



Workplace Safety

## 4 Must-Answer Questions to Help Your Lockout Tagout Training Program

Gillian Scott | Apr 19, 2018

### What You Need to Know

The right employees need to get the right training: Authorized, affected and other employees should be trained in job-specific areas, but all employees should know the importance of LOTO procedures. Training should not only teach employees how tags work, but what the limits of tags are. Though they can be good warning devices, unlike locks, tags do not render machines incapable of working. Training should not be a one-time event. OSHA requires training on a regular basis, and retraining should take place when employees take on new roles, or new machines or procedures are introduced. Documentation is an essential part of training, providing a resource for employees to turn to on the job, and also helping guide managers on when training is needed.

Training manufacturing employees in lockout/tagout procedures is not only smart—it's also required. Here are the key questions to answer when evaluating whether your training program can help reduce serious workplace injuries and fatalities—and keep violations to a minimum.

When equipment or machinery is being serviced or maintained, workers are at risk if the equipment is storing unreleased energy or is unexpectedly restarted. Lockout/tagout programs help prevent injuries and fatalities caused by uncontrolled hazardous energy. However, though having a LOTO program in place is vital to keeping employees safe and avoiding violations, it's of little use without a well-established training program.

For the past several years, lockout/tagout citations have landed consistently on the Occupational Safety and Health Administration's *list of Top 10 violations*. Among the top violations cited in 2017? Failure to provide training or to properly communicate lockout skills and requirements to employees.

OSHA rules for lockout/tagout procedures (*1910 Subpart J The Control of Hazardous Energy (1910.147)*) require facilities not only to establish a lockout/tagout program, but also to provide training "to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees."

Here are a few questions to think about when evaluating the efficacy of your training program.

## Training a Multilingual Workforce

For facilities that employ non-English speakers, there may be a gap between offering training and employees understanding it. *To meet OSHA standards*, training and safety materials have to be presented in a way that employees are capable of understanding.

"If one has a multilingual workforce, for instance, multilingual training tools, signs and documents should be used," *writes* Eric Prinzing of Zing Green Safety Products.

Similarly, if an employee has a limited vocabulary, training and other materials need to be presented at a reading level the employee can understand. Many OSHA publications are available in other languages. Call OSHA's Publications Office at 202-693-1888 or find them online at OSHA's Publications page at: [www.osha.gov/publications](http://www.osha.gov/publications).

Need help finding the right lockout/tagout kits and devices? Take a look and browse *right here*.

### 1. Does Your Lockout/Tagout Training Offer the Right Information to the Right People?

The OSHA standard includes extensive details on training requirements, including what types of employees need what types of training:

- Authorized employees—those who perform the lockout and tagout procedures in order to maintain or service a machine—need training in recognizing hazardous energy sources, the type and magnitude of energy sources, and the methods required for energy isolation and control.
- Affected employees—those who use the machines or work in the area where maintenance is taking place—need training in the purpose and use of lockout/tagout procedures.
- All other employees who work in the areas where lockout/tagout procedures may be used need training in the procedures as well, including being instructed not to restart machines that are locked or tagged out.

"Each worker needs to know what type of employee he is, and strong communication needs to be developed among all workers," writes Eric Prinzing of Zing Green Safety Products, a manufacturer of sustainable safety products, in an *OH&S article*.

In addition, training should start on day one.

"The onboarding process for new employees should stress the importance of compliance with federal, state, and company policies," notes Eric Glass, a senior environmental, health and safety adviser with UL EHS Sustainability, in an *article for OH&S*. "This should not be presented in a way that allows employees to skim a couple of documents and then sign to acknowledge their agreement. Rather, present training information in an interactive format, then quiz employees on what they've learned."

**“An active employee education program could be the reason your company avoids fines and other regulatory action, prevents workplace injuries, and ensures no lives are lost due to improperly controlled energy from machines and equipment.”**

Eric Glass

Senior Environmental, Health and Safety Adviser, UL EHS Sustainability

## 2. Does Your Lockout/Tagout Training Program Teach About the Limits of Tags? **E**

OSHA specifically requires that employees be trained in the limitations of tagout systems. This means reminding employees that:

- Tags are only warning devices and do not provide the restraint on a device’s use that a lock might offer.
- Tags should not be bypassed or removed without the authorization of the person responsible for them.
- Tags must be easily readable and understandable.
- Tags are part of an overall energy control program and should not create a false sense of security.
- Tags must be securely attached to energy-isolating devices so that they cannot be inadvertently or accidentally detached during use.



*What does OSHA think about LOTO programs? Get their full take in our exclusive article.*

## 3. Is LOTO Training Revisited at Appropriate Times?

OSHA also reminds employers that training is not a one-time event: It is an ongoing process. While OSHA requires that lockout/tagout training occur at least annually, the frequency of training should be on a case-by-case basis, says Prinzing.

“In many cases, it would be helpful to revisit training exercises more frequently than yearly in order to ensure that critical repairs and maintenance are still being done safely,” he says.

OSHA says retraining should also be standard, including when:

- Authorized and affected employees change job assignments, or new machines, equipment or processes are introduced.
- Employees show they don’t understand or know how to use energy control procedures.

“All workers, including management, need regular refresher courses to stay as safe as possible on the job,” writes Glass. “Further, when new policies or practices are implemented, make every single employee aware of the changes. An active employee education program could be the reason your company avoids fines and other regulatory action, prevents workplace injuries, and ensures no lives are lost due to improperly controlled energy from machines and equipment.”

## 4. Are Your LOTO Procedures Adequately Documented?

It’s not enough to tell workers what they need to do in training. The procedures need to be spelled out in writing as well. Todd Grover, global senior manager for applied safety solutions at The Master Lock

Company, recommends using documentation as a basis for training.

"The company's written lockout program should be designed as a guide that describes what good lockout practices are intended to look like specific to the facility," writes Grover in an **article for OH&S**. "By turning the program into a user-friendly tool, it can be used as the basis for training workers rather than the common focus of OSHA regulatory requirements and misapplied exceptions."

Prinzing adds that good documentation can also help managers make sure workers have been trained in the right tasks, and to plan for when the next training should take place. "Looking at documentation of lockout training can help one see one's program from a new, more objective perspective," Prinzing notes. "Suggestions can then be taken into account and improvements can be made."

*Do you have a robust lockout/tagout training program? Share your experiences.*

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