

OSHA Recordkeeping

Taking the guesswork out of OSHA recordkeeping...(well almost!)



OSHAcademy™ Course 708 Study Guide

OSHA Recordkeeping

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This study guide is designed to be reviewed off-line as a tool for preparation to successfully complete OSHAcademy™ Online Course 708.

Read each module, answer the quiz questions, and return online to submit the quiz. Print the quiz response screen which will contain the correct answers to the questions.

The final exam will contain questions taken from each module quiz. I hope you enjoy the course and if you have any questions, feel free to email or call:

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■ Course Introduction

Document, document, document!

Employers are responsible for providing a safe **and** healthful workplace for their employees. OSHA's role is to assure the safety and health of America's workers by:

- setting and enforcing standards;
- providing training outreach and education;
- establishing partnerships; and
- encouraging continual improvement in workplace safety and health.

This online course provides a general overview of a particular topic related to an OSHA regulation. It does not alter or determine compliance responsibilities in OSHA standards or the Occupational Safety and Health Act of 1970 or related regulations. Because interpretations and enforcement policy may change over time, you should consult current OSHA administrative interpretations and decisions on OSHA compliance requirements.

The Log of Work-Related Injuries and Illnesses (OSHA Form 300) is used to classify work-related injuries and illnesses and to note the extent and severity of each case. Under this system, it is essential that data recorded by employers be uniform and accurate to assure the consistency and validity of the statistical data which is used by OSHA for many purposes, including:

- inspection targeting;
- performance measurement;
- standards development;
- resource allocation;
- Voluntary Protection Program (VPP) eligibility; and
- "low-hazard" industry exemptions.

The data also aids employers, employees and compliance officers in analyzing the safety and health environment at the employer's establishment and is the source of information for the OSHA Data Initiative (ODI) and the Bureau of Labor Statistics' (BLS) Annual Survey.

Note: In September, 2009 OSHA announce Recordkeeping as the focus of the new National Emphasis Program (NEP) to determine the accuracy of injury and illness data recorded by employers. The NEP involves inspecting occupational injury and illness records prepared by businesses and enforcing regulatory requirements when employers are found to be under-recording injuries and illnesses. See the directive for more information.

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Wasn't that exciting? It gets even better! This course will help you, as a supervisor, understand your important safety accountabilities to the employer and obligations to your employees. With this goal in mind, have fun and study hard on this informative online training course. Remember, if you have questions please feel free to send [your instructor](#) an email. **Tip:** Print the course assignment page and keep the assignments handy as you read through the material.

MODULE 1: EMPLOYER/EMPLOYEE RESPONSIBILITIES

Why are employers required to keep records of work-related injuries and illnesses?

The OSH Act of 1970 requires the Secretary of Labor to produce regulations that require employers to keep records of occupational deaths, injuries, and illnesses. The records are used for several purposes.

Injury and illness statistics are used by OSHA. OSHA collects data through the OSHA Data Initiative (ODI) to help direct its programs and measure its own performance. Inspectors also use the data during inspections to help direct their efforts to the hazards that are hurting workers.

The records should be used by employers and employees to implement safety and health programs at individual workplaces. Analysis of the data is a widely recognized method for discovering workplace safety and health problems and for tracking progress in solving those problems.

The records provide the base data for the BLS Annual Survey of Occupational Injuries and Illnesses, the Nation's primary source of occupational injury and illness data.

What is the effect of workers' compensation reports on the OSHA records?

The purpose section of the rule includes a note to make it clear that recording an injury or illness neither affects a person's entitlement to workers' compensation nor proves a violation of an OSHA rule. The rules for compensability under workers' compensation differ from state to state and do not have any effect on whether or not a case needs to be recorded on the OSHA 300 Log. Many cases will be OSHA recordable and compensable under workers' compensation. However, some cases will be compensable but not OSHA recordable, and some cases will be OSHA recordable but not compensable under workers' compensation.

What is the purpose of the recordkeeping rule?

The recordkeeping and reporting rule requires employers to record and report work-related fatalities, injuries and illnesses. It's important to know that recording or reporting a work-related injury, illness, or fatality:

- does not assign fault to anybody;
- does not prove the violation of an OSHA rule; and
- does not establish the employee's eligibility for workers' compensation or other benefits.

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What is the scope of the rule?

All employers covered by the Occupational Safety and Health Act (OSH Act) are covered by Part 1904 regulations. However, most employers do not have to keep OSHA injury and illness records unless OSHA or the Bureau of Labor Statistics (BLS) informs them in writing that they must keep records. For example, employers with 10 or fewer employees and business establishments in certain industry classifications are partially exempt from keeping OSHA injury and illness records.

