

Lockout/Tagout Program Self-Review

Check your program document, machine procedures, devices, training, and periodic inspections. A no or not sure answer is not a violation, it just marks something to look at more closely.

HOW TO USE THIS CHECKLIST

Go through it with whoever performs lockout on the floor. Pull a procedure and watch a lockout start to finish. Anything that is not a clear yes carries to page two.

1 Written Energy Control Program

YES NO NOT SURE

A written energy control program covers procedures, training, and periodic inspections.	☐	☐	☐
The program names who is authorized to perform lockout and who owns the program.	☐	☐	☐
It states that lockout is used whenever an energy-isolating device can accept a lock.	☐	☐	☐
Someone on site could produce a current copy today if asked.	☐	☐	☐
Procedures address group lockout, shift change, and outside contractors where they apply.	☐	☐	☐

2 Machine-Specific Procedures

Each machine serviced under lockout has its own documented procedure.	☐	☐	☐
All energy sources are listed, including stored hydraulic, pneumatic, spring, and gravity.	☐	☐	☐
Each gives the isolation points and steps to shut down, isolate, block, secure, and verify.	☐	☐	☐
Procedures address how to effectively dissipate energy.	☐	☐	☐

3 Devices and Isolation Points

Locks and tags are durable, standardized, substantial, and identify who applied them.	☐	☐	☐
Lockout devices are used only for energy control and nothing else.	☐	☐	☐
Each authorized employee has an assigned personal lock, only that employee removes it.	☐	☐	☐
Isolation points are labeled to match the procedure. Lockable devices are locked.	☐	☐	☐

4 Training and Communication

Authorized employees are trained on energy sources, isolation methods and procedures.	☐	☐	☐
Affected employees know what lockout means & never restart locked or tagged equipment.	☐	☐	☐
Retraining happened when a job, machine, or procedure changed, or deviation was found.	☐	☐	☐
Training records certify each employee by name and date.	☐	☐	☐

5 Periodic Inspection

Every energy control procedure is inspected at least once a year.	☐	☐	☐
Inspection is done by an authorized employee who does not use said procedure.	☐	☐	☐
Inspector reviews responsibilities with the authorized employees who use that procedure.	☐	☐	☐
Inspections are certified with the machine, date, employees, and who performed it.	☐	☐	☐

Where LOTO Programs Most Often Break Down

Most findings are not about a missing policy. They come from procedures written years ago for equipment that has changed since.

Common Gaps

One procedure covers everything

A general policy exists, but individual machines have no documented procedure of their own.

Stored energy gets missed

The electrical disconnect is locked. Hydraulic pressure, a spring, or a raised part still holds energy.

Minor Servicing Exemption

The exemption is misapplied when it does not qualify or fails to protect employees as effectively as full LOTO.

Equipment changed, the procedure did not

A machine was modified or replaced. The isolation points on paper no longer match the floor.

Questions an Inspector May Ask your Employees

Inspectors ask employees these kinds of questions. Ask your own people first and listen to how they answer.

- ☐ What energy sources does this machine have?
- ☐ How do you verify the energy is actually off?
- ☐ What happens if your shift ends before the work does?
- ☐ Where is the written procedure for it?
- ☐ Whose lock is this, and who can remove it?
- ☐ When was this procedure last inspected?

Prioritizing what you found

● Address now

MOSTLY PILLARS 2 & 3

A machine with no written procedure, stored energy the procedure never addresses, or a lock anyone can remove.

● Address this quarter

MOSTLY PILLARS 1 & 4

An outdated program document, procedures that no longer match modified equipment, or thin training certifications.

● Document and monitor

MOSTLY PILLARS 2 & 5

The annual inspection schedule, procedure updates after equipment changes, and retraining when a deviation turns up.

Worth Knowing: About the LOTO Minor Servicing Exemption

Minor servicing during normal production is exempt from full lockout only when every part of the test is met. The work must be routine, repetitive, & integral to production, and must be performed using alternative measures that provide effective protection. If any piece is missing, full lockout applies. This exemption gets claimed more often than its earned.

Where CMI Can Help

If this review turned up gaps, those are the kinds of things we help organizations fix: machine-specific energy control procedures, authorized and affected employee training, annual periodic inspections, and program documentation that keeps up with equipment changes. For over 30 years, organizations of all sizes have retained CMI for Environmental, Health, and Safety support, from single sites to multi-location operations.

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