

# RECORDKEEPING AND REPORTING TRAINING MODULE

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## I. REPORTING

### **A. Employers report to OSHA when:**

- There are any employee fatalities (within 8 hours); or
- Any work-related in-patient hospitalization from a single incident (within 24 hours)
- All work-related amputations or losses of an eye (within in 24 hours)

***Report these by phone or in person within eight hours to the nearest OSHA office, or call 800-321-OSHA.***

### **The report must include:**

- The name of the establishment
- The time and location of the incidents
- The number of fatalities or hospitalized employees
- The names of any injured employees
- The name of the contact person
- A phone number
- A brief description of the accident

### **B. Motor Vehicle Accident:**

You do not have to report the incident to OSHA if the motor vehicle accident occurs on a public street or highway and does not occur in the construction zone.

Injuries must be recorded on OSHA injury and illness records if you are required to keep such records (OSHA 300 log)

### **C. Commercial or Public Transportation:**

You do not have to call OSHA to report a fatality or hospitalization incident if it involves commercial airplane, train, or subway, or bus accident.

Injuries must be recorded on OSHA injury and illness records if you are required to keep such records.

### **D. Fatalities Caused by Heart Attacks at Work:**

Report to your local OSHA area office director and he or she will decide whether to investigate the incident, depending on the circumstances of the heart attack.

### **E. Fatality or Hospitalization that Occurs Long After the Incident:**

If the fatality or hospitalization incident occurs within 30 days of the incident, you must report it.

If the fatality or hospitalization incident occurs 30 or more days after the incident, you are not required to report it.



## **II. RECORDKEEPING**

OSHA forms 301, 300 and 300-A, or equivalent forms, must be used to record injuries and illnesses. Every item on a 300 Log will have a 301 Injury and Illness Incident Report.

### **A. Step 1 – Are You Required to Maintain a 300 Log?**

Companies with 10 or fewer employees at all times during the previous calendar year are not required to maintain a 300 Log. This is a company-wide employee count that includes workers who are full-time, hourly, salaried, part-time, temporary, or seasonal. Use peak employment numbers when counting employees.

Certain “low hazard” industries are partially exempt and are not required to maintain a 300 Log:

The full listing of the exempted industries can be found at: <http://www.osha.gov/recordkeeping2014/OSHA3746>

#### **1. Defining an Establishment**

An establishment is a single physical location where business is conducted or where services or industrial operations are performed.

**Note: Each establishment must maintain a separate 300 Log.**

Can one business location include two or more establishments?

**Yes:** Two or more separate businesses that share a single location can be separate establishments when special requirements are met.

Can an establishment include more than one physical location?

**Yes:** Two or more physical locations can be combined into a single establishment when special requirements are met.

### **B. Step 2 – Is This Person Recordable?**

You must record injuries and illnesses of all employees on your payroll, whether they are:

- Labor
- Executive
- Hourly
- Salary
- Part-time
- Seasonal
- Migrant workers

You must record injuries and illnesses that happen to workers not on your payroll if you provided day-to-day supervision. Examples include workers from a temporary help service, employee leasing service, personnel supply service, or a contractor.

### **C. Step 3: Is this Case Work-Related?**

It is work related if the work environment caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Unless an exception (listed below) applies, all injuries and illnesses resulting from events or exposure occurring in the work environment are presumed to be work-related.

#### **“Work-related” includes:**

- Physical locations
- Equipment used in course of work, and
- Materials used in course of work.

“Significantly aggravated means an event or exposure in the work environment that results in any of the following:

- Death
- Loss of consciousness
- One or more days away from work, days of restricted work, or days of job transfer
- Medical treatment

Note: A pre-existing injury or illness is scientifically aggravated only if it would likely not have resulted without the occupational exposure.

#### **1. An Injury is not recordable if:**

- The person experiencing the symptoms is in the workplace as a member of the general public.
- The symptoms happen at work but result from a non-work-related event.
- It results from voluntary participation in wellness or recreation programs.
- It results from consuming food or drink, unless it was food or drink contaminated by workplace toxins or food supplied by the employer.
- It results from performing personal tasks outside working hours.
- It results from personal grooming, self-medications of a non-work-related event, or is intentionally self-inflicted.
- It results from a motor vehicle accident involving a moving, personally-owned (i.e., not company owned) vehicle on a company parking lot or company access road as the employee was commuting to or from work.
- The illness is a cold or flu.
- The illness is a mental illness.

