

This training session is recommended for employees and supervisors required to maintain OSHA illness and injury recordkeeping forms and those who need to know about the recordkeeping requirements.

## Session Objectives

By the end of this training session, you will understand:

- · Which employers are affected
- · Recordkeeping forms
- Reporting to the government
- Employees recorded
- Employee rights
- · Injury and illness recording criteria

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- All employers covered by OSHA regulations, including general industry, construction, and maritime, are also covered by the recordkeeping requirements unless the employer meets an exemption.
- If your company had 10 or fewer employees for the entire calendar year, it is partially exempt from the recordkeeping requirements. This is not an average of 10 or fewer employees over the year but peak employment during the calendar year.
- Employers classified in a specific low-hazard industry are partially exempt from recording injuries and illnesses. The specific list of exempt low-hazard industries is contained in 29 CFR 1904, Subpart B, Appendix A.
- The list of industries that are exempt from routinely keeping OSHA injury and illness records is based on the North American Industry Classification System, or NAICS, and injury and illness data from the Bureau of Labor Statistics, or BLS, from 2007, 2008, and 2009.
- OSHA or the BLS may require a partially exempt employer to comply with recordkeeping requirements and will inform the employer in writing that injury, illness, and fatality records must be kept.
- All employers, whether exempt from recordkeeping requirements or not, must report to OSHA any workplace incident that results in a fatality, an in-patient hospitalization of one or more employees, an amputation, or loss of an eye.

Check the list of partially exempt low-hazard industries in 29 CFR 1904, Subpart B, Appendix A, to see if your employer is exempt.

## Reporting to the Government

- Report death within 8 hours
- Provide recordkeeping documents within 4 hours
- OSHA injury and illness survey
- BLS survey
- In-patient hospitalization, amputation, or loss of an eye within 24 hours
- Several reporting options



- You are required to report to OSHA within 8 hours any work-related fatality. Deaths from motor vehicle accidents do not have to be reported to OSHA, but they must be recorded. A death from a heart attack must be reported to OSHA, and OSHA will determine if an investigation is required.
- You are required to provide any of the documentation required by the standard to OSHA authorized representatives within 4 business hours after the request is made. Documents requested might include OSHA 300 Logs, Summary Forms, and OSHA 301 Forms.
- If you receive an injury and illness survey form from the BLS, it must be completed and returned within 30 calendar days or the date stated on the survey. Not every employer will receive a survey each year. Even if your company is normally exempt from recordkeeping requirements, you must still return the completed survey.
- Each year the BLS randomly sends surveys to employers and uses the information to create national occupational injury and illness statistics.
- For any in-patient hospitalization, amputation, or eye loss, you must report the incident within 24 hours of learning about it.
- You have three options for reporting the event:
  - Calling or visiting the nearest OSHA area office during normal business hours;
  - Calling the 24-hour OSHA hotline at 800-321-OSHA or 800-321-6742; or
  - Using OSHA's online form at http://www.OSHA.gov/report\_online/index.html.



- Record a one- or two-line description of the injury or illness on the OSHA 300 Log within 7 calendar days of the incident. Also include the identity of the employee (unless a privacy case), when and where the incident occurred, the type of injury or illness, body parts affected, and the object or substance that directly caused the injury or illness. Classify the incident according to the most serious outcome and identify it as an injury or an illness.
- The OSHA 300A Summary of Work-Related Injuries and Illnesses form is used to summarize the information from the OSHA 300 Log. You must post the 300A form every year from February 1 through April 30.
- The OSHA 301 Injury and Illness Incident Report is used to investigate the incident. Complete a 301 form for each recordable injury or illness within 7 calendar days of the incident.
- You may use other equivalent forms as long as the form contains the same information, is readable and understandable, and is completed using the same instructions as the OSHA form it replaces. Records may also be kept electronically as long as forms can be obtained when required.



- You must keep a separate OSHA 300 Log for each establishment that is expected to be in operation for 1 year or longer. You may keep the same OSHA 300 Log for all short-term establishments that exist for less than 1 year or for short-term establishments for individual company divisions or geographic regions.
- You may choose to maintain OSHA 300 Logs for each of your facilities at a central location. Information must be recorded on the log within 7 days of an incident and records must be provided to OSHA and employees within the required time frames.
- If an employee is injured or becomes ill when visiting a different facility, the incident is recorded on the OSHA 300 Log of the facility where the incident occurred.
- If an employee is injured or becomes ill when working away from an establishment—such as a truck driver who suffers a back injury while delivering products to a customer—the incident is to be recorded on the OSHA 300 Log of the facility where the employee is based or normally works.

