

2026 OSHA LOTO Compliance Checklist

10-Point Assessment -- Spot Gaps Before OSHA Does

+ OSHA 1910.147 Aligned

+ 2026 Penalty Schedule

+ Used by EHS Directors

+ Printable Reference

29 CFR 1910.147 -- the Control of Hazardous Energy (Lockout/Tagout) standard -- consistently ranks in OSHA's Top 10 most-cited violations. This checklist covers the 10 areas OSHA inspectors audit first, the most common gaps found, and the penalty risk for each.

SECTION 1 -- OSHA 1910.147 REQUIREMENTS REFERENCE

Compliance Requirements by Standard

Requirement	Standard Reference
Written energy control program	1910.147(c)(1)
Equipment-specific written procedures	1910.147(c)(4)
Durable, standardized LOTO devices	1910.147(c)(5)
Employee training -- 3 categories	1910.147(c)(7)
Annual periodic inspection	1910.147(c)(6)
Group lockout procedures	1910.147(f)(3)
Shift/personnel change procedures	1910.147(f)(4)
Contractor coordination	1910.147(f)(2)

2026 OSHA Penalty Schedule (29 CFR 1910.147):

Serious: up to \$16,550 per violation | Willful/Repeat: up to \$165,514 per violation

SECTION 2 -- 10-POINT COMPLIANCE ASSESSMENT

1

Lockout Device Inventory & Placement Compliance



OSHA REQUIRES: Devices must be durable, standardized, substantial, and individually identifiable (1910.147(c)(5)). Each authorized employee must have their own uniquely keyed lock.

COMMON GAP: Facilities sharing master keys, using non-durable tags where lockout is feasible, or missing devices at certain isolation points.

! Up to \$16,550 per violation (1910.147(c)(5))

2

Energy Source Identification -- #1 Missed Step



OSHA REQUIRES: All energy sources (electrical, hydraulic, pneumatic, thermal, mechanical, chemical, gravity) must be identified and documented per 1910.147(c)(4)(ii).

COMMON GAP: Procedures identify electrical sources but miss secondary sources -- hydraulic accumulators, stored pneumatic pressure, gravity loads, spring tension, or thermal energy.

! Up to \$16,550 per procedure (1910.147(c)(4))

3

Written LOTO Procedures Per Equipment/Machine



OSHA REQUIRES: A specific written energy control procedure for each piece of equipment, identifying steps, energy types, magnitude, isolation points, and verification method.

COMMON GAP: Generic "one-size-fits-all" procedure applied to all equipment, or procedures written years ago and never updated when equipment changed.

! Up to \$16,550 per machine without a compliant procedure

4

Employee Training Records & Annual Refresher Sign-Offs



OSHA REQUIRES: 1910.147(c)(7) requires training for 3 categories: Authorized Employees (full LOTO), Affected Employees (awareness), and Other Employees (basic recognition).

COMMON GAP: Only authorized employees trained. Affected employees (operators) and Other employees (bystanders) never trained. No documentation of when training occurred.

! Up to \$16,550 per employee category gap

5

Periodic Inspection Records (OSHA 1910.147(c)(6))



OSHA REQUIRES: At minimum one annual inspection of each energy control procedure, conducted by an authorized employee other than the one who regularly uses it.

COMMON GAP: No documented annual inspection -- the #1 cited LOTO violation. Inspection must occur with the authorized employee present; must cover all procedures.

! Frequently cited -- up to \$16,550 per procedure not inspected

6

Permit & Verification Workflows



OSHA REQUIRES: Authorized employees must verify the machine is de-energized before servicing begins by attempting to start using normal operating controls.

COMMON GAP: Verification step skipped. Employees apply locks but never test for zero energy state. No formal verification record exists.

! Up to \$165,514 for willful violation if a worker is injured

SECTION 2 CONTINUED -- ITEMS 7-10

7

Group Lockout/Tagout Procedures

OSHA REQUIRES: 1910.147(f)(3) requires a procedure providing equivalent protection when multiple employees service the same equipment simultaneously.

COMMON GAP: No group lockout procedure (lockbox system). Employees share one lock instead of each applying their own device to a common lockbox.

! Up to \$16,550 per incident (1910.147(f)(3))

8

Contractor Notification & Coordination Procedures

OSHA REQUIRES: 1910.147(f)(2): The host employer must inform outside contractors of the LOTO program and obtain assurance of equivalent protection for all employees.

COMMON GAP: No written contractor LOTO coordination form. Contractors enter the facility and perform LOTO work without documented exchange of program information.

! Up to \$16,550 per contractor coordination failure

9

Shift/Personnel Change Protocols

OSHA REQUIRES: 1910.147(f)(4) requires procedures for orderly transfer of lockout/tagout devices during shift or personnel changes to maintain continuous protection.

COMMON GAP: No defined handoff process. Outgoing employee removes their lock before the incoming employee applies theirs -- creating an unprotected window.

! Up to \$165,514 willful if a worker is injured during the handoff gap

10

Incident History & Corrective Action Documentation

OSHA REQUIRES: LOTO-related incidents, near-misses, and inspection deficiencies must be investigated and corrective actions documented and completed before next equipment use.

COMMON GAP: Near-misses go unreported. Deficiencies found during annual inspection are noted but corrective actions never formally closed out or employees retrained.

! Willful violation risk if prior incidents show a known unaddressed hazard

SECTION 3 -- NEXT STEPS

What To Do After This Checklist

1. Assign each gap a priority (Critical/High/Medium) based on OSHA citation frequency and penalty risk.
2. Fix Critical gaps before your next scheduled OSHA inspection window.
3. Update written procedures for any equipment missing a compliant LOTO procedure.
4. Schedule annual periodic inspection for all procedures not yet inspected this calendar year.
5. Train or retrain employees in all three categories: Authorized, Affected, and Other.
6. Document everything. OSHA's primary ask is: "Can you show me the records?"

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+ Automated annual inspection reminders

+ Training records with competency tracking

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