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Forklift Operator Training in California: What Section 3668 Requires

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Forklift training is one of the most frequently cited items I see in California warehouses, distribution centers, and manufacturing plants, and it is almost never because the employer did no training at all. It is because the training cannot be proven, the evaluation was never done, or a refresher was owed after an incident and nobody noticed. Title 8, Section 3668 is short and specific about what a compliant program looks like, and Cal/OSHA inspectors know exactly which records to ask for. This article covers who is covered, what the standard requires, what the refresher triggers are, and where warehouses most often fall short.

Who and What Is Covered

Section 3668 applies to every employer whose employees operate a powered industrial truck. Title 8, Section 3650, the general industrial truck standard, references the consensus standards for low lift and high lift trucks, rough terrain forklift trucks, personnel and burden carriers, and operator-controlled industrial tow tractors. In practical terms that means sit-down counterbalanced forklifts, stand-up reach trucks, order pickers, powered pallet jacks, tow tractors, and rough terrain forklifts on construction sites. A motorized pallet jack that an employee walks behind is still a powered industrial truck, and the training requirement applies to it just as it does to a 6,000-pound counterbalance unit. That is the single most common misunderstanding I run into.

Section 3650(t) closes the loop from the equipment side: only drivers authorized by the employer and trained in safe operation under Section 3668 may operate industrial trucks or tow tractors. So the standard is not just a training rule. It is an authorization rule, and an untrained operator on a truck is a violation regardless of how well they happen to drive.

What Section 3668 Requires

The employer must ensure each operator is competent to operate the truck safely before permitting them to operate it, as demonstrated by successful completion of training and evaluation. The training program has three required components:

- **Formal instruction.** The standard lists lecture, discussion, interactive computer learning, video, and written material as acceptable methods. A video alone is formal instruction; it is not a complete program.
- **Practical training.** Demonstrations by the trainer and practical exercises performed by the trainee on the truck.



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- **Evaluation.** An evaluation of the operator's performance in the workplace, on the actual equipment, in the actual conditions.

The content is also prescribed. Truck-related topics include operating instructions and controls, engine or motor operation, steering and maneuvering, visibility limitations, fork and attachment use, vehicle capacity and stability, maintenance the operator is expected to perform, refueling or battery charging, operating limitations, and the warnings in the operator's manual. Workplace-related topics include surface conditions, load composition and stability, load manipulation and stacking, pedestrian traffic, narrow aisles and restricted places, hazardous locations, ramps and sloped surfaces, closed environments where carbon monoxide or diesel exhaust can build up, and any other unique hazardous conditions at the site.

Two points matter here. First, a generic online course that never mentions your dock plates, your racking, your battery charging area, or your pedestrian crossings does not cover the workplace-related topics and does not satisfy the standard by itself. Second, the standard requires training on the type of truck the operator will use. An operator certified on a counterbalance forklift is not, by that fact, trained on a stand-up reach truck or an order picker.

The Three-Year Evaluation

Section 3668 requires an evaluation of each operator's performance at least once every three years. Note the word. It is an evaluation, not a re-training. Someone competent has to watch the operator drive and confirm they still do it safely. If the evaluation is unsatisfactory, refresher training follows. Employers routinely miss this because they treat the initial certification as permanent. It is not. If your longest-tenured operator was certified four years ago and has never been re-evaluated, you have a gap that an inspector will find in about two minutes.

Refresher Training Triggers

Independent of the three-year cycle, Section 3668 requires refresher training, including an evaluation of its effectiveness, when an operator:

- Has been observed operating the vehicle in an unsafe manner.
- Has been involved in an accident or a near-miss incident.
- Has received an evaluation showing they are not operating safely.
- Is assigned to drive a different type of truck.
- Faces a change in workplace conditions that could affect safe operation.

The accident and near-miss trigger is where I see the most exposure. A forklift clips a rack upright, the damage gets reported to maintenance, and nobody connects it to the training file. Six months later Cal/OSHA is on site for a different reason, sees the repaired upright, asks about it, and then asks for the operator's refresher training record. There is none. That is a citation, and it is an easy one for the Division to prove because your own maintenance log establishes the incident.



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Certification and Records

The employer must certify that each operator has been trained and evaluated as required. Section 3668 specifies what the certification must include: the operator's name, the date of training, the date of evaluation, and the identity of the person or persons who performed the training or evaluation. That is the record an inspector will ask for, by name, for every operator on the floor that day.

In my experience, a wallet card from a vendor course is not, on its own, the certification the standard describes. It often lacks the evaluation date and never identifies who evaluated the operator on your equipment at your site. Keep the card if you like, but the record that protects you is the employer's certification with all four elements.

Section 3668 does allow you to avoid duplicating training. If an operator received prior training in a topic that is appropriate to your trucks and working conditions, and the operator is evaluated and found competent, you do not have to repeat that portion. You still have to document the evaluation.

What Inspectors Look For

A Cal/OSHA inspection in a warehouse usually starts with a walk of the floor and a request for records. On the floor, the compliance officer is watching for operators traveling with forks raised, which Section 3650(t)(15) prohibits by requiring forks be carried as low as possible; employees riding on forks, prohibited by Section 3650(t)(4); seat belts unused where the manufacturer provided them; and loads that exceed the capacity on the nameplate. Illegible or missing nameplates are their own violation under Section 3650, and so are unapproved modifications and attachments.

Then come the records. Expect to be asked for the training certification for every operator observed, the three-year evaluation dates, refresher records tied to any known incidents, and the pre-shift inspection checklists. Section 3650(t)(7) requires drivers to check the vehicle at the beginning of each shift, report anything unsafe, and keep the truck out of service until it is fixed. Blank checklists, or checklists that show a defect with no corresponding repair, are a problem.

Common Gaps in Warehouses

- Temporary and staffing-agency workers operating trucks with no certification on file from the host employer.
- Powered pallet jacks treated as exempt equipment.
- Operators certified on one truck type and moved to another with no additional training.
- No evaluation date on the certification, or evaluations that are more than three years old.
- Incidents logged by maintenance but never triggering refresher training.
- Employees elevated on forks or improvised platforms rather than the secured platform Title 8, Section 3657 requires, with an operator at the controls and the mast vertical.
- Training conducted entirely by a vendor off site, with no site-specific workplace hazards covered.



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What to Do This Week

- Build a roster of every employee who touches a powered industrial truck, including pallet jacks, temps, and supervisors who “just move it out of the way.”
- Pull the certification for each one and confirm it lists name, training date, evaluation date, and the trainer or evaluator.
- Flag every evaluation older than three years and schedule a documented workplace evaluation.
- Cross-check maintenance logs and incident reports against training files; any collision or near miss without a refresher record needs one now.
- Confirm each operator is trained on each type of truck they actually use.
- Audit pre-shift inspection checklists for the last 30 days and close out any defect that was reported but not repaired.
- Add your site-specific hazards (dock edges, ramps, pedestrian routes, charging areas, exhaust concerns) to the formal instruction so the workplace-related topics are covered.

If you want a forklift program that is built around your equipment and your floor rather than a generic video, McNeil Safety Consulting can deliver the training and the evaluations and set up records that hold up under inspection. Learn more about our [OSHA safety training services](#) or call **(626) 546-9384**.

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