## **Employees Recorded**

- Employees on your payroll
- Workers supervised on day-to-day basis
- Contractor's employees not recorded
- Self-employed persons not recorded



- You must record all injuries and illnesses on the OSHA 300 Log that meet recordkeeping requirements for all employees on the company's payroll. This includes hourly, salaried, part-time, seasonal, executive, labor, and migrant workers.
- Employees not on your company's payroll, but who are supervised by your company on a day-to-day basis, must be recorded on your OSHA 300 Log if they suffer a recordable injury or illness. This includes employees from a temporary service, employee leasing service, or personnel supply service.
- If a contractor working in your facility is supervising his or her employees on a day-to-day basis while in your facility, the contractor records any injury or illness on his or her OSHA 300 Log. However, if your company is supervising the contractor's employees, any injury or illness is recorded on your company's OSHA 300 Log.
- Self-employed persons are not covered by OSHA regulations and therefore not covered by this recordkeeping standard. If a self-employed person is injured or becomes ill while conducting work at your facility, the incident should not be recorded on your OSHA 300 Log.



Under new provisions to the recordkeeping rules:

- Establishments with 250 or more employees (including part-time, seasonal, or temporary workers) at any time during the previous calendar year, must electronically submit information from three OSHA injury and illness recordkeeping forms (300 log, 300A annual summary, and 301 incident report) to OSHA on an annual basis.
- Also, establishments with 20 to 249 employees in certain industries (listed in appendix A of the rules) must electronically submit information from their 300A form on an annual basis. Following is how it will phase in.
- By July 1, 2017, establishments with 250 or more employees, as well as establishments with 20 to 249 employees, must electronically submit their 300A annual summaries for injuries and illnesses in 2016.
- By July 1, 2018, establishments with more than 250 employees must electronically submit all three OSHA forms (300, 300A, and 301) for injuries and illnesses for calendar year 2017. By this date, establishments with 20 to 249 employees must electronically submit their 300A for 2017 incidents.
- And beginning in 2019, these establishments must electronically submit the required information by March 2 (for example, by March 2, 2019, for the information covering 2018).



Employers must establish a method for employees to immediately report injuries or illnesses and inform employees of this method.

- Employees, former employees, their personal representatives, and their authorized employee representatives have the right to access the OSHA injury and illness records, with some limitations.
- Employers must establish "reasonable procedures" for employees to report work-related injuries and illnesses promptly and accurately.
- When a request is made for a copy of the OSHA 300 Log, a copy must be provided by the end of the next business day. You cannot make changes to the OSHA 300 Log such as crossing off employee names for privacy. You cannot charge for the copies when initially requested.
- You may not enter the employee's name on the OSHA 300 Log if the case involves a privacy concern. Instead, enter "privacy case" in the space normally used for the employee's name. You must keep a separate, confidential list of the case numbers and employee names for privacy concern cases so the cases can be updated and information provided to the government if requested.
- Privacy concern cases include injury or illness to intimate parts of the body or the reproductive system, injury or illness from sexual assault, mental illness, HIV infection, hepatitis, tuberculosis, needlestick injuries, or other illnesses if employee voluntarily requests that his or her name not be entered on the log.



After establishing the procedure for reporting work-related injuries and illnesses, employers must inform each employee about it.

OSHA does not formally call this training or an educational program, but it is clear an employer will need to be able to prove its employees received the information.

Specifically, the employer must tell all employees:

- They have the right to report work-related injuries and illnesses; and
- A company is prohibited from discharging or in any manner discriminating against employees for reporting work-related injuries or illnesses.



Do you understand the information presented in the previous slides?

• Are there any questions regarding affected employers, recordkeeping forms, electronic submission of records, employees recorded, reporting to the government, and employee rights?



Within 7 calendar days after receiving information about an injury or illness, you must determine if the case meets all three of these basic recording criteria:

- The injury, illness, or fatality must be work related.
- The injury, illness, or fatality must be a new case.
- The injury, illness, or fatality must meet the general or specific recording criteria.

If all three criteria are met, complete the OSHA 301 Form and the 300 Log.



- An injury or illness is work related if an event or exposure in the work environment either caused or contributed to the condition or significantly aggravated a preexisting injury or illness.
- A preexisting injury is "significantly aggravated" when an event or exposure in the workplace resulted in death, loss of consciousness, time away from work, restricted work, or medical treatment that would not have been necessary if not for the recent event or exposure.