Who is partially exempted from the rule?

If your company has had ten (10) or fewer employees at all times during the last calendar year, you do not need to keep OSHA injury and illness records unless your State Plan, the Federal OSHA Director or the BLS informs you in writing that you must keep records under Section 1904.41 or Section 1904.42. However, as required by Section 1904.39, all employers covered by the OSH Act must report to OSHA any workplace incident that results in one or more fatalities or the hospitalization of three or more employees.

- If your company had more than ten (10) employees at any time during the last calendar year, you must keep OSHA injury and illness records unless your establishment is classified as a partially exempt industry under Section 1904.2.
- The partial exemption for size is based on the number of employees in the entire company.
- To determine if you are exempt because of size, you need to determine your company's peak employment during the last calendar year. If you had no more than 10 employees at any time in the last calendar year, your company qualifies for the partial exemption for size.

Can you keep alternative or duplicate records?

If you create records to comply with another government agency's injury and illness recordkeeping requirements, OSHA will consider those records as meeting OSHA's Part 1904 recordkeeping requirements if OSHA accepts the other agency's records under a memorandum of understanding with that agency, or if the other agency's records contain the same information as this Part 1904 requires you to record. You may contact your nearest OSHA office or State agency for help in determining whether your records meet OSHA's requirements.

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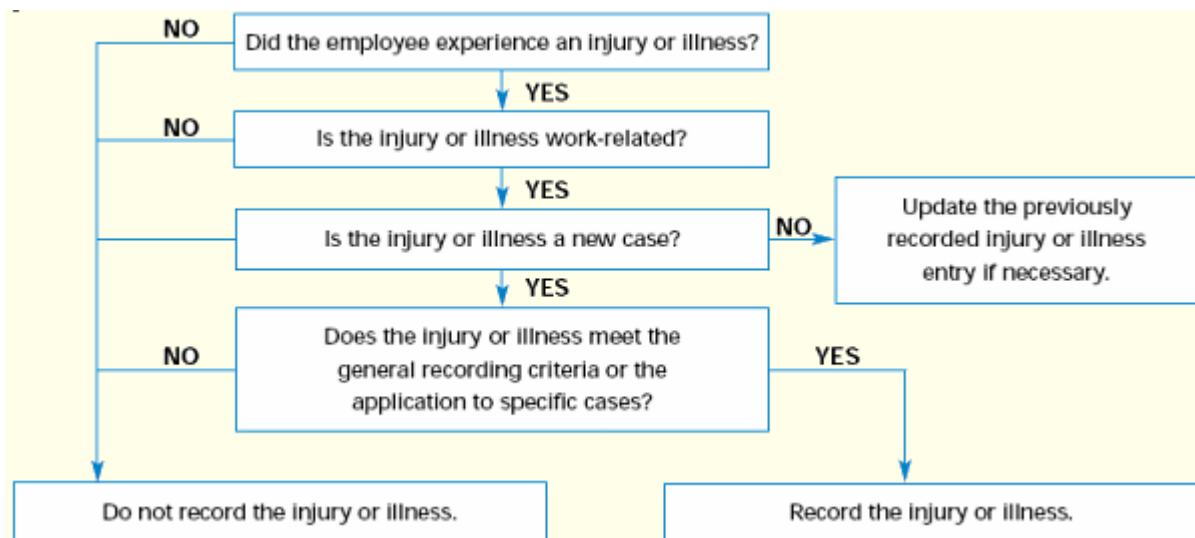
What are the criteria for recording injuries and illnesses?

Each employer is required to keep records of fatalities, injuries, and illnesses that:

- Are work-related;
- Is a new case; and
- Meets one or more of the general recording criteria of Section 1904.7 or the application to specific cases of Section 1904.8 through Section 1904.11.

Using a Decision Tree to determine if you need to record an injury

Use the decision tree below to help in determining if an injury or illness is work-related.



