

Welcome to the Agency's tutorial on completing OSHA recordkeeping forms.

## Brief Tutorial on Completing the OSHA Recordkeeping Forms

A review of the recordkeeping requirements and forms at a high level:

- Requirement to complete the forms and evaluate specific exceptions
- The forms in OSHA's recordkeeping package
- Recordability criteria for injuries and illnesses
- Recording injuries/illnesses on the forms



This brief presentation reviews OSHA recordkeeping requirements at a high level, with an emphasis on how to fill out the forms provided in OSHA's Recordkeeping Forms package. The tutorial covers what types of operations come under the recordkeeping rule and thus are required to complete the forms, what types of injury and illness incidents must be recorded, and what information is to be included in each of the three OSHA forms respectively.

To move sequentially through the presentation, use the control buttons just below the slide window. (You can also use the linked navigation panel to the left to move to a particular slide.)

A few other features of the interface frame are worth mentioning at this point:

- --The blue-gray bar just below the slide window keeps you informed of where you are in the presentation. There's also a volume control button just to the left of this.
- --Next, in the upper portion of the left-hand navigation panel, the tab set allows you to switch from the outline listing of slides to a thumbnail view of the slides or to a view with a transcription of the slide voiceovers. The last tab accesses a feature for searching the entire presentation by key words.
- --Finally, in the right-hand side of the red bar across the top are two navigation items: Behind the "Links/Accessibility" item is a downloadable/accessible version of the presentation; the "Bookmark" item allows you to set which slide you want to return to after exiting the presentation.

OK. You can now continue with the presentation on the OSHA recordkeeping forms by selecting the flashing arrow button below the slide window.

# Who has to complete the OSHA injury and illness recordkeeping forms?

Many but not all employers. Exceptions are based on:

- Small employer exemption 10 or fewer employees at all times during the year
- Low-hazard industry exemption <u>see list of Partially Exempt</u> Industries (PDF)



Many but not all employers must complete the OSHA injury and illness recordkeeping forms on an ongoing basis.

Employers with 10 or fewer employees throughout the previous calendar year do not need to complete these forms. Said another way, if there are more than 10 employees *at any time* during that calendar year, the employer may come under the requirement. When counting employees, you must include full-time, part-time, temporary, and seasonal workers. This exemption is based on the employment of the entire company rather than the establishment. For example, if a company has two establishments, one with 5 employees and one with 7 employees, the company must fill out the forms for each establishment because the company employment is greater than 10.

In addition to the small employer exemption, there is an exemption for establishments classified in certain industries. For example, the forms do not need to be completed for restaurants, banks, and medical offices. A complete list of exempt industries can be found on the Recordkeeping page by using the Partially Exempt Industries link.

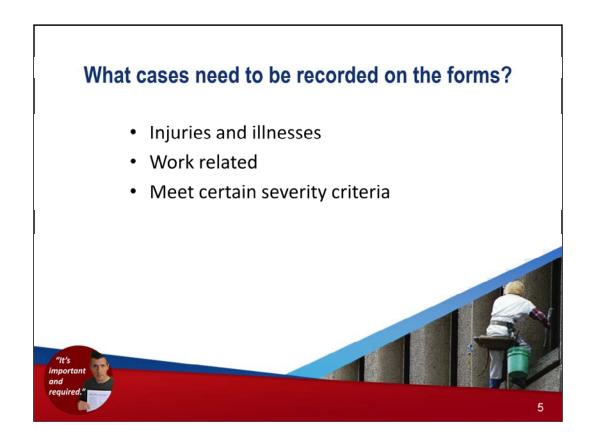
Establishments normally exempt from keeping the OSHA forms must complete the forms if they are informed in writing to do so by the Bureau of Labor Statistics or OSHA. Also, exempt establishments must report to OSHA within 8 hours any work-related fatality. Work-related amputations, in-patient hospitalizations, and the loss of an eye must be reported to OSHA within 24 hours of learning of the incident. These events can be reported by phone to the local OSHA Area Office or by using the OSHA 800 number (1-800-321-6742) or by using the reporting application on OSHA's public website.