The following injuries or illnesses occurring in the work environment are not considered work related.

- Employee is in the work environment as a member of the general public when the injury/illness occurs.
- Injury/illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- Injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, or baseball.
- Injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption.
- Injury or illness is solely the result of an employee doing personal tasks (unrelated to employment) at the establishment outside of the employee's assigned working hours.



The following injuries or illnesses occurring in the work environment are not considered work related.

- Injury or illness is solely the result of personal grooming, self medication for a non-work-related condition, or is intentionally self-inflicted.
- Injury or illness is caused by a motor vehicle accident that occurs in a company parking lot or access road while the employee is commuting to or from work.
- Illness is the common cold or flu contracted from another employee.
- Illness is a mental illness.



- OSHA defines the work environment as "the establishment and other locations where one or more employees are working or are present as a condition of their employment."
- The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of work
- Injuries that occur while an employee is traveling are considered work related if the employee is engaged in work activities such as traveling to a customer's location, doing job-related tasks, and entertaining to discuss business at the direction of the employer. However, once an employee checks into a hotel, a home away from home is established. So, an injury when showering would not be work related. Another exception would be an injury while taking a side trip for personal reasons.
- An injury or illness that occurs while an employee is working at home is considered work related only if the employee is performing work for pay at home and the injury is directly related to the performance of the work rather than the home environment. For example, dropping a box of work-related materials on your foot would be considered work related. However, running to catch a ringing work phone and tripping over the family dog would not be considered work related.



If you have determined that an injury or illness is work related, you must also determine whether the injury or illness is a new case. If it is not a new case, it will not be a recordable incident.

- A work-related injury or illness will be considered a new case if the employee has not previously experienced a recorded injury or illness of the same type affecting the same part of the body.
- A work-related injury or illness is considered a new case if the employee had recovered completely from the previous injury or illness (all signs and symptoms had disappeared) and an event or exposure in the work environment caused the signs or symptoms to reappear:
  - Chronic illnesses in which signs and symptoms recur or continue even in the absence of exposure in the workplace should only be recorded once.
  - When an employee experiences the signs or symptoms of an illness as a result of an event or exposure in the workplace, such as occupational asthma, the episode must be treated as a new case because it occurred in response to a new exposure.
- Employers may rely on a physician or other licensed healthcare provider to determine if an injury/illness is a new case or a recurrence of an old case. If the employer seeks advice from a physician, the employer must follow the physician or other licensed healthcare professional's recommendation about whether the case is a new case or a recurrence.

## General Recording Criteria

- Death
- Days away from work
- Restricted work or transfer to another job
- · Medical treatment beyond first aid
- Loss of consciousness
- A significant injury or illness diagnosed by a physician

If the employer has already determined that an injury or illness is work related and it is also a new case, the employer now needs to determine if the injury or illness meets the general or specific recording criteria. If the injury or illness does meet the general or specific recording criteria, then the incident must be recorded on the OSHA 300 Log. Recording criteria include the following:

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- Death
- Days away from work
- Restricted work or transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- A significant injury or illness diagnosed by a physician



- Employers are required to report to OSHA within eight hours any work-related death or any incident that results in the inpatient hospitalization of three or more employees. The report must be made orally. The report cannot be faxed or left on an answering machine. The local area OSHA office or the main OSHA number at 1-800-321-OSHA (1-800-321-6742) must be called.
- Any work-related injury or illness that results in death must be recorded. If an employee is hospitalized because of a work-related injury, the incident would be recorded as time away from work. However, if the employee dies a few weeks after the incident, then the recorded injury would be changed to a death.
- Mark the "death" box on the OSHA 300 Log.



If an employee suffers a work-related new case, injury or illness, enter the information as follows on the 300 Log:

- Mark the "days away from work" box
- Enter the number of calendar days that the employee is away from work within 7 calendar days of the incident. You may need to estimate and then update when the employee returns to work.
- Do not count the day of the injury or illness. Day one of the days away from work would be the day after the injury/illness occurred.
- Include weekends and holidays the employee would not have worked. If the employee goes on vacation after the incident, record the number of days away from work recommended by the doctor.
  - Encourage the employee to follow the doctor's instructions. If the employee returns early, record the calendar days recommended by the doctor, not the actual days that the employee was away from work.
  - If the employee does not return when released, record the days recommended by the doctor, not the actual days the employee was away.
- Do not record days away from work beyond 180. Enter "180" on the 300 Log and stop counting. Stop counting when an employee retires or leaves the company for reasons not related to the injury or illness.
- Cases that result in days away from work that extend into the next calendar year should be estimated on the 300A summary, but the 300 Log must be updated when the actual days away is known or the 180-day limit is reached.