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MODULE 1 QUIZ

1. Recording or reporting a work-related injury, illness, or fatality does which of the following?
 - a. proves a violation occurred
 - b. assigns fault
 - c. fulfills recording requirements
 - d. establishes eligibility for benefits

2. 29 CFR 1904 applies to all employers covered by the: _____.
 - a. OSHA Act of 1970
 - b. Workers Compensation Act
 - c. DOL Act of 1973
 - d. Bureau of Labor Employee Protection Act

3. According to 29 CFR 1904, all employers covered by the OSHA Act of 1970 must report to OSHA which of the following incidents?
 - a. all injuries
 - b. the hospitalization of three or more employees
 - c. work-related fatalities
 - d. b and c above

4. If your company has had less than ten (10) employees during the entire last calendar year, you do not need to keep OSHA injury and illness records unless: _____.
 - a. encouraged to do so by an OSHA consultant
 - b. told to do so in writing by your insurer
 - c. it's discovered you're not doing so by an OSHA inspector
 - d. told to do so in writing by OSHA or BLS

5. Which of the following is not one of the criteria for recording injuries and illnesses?
 - a. the injury or illness is work-related
 - b. the injury or illness is a new case
 - c. the injury or illness is a carry-over from the previous year
 - d. the injury or illness meets general recording criteria

■ MODULE 2: DETERMINING WORK-RELATEDNESS

In this module we'll take a look at Paragraph (5) of the rule to become more familiar with the concept of "work-relatedness" and how it applies to OSHA 300 Recordkeeping. We will also look at Paragraph (6) that discusses the criteria for a "new case."

(5) Work Related. What is a work-related injury or illness?

An injury or illness is work-related if an event or exposure in the work environment either:

- caused or contributed to the resulting condition; or
- significantly aggravated a pre-existing injury or illness.

Presume work-relatedness for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception in Table 3 below specifically applies.

A case is presumed work-related if, and only if, an event or exposure in the work environment:

- is a discernible cause of the injury or illness; or
- a significant aggravation to a pre-existing condition.

The work event or exposure need only be one of the discernible causes; it need not be the sole or predominant cause.

What is a "work environment"?

The work environment is the establishment and other locations where one or more employees work or are present as a condition of their employment.

The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of their work.

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What does "significantly aggravated" mean?

A pre-existing injury or illness is significantly aggravated when an event or exposure in the work environment results in any of the circumstances below.

1. Death, provided that the pre-existing injury or illness would likely not have resulted in death but for the occupational event or exposure.
2. Loss of consciousness, provided that the pre-existing injury or illness would likely not have resulted in loss of consciousness but for the occupational event or exposure.
3. One or more days away from work, of restricted work, or days of job transfer that otherwise would not have occurred but for the occupational event or exposure.
4. Medical treatment in a case where no medical treatment was needed for the injury or illness before the workplace event or exposure, or a change in medical treatment was necessitated by the workplace event or exposure.

To ensure that non-work-related cases are not entered on the Log, the rule requires employers to consider as non-work-related any injury or illness that "involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment." (See Table 3 below)

Pre-existing conditions also include any injury or illness that the employee experienced while working for another employer.

Are there situations where an injury or illness occurs in the work environment and is not considered work-related?

Yes, an injury or illness occurring in the work environment that falls under one of the following exceptions is not work-related and therefore is not recordable. Do not record injuries and illnesses if the circumstances below occurred. (Source: Table 3.)

- At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.

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- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in).
- The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The injury or illness is solely the result of personal grooming, self medication for a nonwork-related condition, or is intentionally self-inflicted.
- The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are work-related if the employee is infected at work).
- The illness is a mental illness. Mental illness is not work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a work-related mental illness.

What about the work environment while traveling?

Injuries occurring during travel are work-related if the employee was engaged in work activities in the interest of the employer and it is not one of the exceptions in Table 4 below.

As an example, the work-environment presumption clearly applies to the case of a delivery driver who experiences an injury to his or her back while loading boxes and transporting them into a building. The worker is engaged in a work activity and the injury resulted from an event--loading/unloading-- occurring in the work environment. Similarly, if an employee is injured in an automobile accident while running errands for the company or traveling to make a speech on behalf of the company, the employee is present at the scene as a condition of employment, and any resulting injury would be work-related.

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Table 4	
Do not record injuries or illnesses that occur when the employee is on travel status if they meet one of the exceptions listed below.	
If the employee . . .	You may use the following to determine if an injury or illness is work-related.
checked into a hotel or motel for one or more days.	When a traveling employee checks into a hotel, motel, or other temporary residence, they establish a "home away from home." You must evaluate the employee's activities after they check into the hotel, motel, or other temporary residence for their work-relatedness in the same manner as you evaluate the activities of a nontraveling employee. When the employee checks into the temporary residence, they have left the work environment. When the employee begins work each day, they re-enter the work environment. If the employee has established a "home away from home" and is reporting to a fixed worksite each day, you also do not consider injuries or illnesses work-related if they occur while the employee is commuting between the temporary residence and the job location.
took a detour for personal reasons.	Injuries or illnesses are not work-related if they occur while the employee is on a personal detour from a reasonably direct route of travel (e.g., took a side trip for personal reasons).

