
- 3) A QP is defined in Appendix Q, EM 385-1-1;
- 4) The written and practical exams used shall either be those developed by an accredited testing organization (i.e., the organization is using NCCCO, NCCER, or others' exams) OR the QP has approved them as meeting nationally recognized testing criteria per their auditing process. Program shall have been audited within 3 months of existence and every 3 years afterwards and must meet the requirements in this paragraph.

5) So, what does a contractor submit to show that they are complying with Option 2 (refer to EM 385-1-1, Change #6, 16.B.03.b(1) – (6))?

- Identify and submit a resume' for the QP (whether in-house or external) detailing experience, training and skills with cranes, hoists, rigging and/or signal person-related work so that a determination can be made as to this individual's associated competency level;

- Names and resumes that include qualifications of personnel performing classroom training (if other than the Qualified Person), and administering the written and practical examinations shall be included.

- A memorandum/letter, signed by the QP, that states the program has been audited and confirming that the program is structured upon nationally accredited programs and that the written and practical examinations are being provided by an accredited testing organization OR that the examiner has approved these examinations as meeting nationally recognized testing criteria.

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e. Paragraph 16.B.05 Operator Physical Qualifications/Examination states “All crane/derrick operators shall be physically qualified to operate the equipment. Physical examinations for operators are required to be conducted every 2 years and any time a condition is observed that may impact safe operation. Written proof, signed by a physician stating that the operator has had a physical examination and meets the medical requirements set forth below shall be submitted to the GDA for acceptance prior to allowing an operator to operate the equipment.

Note: Operators of Hoisting Equipment are exempt from this requirement UNLESS this equipment is used to hoist/lift personnel. This activity is considered a Critical Lift and as such, requires a physical examination for the operator. See also 16.A.01.i and Section 16.U;”

- The term “physician” has been determined to be a Medical Doctor (M.D.) or a Doctor of Osteopathy (D.O).

- The intent is that the “NOTE” above only applies to hoists, not cranes and/or derricks. The term “hoisting equipment” above is intended to mean strictly HOISTS – which just pick loads vertically, (for example, a jib hoist). This term DOES NOT mean crane and/or derrick operators.

f. Paragraph 16.B.06 Signal Person Qualifications I believe this section is self-explanatory and does not need further interpretation.

- What are the necessary submissions? Contractor/USACE/Government would submit signal person qualifications which would include 3rd party Qualified Evaluation or employer’s QE documentation as detailed in requirement.

2. 2008 EM 385-1-1 Crane Operator Requirements.

a. All the requirements in 16.B.01 and 02 apply to all operators regardless of manner in which they become certified and include successful completion of a written examination and practical examination.

b. Paragraph 16.B.03.a: Option 1 allows crane operator to become qualified via an accredited crane testing organization (NCCCO, NCCER, CIC, etc).

c. Paragraph 16.B.03.b, Option 2 allows contractors to use a 3rd party or in-house resource to qualify their operators as long as the program is an audited program and this documentation is submitted. The written and practical exams shall either be those developed by an accredited testing organization (i.e., the organization is using NCCCO, NCCER, or others’ exams) OR the examiner has approved them as meeting nationally recognized testing criteria. Program shall have been audited by the employer within 3 months of existence and every 3 years afterwards.

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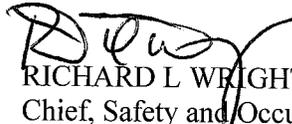
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d. Paragraphs 16.B.03.c and d, Option 3. Qualification by the U.S. Military and Option 4. Licensing by a Government Entity. Neither Option 3 or 4 are discussed here as these 2 options are not available to contractor operators.

3. REFERENCES: 2008 EM 385-1-1, Change #6 Text.

- 16.B PERSONNEL QUALIFICATIONS; 16.B.01.a-c;
- 16.B.02 Crane Operator Requirements – General.a-e;
- 16.B.03 Crane Operator Qualifications and/or Certifications. a. Option 1;
- 16.B.03.b Option 2;
- 16.B.03.c Option 3. Qualification by the U.S. Military - is not discussed here as it is not an available option for contractor operators;
- 16.B.03 Option 4. Licensing by a State or Local Government Entity - is not discussed here as it is not an available option for contractor operators (license is good only for equipment operated within the jurisdiction of the government entity; non-transferrable).
- 16.B.05 Operator Physical Qualifications/Examination and associated "Note";
- 16.B.06 Signal Person Qualifications.

4. POC for this action is Ms. Ellen B. Stewart, CSP, 202-761-8565 or Ellen.B.Stewart@usace.army.mil.


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