OSHA Record Keeping Requirements

The basics on how to stay compliant...

By: &

INSafe
Indiana’s Worker Safety Initiative
What is an OSHA 300 Log???

• An OSHA 300 Log is a listing of all injuries and illnesses at your jobsite.
  • OSHA requires that most employers keep a 300 Log. You may keep the log on your computer or elsewhere, as long as you can produce a copy in the workplace whenever it is necessary.

• REMEMBER—if you are inspected by OSHA, and are required to keep a 300 Log, you will need to be able to produce a copy during inspection (or within 4 hours of their request for the log).
Who has to keep a 300 Log???

Not every employer is required to keep a 300 Log. So, before you go through the process of learning how to keep one—you should find out if you are required to do so!
You don’t have to keep a 300 Log if...

1. You have 10 or fewer employees (at anytime during the calendar year)
   (include temporary and contracted workers who are under your direct supervision)
2. You are in one of the exempt low-hazard industries
   (as determined by your company SIC code)

Even if you are exempt for one of the aforementioned reasons—if OSHA or the Bureau of Labor Statistics asks you to take part in an annual survey, you will have to keep records for that year.

For a complete list of exempt industries & SIC codes, visit:
http://osha.gov/recordkeeping/ppt1/RK1exempttable.html
REMEMBER!

• REGARDLESS of whether or not you are required to keep OSHA records—EVERY EMPLOYER must report incidents that involve the death of a worker and/or the overnight hospitalization of 3 or more workers.

• Reports should be made to your local OSHA office or to 1-800-321-OSHA within 8 hours of learning of the incident.

• You can find your local OSHA phone number at http://www.osha.gov/html/RAmap.html.
What is a recordable injury???

• If you are required to keep OSHA records, the next thing you need to know is what you have to record.

• A recordable injury is:
  – a new injury that is work related, or
  – a pre-existing condition which has been aggravated by workplace events.

• In addition to being a “new” injury, recordable injuries are those that meet some or all of the following criteria...
Recordable injuries...

- Results in **Death**
- Results in **days away from work**
- Restricts their ability to work or requires **transfer to a new job**
- Medical treatment **beyond 1st Aid**
- Loss of consciousness
- Significant injury or illness diagnosed by a healthcare professional and determined by that person to be work related
- **Mental illness** (if stated by a healthcare professional that it is work related)
- ALL injuries from needles or sharps that are contaminated by another’s blood or other infectious material
- **Work related cases of Tuberculosis**
- Cases where a worker is removed from work under the provisions of an OSHA standard (ex: lead exposure)
- Some injuries incurred while an employee was traveling for work or working from home
How to record Days Away from Work & Restricted/Transferred Days

• After you determine which injuries you need to record, you must then learn how to calculate the number of days away from work or job restriction/transfer.

• When calculating these totals, it is important to remember that you start counting *days away from work* or *restricted/transferred days*, the day AFTER an injury occurs.

**Ex.** *If someone is injured at noon on Tuesday, and takes the rest of the week off (Wed-Fri) the days away is 3. You don’t count Tuesday in that total.*
What doesn’t have to be recorded???

- Cases involving eating and drinking food or beverages
- Common colds and flues
- Injuries involving blood donations
- Injuries involving exercise programs
- Injuries treated through 1st Aid

OSHA Standard 1904.7(b)(5)(ii) contains a complete list of what is considered 1st Aid. If the treatment is not on the list, it must be recorded.

For FAQ’s on recordable injuries and pertinent OSHA standards, visit: [http://osha.gov/recordkeeping/entryfaq.html](http://osha.gov/recordkeeping/entryfaq.html)
*Important*

- When filling out your Log, you will be asked to check a box indicating the outcome of the injury.

- It is important to read the directions on this part carefully. One of the most common mistakes people make is in this section.

Check only **ONE** of the outcomes for each injury!
Confidentiality & Retention

• You should not enter employee names for sensitive cases (such as mental illness or injuries involving a sensitive body part). This information should be kept separate and confidential.

• When records are shown to anyone not authorized to see them, names should be removed.

• OSHA records must be kept for 5 years following the year they cover.

• If you sell your business, be sure to transfer OSHA forms.
Utilize Your Employees...

• Establish a reporting system that your employees know how to use.

• This will make your job of reporting injuries and illnesses much easier.

**IMPORTANT:**
Remember to record injuries for temporary and contract workers, if they are on your payroll and you supervise their work.
Hypothetical(s)...

The following 5 slides demonstrate hypothetical injury and illness scenarios. Given what you’ve just learned, fill out the OSHA 300 Log for each scenario. After you are finished you can check your answers on the “Answers” slide. Keep in mind the section on non-recordable injuries.