- Restricted work occurs when a work-related injury or illness prevents the worker from performing one or more routine functions of his or her job. A routine function is regularly performed at least one time per week.
- Mark the "job transfer or restriction" box on the OSHA 300 Log.
- Only if the doctor-recommended restriction prevents the employee from doing his or her normal job functions should the incident be recorded as "restricted work or job transfer." Restricted work also occurs when the injured or ill worker cannot work the normally scheduled full workday.
- A job transfer occurs when the injured or ill worker is assigned to a job other than his or her normal job for part of a day. This job transfer may be required by the employer or by the physician treating the employee.
- Count the calendar days of restricted work or job transfer, just as you count the days away from work. Start on the day after the incident. Count the days of restricted work according to the doctor's recommendations, not what the employee actually does. Limit the count to 180 days. The counting can also be stopped if the worker is permanently assigned or transferred to a job that meets the employee's work restrictions.



- If a work-related injury or illness results in medical treatment beyond first aid and did not involve death, one or more days away from work, restricted work, or job transfer, check the "other recordable cases" box.
- According to OSHA, medical treatment does not include: visits to the doctor for observation or counseling, diagnostic procedures such as x-rays or blood tests including the administration of prescription medication used in the diagnostic process, and first-aid procedures.
- OSHA is not concerned with the professional status of the person providing the first aid or medical treatment, but only with the method of treatment for recording purposes.
- If a healthcare professional recommends medical treatment but the employee does not follow through, the incident must still be recorded as an "other recordable case" that required medical treatment.



An injury or illness that requires first-aid treatment only is not recordable. Only the following 14 procedures listed on the next two slides are considered first aid by OSHA. All other treatments are OSHA recordable.

- Nonprescription medication at nonprescription strength.
- A tetanus shot. However, other immunizations, such as vaccinating for Hepatitis B or rabies, are considered medical treatment.
- Cleaning, flushing, or soaking wounds on the surface of the skin.
- Using wound coverings, such as bandages, Band-Aids<sup>®</sup>, gauze pads, butterfly bandages, or steri-strips. However, the use of wound closing devices, such as sutures, stitches, or staples, is considered medical treatment.
- Using hot or cold therapy.
- Nonrigid support including elastic bandages, wraps, and nonrigid back belts. Any support device with rigid components that are designed to immobilize parts of the body are considered to be medical treatment.
- Temporary immobilization devices during the transportation of an accident victim including: splints, slings, neck collars, back boards, etc.



- Drilling a fingernail or toenail to relieve pressure or draining fluid from a blister.
- Use of an eye patch.
- Removing a foreign object from an eye by the use of irrigation or a cotton swab.
- Removing objects from the body by use of simple means such as tweezers, irrigation, or cotton swabs.
- Use of finger guards.
- Massages.
- Drinking fluids to relieve heat stress.



- If any work-related injury or illness causes a worker to become unconscious, the incident must be recorded.
- Even if the worker is unconscious for a few moments, the incident must still be recorded because the length of time does not matter.
- Mark the "other recordable cases" box on the OSHA 300 Log. This assumes that the injury or illness that caused the worker to be unconscious did not result in death, days away from work, restricted work, or medical treatment.



Most significant injuries or illnesses will result in one of the general recording criteria such as days away from work, restricted work, or medical treatment. However, there are some instances where a significant injury may not require work restrictions or medical treatment. In some cases, the medical treatment may not be recommended when diagnosed but may be given in the future.

- Work-related cancer or a chronic irreversible disease may not require immediate treatment, so when initially diagnosed these diseases would be recorded as "other recordable cases." However, if future medical treatment results in days away from work, job restriction, or even death, the OSHA 300 Log must be updated by marking the appropriate box.
- A fractured rib or toe or a punctured eardrum may not require any medical treatment, restricted work, or days away from work when diagnosed. The injured employee may just have to wait for it to heal. However, OSHA considers this to be a significant injury that must be recorded as an "other recordable cases."



- All work-related needlestick injuries and cuts from sharp objects that are contaminated with blood or other potentially infectious materials (OPIM) must be recorded. Do not enter the employee's name because this is a privacy concern case. If the cut or needlestick results in a bloodborne disease, the 300 Log must be updated to reflect an "illness" instead of an "injury."
- If an employee is splashed or otherwise exposed to blood (without being cut), the incident should be recorded only if it results in a bloodborne disease.
- If an employee is medically removed under the medical surveillance requirements of other OSHA standards, the case must be recorded. If medical removal is a result of chemical exposure, record it as a "poisoning." Medical removal may be considered "days away from work" or "restricted work." If an employer voluntarily removes an employee from exposure before medical removal is required, the case is not recordable.