Table 4 describes three situations in which injuries or illnesses sustained by traveling employees are not considered work-related for OSHA recordkeeping purposes and therefore do not have to be recorded on the OSHA 300 Log.

1. First, when a traveling employee checks into a hotel, motel, or other temporary residence, he or she is considered to have established a "home away from home." At this time, the status of the employee is the same as that of an employee working at an establishment who leaves work and is essentially "at home." Injuries and illnesses that occur at home are generally not considered work related.

However, just as an employer may sometimes be required to record an injury or illness occurring to an employee working in his or her home, the employer is required to record an injury or illness occurring to an employee who is working in his or her hotel room (see the discussion of working at home, below).

2. Second, if an employee has established a "home away from home" and is reporting to a fixed worksite each day, the employer does not consider injuries or illnesses work-related if they occur while the employee is commuting between the temporary residence and the job location. These cases are parallel to those involving employees commuting to and from work when they are at their home location, and do not have to be recorded, just as injuries and illnesses that occur during normal commuting are not required to be recorded.
3. Third, the employer is not required to consider an injury or illness to be work-related if it occurs while the employee is on a personal detour from the route of business travel. This exception allows the

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employer to exclude injuries and illnesses that occur when the worker has taken a side trip for personal reasons while on a business trip, such as a vacation or sightseeing excursion, to visit relatives, or for some other personal purpose.

OSHA has decided not to limit the recording of occupational injuries and illnesses to those cases that are preventable, fall within the employer's control, or are covered by the employer's safety and health program.

The issue is not whether the conditions could have, or should have, been prevented or whether they were controllable, but simply whether they are occupational, i.e., are related to work. This is true regardless of whether the employee is injured while on travel or while present at the employer's workplace.

An employee who is injured in an automobile accident or killed in an airline crash while traveling for the company has clearly experienced a work-related injury that is rightfully included in the OSHA injury and illness records and the Nation's occupational injury and illness statistics.

OSHA believes that employees who are engaged in management, sales, customer service and similar jobs must often entertain clients, and that doing so is a business activity that requires the employee to work at the direction of the employer while conducting such tasks. If the employee is injured or becomes ill while engaged in such work, the injury or illness is work-related and should be recorded if it meets one or more of the other criteria (death, medical treatment, etc.).

Gastroenteritis, for example, is one type of injury or illness that may occur in this situation, but employees are also injured in accidents while transporting clients to business-related events at the direction of the employer or by other events or exposures arising in the work environment.

On the other hand, not all injuries and illnesses sustained in the course of business-related entertainment are reportable. To be recordable, the entertainment activity must be one that the employee engages in at the direction of the employer.

Business-related entertainment activities that are undertaken voluntarily by an employee in the exercise of his or her discretion are not covered by the rule. For example, if an employee attending a professional conference at the direction of the employer goes out for an evening of entertainment with friends, some of whom happen to be clients or customers, any injury or illness resulting from the entertainment activities would not be recordable. In this case, the employee was socializing after work, not entertaining at the direction of the employer. Similarly, the fact that an employee joins a private club or organization, perhaps to "network" or make business contacts, does not make any injury that occurs there work-related.

Note that the recordkeeping regulation does not apply to travel outside the United States because the OSH Act applies only to the confines of the United States (29 U.S.C. Section 652(4)) and not to foreign operations. Therefore, the OSHA recordkeeping regulation does not apply to non-U.S. operations, and injuries or illnesses

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that may occur to a worker traveling outside the United States need not be recorded on the OSHA 300 Log.

How do I decide if a case is work-related when the employee is working at home?

When an employee is working on company business in his or her home and reports an injury or illness to his or her employer, and the employee's work activities caused or contributed to the injury or illness, or significantly aggravated a preexisting injury, the case is considered work-related and must be further evaluated to determine whether it meets the recording criteria. If the injury or illness is related to non-work activities or to the general home environment, the case is not considered work-related. For example:

- If an employee drops a box of work documents and injures his or her foot, the case is considered work-related.
- If an employee's fingernail is punctured by a needle from a sewing machine used to perform garment work at home, becomes infected and requires medical treatment, the injury is considered work-related.
- If an employee is injured because he or she trips on the family dog while rushing to answer a work phone call, the case is not considered work-related.
- If an employee working at home is electrocuted because of faulty home wiring, the injury is not considered work-related.

Injuries and illnesses occurring while the employee is working for pay or compensation at home should be treated like injuries and illnesses sustained by employees while traveling on business. The relevant question is whether or not the injury or illness is work-related, not whether there is some element of employer control. The mere recording of these injuries and illnesses as work-related cases does not place the employer in the role of ensuring the safety of the home environment.

