



Qualifications for Forklift Trainer

Frequently Asked Question

September 2010

While the MEL Safety Institute offers Forklift (Powered Industrial Truck, PIT) training / evaluation, many agencies ask if their supervisors may conduct the training in-house. 29 CFR 1910.178(l)(2) on Training Program Implementation gives the following regulations:

1910.178(l)(2)(ii)

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace.

1910.178(l)(2)(iii)

All operator training and evaluation shall be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.

The standard states that training and driving evaluation must be done by a person with the knowledge, training, and experience to evaluate competency of the participant. The standard does require trainers to be 'certified'. However, there are a few caveats with the short answer that non-certified, in-house trainers can be used.

In addition to regulations, OSHA also publishes *Letters of Interpretation* that offer great insight into the intent of the regulation as it applies to real world situations. The Letters carry the same weight as the regulation.

In a July 2003 letter, the question was posed:

Question: What does OSHA mean by the word "experience" in 29 CFR 1910.178(l)(2)(iii)? Specifically, does it mean that the trainers must be certified to train drivers to operate PITs, or does it mean that the trainers must operate PITs on a regular basis as part of their job function and responsibility?

OSHA's Reply: A trainer must have the "knowledge, training, and experience" to train others how to safely operate the powered industrial truck in the employer's workplace. In general, the trainer will only have sufficient "experience" if he has the practical skills and judgment to be able to himself operate the equipment safely under the conditions prevailing in the employer's workplace. For example, if the employer uses certain truck attachments and the trainer has never operated a truck with those attachments, the trainer would not have the experience necessary to train and evaluate others adequately on the safe use of those attachments. However, the standard does not require that the trainers operate a PIT regularly (i.e., outside of their operator training duties) as part of their job function or responsibility.

Again, OSHA clearly states trainers are not required to be certified, but does caution employers on the burden of ensuring those trainers have the knowledge, training, and experience to adequately train and evaluate workers in their workplace. Certainly, working with a nationally-recognized training program and organization, gives more credibility to the program. Otherwise, the employer should have the instructor's qualifications and a copy of the training program, handouts, tests, etc. to document the training provided.

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