#### **2. Working at Home**

Even though an injury or illness occurred at home, if the answer to all the following questions is “yes”, the case is work-related and recordable:

- Was the employee working at home or at a home office at the time he or she became injured or ill?
- Was the employee being paid or compensated for the work?
- Was the injury or illness directly related to performing the work, rather than to the general home environment?

#### **D. Step 4: Is this a New Case?**

It is a new case if:

- You have not previously recorded an incident for that employee;
- You have a recordable incident for that employee of the same part of the body, but he or she recovered and was released to resume full duties.

#### **E. Step 5: Is this Case Recordable?**

##### **1. Injuries include cases such as, but not limited to:**

- Cuts
- Fractures
- Sprains
- Amputations

##### **2. Illnesses include both acute and chronic cases such as, but not limited to:**

- Skin diseases
- Respiratory disorders
- Poisoning
- Hearing Loss

##### **Are paper cuts occupational injuries?**

- Yes

##### **Do we need to record them?**

- **NO**, unless they require:
  - Medical treatment beyond first aid,
  - Transfer to another job, or
  - Restriction of job.

##### **A work-related injury or illness must be recorded if it results in one or more of the following:**

- Death
- Days away from work
- Restricted work or transfer to another job
- Loss of consciousness
- Significant diagnosis
- Needlesticks and sharps injuries
  - If contaminated by another person's blood or other fluids
- Medical treatment beyond first aid
- Medical removal under an OSHA standard

##### **3. Medical Treatment defined:**

**“Medical treatment” is the management and care of a patient to combat disease or disorder.”**

##### **The following are considered medical treatment:**

- Prescription medication
- Immunization shots, such as:
  - Hepatitis B or rabies vaccines
- Closing wounds with devices such as:
  - Sutures, staples, or surgical glue

- Rigid immobilization support, such as:
  - Devices with rigid stays
- Removing foreign material from the eye with tweezers or other similar means
- Physical therapy
- Chiropractic treatment

**The following is NOT medical attention:**

- Visits to physicians or other health care providers solely for observation or counseling
- Diagnostic procedures, such as:
  - X-rays, blood tests, or the administration of prescription medication used solely for diagnostic purpose
- First-aid treatments

**4. First Aid Defined:**

**The following are considered First Aid:**

- Non-prescription medications, such as:
    - Over the counter in non-prescription strength
  - Tetanus shots
  - Cleaning, flushing, or soaking surface wounds
  - Wound coverings, such as:
    - Bandages, gauze pads, butterfly strips, and Steri-strips
  - Hot or cold therapy
  - Non-rigid supports, such as:
    - Elastic bandages, wraps, and non-rigid back belts
  - Temporary supports for transportation, such as:
    - Splints, slings, and neck collars
  - Drilling nail to relieve pressure
  - Draining fluid from blister
- II. Recordkeeping (continued)

**E. Step 5: Is this Case Recordable? (continued)**

**4. First Aid Defined: (continued)**

- Using Eye patches
- Removal of foreign bodies from eye with irrigation or cotton swab
- Removal of splinters (other than from the eye) with tweezers
- Using Finger guards
- Using Massages
- Drinking fluids for relief of heat stress

***Note: This is a complete list of all treatments considered first aid.***

**5. Recording Needle Sticks and Sharps Injuries**

All work-related needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material must be recorded.

- Enter the case on the 300 Log as an injury
- Don't forget the Sharps Injury Log (see OSHA 1910.1030.(h)(5)).

**To protect employee's privacy:**

- Do NOT enter the employee's name (or job title if it reveals his or her identity) on the 300 Log.
- Enter the words "Privacy Case"

**6. Recording Hearing Loss**

- Job-related hearing losses must be recorded if they meet both of the following criteria:
  - Reflect a standard threshold shift (STS) (which is a change in hearing threshold, relative to the baseline audiogram for the employee) of an average of 10 decibels (dB) in one or both ears at 2,000, 3,000, and 4,000 hertz; and
  - Result in a total hearing level that is 25 dB or more from "audiometric zero" (which is the statistically average hearing of young adults without hearing problems).
- The presence of an STS is determined by measuring the employee's hearing relative to his or her baseline audiogram.
  - Employers may subtract for hearing loss caused by aging when determined if a 10-dB has occurred.
  - Employers may adjust for aging in determining whether the employee's hearing level is 25 dB or more from audiometric zero.
- Employer's do not have to record an STS if:
  - They retest the employee's hearing within 30 days of the first test; and
  - The test does not confirm the STS.
- To enter a recordable hearing loss case on the 300 Log, check the 300 column for hearing loss.