- If an employee develops tuberculosis (TB), as evidenced by a positive skin test, after being occupationally exposed to someone with active TB, record the case as a "respiratory condition." Evidence is required to prove that the case was not caused by occupational exposure.
- If an employee's hearing test indicates that a Standard Threshold Shift (STS) has occurred, record the case by checking the hearing loss box. A healthcare professional should determine if an STS has occurred and whether it is work related.
- Work-related musculoskeletal disorders (MSD) must be recorded on the 300 Log. Determine recordability as any other injury or illness. MSDs do not include disorders caused by a slip, trip, or fall, but do include: carpal tunnel syndrome, trigger finger, tendonitis, and herniated spinal disk.



- An injury is any wound or body damage including: cut, puncture, laceration, abrasion, fracture, bruise, chipped tooth, amputation, electrocution, insect bite, thermal or chemical burn, or sprain or strain from a slip or fall.
- Skin disorders are caused by exposure to chemicals, plants, or other substances, including contact dermatitis, eczema, rash, oil acne, friction blisters, or skin inflammation.
- Respiratory conditions are illnesses associated with breathing hazardous biological agents, chemicals, dust, gases, vapors, or fumes, including silicosis, asbestosis, pneumonitis, farmer's lung, beryllium disease, tuberculosis, occupational asthma, chronic obstructive pulmonary disease, toxic inhalation injury, and metal fume fever.
- Poisoning includes disorders evidenced by abnormal toxic substances in the blood or breath, or the absorption of toxic substances into the body, including poisoning from lead, mercury, cadmium; carbon monoxide, hydrogen sulfide; benzene or other organic solvents; and poisoning from insecticide sprays or other chemicals.
- Hearing loss is defined as a change in a person's hearing threshold relative to the baseline audiogram.
- Other occupational illnesses include heatstroke, heat stress, frostbite, decompression sickness, anthrax, bloodborne pathogens.

Annual Summary	
<ul> <li>Review OSHA 300 Log to ensure accuracy</li> <li>Complete annual</li> </ul>	COUNT from 320 mem         Immediate and illnesses         Immediate and illne
summary Form 300A	
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- At the end of each calendar year, review the OSHA 300 Log to make sure all entries are complete and accurate. Correct any deficiencies and update the information if it has changed. Make sure the number of days away from work and days of restricted work are accurate.
- Complete Form 300A or equivalent. Total the columns on the 300 Log and transfer those numbers to the Form 300A. Fill in the rest of the information, which includes facility name, address, industry, standard industrial classification (SIC), and employee information. Use OSHA's worksheets to help you complete the information for the average number of employees and the total hours worked by employees in the last year.
- A company executive must certify, by signing and dating the summary, that the summary is accurate to the best of his or her knowledge. Company executives can include: an owner of the company, officer of the company, highest ranking company official working at the establishment, or the immediate supervisor of the highest ranking company official working at the establishment.
- The summary must be posted from February 1 to April 30 of the year following the year covered by the records. The summary must be posted in a conspicuous place or place where notices to employees are normally posted so that all employees have access to the posting.



- The OSHA 300 Log, the privacy list, the annual summary, and the OSHA 301 forms must all be maintained for at least 5 years following the end of the calendar year covered by the records.
- During the 5-year retention period, the OSHA 300 Logs must be updated to reflect any new or changed information. Annual summary forms do not have to be updated to reflect the changed OSHA 300 Log. The OSHA 301 forms also do not need to be updated with new information.
- Update the OSHA 300 Logs to record any newly discovered injuries or illnesses.
- Update the OSHA 300 Logs to record any changes in the classification of previously recorded incidents. An employee with an injury that previously only required a job restriction may have to go in for surgery that requires some time away from work. This record must be updated to reflect the new classification as a "days away from work" case.



Let's take a few moments now to review and make sure you understand the information presented in the previous slides.

• Are there any questions regarding injury and illness recordkeeping criteria, recordkeeping forms, or updating forms?

Let's continue now to the last slide.



Key points to remember are:

- Complete forms within 7 calendar days.
- Determine if the incident is work related and a new case.
- Evaluate for general or specific recording criteria.
- Post the summary.
- Retain records for 5 years and update past OSHA 300 Logs.