

Lockout Tagout Employer's Guide

Step 9: Audit

What You NEED To Do

Lockout Tagout (LOTO) procedures are used to make sure that a machine or equipment is isolated from the energy source and rendered inoperative. The [OSHA LOTO standard](#) has ranked among the top five most cited violations for each of the last five consecutive years.

[Download a model LOTO procedure](#) that you can quickly edit and make your own.

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OSHA's Lockout Tagout Standard

[Lockout Tagout](#) (or isolation) aims to protect workers from the unexpected release of stored energy during the servicing and maintenance of machines and equipment. There are many sources of hazardous energy, including electrical, mechanical, hydraulic, pneumatic, chemical, thermal, etc. The unexpected startup or release of stored energy can result in serious injury or fatality.

According to OSHA, **failure to control hazardous energy accounts for almost 10% of serious accidents in many industries**. Craft workers, electricians, machine operators, and laborers are among the 3 million workers in the U.S. who service equipment routinely and face the greatest risk of injury.

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Audits and Inspections Are Different

OSHA's LOTO standard requires periodic inspections:

1910.147(c)(6)(i): *The employer shall conduct a periodic*

inspection of the energy control procedure at least annually to ensure that the procedure and the requirements of this standard are being followed.

1910.147(c)(6)(ii): The employer shall certify that the periodic inspections have been performed. The certification shall identify the machine or equipment on which the energy control procedure was being utilized, the date of the inspection, the employees included in the inspection, and the person performing the inspection.

Be careful not to confuse inspections required by OSHA, and audits that verify whether inspections are being performed. In addition to inspections, conduct an annual audit to ensure compliance and to verify the effectiveness of your energy control or LOTO program.

Here are the main items to verify during the audit:

- **Energy control procedures:** Are procedures developed, documented and used for the control of potentially hazardous energy for each applicable machine or equipment? A generic procedure for all machines and equipment will not work. Also, check out section 1910.147(c)(4)(i) of the standard for a list of exceptions regarding the documentation of procedures.
- **Protective materials and hardware:** Are locks, tags, chains, wedges, key blocks, adapter pins, self-locking fasteners, or other hardware provided for isolating, securing or blocking machines or equipment from energy sources? Are they durable and easily identifiable?
- **Periodic Inspections:** Are periodic inspections of energy control procedures conducted at least annually to correct deviations or inadequacies? Are there certifications identifying the machine or equipment associated to the procedure, the date of the inspection, employees included in the inspection and the person performing the inspection?
- **Training:** Is training provided to ensure that the purpose of the energy control program is understood, and that knowledge and skills required for the safe application, usage and removal of energy controls are acquired? Is there retraining

when there is a change in job assignments, a change in machines, equipment or processes that present a new hazard, or a change in the energy control procedures?

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