

# NPS National Chainsaw Safety Policy Frequently Asked Questions

## Version Date 04/24/2020

### *Q1. Is USFS S-212 qualification recognized?*

**A1.** If you are a current red carded wildland firefighter and are certified to operate a chainsaw (FAL1, FAL2, FAL3) then you may continue to operate a chainsaw in a non-fire capacity and under the qualification levels described by the [National Wildfire Coordinating Group](#) (NWCG). If you have attended S-212 and are not red carded, you will need to qualify under the NCSP.

### *Q2. Who is the Point of Contact for having my competencies evaluated?*

**A2.** Your Park Chainsaw Safety Program Manager is your point of contact. Follow established individual Park policies and procedures/chain of command.

### *Q3. Will employees who have been using chainsaws regularly in their jobs for years have to be tested as well?*

**A3.** Everyone in the NPS that uses a chainsaw as a non-wildland fire operator MUST comply with the new policy. This means each person must take the [mandatory online e-course](#) and have their competencies evaluated by an NCSP Competency Evaluator.

There are only two types of chainsaw operators in the NPS:

1. **Wildland Fire Chainsaw Operators** who will continue to be trained and qualified through the NWCG program.
2. **Non-Wildland Fire Chainsaw Operators** who will be qualified through the NCSP program.

### *Q4. I am a certified Arborist and have gone through the NPS sponsored Arborist Training Program (ATP). Do I have to have my competencies evaluated again?*

**A4.** Yes – see answer A3 above.

### *Q5. Who decides that an employee is qualified?*

**A5.** Only NCSP Instructor/Competency Evaluators may qualify and issue cards. However, it is ultimately up to your Superintendent (or their designee) to sign and present the card to you. The card must be carried by the operator at all times and provided upon request at any NPS park unit when chainsaws are being used.

### *Q6. How long is the qualification valid? Are there CEU's to obtain?*

**A6.** The qualification will be valid for 3 years from the date of issuance. After the 3-year period is up, you will need to re-qualify. There are no Continuing Education Units (CEU's) to obtain. Re-qualification procedures are the same as initial evaluation and must be from a qualified NCSP instructor/competency evaluator.

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***Q7. Where will proof of my qualifications be kept? Who will monitor qualifications?***

**A7.** Proof of training ultimately resides at your park. Your Superintendent (or designee) will have ultimate authority of your actions. He/she may retain your training documents, but you should also maintain your own training documents. This qualification will travel with you in your NPS career. Likewise, you SHALL carry your card at all times. Qualification will be monitored at the park level. Your card WILL be requested when serving on any incident or project outside of your park. There will also be a database for all NCSP Chainsaw Operators, including qualification levels and qualification expiration, maintained by the Office of Risk Management at WASO.

***Q8. Does a qualified operator have to record the number of hours operating a saw?***

**A8.** No, however, if they want to become a qualified NCSP Instructor/Competency Evaluator they will need to verify that they have had 40 hours of chainsaw operations per year.

***Q9. Will there be funding available to bring trainers/evaluators into parks?***

**A9.** Evaluation/Training strategy will be implemented at the regional level and will be the responsibility of the Park to fund.

***Q10. Is there an interim phase of the qualification process for those who need additional experience?***

**A10.** Based on the outcome of the evaluation, one of three recommendations will be made by the instructor/competency evaluator to the Superintendent:

- The instructor/competency evaluator decides that the candidate has successfully demonstrated the knowledge, skills, and ability necessary to operate a chainsaw independently – chainsaw operator qualification at the stated level is recommended and forwarded to their respective Superintendent.
- The instructor/competency evaluator decides that the candidate requires additional training. The participant may operate a chainsaw under the direct supervision of a qualified operator while receiving additional training.
- The instructor/competency evaluator decides that the candidate has NOT successfully demonstrated the skills necessary to operate a chainsaw. The participant should attend additional training to build the required skills before operating a chainsaw.