### What forms must be completed?

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



There are three forms you--the employer--must complete. OSHA forms 300 and 301 are maintained on an ongoing basis. Recordable injuries and illnesses must be entered on these forms as they occur throughout the year. The OSHA Form 300A is completed after the end of the year, summarizing the number of recordable cases that occurred. Employers may use equivalent forms in place of these forms as long as the equivalent forms contain all of the same data elements and are as easy to read as the OSHA forms.



Any work-related injury or illness that meets certain severity criteria must be entered on the forms within 7 calendar days of learning about its occurrence. We'll talk about each of these bullet items on the next few slides.

### What is considered an injury or illness?

- An abnormal condition or disorder
- Not an exposure, unless it results in signs or symptoms

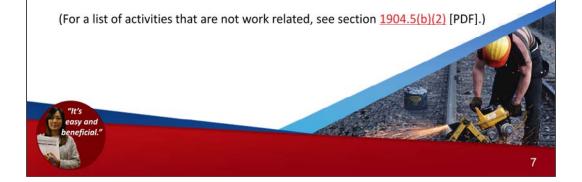


OSHA defines an injury or illness as an abnormal condition or disorder. Injuries and illnesses include cases such as cuts, fractures, sprains, skin diseases, or respiratory conditions. For OSHA recordkeeping purposes, an injury or illness can also consist of only subjective symptoms such as aches or pain.

Exposures that do not result in signs or symptoms are not considered injuries or illnesses and should therefore not be recorded on the OSHA forms. For example, if an employee is exposed to chlorine and does not exhibit any signs or symptoms due to the exposure, the case would not be recorded on the Log, even if it involved prophylactic—that is, preventative--medical treatment.

#### What cases are work related?

- Cases caused by events or exposures in the work environment
- Cases contributed to by events or exposures in the work environment
- Cases significantly aggravated by events or exposures in the work environment

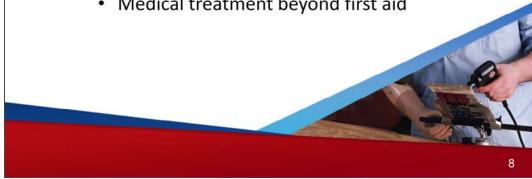


Cases that are caused, contributed to, or significantly aggravated by events or exposures in the work environment are considered work related for OSHA recordkeeping purposes. Work-relatedness is presumed for injuries and illnesses occurring in the workplace or in locations where the employee is located as a condition of employment. It's important to remember that if work makes any contribution to the injury or illness, it is considered work-related for OSHA recordkeeping purposes.

There are certain activities that occur in the work environment that OSHA does not consider work related. For example, injuries resulting directly from eating, drinking, or preparing ones own food at the workplace are not considered work related. For a complete list of these activities, refer to section 1904.5(b)(2) using the Regulatory Text link found on the Recordkeeping page.

## What are the severity criteria for recording a workrelated injury or illness?

- Death
- · Loss of consciousness
- Days away from work
- · Restricted work activity or job transfer
- Medical treatment beyond first aid



Work-related injuries and illnesses that result in death, loss of consciousness, days away from work, restricted work activity, transfer to another job, or medical treatment beyond first aid must be recorded on the OSHA forms. We'll talk about these criteria on the next few slides.

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1	Mark Bagin	Velder	5/25	basement														

For cases involving a fatality, enter a checkmark in column G on the OSHA Form 300. Note in column M whether the case involved an injury or an illness.

Also remember that you must report the fatality to OSHA within 8 hours of learning of its occurrence. The event can be reported by phone to the local OSHA Area Office or by using the OSHA 800 number (1-800-321-6742) or by using the reporting application on OSHA's public website.

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For cases that involve one or more days away from work, you must place a checkmark in column H on the OSHA Form 300 and enter the number of calendar days the employee was away from work in column K. Then note in column M whether the case involves an injury or an illness.

When counting days, be sure to count the days the employee would not have been able to work regardless of whether he or she was scheduled to work. This would include weekends and holidays. Do not count the day of the injury. If the day count reaches 180 calendar days, you may stop counting subsequent days and enter 180 in column K.

