

OSHA Language Compliance Checklist

Is your facility legally compliant when it comes to communicating with limited English proficiency (LEP) workers? Every unchecked box is a documented liability.

MAX OSHA FINE

\$161,323

per willful violation

Count your checkmarks.
Score yourself at the end.

SECTION 1 Safety Training Delivery

- All safety training is delivered in a language each worker understands — not just English. **HIGH RISK**
OSHA 29 CFR 1910.132 / General Duty Clause — language-appropriate delivery is legally required, not optional.
- LockOut/TagOut (LOTO) procedures are available in every language spoken on the floor. **HIGH RISK**
LOTO violations are among OSHA's most-cited. A worker who can't read the procedure is an unacceptable hazard.
- Hazard Communication (HazCom) and Safety Data Sheets (SDS) are accessible in workers' native languages. **HIGH RISK**
OSHA 29 CFR 1910.1200 — workers must be able to understand chemical hazard information at point of use.
- PPE requirements and usage instructions are communicated in each worker's language. **MEDIUM**
- Emergency evacuation procedures and alarm meanings are explained in workers' native languages. **HIGH RISK**
A worker who doesn't understand the evacuation plan in an emergency is a life-safety failure.

SECTION 2 Onboarding & Documentation

- New hire onboarding materials are translated for New American workers (LEP) before their first day. **HIGH RISK**
Courts have ruled that onboarding acknowledgments signed without comprehension are not legally valid.
- Policy acknowledgment forms (handbook, code of conduct, etc.) are available in workers' native languages. **MEDIUM**
- Benefits enrollment forms and explanations are provided in languages workers understand. **MEDIUM**
Mis-enrollment due to language barriers creates legal exposure and worker dissatisfaction.

SECTION 3 Recordkeeping & Proof of Compliance

- Digital records exist proving each New American worker (LEP) completed safety training in their native language. **HIGH RISK**
In an OSHA inspection, "we told them verbally" is not a defense. Documented proof is essential.
- Training completion records include the language in which training was delivered. **MEDIUM**
- You can produce language-specific training records within 24 hours of an OSHA request. **HIGH RISK**

SECTION 4 Incident Reporting & Hazard Communication

- New American workers (LEP) can report near-misses and hazards in their native language without relying on a bilingual coworker. **HIGH RISK**
Reliance on informal translation creates liability and suppresses safety reporting.
- Incident investigation forms are available in the languages of your workforce. **MEDIUM**
- You do not rely on bilingual coworkers as the primary translation method for safety-critical communication. **HIGH RISK**
Informal translation creates inconsistency, liability, and a burden on your bilingual staff.

SECTION 5 Ongoing Operations

- Work instructions, SOPs, and quality specs at each workstation are available in workers' languages. **MEDIUM**
- Safety signage and floor markings are supplemented with language-appropriate explanations where needed. **LOWER**
- Refresher training and safety updates are delivered to New American workers (LEP) in their native language — not just emailed in English. **HIGH RISK**

How to Score

Count the number of boxes you checked. Each unchecked item — especially those marked **HIGH RISK** — represents a documented compliance gap that could result in OSHA fines, litigation, or a workplace fatality. There are **18 items total**, with 11 marked High Risk.

<p>16–18 ✓ Compliant Strong foundation. Audit your High Risk gaps and document your proof trails. Consider a platform to automate recordkeeping.</p>	<p>10–15 ⚠ Moderate Exposure Significant gaps exist. An OSHA inspection or workplace incident would likely reveal these. Prioritize High Risk items immediately.</p>	<p>0–9 ✗ High Liability Your facility has serious, documented language compliance gaps. Each is an actionable violation under OSHA's General Duty Clause.</p>
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OSHA Fine Reference — What Each Gap Could Cost You

VIOLATION TYPE	FINE PER INSTANCE	WHAT TRIGGERS IT
Other-Than-Serious	Up to \$16,131	Minor language gap with low immediate hazard potential
Serious Violation	Up to \$16,131	Language barrier that could cause death or serious injury (e.g. LOTO, HazCom)
Willful Violation	\$11,524–\$161,323	Employer knew of the language barrier and failed to act — most common in inspections following an incident
Repeat Violation	Up to \$161,323	Same gap found in a re-inspection within 5 years of original citation
Failure to Abate	Up to \$16,131/day	Cited violation not corrected within the OSHA-mandated timeframe

<p>What OSHA Inspectors Look For During an inspection following a workplace incident involving a New American worker (LEP), OSHA will request training records, ask whether materials were provided in the worker's language, and interview workers directly. "We used a bilingual coworker" is not a defense — it demonstrates awareness of the gap without a systematic solution.</p>	<p>The Hidden Costs Beyond Fines Workers' comp claims average \$41,000 per incident — and language-related accidents are 25% of all incidents. Add litigation exposure, OSHA-mandated corrective action costs, and reputational damage with your workforce. The total cost of a single preventable incident routinely exceeds \$250,000.</p>
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Close Every Gap on This Checklist — Automatically

TheLanguageGap.com, powered by UnDesked, delivers every item on this checklist out of the box. Safety training in 50+ languages. OSHA-defensible digital proof trails for every completion. Instant translation of LOTO, HazCom, SOPs, and HR documents. Accessible on any web-based device — tablets, kiosks, digital signage, and mobile phones — with no app download, company email, or IT lift required.

Schedule a Free Compliance Review
 TheLanguageGap.com

We'll walk through your checklist results and show you exactly how to close each gap — typically deployable in under 2 weeks.

Fine amounts current as of 2026 per OSHA's annual inflation adjustments. This checklist is for informational purposes and does not constitute legal advice. Consult with a qualified employment attorney for facility-specific compliance guidance. | Sources: OSHA.gov, 29 CFR 1910, General Duty Clause Section 5(a)(1)