***Q11. Am I required to take the Chainsaw Safety Maintenance and Operations Course or any other hands on training before having my competencies as a chainsaw operator evaluated?***

**A11.** Unless otherwise required by your park or region, you do not need to participate in a training course before you have your skill as a chainsaw operator or faller evaluated. You may

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request a copy of the competency guide so you can conduct a self-assessment of your skills prior to your official competency evaluation.

***Q12. What is the Trail Safe Program and where can I locate it?***

**A12.** Trail Safe is a formal risk management training that was developed based on the NPS Operational Leadership principles. This training was developed specifically for those volunteers and partner groups who work on the NPS National Historic and Scenic Trail System. It focuses on identifying, assessing, and mitigating risks specific to work that is performed on the trails. It can currently be found at NPS Trail Safe <https://www.nps.gov/iatr/trail-safe.htm>. You will need to keep a record of your training completion.

***Q13. Do I have to complete the Operational Leadership 16-hour course, or can my previous risk management training suffice? I attended an Operational Risk Management training program in my last assignment.***

**A13.** If you have attended a formal risk management training course and you have a training certificate to verify, you do not have to attend the 16-hour Operational Leadership course prior to certification.

***Q14. When you transfer to a new park, do you need a new card signed by the new superintendent?***

**A14.** This would be at the discretion of the Superintendent. If they are comfortable accepting the card that has been issued from another park superintendent, then a new card would not be required. However, the current Superintendent may elect to require a competency evaluation performed in their park before allowing the operator to perform chainsaw work. It would also be necessary when the operator's existing card expires.

***Q15. What if the superintendent doesn't want to sign each candidate's qualification card and wants the supervisor to be the signature authority on the qualification card?***

**A15.** The superintendent can delegate signature authority, but the superintendent is ultimately responsible for the program and ensuring that chainsaw operators are qualified.

***Q16. How is a designee authorized/assigned?***

**A16.** If a superintendent wishes to assign a designee for signature authority on qualification cards, designation should be in writing.

***Q17. Is the card valid if the Instructor/Competency Evaluator (I/CE) that issued it is no longer employed by NPS?***

**A17.** If the I/CE is no longer employed by NPS, the qualification remains valid as they were a current I/CE at the time of issuance.

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***Q18. Is the Sawyer qualification card only valid with a current First Aid certification?***

**A18.** Before starting a project or chainsaw operations, the supervisor should ensure that operators have current FA/CPR/BBP.

***Q19. Does the 3-year qualification cycle start on the date the qualification card is signed by the superintendent or date of evaluation? We had delays due to the government shutdown, new superintendent, etc.***

**A19.** Three years from the date the superintendent or designee signs the qualification card. Superintendents or their designee should sign the qualification card within in 14 days of receipt.

***Q20. Who is the Advisory Board? National Chainsaw Safety Program (RM 50B Chapter 15) doesn't indicate who to send waiver requests to. What is the intended turnaround time from the Advisory Board?***

**A20.** The advisory board currently consists of previous NCSP Workgroup Members and will be modified to include representatives from all stakeholder groups. There is an established Advisory Group Charter and we will be updating Advisory Group Members by no later than the close of FY20. Currently, the Occupational Safety Manager in the Office of Risk Management at WASO is the chair of the advisory group and waivers should be sent via email to [Risk\\_Management@nps.gov](mailto:Risk_Management@nps.gov). Response time for a waiver should not exceed 14 days as long as all the appropriate documentation is provided at the time of submission.

***Q21. Most of our maintenance staff have obtained their CSMO Sawyer cards. When we started, the online course was not available to the park. Do they need to go back and complete the e-course? Most have been using saws here at the park for years.***

**A21.** Yes, everyone needs to take the one hour e-course [NPS Chainsaw Policy and Use](#).

***Q22. Is there a mechanism for supervisors to provide the On-Job-Training (OJT) or does it require a trainer such as a competency evaluator?***

**A22.** On the job training can occur after they have been evaluated (gone through the competency evaluation process) and it is determined that they need additional training and skills improvement. This OJT can be supervised by a qualified NCSP Sawyer at the level of certification for which the employee is trying to obtain.