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For cases that involve restricted work activity or job transfer, you must place a checkmark in column I on the OSHA Form 300 and enter the number of calendar days the employee was restricted in column L. You count the days in the same manner as counting days away from work. Then note in column M whether the case involves an injury or an illness.

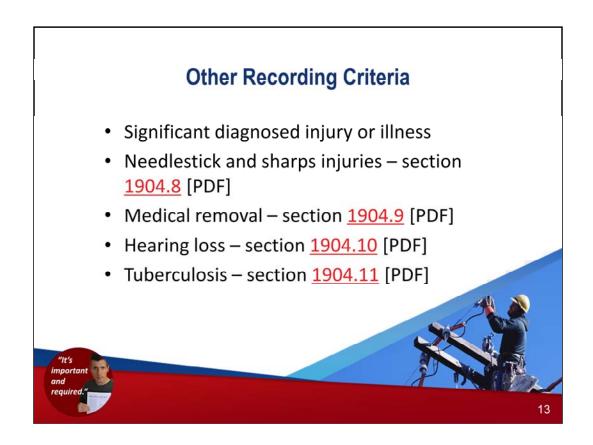
An employee is considered restricted if he or she is unable to work a full shift or is unable to perform all of the work activities he or she would be expected to do at least once during a week.

If a case involves both days away from work AND days of restricted work activity, place a checkmark in column H, leave column I blank, and enter the correct day counts in both columns K and L. (For example, if an employee had 3 days away from work and 2 of restricted work activity, place a checkmark in column H and enter a 3 in column K and a 2 in column L.) Again, note in column M whether the case involves an injury or an illness.

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For cases that involve medical treatment beyond first aid, you must place a checkmark on the OSHA Form 300 in column J, which is for "other recordable cases." Then note in column M whether the case involves an injury or an illness.

For OSHA recordkeeping purposes, medical treatment is any treatment for an injury or illness except diagnostic procedures, observation and counseling, and first aid. First aid consists of 14 specific treatments listed in section 1904.7(b)(5) of the regulatory text. It includes items such as non-prescription medication, wound coverings, and hot and cold treatment. You can access the complete list using the Regulatory Text link on this web page or by looking in the Overview section of the Recordkeeping Forms package (also linked from the Recordkeeping page).



Work-related cases of cancer, chronic irreversible disease, fractured or cracked bones or teeth, or a punctured ear drum must be entered on the OSHA forms. These are considered significant injuries and illnesses.

The recordkeeping rule also contains special criteria for recording occupational hearing loss, tuberculosis, injuries from needlesticks and sharps potentially contaminated with bloodborne pathogens, and cases involving medical removal required by other OSHA standards. For the specific requirements, refer to sections 1904.8 through 1904.11 using the Regulatory Text link on the Recordkeeping page or by looking in the Overview section of the Recordkeeping Forms package (also linked from the Recordkeeping page).

OSHA's Form 301 Injury and Iliness	Incident Penert	Attention: This form contains informatic employee health and must be used in a m protects the confidentiality of employees t possible while the information is being use occupational safety and health purposes.
This Injury and Illness Incident Report is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the Lag of Work-Related Injuries and Illnesse and the accompanying Summary, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.  Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable	Information about the employee	Information about the case  10: Case number from the Log  11: Date of injury or illness  12: Time employee began work  13: Time of event  14: What was the employee doing just tools, equipment, or material the emerarying roofing materials"; "sprayi
substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.	Information about the physician or other health care professional	15) What happened? Tell us how the inj fell 20 feet"; "Worker was sprayed w developed soreness in wrist over tim
According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, you must keep	6) Name of physician or other health care professional	

You must fill out an Injury and Illness Incident Report for every recordable work-related injury or illness. Together with the Log of Work-Related Injuries and Illnesses and the accompanying Summary, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

