

August 20, 2003

Revised March 8, 2007

Jim McNeil, Corporate Safety Manager
TP Trucking
5630 Table Rock Road
Central Point, Oregon 97502

Dear Mr. McNeil:

This letter replaces OR-OSHA's August 20th, 2003 response to your inquiry relating to forklift training. Your July 28th letter described your companies forklift operator refresher training and evaluation program for truck drivers.

- *Each driver is provided an updated job hazard analysis for TP Trucking Forklift Operators and a TP Trucking Forklift Safety Rules Handbook.*
- *Each driver is given a 25 question multiple-choice test, which must be passed with a minimum score of 80%.*

You also asked if your program meets the requirements of 1910.178(l)(4)(iii). Your question touches on two parts to the three-tiered training that the Powered Industrial Truck (forklift) rule was intended to provide as outlined below.

- The first tier, (1910.178(l)(2)) is the initial training and evaluation component for all powered industrial truck operators.
- Secondly (1910.178(l)(4)(i)) requires refresher training and evaluation for any operator observed operating unsafely, involved in an accident or near-miss, determined by an evaluation to need retraining, or called upon to operate a different kind of truck or to operate under changed workplace conditions.
- Finally (1910.178(l)(4)(iii)) is the requirement for a three-year evaluation to ensure that the necessary knowledge and skills have been retained by all operators.

This combination of training was intended to provide a complete and systematic approach to powered industrial truck operator training. All three levels of training have an evaluation requirement. Your 25 question multiple-choice test does not complete any one of those levels. It would be merely a component of your refresher training and evaluation or a component of the three-year evaluation as required in 1910.178(l)(4)(iii). Thus, it does not meet the requirements of 1910.178(l)(4)(iii).

Your company can schedule training/evaluation sessions to accommodate your driver's schedules with each driver's forklift operating skills being evaluated over a prescribed course with specific tasks. Or your company can rely on periodic evaluations of your drivers' operating skills (at least one evaluation every three years), provided to you from other locations where your drivers use forklifts. The evaluators must meet the requirements of 1910.178(l)(2)(iii). Either method of evaluating and documenting your drivers' forklift operating skills will meet the requirements of 1910.178(l)(4)(iii).

Should you have further questions, please contact OSHA at (800) 922-2689 or visit our Web site at www.osha.org.

Sincerely,

Peggy Munsell, Manager
Standards & Technical Resources
Oregon Occupational Safety and Health Division