True or False: Forklifts

1. It is unlawful for anyone under the age of 18 years, regardless of their experience, to operate a forklift.

True: The prohibition of employees under the age of 18 from operating forklifts is found in Title 29 of the Code of Federal Regulations, section 570.58, *Occupations involved in the operation of power driven hoisting apparatus*. OSHA issued a Safety and Health Information Bulletin (09-30-2003) to emphasize the prohibition. The bulletin may be found here: [https://www.osha.gov/dts/shib/shib093003.html](https://www.osha.gov/dts/shib/shib093003.html).

2. It is OK for a new employee over the age of 18 years with years of experience operating forklifts to go right to work operating our forklifts without any additional training.

False: Prior to permitting an employee to operate a powered industrial truck (except for training purposes), the employer shall ensure that each operator has successfully completed the training required by the OSHA Standard. 1910.178(l)(1)(i).

However, if an operator has previously received training in a topic specified in the OSHA standard, and such training is appropriate to the truck and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the truck safely. See *Avoidance of duplicative training*, 1910.178(l)(5).

3. As long as the employee is undergoing OSHA-required training, it’s OK for the employee to operate a forklift.

False: Trainees may operate a powered industrial truck only under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence, and where such operation does not endanger the trainee or other employees. 1910.178(l)(2)(i)(A) and (B).

4. I’ve got a great forklift operator who has gone through all the OSHA-required training. It’s OK if I let him develop our training program as he sees fit.

False: The OSHA standard requires specific content that must be included in a training program. This content is organized in the standard under truck-related topics and workplace-related topics. See 1910.178(l)(3).

5. No matter how competent my forklift operators are or how well-trained they are, they must undergo refresher training and evaluation at least once every three years.

True: An evaluation of each power industrial truck operator’s performance shall be conducted at least once every three years. 1910.178(l)(4)(iii).
6. In addition to providing refresher training and evaluation once every three years for my operators, I must provide the same to any operator who is involved in a “near miss” incident.

True: The OSHA standard also requires refresher training and evaluation under certain circumstances such as when the operator has been observed operating a forklift in an unsafe manner, the operator has been involved in an accident of near-miss incident, the operator has received an evaluation that reveals the operator is not operating the truck safely, the operator is assigned to drive a different type of truck, or a condition in the workplace has changed in a manner that could affect the safe operation of the truck. See 1910.178(l)(4)(ii)(A) through (E).

7. All of our surfaces used by our forklifts are flat and we enforce a strict forklift speed limit of “not to exceed walking speed.” Therefore, our forklift drivers do not need to use the seat belts in the forklifts.

False: OSHA’s current enforcement policy on the use of seat belts on forklifts is that employers must require operators of forklifts equipped with operator restraint devices, including seat belts, to use the devices. Please note that 29 CFR 1910.178(q)(6) prohibits employers from removing seat belts from forklifts. (Standard Interpretation: July 28, 2004)

8. Most of our drivers perform a limited number of forklift driving tasks on a daily basis while a smaller group performs a greater variety of tasks, such as the loading and unloading of trucks. I can provide different training for the two groups of drivers based on the tasks each performs.

False: The standard does not distinguish between different levels of evaluating the employees’ training on the same type of truck used at the same workplace, regardless of different task complexities. 29 CFR 1910.178(l)(3) requires that powered industrial truck operators receive initial training in truck- and workplace-related topics and the requirements of the powered industrial truck section (i.e., 29 CFR 1910.178), except in topics that the employer can demonstrate are not applicable to the safe operation of the truck at the employer’s workplace. (Standard Interpretation: July 28, 2004)

9. Because I do not use my forklift every day, I do not need to inspect it every day.

True: Powered industrial trucks are required to be examined prior to use; however, if the powered industrial truck is stored or is not used every day, it would not require an examination until it is ready to be placed in service. However, please be advised that powered industrial trucks that have been stored or not in use for significant periods of time may require some service or maintenance before being returned to use. The powered industrial truck manufacturer should be contacted for information regarding the specific truck’s maintenance and/or service needs. (Standard Interpretation: March 3, 2005)

10. Once the pre-start inspection is conducted, the operator can start regular operation of the forklift, as long as anything that needs to be fixed is reported as the problem occurs.

False: While it is true that any defect found must be immediately reported and corrected (1910.178(q)(7)), after the pre-start inspection is conducted without the engine running, OSHA
remends conducting an “operational inspection” with the engine running, but before the forklift is put in service. 1910.178(q)(7).

**Paperwork Requirements**

11. I should keep all records of training and refresher training for all of my forklift operators.

True: The employer shall certify that each operator has been trained and evaluated as required by this paragraph (l). The certification shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation. 1910.178(l)(6).

12. Pre-operation inspections of forklifts do not need to be in writing (such as the completion of checklists).

True: Standard 1910.178(q)(7) requires powered industrial trucks to be examined before being placed in service. They must not be placed in service if the examination shows any conditions adversely affecting the safety of the vehicle. Although the standard requires that the examination be conducted, there is no OSHA requirement that the examination be recorded in writing on a checklist. However, an employer may implement additional safety practices that go beyond OSHA’s requirements such as the completion of a written checklist. *(Standard Interpretation: May 9, 2000)*

29 CFR 1910.178(q)(7) requires that powered industrial trucks be examined at least daily prior to being placed in service. The standard does not require documentation of a powered industrial truck examination. Therefore, it would be at the employer’s discretion to determine the duration of powered industrial truck examination record retention. The employer must not place a powered industrial truck in service if the examination shows any condition which adversely affects the safety of the vehicle. Defects found during an examination must be immediately reported and corrected. *(Standard Interpretation: February 7, 2000)*

See these OSHA approved Sample Daily Checklists for Powered Industrial Trucks:

- [https://www.osha.gov/dte/library/pit/pit_checklist.html#electric_forklift_truck](https://www.osha.gov/dte/library/pit/pit_checklist.html#electric_forklift_truck)

**Resources:**

The most recent directive issued by OSHA on these training requirements came on November 30, 2000: [Compliance Assistance for the Powered Industrial Truck Operator Training Standards (CPL-2-1.28A)](https://www.osha.gov/dte/library/pit/pit_checklist.html#electric_forklift_truck)