

FREQUENTLY ASKED QUESTIONS ABOUT POWERED INDUSTRIAL TRUCK OPERATOR TRAINING

On December 1, 1998, the Occupational Safety and Health Administration (OSHA) published a standard that revised the existing requirements and issued new requirements to improve the training of powered industrial truck operators. The standard becomes effective on March 1, 1999. This new standard is intended to reduce the number of injuries and deaths that occur as a result of inadequate operator training. The powered industrial truck operator training requirements will apply to all industries where trucks are being used, except agricultural operations.

1. What is the definition of a powered industrial truck?

Any mobile power-propelled truck used to carry, push, pull, lift, stack or tier materials. Powered industrial trucks can be ridden or controlled by a walking operator. Earth moving and over the road haulage trucks are not included in the definition. Equipment that was designed to move earth but has been modified to accept forks are also not included.

2. What does the new standard require?

The new standard requires employers to develop and implement a training program based on the general principles of safe truck operation, the types of vehicle(s) being used in the workplace, the hazards of the workplace created by the use of the vehicle(s), and the general safety requirements of the OSHA standard. Trained operators must know how to do the job properly and do it safely as demonstrated by workplace evaluation. Formal (lecture, video, etc.) and practical (demonstration and practical exercises) training must be provided. Employers must also certify that each operator has received the training and evaluate each operator at least once every three years. Prior to operating the truck in the workplace, the employer must evaluate the operator's performance and determine the operator to be competent to operate a powered industrial truck safely. Refresher training is needed whenever an operator demonstrates a deficiency in the safe operation of the truck.

3. Does OSHA provide a list of topics to include in my training program?

Yes. The standard provides a list of training topics; however, the employer may exclude those topics which are not relevant to safe operation at the employee's work location.

4. Who should conduct the training?

All training and evaluation must be conducted by persons with the necessary knowledge, training, and experience to train powered industrial truck operators and evaluate their competence. An example of a qualified trainer would be a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience has demonstrated the ability to train and evaluate powered industrial truck operators.

There are many resources available to the employer if he/she chooses not to perform the training himself. Truck manufacturers, local safety and health safety organizations, such as the National Safety Council local chapters, private consultants with expertise in powered industrial trucks, local trade and vocational schools are some available resources.

Various Internet sites are devoted to forklift safety. Private companies who provide forklift safety training services, including videos and written programs, can be located on various Internet websites. Most videos can be either leased or purchased. One important thing to remember is that simply by showing employees a video or videos on some aspect of forklift safety does not meet the full requirements of the OSHA standard. Site specific information must be conveyed as well as a method to evaluate the employee's acquired knowledge subsequent to the training.

5. If my employees receive training from an outside consultant, how will I know that these employees have been adequately trained?

Outside qualified training organizations can provide evidence that the employee has successfully completed the relevant classroom and practical training. However, each employer must ensure that each powered industrial truck operator is competent to operate a truck safely, as demonstrated by the successful completion of the training and evaluation.

6. My employees receive training from the union on the use of powered industrial trucks. Will I have to provide any additional training?

When a worker reports to work, the employer must evaluate the employee to ensure that he/she is knowledgeable about the operation of the powered industrial trucks he/she will be assigned to operate. This evaluation could be as simple as having a person with the requisite skills, knowledge and experience observe the operator performing several typical operations to ensure that the truck is being operated safely

and asking the operator a few questions related to the safe operation of the vehicle. If the operator has operated the same type of equipment before in the same type of environment that he/she will be expected to be working, then duplicative or additional training is not required.

7. Will testing be required?

No. The standard does not specifically require testing; however, some method of evaluation is necessary.

8. Does OSHA require the employer to issue licenses to employees who have received training?

No. The OSHA standard does not require employees to be licensed. An employer may choose to issue licenses to trained operators.

9. What type of records or documentation must I keep?

The OSHA standard requires that the employer certify that each operator has received the training and has been evaluated. The written certification record must include the name of the operator, the date of the training, the date of the evaluation, and the identify of the person(s) performing the training or evaluation.

