

Before you begin:

Ask your session members to review the Occupational Safety and Health Administration's (OSHA) Recordkeeping Standard. Make sure they understand why the standard is important for their workplace.



Introduction

To help your participants understand how to report and record occupational injuries and illnesses, please ask them these discussion questions.

Definitions

OSHA recordable injuries and illnesses: those that cause fatalities, unconsciousness, loss of workdays, restricted work activities, job transfers, or medical care beyond first aid. Illnesses associated with workplace exposures, such as some cancers, must also be recorded.

OSHA reportable injuries and illnesses: severe injuries and illnesses must be reported directly to the OSHA in addition to being recorded by the employer. For instance, all work-related deaths must be reported to the OSHA within an eight-hour period, and all in-patient hospitalizations and amputations must be reported within a 24-hour period. These reports must be made directly either by telephone or by using a dedicated online form.

Discussion

What is the OSHA Recordkeeping Standard?

OSHA has specific requirements for how employers report and record occupational injuries and illnesses. The OSHA recordkeeping requirements include these three forms:

- Log of Work-Related Injuries and Illnesses (OSHA 300).
- Summary of Work-Related Injuries and Illnesses (OSHA 300A).
- Injury and Illness Incident Report (OSHA 301).

You will learn more about these forms later in this discussion.

Where is the OSHA Recordkeeping Standard?

The OSHA Recordkeeping Standard is in 29 Code of Federal Regulations (CFR) Part 1904 and is on OSHA's website, www.osha.gov.

Does this standard apply to my employer?

If an employer has 11 or more employees, the employer must keep recordkeeping forms. In fact, 1904.1 (a) (2) requires a company that had more than 10 employees at any time during the last calendar year to keep OSHA injury and illness records unless it is classified as a partially exempt industry under §1904 Appendix A.

Based on the employer's type of business, some employers are partially exempt from these requirements. You can find a list of the partially exempt industries in Appendix A of Subpart B of this standard. However, the fact that an employer is exempt from the injury and illness recordkeeping requirements does not mean the employer is exempt from the standard's reporting requirements. All employers covered by the Occupational Safety and Health Act must report any occupational fatality, amputation, loss of an eye, or accident that results in hospitalization of one or more employees to OSHA. Section 1904.39 has the full reporting requirements. Section 1904.41 has the electronic reporting requirements.

What is recordable?

In many cases, the staff member who handles the management of workers' compensation claims also administers OSHA recordkeeping. However, you do not record all workers' compensation claims under the OSHA recordkeeping requirements. Likewise, not all OSHA recordable injuries/illnesses are workers' compensation claims.

OSHA recordable injuries are similar to workers' compensation claims because the injuries/illnesses must be work related. However, you must determine several other important issues before recording the injury or illness on the OSHA injury/illness log.

The main section of 1904 that OSHA's record keeper needs to understand is 1904.7. This section defines the recording criteria. For example, Section 1904.7 (b) (1) states: "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, medical treatment beyond first aid, loss of consciousness, or a significant injury or illness diagnosed by a physician or other licensed health care provider."

To determine if an occupational injury is a recordable event or not, you need to know whether the injury or illness requires medical treatment beyond first aid. OSHA's first-aid definitions are in 1904.7 (b) (5) (ii). The staff member responsible for OSHA recordkeeping can use these definitions to determine which occupational injuries or illnesses they need to enter on the OSHA 300 log and which ones they do not need to enter.

What forms do I need to keep?

The OSHA 300 lists the recordable injuries and illnesses that occur during each calendar year. The record keeper enters:

- A case number.
- Injured worker's name (if it is not a privacy case).
- Injured worker's job title.
- Date of injury.
- Department or location where the injury occurred.
- A description of the injury, including the nature of the injury and the body part(s) involved.

In addition, the record keeper must place a check mark in the appropriate columns and enter the days of lost, restricted, or transferred time.

The OSHA 300A is a summary of the OSHA 300. You must complete it at the end of the year. OSHA requires that you post the 300A from the previous year from Feb. 1 through April 30 in a conspicuous location where employees may see it.

There is no personal information on the OSHA 300A. However, it does require the record keeper to obtain employee information such as the average number of employees and the total hours worked. In addition, the highest-ranking official at the establishment must sign the OSHA 300A.

In addition, employers must complete an OSHA 301 or an alternative form for each recordable injury or illness on the OSHA 300. The OSHA 301 or an alternative form provides important information about the worker, job, type of injury, and a more detailed description of how the injury occurred.

BWC's First Report of an Injury, Occupational Disease or Death (FROI) is an acceptable substitute for the OSHA 301. However, we suggest employers analyze the causes of any accidents and document corrective actions to help prevent a similar injury from occurring.

Proper reporting and recording of occupational injuries and illnesses is an important part of OSHA compliance. The information from these reports is instrumental in helping identify injury and illness trends and areas needing improvement.

Conclusion

In addition to meeting the recordkeeping requirements set by OSHA, the data collected can be used to figure out injury and illness trends. Analyze your OSHA 300 logs and use the results of this analysis to identify and put in place safety-system improvements.

If you need more information or help understanding OSHA's recordkeeping requirements, you may contact your local OSHA office. BWC's Division of Safety and Hygiene can provide guidance, information, and training to help you comply with this standard and improve your injury-prevention programs. For more information, please visit our website at www.bwc.ohio.gov.

Group Activity

- Discuss the OSHA Recordkeeping Standard to determine if it covers your organization.
- Discuss a hypothetical accident. How does your company record what happened? Have the group describe the information they need to record to assist the recordkeeper at your company with providing accurate information to OSHA.

Resources

[OSHA, Injury and illness recordkeeping and reporting requirements](#)

[BWC Learning Center](#), search for: OSHA Recordkeeping 101 (Online)

[BWC Learning Center](#), search for: Precision OSHA Recordkeeping (Webinar Recording Replay)

[Recordkeeping - Recordkeeping Forms | Occupational Safety and Health Administration](#)