

# OSHA requirements for reporting and recording occupational injuries and illnesses

By Scott Turner

## 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.

### What is the OSHA Recordkeeping Standard?

OSHA has specific requirements for how employers report and record occupational injuries and illnesses. The revised OSHA recordkeeping requirements went into effect Jan. 1, 2002. Not only did OSHA make dramatic changes to the reporting and recording requirements, but it also mandated using new and improved recordkeeping forms.

The OSHA recordkeeping requirements include these three forms:

- o *Log of Work-Related Injuries and Illnesses* (OSHA 300);
- o *Summary of Work-Related Injuries and Illnesses*; (OSHA 300A);
- o *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](http://www.osha.gov). On the home page, you will see Recordkeeping halfway down on the left side of the page. From this link, you may access injury and illness recordkeeping requirements.

### Does this standard apply to my employer?

If an employer has 11 or more employees, the employee 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 § 1904.2.

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 an employer is exempt from the injury and illness recordkeeping requirements does not mean the employer is exempt from the standard's reporting. In particular, all employers covered by the Occupational Safety and Health Act must report any occupational fatality or accident that results in hospitalization of three or more employees to OSHA within eight hours of the occurrence.

### 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 a number of 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. Fortunately, the first-aid definitions provided in the revised standard are much better than those in the former standard version. As a result, the staff member responsible for OSHA recordkeeping can more easily determine which occupational injuries or illnesses he or she needs to enter on the OSHA 300 log and which ones he or she does not need to enter. OSHA's first-aid definitions are in 1904.7 (b) (5) (ii).

### **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:

- o A case number;
- o Injured worker's name (if it is not a privacy case);
- o His or her job title;
- o Date of injury;
- o Department or location where the injury occurred;
- o 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 on 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.

### **For more information**

If you need additional information or assistance to understand OSHA's recordkeeping requirements, you may contact your local OSHA office. In addition, to help you comply with this standard and improve your injury-prevention programs, BWC's Division of Safety and Hygiene may provide guidance, information and training. For more information, please visit our website at [ohiobwc.com](http://ohiobwc.com).

### **Group activities**

- o Determine if the OSHA Recordkeeping Standard covers your organization.
- o Find out who is responsible for maintaining the various OSHA recordkeeping forms and make sure that person completes them properly.
- o Make sure you post the OSHA 300A from February through April each year.

### **Conclusion**

To determine injury and illness trends, analyze your OSHA 300s. Use the results of this analysis to identify and put in place safety-system improvements.

### **Reference**

29 CFR 1904

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