10. How long must I keep the certification records?

Employers who evaluate the operator's performance more frequently than every three years may retain the most recent certification record; otherwise, certification records must be maintained for three years.

11. If my employees receive training, but accidents still continue to occur, what should I do?

Refresher training in relevant topics is necessary when the operator has been involved in an accident or near-miss incident.

12. Is annual training required?

No. An *evaluation* of each powered industrial truck operator's performance is required to be conducted after initial training, after refresher training, and at least once every three years.

13. How often must refresher training be given?

The standard does not require any specific frequency of refresher training. Refresher training must be provided when:

1. The operator has been observed to operate the vehicle in an unsafe manner.
2. The operator has been involved in an accident or near-miss incident.
3. The operator has received an evaluation that reveals that the operator is not operating the truck safely.
4. The operator is assigned to drive a different type of truck.
5. A condition in the workplace changes in a manner that could affect safety operation of the truck.

14. If my employees have already received training, or have been operating trucks for many years, must I retrain them?

No. An employer does not need to retrain an employee in the operation of a powered industrial truck if the employer certifies that the operator has been evaluated and has proven to be competent to operate the truck safely. The operator would need additional training in those elements where his or her performance indicates the need for further training and for new types of equipment and areas of operation.

15. How do I evaluate my employee's competency to operate a truck safely?

Evaluation of an operator's performance can be determined by a number of ways, such as:

- * a discussion with the employee
- * an observation of the employee operating the powered industrial truck
- * written documentation of previous training
- * a performance test

16. Will OSHA provide training to my truck operators?

No. It is the employer's responsibility to train the employees.

17. Will I have to train all employees in my workplace?

Any employee that operates a powered industrial truck must be trained.

18. Will I have to ensure that my operator's are *physically capable* of driving a powered industry truck?

The new standard does not contain provisions for checking vision, hearing or general medical status of employees operating powered industrial trucks. The Americans With Disabilities Act (ADA) addresses the issue of whether employers may impose physical qualifications upon employees or applicants for employment. The ADA permits employers to adopt medical qualification requirements which are necessary to assure that an individual does not pose a "direct threat to the health or safety of other individuals in the workplace" provided all reasonable efforts are made to accommodate otherwise qualified individuals.

19. I have three different types of trucks in my workplace. Can I provide training on just one type of truck?

If an operator will be expected to operate all three types of vehicles, then training must address the unique characteristics of each type of vehicle the employee is expected to operate. When an attachment is used on the truck to move odd-shaped materials, then the operator training must include instruction on the safe conduct of those operations so that the operator knows and understands the restrictions or limitations created by each vehicle's use.

20. I only have powered hand trucks in my workplace. Do the training requirements cover the operators of this type of vehicle? The operator walks alongside the unit while holding onto the handle to guide it.

Yes. The use of powered hand trucks present numerous hazards to employees who operate them and those working in the area where they are used.

21. I employ drivers from a temporary agency. Who will provide them training - the temporary service or me?

OSHA has issued several letters of interpretations on the subject of training of temporary employees. Basically, there is a shared responsibility for assuring employees are adequately trained. The responsibility for providing training should be spelled out in the contractual agreement between the two parties. The temporary agency or the contracting employer may conduct the training and evaluation of operators from a temporary agency as required by the standard; however, the host employer (or other employer who enters into a contract with the temporary agency) must provide site-specific information and training on the use of the particular types of trucks and workplace-related topics that are present in the workplace.

22. Should my training include the use of operator restraint devices (e.g. seat belts)?

Employers are required to train employees in all operating instructions, warnings, and precautions listed in the operator's manual for the type of vehicle which the employee is being trained to operate. Therefore, operators must be trained in the use of operator restraint systems when it is addressed in the operating instructions.

23. What does OSHA expect to achieve as a result of improved operator's training?

OSHA's goal is to reduce the number of injuries and illnesses that occur to workers in the workplace from unsafe powered industrial truck usage. By providing an effective training program many other benefits will result. Among these are the lower cost of compensation insurance, less property damage, and less product damage.

