

Occupational Health and Safety Administration (OSHA) Recordkeeping Policy

In January 2002, OSHA's revised recordingkeeping rule became effective. It helps generate more accurate information about occupational injuries and illnesses. It simplifies the overall recordkeeping system for employers. It better protects employees' privacy. The standard also covers recording both needlestick/sharps injuries and musculoskeletal disorders (MSDs).

Employers with 10 or fewer employees are exempt from most requirements of the rule. Any company, however, that has one fatality or the hospitalization of three or more employees must still report to OSHA within eight hours. This is regardless of the number of workers a business employs.

Scope

OSHA's injury and illness recordkeeping requirements classify employers into one of three groups:

1. Employers regularly exempt from OSHA recordkeeping
 - Includes small businesses with fewer than 11 full- or part-time employees during the previous calendar year. It also includes employers classified in low-hazard industries. These employers are still required to report multiple hospitalizations and fatalities as required by 29 CFR 1904.8.

If OSHA notifies the employer in writing to participate in a statistical survey, the employer must maintain injury and illness records in accordance with 29 CFR 1904.

2. Employers exempt from preparing and maintaining injury and illness records
 - Includes industries listed in Appendix A of Subpart B of the recordkeeping standard contained in 29 CFR 1904.
3. Employers that are not classified under groups 1 and 2
 - These employers are required to comply with the regulations in 29 CFR 1904.

The OSHA Log 300

Employer establishments use the OSHA 300 log to record and maintain information about employee injuries and illnesses. It is printed on 8 ½ " x 11" paper. An establishment, as defined by OSHA, is, "A single physical location where business is conducted, or where services or industrial operations are performed; the place where employees report for work, operate from or from which they are paid."

The form is divided into three general sections:

1. Identity (e.g. name, case number, job title, etc.)
2. Descriptive (e.g. date, injury location, description of incident, etc.)
3. Classification (e.g. type of injury, days away from work, days on restriction, etc.).

Here is a list of guidelines to use for maintaining an OSHA 300 log:

- Maintain the OSHA 300 log on a calendar year cycle (not fiscal).
- Record cases within seven calendar days of receiving information that a recordable case has occurred.
- Retain the OSHA 300 log for five years.
- Maintain an OSHA 300 log during those five years and add or delete cases as necessary.

The OSHA Form 301

If an injury or illness is recordable, you must complete a supplementary form (e.g. OSHA 301). This form has more information about the case and is printed on 8 ½ " x 11" paper. You will include information such as the events leading up to the injury or illness, body parts affected, object(s) or substance(s) involved, etc.

OSHA only suggests using the OSHA 301 form. It is not required. You can use a different form if it contains the same information as the OSHA 301 form. Here are some examples of other suitable forms:

- State workers' compensation reports
- Insurance claim reports
- Employer's accident report forms

Here is a list of guidelines to use for maintaining supplementary records:

- Record cases within seven calendar days of receiving information that a recordable case has occurred.
- Keep the OSHA 301 form current within 45 days at any given time.
- Each establishment must maintain an OSHA 301 form or similar form.
- Retain records for five years.

How to Determine if a Case is Recordable

As an employer, you are responsible for reporting all recordable injuries and illnesses that happen in the workplace.

Medical vs. First Aid Treatment

One of the most confusing aspects of recordkeeping is determining if an injury or illness is recordable, based upon first aid or medical treatment. The standard sets definitions of medical treatment and first aid to simplify recording decisions.

Medical Treatment is defined as:

- Administering immunizations, such as Hepatitis B or rabies (does not include tetanus).
- Using wound closing devices, such as sutures, staples, etc.
- Using rigid means of support to immobilize parts of the body.
- Physical therapy or chiropractic treatment.

Medical Treatment does not include:

- Visits to a physician or other licensed health care professional solely for observation or counseling.
- The conduct of diagnostic procedures, such as X-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes.

First Aid is defined as:

- Using a nonprescription medication at nonprescription strength.
- Administration of tetanus immunizations.
- Cleaning, flushing or soaking wounds on the surface of the skin.
- Use of wound coverings, such as bandages, Band-Aids[®], gauze pads, etc.
- Application of hot or cold therapy.
- Use of any nonrigid means of support, such as elastic bandages, wraps, nonrigid back belts, etc.
- Use of temporary immobilization devices while transporting an accident victim (e.g. splints, slings, neck collars, back boards, etc.).
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister.
- Use of eye patches.
- Removal of foreign bodies from the eye using only irrigation or a cotton swab.
- Removal of splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- Use of finger guards.
- Administration of massage.
- Drinking fluids to relieve heat stress

The OSHA Form 300A (Annual Summary)

The employer is responsible for preparing an annual summary of injuries and illnesses that occurred during the calendar year. The annual summary, OSHA form 300A, displays the totals from columns G through M of OSHA log 300. The summary also includes:

- Calendar year covered.
- Company's name.
- Company's address.
- Annual average number of employees.
- Total hours worked by all employees covered by the OSHA 300 log.

Form 300A is a separate form. It does not display any personal information, as shown on OSHA log 300. Form 300A also makes it easier to calculate incident rates. The annual summary must be:

- Posted by February 1 and remain posted until April 30.
- Posted in areas where other notices are normally placed.
- Certified (signed) by a company executive, stating that the information is correct and complete to the best of the employer's ability.
- Retained for five years.

If you do not record any cases during a reporting period, you must still post a summary. You should enter zeros into all spaces provided on form 300A.

Revised: _____ (revision date)