

Loss Control Bulletin

*A Policy of Working Together
for a Safer Tomorrow*

OSHA Recordkeeping Requirements

Recordkeeping is one of the most cited violations of OSHA Standards every year. This can be either a lack of or improper recordkeeping. Recordkeeping requirements include documentation of employee injuries and illnesses, documentation of employee training and others.

Employers are required to document work-related injuries, illnesses and fatalities following the guidelines in 29 CFR, Part 1904. There are partial exemptions to some of the recordkeeping requirements. If an employer has ten or fewer employees, they are not required to keep OSHA injury and illness records. There are also particular types of business establishments that are not required to keep these records. These types of businesses are typically low hazard retail, service, finance, insurance or real estate industries. For a list of these businesses, see Appendix A of Subpart B in 29 CFR, Part 1904.

OSHA injury and illness recordkeeping forms

Each business establishment that does not meet either of the partial exceptions above must maintain the OSHA 300 Log of Work-Related Injuries and Illnesses, the OSHA 300-A Summary of Work-Related Injuries and Illnesses and the OSHA 301 Injury and Illness Incident Report or equivalent forms. An equivalent form is one that will require the same information as the particular OSHA form.

For example, an OSHA 301 form does not need to be filled out if the employer is completing an accident investigation form for a work-related injury or illness as long as the employers form addresses all of the information required by OSHA.

Businesses that have multiple establishments must keep a separate OSHA 300 Log for each establishment (if the establishment is expected to be in operation for one year or more). The injury or illness must be recorded on the OSHA 300

Log for the particular establishment at which the incident occurred.

OSHA 300 log of work-related injuries and illnesses

This form is used to classify work-related injuries and illnesses and notes the extent and severity of each case. The following work-related injuries and illnesses should be recorded:

- Death
- Loss of consciousness
- Incidents that require days away from work
- Incidents that require restricted work activity or job transfer
- Incidents that require medical treatment beyond first aid
- Injury or illness diagnosed by a physician or other licensed health professional
- Any work-related case involving cancer, irreversible disease, fractured or cracked bone or punctured eardrum
- Any needlestick injury or cut from a sharp object that is contaminated with another person's blood or other potentially infectious material
- A tuberculosis infection as evidenced by a positive skin test or diagnosis by a physician or other licensed health professional after an exposure to a known case of tuberculosis

Incidents where basic first aid such as cleaning wounds on the skin surface, using wound covering such as bandages, using heat or cold therapy and others are not considered medical treatment and do not need to be recorded on the OSHA 300 Log.

Restricted work activity occurs when, as the result of a work-related injury or illness, the employer or health care professional recommends keeping an employee from doing the routine

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functions of their job or from working the full day that the employee would normally work. To determine the number of restricted work days or days away from work, count the number of calendar days the employee was on restricted work activity or was away from work as a result of the recordable injury or illness. Do not count the actual day of the injury or illness in this number.

The OSHA 300 Log, the OSHA 300A Summary and the OSHA 301 Injury and Illness Report must be kept for five years following the year to which they pertain. These forms do not need to be sent to OSHA unless an employer is specifically asked to do so.

OSHA 300A summary of work-related injuries and illnesses

At the end of each calendar year, the results of the OSHA 300 Log should be reviewed to see that they are complete and accurate. These results should then be summarized on the OSHA 300A Summary. Once the summary has been completed, it must be posted in a conspicuous place by February 1 of the following year covered by the form through April 30. The OSHA 300 Log does not need to be posted, just the OSHA 300A Summary.

OSHA 301 injury and illness incident report

As mentioned earlier, this form is not required to be completed if an equivalent form is used that supplies all the information required by OSHA. Equivalent forms can include an accident investigation form, a state's first-report-of-injury form or other forms. This or equivalent form should be one of the first forms completed after a work-related injury or illness.

Additional recordkeeping requirements

Within eight hours after the death of an employee from a work-related incident or the in-patient hospitalization of three or more employees from a work-related incident, the employer must orally report to OSHA via telephone or in person to the Area Office of OSHA that is nearest to the incident. The OSHA Toll-Free phone number 1-800-321-6742 may also be used.

OSHA may send out an Annual OSHA Injury and Illness Survey form to employers. If you receive this form, you are required to complete it and return it to OSHA. If you do not receive this form, you do not need to send your injury and illness information to OSHA.

Records should be kept for any employee safety training and any safety meetings that are held. These records should indicate the topic(s) covered, the names and signatures of attendees and the name of the trainer/presenter. A log or file should be kept of all the documents that pertain to any safety training sessions or safety meetings.

Employee medical records must be kept for the duration of employment plus thirty years and employee exposure records must be kept for at least thirty years.

Many of the OSHA Standards have particular recordkeeping requirements such as the Hazard Communication Standard. The Hazard Communication Standard requires that the employer develop a written hazard communication program which includes a list of hazardous chemicals in the workplace and the employer must maintain a file of material safety data sheets (MSDS) for all the chemicals used in the workplace.

In order to determine any additional recordkeeping requirements, job hazards particular to each employer should be determined. Once these job hazards (i.e., fall protection, excavation, powered lift-trucks, etc.) have been identified, the OSHA Standards that apply to those hazards should be reviewed to determine what recordkeeping requirements may apply.

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