24. Where can I get additional information about OSHA and new standards?

For more information, contact your local or Regional OSHA office (listed in the telephone directory under United States Government - Department of Labor - Occupational Safety and Health Administration). OSHA also has a Home Page on the Internet. The address is:

<http://www.osha.gov/>

QUESTIONS AND ANSWERS SPECIFIC TO THE MARITIME INDUSTRY

1. What OSHA standards apply to the training of powered industrial truck operators in the maritime industry?

Maritime standards include 29 CFR 1915 for Shipyard Employment, 29 CFR 1917 for Marine Terminals and 29 CFR 1918 for Longshoring. The new standards for training of powered industrial truck operators in the maritime industry are located in 29 CFR 1915.120 (Shipyard Employment), 29 CFR 1917.1(a)(2)(xiv) (Marine Terminals) and 29 CFR 1918.1(b)(10) (Longshoring). These standards will improve but not replace the present training requirements for powered industrial truck operators in the maritime industries.

The OSHA standard for Longshoring, 29 CFR 1918.98 includes requirements for the qualifications of machinery operators of mechanically powered vehicles. This standard states that only those employees considered by the employer to be competent by reason of training or experience, and who understands the signs, notices, and operating instructions and are familiar with the signal code in use shall be permitted to operate any powered operated vehicle. 29 CFR 1918.65 includes requirements for the safe operation of mechanically powered vehicles used aboard vessels.

The OSHA standard for marine terminals, 29 CFR 1917.27 includes requirements for personnel on the shore side segment of marine cargo handling. This standard states that only those employees determined by the employer to be competent by reason of training or experience and who understands the signs, notices and operating instructions and are familiar with the signal code in use shall be permitted to operate any power operated vehicle. 29 CFR 1917.43 also includes requirements for powered industrial trucks. However, these requirements are for operating, maintaining, and outfitting the vehicles and do not cover training.

2. What types of equipment are covered by the standard?

Besides the typical forklifts, the following equipment is covered:

- * Container top handlers
- * Container reach stackers
- * Straddle carriers
- * Hustlers
- * Toploaders
- * Semi-tractor/utility vehicles
- * Sidehandlers
- * Yard tractors

QUESTIONS AND ANSWERS SPECIFIC TO GENERAL INDUSTRY

1. What OSHA standards apply to the training of powered industrial truck operators in general industry?

The OSHA standard for the training of truck operators is located in 29 CFR 1910.178(l).

2. What types of equipment are covered by the standard?

Vehicles covered include:

- * High lift trucks
- * Counter-balanced trucks
- * Cantilevered trucks
- * Rider trucks
- * Forklift trucks
- * High lift platform trucks
- * Low lift trucks
- * Low lift platform trucks
- * Motorized hand trucks
- * Pallet trucks
- * Narrow aisle rider trucks
- * Straddle trucks
- * Reach rider trucks
- * Single side loader rider trucks
- * High lift order picker rider trucks
- * Motorized hand/rider trucks
- * Rough terrain trucks

3. What types of industries are covered by the standard?

Every type of establishment (except agricultural operations) that has employees who operate powered industrial trucks will have to comply with the requirements of the standard. Powered industrial trucks are used in a wide variety of workplaces, including but not limited to retail establishments, warehousing and distribution operations, and manufacturing establishments.

QUESTIONS AND ANSWERS SPECIFIC TO CONSTRUCTION

1. What OSHA standards apply to the training of powered industrial truck operators in construction?

The OSHA standard on training of powered industrial truck operators applicable to construction is 29 CFR 1926.602(d).

2. What types of equipment are covered by the standard?

The construction standard covers the same types of equipment as covered by the general industry standard. Specialized equipment used in the construction industry includes rough terrain straight-mast and extended reach forklift trucks.

This handout is intended only as a general description of the Powered Industrial Truck Operator Training Requirements. It does not carry the force of legal opinion. For more detailed information, consult the OSHA standards.