(To complete the following hypothetical(s) you will need an OSHA Form 300. You can access the excel version of this form at the link below, or use a hard copy version of the form. To utilize the following link, you will need access to the internet.)

[OSHA Recordkeeping Forms](#) (Excel)
• January 15th

• Bob Johnson, a welder, passed out at his station and did not come-to until 5 minutes later. Bob was taken to the emergency room and the doctor determined that he passed out from heat and dehydration. The doctor ordered him to take the following day off work to rest and get rehydrated.
#2

- April 30th
- Kim Casey, driver, was loading a truck and fell off of the loading dock. The fall caused her to sprain her wrist. The doctor gave her a brace and ordered her not to drive for a week (5 days). Her employer gave her some administrative duties to do for that week.
May 21\textsuperscript{st}

Mark Smith, a painter, was working at his station. He took off his eye protection momentarily and paint got into his eyes. He immediately went to an eyewash and rinsed both eyes until they were clean.
• July 17\textsuperscript{th}

• Mary Wilson, administrative assistant, cut her hand on a paper cutter while sitting at her desk. After an hour, the bleeding hadn’t stopped and she went to the doctor. She had to get 5 stitches. She came back to work the next day.
#5

- October 5th
- John Young, warehouse supervisor, was helping to load boxes onto a truck when he felt a pop in his back and couldn’t stand upright. He was taken to his doctor, who gave him a back brace to wear while working and told him to take the following day off, to rest his back.
OSHA's Form 300 (Rev. 01/2004)  
Log of Work-Related Injuries and Illnesses

You must record information about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR 1904.4 through 1904.12. Feel free to use two lines for a single case if needed. You must complete an injury and illness incident report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you are not sure whether a case is reportable, call your local OSHA office for help.

| (A) Case No. | (B) Employee's Name | (C) Job Title (e.g., Welder) | (D) Date of injury or onset of illness (mo/day) | (E) Where the event occurred (e.g., Loading dock north end) | (F) Describe injury or illness, parts of body affected, and objects/substance that directly injured or made person ill (e.g., Second degree burns on right forearm from acetylene torch) | (G) Days away from work | (H) Job transfer or restriction | (I) Other recordable cases | (J) Away from work (days) | (K) On job transfer or restriction (days) | (M) Injury | (N) Size of injury | (O) Respiratory Condition | (P) Poisoning | (Q) Hearing loss | (R) All other illnesses |
|--------------|---------------------|-----------------------------|-------------------------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------|------------------------|----------------------|------------------------|------------------------|----------------|-------------------|------------------|----------------|-------------------|
| 1            | BOB JOHNSON         | Welder                      | 1/15                                            | Welding Station                                              | Lost Consciousness/Passed out                                                                    | X                      | 1                      | X                    | 1                      | X                      | 2              | 3                 | 4                 | 5              | (G) (H) (I) (J) (K) (L) |
| 2            | KIM CASEY           | Truck Driver                | 4/30                                            | Loading Dock                                                | Fall from dock caused a sprained wrist                                                           | X                      | 5                      | X                    | 2                      | 1                      | 1              | 3                 | 4                 | 5              | (G) (H) (I) (J) (K) (L) |
| 3            | MARY WILSON         | Admin. Asst.                | 7/17                                            | Desk                                                         | Cut hand on paper cutter                                                                         | X                      | X                      | X                    | 1                      | X                      | 2              | 3                 | 4                 | 5              | (G) (H) (I) (J) (K) (L) |
| 4            | JOHN YOUNG          | Warehouse Sup.              | 10/5                                            | Warehouse Loading Dock                                       | Injured back                                                                                   | X                      | 1                      | X                    | 2                      | 4                      | 0              | 0                 | 0                 | 0              | (G) (H) (I) (J) (K) (L) |

Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instruction, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistics, Room N-3644, 200 Constitution Ave, NW, Washington, DC 20210. Do not send the completed forms to this office.

ANSWERS...

For explanations of the answers, see the next slide.
EXPLANATIONS of ANSWERS

1. Loss of consciousness is a recordable injury, and Bob also had days away from work which had to be documented.

2. Kim’s injury required more than first aid treatment. She also had 5 days of job restriction.

3. The use of an eye wash is considered 1st Aid and, therefore, is not recordable.

4. Mary’s injury required more than 1st Aid, therefore it was recordable, however she didn’t require time off or a job transfer so it goes under “other recordable cases”.

5. John’s injury required him to take a day off of work, therefore it was recordable.
For More Information...

• Visit [www.OSHA.gov/recordkeeping](http://www.OSHA.gov/recordkeeping)

• You can find a flowchart to assist you when filling out your 300 Log at [http://osha.gov/recordkeeping/ppt1/RK1flowchart.html](http://osha.gov/recordkeeping/ppt1/RK1flowchart.html)