

OSHA Compliance Directive - Forklift Training

When OSHA inspectors conduct a compliance inspection of your employee training for industrial vehicle drivers (forklifts, pallet jacks, etc.) they will ask the following questions about your training program. This directive applies to all employers except agricultural operations. This directive became effective on November 20,2000.

1. Does the training program include formal classroom instruction and practical (drive-around) training? 1910.178(l)(2)(ii).
2. Is the trainer qualified, based on their knowledge, training and experience, to conduct the training and evaluate the trainee's competence? 1910.178(l)(2)(iii). *No specific certifications or schooling is required. This is a judgment call by the employer. Trainers should be experienced and incident-free operators of the equipment on which they are giving instruction.*
3. Does the training cover the applicable topics listed in 1910.178(l)(3)? *Truck related topics and workplace-related topics.*
4. Does the training cover the operating instructions, warnings or precautions, including seat belt use, as listed in the operator's manual for the type of vehicle(s) the employee is or will be operating? *Failure to train on seatbelt use can be cited under 1910.178(l)(3)(i)(M) and failure to use seat belts can be cited under Section 5(a)(1) general duty clause of the OSH Act.*
5. Is all training certified? When training and evaluations are properly completed, but no, certifications are kept, no citations will be issued and the employer will be instructed to do so. Future failures to certify training may result in citations and fines. 1910.178(l)(6). *Certification means a record of the training is created with the date, name (signature) of the trainee, name of the trainer and, summary of the training material. Pocket cards for employees are not required but are often used.*
6. When possible, the OSHA inspector will observe forklift operation and conduct employer/employee interviews.

Information from OSHA's question and answer section on forklift training.

- a. Employees can be properly trained and allowed to operate industrial vehicles even if they can't read, have poor vision in one eye and a hearing impairment as long as they don't pose a **"direct threat to the health or safety of other individuals in the workplace."** *Instruction must be adjusted to their learning and physical requirements.*
- b. Toolbox training and informal discussions are considered formal instruction.
- c. Just watching a video is not sufficient training.

- d. Training may be provided by in-house personnel or by outside contractors.
- e. If operators drive several different types of vehicles, they need not have completely separate training on each vehicle. Topics common to several vehicles may be covered in one training, with topics peculiar to each vehicle being covered separately.

Forklift Daily Inspections.

Under 1910.178(q)(7), forklifts must be inspected at least daily and those used round the clock must be inspected at the end of each shift. *RCI commentary - since the purpose of the inspection is to ensure each vehicle being used is in good working order, it seems that the once-per-shift inspection could be done at the beginning of each shift instead of at the end of the shift. I would rather the person getting ready to use the vehicle did the inspecting as opposed to the person leaving for the day. The person coming on should be rested, more alert and be more concerned with ensuring the vehicle was in good working order for their own use. This may be a bleed-over from DOT's requirement for a post-trip inspection. Post-trip or post-use inspections allow for the vehicle to be sent to the maintenance department for repairs before the next user needs the vehicle. As long as the pre-trip or pre-use inspection which found a problem needing correction resulted in the defective vehicle being put out of service until repairs had been made, I don't think it would make any difference when the inspection was performed.*

There is no requirement that the inspection be documented, and therefore no requirement for keeping documentation on file for any length of time. *Documenting all safety compliance efforts is always a good idea. If an injury would occur while using a forklift, a written inspection would be invaluable to verify the condition of the vehicle pre-use, This is a good thing as long as all vehicles are used only when they would pass an inspection.*

Typical inspections would cover:

fluid leaks; damaged hoses; loose or broken parts, including welds on protective cages; fluid levels for lubricants, battery, coolants, hydraulic systems; LPG tank connections and securement; battery connections; lights; horns and backup warning devices; seatbelt; mast, tines and other attachments; tires; belts or chains; brakes; mirrors; steering; muffler, and any other moving part.