***The hearing loss must be work-related for it to be entered on the 300 Log.***

**If the physician or other licensed healthcare professional determines the hearing loss is not work-related or has not been significantly aggravated by occupational noise exposure, the case does not have to be recorded on the OSHA 300 Log.**

**F. Step 6: How Do I complete the 300 Log?**

**1. To fill out the 300 Log for recordable injury or illness, do the following:**

- Fill in the employee's name, unless the incident involves a privacy concern case involving one or more of the following:
  - An intimate body part or the reproductive system
  - Sexual assault
  - Mental illness
  - HIV infection, hepatitis, or tuberculosis
  - Needlestick or sharps injuries involving blood or other potentially infectious materials
  - Other illnesses for which the employee independently and voluntarily requests that his or her name not be entered on the Log.

**Note: In addition, the employer must keep a separate privacy concern list containing the employees' names and case number for all privacy cases. This separate list is kept so that the employer may update the case or provide the information to the government if asked.**

- Identify all of the following with respect to the incident:
  - Date of occurrence
  - Place of occurrence
  - Brief injury description
  
- Classify the seriousness of the case (from most to least):
  - Death
  - Days away from work
  - Job transfer or job restriction
  - Other recordable cases
  
- Identify the number of days away from work or on job transfer or restriction:
  - Don't include the day on which the injury occurred, or the illness began
  - Count calendar days not scheduled work days. Weekend days, holidays, vacation days, or other days off are included in the total number of days recorded if the employee would not have been able to work on those days because of a work-related injury or illness.
  - Count work from home as days away from work if an injured employee performs services for the company from home as a condition of his/her medical restriction (if that employee does not work from home as part of his or her normal work schedule).
  - Consider an employee to be on restricted work if the employee is unable to perform one or more routine job functions, the employee is unable to work a full work day that he/she was otherwise scheduled to work, or a physician or other licensed health care professional recommends against working a full work day or performing one or more routine job functions.
  - Enter the total days for both days away and restricted work if a single case involves both.
  - Apply a 180-day cap once the total of days off work or on restricted activity (either individually or in combination) reaches 180.
  
- Identify the case as an injury or illness and check the appropriate category for any illness.

**G. Step 7: How to Update a Case:**

If there are changes to the case during a five-year period, you must update the original 300 Log entry to show these changes. Also enter on the original 300 Log any newly discovered recordable injuries or illnesses. (See 1904.33(b) for information on updating records.)

**H. Step 8: How Do I Complete, Display, and Retain Forms?**

The employer:

- Has seven calendar days to initiate entries on the log;
- Has until the end of the next business day to provide copy of records to employee requests;
- Has no direct requirement to keep records onsite, but has four business hours to give records to a government representative; and
- Must maintain all logs for five years beyond the current year.

**OSHA 300 Log**

- Summarize and total all columns at the end of the year.
  - Place “zeros” in empty columns.
- Do not post the 300 Log.

### **OSHA 300A Report**

- The 300A Report must be examined and certified by a company executive (officer of corporation, owner or a sole proprietorship or partnership, highest-ranking company official working at the site, or his/her immediate supervisor).
- Post the 300A annual summary for the previous year.
  - Post each establishment's summary only within that establishment.
  - The 300A summary report must be posted from February 1 to April 30.

### **III. Employee Involvement**

#### **A. Your employees and their representatives must be involved in the recordkeeping system in several ways:**

- You must inform each employee of how he or she is to report an injury or illness to you
- You must provide limited access to your injury and illness records for your employees and their representatives.

#### **B. Employees are protected under the Section 11© of the OSH Act:**

- From retaliation for reporting injuries, illnesses, or fatalities
- From retaliation for filing a safety and health complaint;
- For asking for access to Part 1904 records; and
- For exercising any other rights.