OSHA's Form 300A (Rev. 01/2004)								
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to verify that the en Using the Log. o	tries are complete and accura ount the individual entries you	e before completing this summer	Y	r illnesses occurred during the year. Remember to review the Log sure you've added the entries from every page of the Log. If you	Estab			
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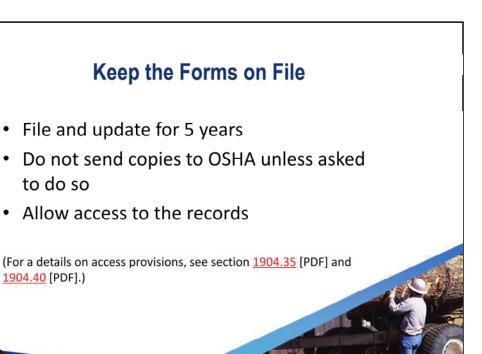
All establishments covered by Part 1904 must complete the Summary of Work-Related Injuries and Illnesses, even if no injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary. Using the Form 300, count the individual entries you made for each category. Then, write the totals on the left side of the Form 300A, making sure you've added the entries from every page of the Log. If you had no cases, write in a zero.

Establis	hment information		
Your establi	shment name		
Street			
City	State ZIP	_	
Industry des	cription (e.g., Manufacture of motor truck trailers)		
Standard Inc	dustrial Classification (SIC), if known (e.g., 3715)		
OR			
North Amer	rican Industrial Classification (NAICS), if known (e.g., 3	36212)	
	nent information (If you don't have these figures, see the back of this page to estimate.)	he	
Annual aver	age number of employees		
Total hours	worked by all employees last year		
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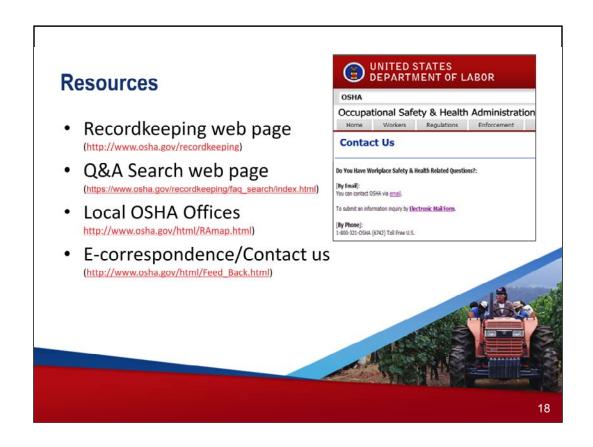
On the right side of the Form 300A, fill in the establishment information.

Also in this section of the form, a company official must certify that the entries on the summary are true, accurate, and complete. The certifying official must be the owner of the company, an officer of the corporation, the highest ranking company official at the establishment, or that person's supervisor.

You must post a copy of the annual summary in each establishment in a conspicuous place or places where notices to employees are customarily posted. You must post it no later than February 1 of the year following the year covered by the records and keep the posting in place for three months until April 30.



You must keep these forms on file for 5 years following the year to which they pertain. You must also update the Form 300 with any changes that may occur to the recorded cases during that period. Do not send completed copies of the forms to OSHA. You must make the forms available to employees, former employees, their representatives, and to OSHA officials upon request. (Note, however, that both the Log 300 and Form 301 incident reports will include information relating to employee health and thus can only be used in a manner that protects confidentiality to the extent possible while promoting occupational safety and health.) For details concerning the access provisions, refer to sections 1904.35 and 1904.40 using the Regulatory Text link on the Recordkeeping page.



In conclusion, this presentation reviewed OSHA's injury and illness recordkeeping requirements at a very high level. The Recordkeeping page, however, includes links to reference documents that address the specific requirements of the recordkeeping rule and answer many reoccurring questions, as well as a link to the recordkeeping forms package itself. To learn the details of what you need to do to be in compliance with the recordkeeping rule, you may want to take some time to familiarize yourself with the Regulatory Text and FAQs posted here. The Letters of Interpretation and the Recordkeeping Handbook are also useful reference documents linked from the Recordkeeping page.

If you have specific questions that you cannot find direct guidance for in these documents, you may want to try the Recordkeeping Q&A Search application. Also, feel free to call your local OSHA office or submit your question using OSHA's e-correspondence web page. You can get a list of OSHA offices and can access OSHA's Electronic Mail Form using the Contact Us link at the bottom of the Recordkeeping page.

Thanks for helping to make the nation's workplaces safer.