

FREQUENTLY ASKED QUESTIONS

Site Safety Training – Local Law 196 of 2017

SECTION 1: Who needs to be trained?

Q1. I'm a construction worker; do I need to meet the Local Law 196 training requirements?

A. You need to meet the Local Law 196 training requirements if you are a construction worker at a site that is required to designate a Construction Superintendent, Site Safety Coordinator or Site Safety Manager. If you are a worker, you need **40** hours of training. If you are a supervisor, which includes Construction Superintendents, Site Safety Coordinators, Site Safety Managers, Concrete Safety Managers, and competent persons, you need **62** hours of training.

Q2. I work on big jobs, but my company is small, and we only do a small part of the overall project. Do I need to meet the Local Law 196 training requirements?

A. Yes. Workers and supervisors at job sites that are required to designate a Construction Superintendent, Site Safety Coordinator or Site Safety Manager must be trained, regardless of company size.

Q3. I'm a subcontractor. Do I need to meet the Local Law 196 training requirements?

A. Yes. Workers and supervisors at job sites that are required to designate a Construction Superintendent, Site Safety Coordinator or Site Safety Manager must be trained, regardless of whether they are the general contractor or a subcontractor.

Q4. I'm a DCA-licensed Home Improvement Contractor. Do I need to meet the Local Law 196 training requirements?

A. Generally, DCA-licensed Home Improvement Contractors and workers at job sites that only involve minor alterations or the construction of a new 1-, 2-, or 3-family home are not required to be trained.

Local Law 196 applies to workers and supervisors at job sites that are required to designate a Construction Superintendent, Site Safety Coordinator or Site Safety Manager.

Q5. I'm not a construction worker, but I spend time on construction sites as part of my job. Do I need to meet the Local Law 196 training requirements?

A. Delivery persons, flag persons, design professionals (professional engineers/registered architects), Department-licensees and Department-registrants (excluding safety professionals) are not required to be trained.

If you fall into one of these categories but serve as a Site Safety Manager, Site Safety Coordinator, Concrete Safety Manager, Construction Superintendent or competent person, you are required to receive training. While licensees themselves do *not* need to be trained, employees working under their direct and continuing supervision *do need* to be trained.

For additional examples, see the chart below:

SAFETY TRAINING REQUIRED	SAFETY TRAINING NOT REQUIRED
Construction Workers	Building Site Owners
Demolition Workers	Project Managers
Construction Superintendents (CS)	Professional Engineer (PE)
Site Safety Coordinators (SSC)	Registered Architect (RA)
Site Safety Managers (SSM)	Developers
Concrete Safety Managers (CSM)	Delivery Persons
Competent Persons	Construction Managers
Journeypersons	Flag Persons
Forepersons	General Contractors
Employees of DOB Licensees or Registrants	DOB Licensees and Registrants that are not CS, SSC, SSM, or CSM
	Concrete Testing Laboratories/Concrete Inspectors
	Filing Representatives
	Security Officers
	Special Inspectors
	Service Technicians
	Consultants

Q6. I'm a foreperson. Am I considered a 'supervisor' and required to get 62 hours of training?

- A. You are only considered a supervisor for the purposes of Local Law 196 if you are serving on a construction site as a Construction Superintendent, Site Safety Coordinator, Site Safety Manager, Concrete Safety Manager, or competent person.

SECTION 2: Training requirements and providers

Q1. I'm a registered site safety professional. Does the training I already have count towards the 62-hour requirement for supervisors?

- A. If you have taken a Department-approved course, such as the 40-Hour Site Safety Manager or 16-Hour Rigging Worker courses, you may be eligible to receive credit towards your SST training requirement. The Department has published a DOB-Approved Site Safety Training Course Equivalent document, available on our website at www1.nyc.gov/assets/buildings/pdf/DOBApproved_SST_Course_Equivalent.pdf

Q2. I received OSHA training 7 years ago, is my OSHA card still valid, and does it meet the requirements for Local Law 196?

- A. Any training that will be applied towards a Site Safety Training Card, including OSHA training, must have been received within the past **five** years.

Q3. Where do I find a list of U.S. Department of Labor approved OSHA training providers? Where do I find a list of DOB approved SST training providers?

- A. You may take in-person OSHA training with an OSHA-authorized trainer or online, as long as the online training is actively proctored. For a list of OSHA-authorized trainers, visit OSHA's website at https://www.osha.gov/dte/outreach/outreach_trainers.html

Visit this webpage for a list of NYC Department of Buildings approved course providers: <https://www1.nyc.gov/site/buildings/industry/departments-approved-course-provider-list.page>.

Q4. How do I know if my OSHA-30 online training is 'actively proctored'?

- A. Actively proctored online training is:
- online training that is taken in a classroom with a proctor; **or**
 - online training that at a minimum requires the individual receiving the training:
 - to attest that they are the individual that received the training and that the training was received without assistance; **and**
 - to have their participation monitored at random times to ensure that the individual receiving the training is present for the entirety of the training.

SECTION 3: Compliance with Local Law 196

Q1. I have an OSHA-30 card, will that be accepted by DOB inspectors, or do I need a Limited SST card?

- A. For the purposes of the December 1, 2019 training deadline, an OSHA-30 card **or** a Limited Site Safety Training Card will serve as acceptable proof that a worker has received the training required by Local Law 196.

Q2. Has the June 1, 2019 deadline for workers to get 30 hours of training and supervisors to get 62 hours been extended?

- A. Yes, on May 8, City Council passed legislation extending the deadline. Workers will now need to have 30 hours of training and supervisors must have 62 hours of training by December 1, 2019.

Q3. As a construction worker, when will I need my 40 hours of training?

- A. Workers will be required to complete their 40 hours of training by September 1, 2020. By this date, workers will need a Site Safety Training Card.

Q4. Where do I get a Site Safety Training Card?

- A. DOB-approved course providers are responsible for issuing Site Safety Training Cards upon the completion of training. A list of DOB-approved course providers is available on our website at <https://www1.nyc.gov/site/buildings/industry/department-approved-course-provider-list.page>.

Q5. Once I get the SST card, will it expire?

- A. SST cards expire after five years. Card holders will be required to take a refresher course every five years to renew their SST card.

Q6. What are the training topics and hours I must complete to get my Site Safety Training Card?

A.

Workers with a valid OSHA 30-Hour Card	
Training / Course	Hours
30-Hour OSHA	30
8-Hour Fall Prevention	8
2-Hour Drug and Alcohol Awareness	2
Total Hours: 40	

Workers with a valid OSHA 10-Hour Card	
Training / Course	Hours
10-Hour OSHA	10
8-Hour Fall Prevention	8
8-Hour Site Safety Training (SST) Worker Chapter 33 Site Safety	8
4-Hour Supported Scaffold	4
2-Hour Drug and Alcohol Awareness	2
General Electives	4
Special Electives	4
Total Hours: 40	

Q7. What if I don't have a Site Safety Training Card or the required training, do I get a violation?

A. DOB will not be issuing violations to workers. Permit holders are responsible for ensuring that workers at their sites are trained. If the Department discovers that workers at a construction site are untrained, the Department will issue a violation with civil penalties that go as high as \$5,000 per untrained worker to the owner of the site, the permit holder and the employer of the untrained worker.

Q8. I'm a small business owner. How do I sign up for free training for my workers?

A. If you own a small construction business, you may be eligible for free training provided by the NYC Department of Small Business Services (SBS). For more information, visit: <http://on.nyc.gov/sitesafetytraining>. You can also contact SBS by calling 311.