***Q23. For myself and others that have completed the NPS Arborist Program and are certified NPS Arborists, does hazard tree work/removal stop until Master Faller Qualifications are obtained?***

**A23.** Arborists are considered a specialty job as some aspects (ex. tree climbing and rigging) fall outside the NCSP. Arborists who fall trees will need to go through the NCSP qualification, but work does not need to stop until the policy implementation date of May 1, 2021.

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***Q24. What about parks with fallers with hazard tree programs? Does hazard tree removal stop until master faller qualifications are obtained?***

**A24.** No, but the employees will have to be qualified at the levels that are currently available in the NCSP Program. Once the Journey-level Faller (JF) and Master Faller (MF) qualifications are released, the 12-month clock starts for employees to become certified at the JF and MF levels.

***Q25. Where will instructors store training records?***

**A25.** Instructors will be notified and provided an electronic link where records will be uploaded and stored.

***Q26. Should volunteers be using chainsaws; is chainsaw operations considered “Dangerous Work”?***

**A26.** Volunteers may perform work as long as they are qualified to do that work. This means that the volunteer must have the proper credentialing and/or training to perform the work which should be the same requirement as paid staff in that program or profession. The park, program, or office may either recruit volunteers with these skills or setup a program that certifies them in-house. These individuals must be signed up as a volunteer (VIP) so that they are covered in terms of liability and tort claims as “employee-equivalent”.

With regards to the restriction of volunteers performing hazardous duties (dangerous work), unless waived by the secretary, SOL has deemed that this authority has been delegated to bureaus via management policies (DOs/RMs).

***Q27. Who will be responsible for all the administrative documentation and tracking of training - especially as personnel consistently move around in the NPS?***

**A27.** Instructors will need to track their training and send a copy to the Regional NCSP Manager for filing. Regional NCSP Program Managers will send copies to WASO to be entered into a database for tracking.

***Q28. What is the policy on pole saws, if any?***

**A28.** NCSP does not address pole saws. They are considered specialty equipment. Specialty equipment, specialty tools, and simple falling aids are not defined by policy

***Q29. Do I need to complete a full Bloodborne Pathogens training course? Does the Bloodborne Pathogen (BBP) training include offering the HBV vaccinations (shots)?***

**A29.** No, you only need awareness training to understand the concept of Universal Precautions, which should be a component of your first aid/CPR training. Just because you provide BBP awareness training, it does not automatically require that those trainees receive vaccinations.

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Determination of whether vaccinations are required is based on the hazard assessment that is a part of your BBP SOP.

***Q30. Will there be more train the trainer sessions in the near future? We have a CSMO Sawyer who is interested.***

**A30.** Contact your Park NCSP Program Manager.

***Q31. During implementation period, can we allow a student to participate in the CSMO training course without completing OL, First Aid, CPR, or BBP and then wait to recommend qualification of Chainsaw Operator to Superintendent until proof of completed training is submitted to the instructor?***

**A31.** According to the policy, students are required to have current certification prior to attending the CSMO course.

***Q32. Can non-I/CE help monitor during field portion of CSMO? (to help with the 1:4 ratio)***

**A32.** No

***Q33. What is the full implementation date for the NCSP Policy?***

**A33.** May 1, 2021

***Q34. Are the master faller task books available now?***

**A34.** No, but they are nearing final completion and we anticipate that they will be ready by end of FY20.

***Q35. Do master faller endorsements expire?***

**A35.** Yes, every three years they must demonstrate their MF skills again.

***Q36. Without a rapid growth in new trainers, Instructors, and competency evaluators, how is it feasible to evaluate and certify the hundreds of sawyers in our region in a year, especially when most are seasonal and work for just the summer?***

**A36.** Parks need to assess how many actual sawyers and fallers they need to ensure continuity of operations, and then follow-up with Park and Regional Chainsaw Safety Program Managers to coordinate further training sessions and development of their instructor cadre.

***Q37. Do recertification evaluations count toward the 3 training courses required to maintain the I/CE certification?***

**A37.** No, they count towards the 10 Competency Evaluations that are required during the three year period, but not the three training courses.