OSHA has recently issued a compliance directive (CPL 2-0.125) that clarifies that OSHA will not conduct inspections of home offices and does not hold employers liable for employees' home offices. The compliance directive also notes that employers required by the recordkeeping rule to keep records "will continue to be responsible for keeping such records, regardless of whether the injuries occur in the factory, in a home office, or elsewhere, as long as they are work-related, and meet the recordability criteria.

How do I handle a case if it is not obvious whether the precipitating event or exposure occurred in the work environment or occurred away from work?

If an employee reports pain and swelling in a joint but cannot say whether the symptoms first arose during work or during recreational activities at home, it may be difficult for the employer to decide whether the case is work-related. The same problem arises when an employee reports symptoms of a contagious disease that

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affects the public at large, such as a staphylococcus infection ("staph" infection) or Lyme disease, and the workplace is only one possible source of the infection.

In these situations, the employer must evaluate the employee's work duties and environment to decide whether or not one or more events or exposures in the work environment either caused or contributed to the resulting condition or significantly aggravated a preexisting condition.

If the employer determines that it is unlikely that the precipitating event or exposure occurred in the work environment, the employer would not record the case. In the staph infection example given above, the employer would consider the case work-related, for example, if another employee with whom the newly infected employee had contact at work had been out with a staph infection. In the Lyme disease example, the employer would determine the case to be work-related if, for example, the employee was a groundskeeper with regular exposure to outdoor conditions likely to result in contact with deer ticks.

The employer must also determine if the precipitating event or exposure occurred in the work environment. If an event, such as a fall, an awkward motion or lift, an assault, or an instance of horseplay, occurs at work, the geographic presumption applies and the case is work-related unless it otherwise falls within an exception. Thus, if an employee trips while walking across a level factory floor, the resulting injury is considered work-related under the geographic presumption because the precipitating event -- the tripping accident -- occurred in the workplace.

The case is work-related even if the employer cannot determine why the employee tripped, or whether any particular workplace hazard caused the accident to occur. However, if the employee reports an injury at work but cannot say whether it resulted from an event that occurred at work or at home, as in the example of the swollen joint, the employer might determine that the case is not work-related because the employee's work duties were unlikely to have caused, contributed to, or significantly aggravated such an injury.

(7) New Cases. What is a "new case"?

An injury or illness is a "new case" if it meets one of the following two conditions:

1. The employee has no previous recorded injury or illness of the same type that affects the same part of the body, or
2. The employee previously had a recorded injury or illness of the same type that affected the same part of the body but recovered completely (all signs and symptoms disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.

For occupational illnesses where the signs or symptoms may recur or continue in the absence of a workplace exposure, record the case only once. Examples include occupational cancer, asbestosis, byssinosis and

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silicosis.

You are not required to seek the advice of a physician or other licensed health care professional. If you do seek such advice, you must follow their recommendation about whether the case is a new case or a recurrence.

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MODULE 2 QUIZ

Determine which of the situations below are work-related injuries or illnesses.

6. Employee is swimming with his family at the pool where he is employed, slips and breaks his arm.

- a. yes
- b. no

7. Employee is diagnosed with a mental illness as a result of nutritional deficiency.

- a. yes
- b. no

8. Employee is injured when his car slides into a light pole in the company's icy parking lot upon arriving for work.

- a. yes
- b. no

9. Employee is working at home (telecommuting) and the chair she is sitting on collapses, injuring her.

- a. yes
- b. no

10. While cleaning up at the end of the shift, an employee sustains a broken hip as a result of tripping over a lug wrench on the floor of the vehicle service shop.

- a. yes
- b. no

11. Employee is injured in the lunch room at the worksite when he slips on some water while walking up to a fellow employee.

- a. yes
- b. no

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12. Employee is performing stretching exercises in the company lounge as part of the company's voluntary wellness program when she is injured.

- a. yes
- b. no

13. Employee is driving a company truck delivering gravel to a worksite when injured.

- a. yes
- b. no

14. Employee gets food poisoning from pizza provided by her employer as a safety reward.

- a. yes
- b. no

15. OSHA limits the recording of occupational injuries and illnesses to those that are: _____.

- a. work-related
- b. preventable
- c. controllable
- d. programmatic

16. Which of the following is not an example of a possible significant aggravation to a pre-existing injury or illness?

- a. death
- b. loss of memory
- c. one or more days away from work
- d. medical treatment

17. Which of the following is not considered part of the work environment when determining work-relatedness?

- a. two or more employees work or are present
- b. the establishment
- c. equipment or materials used by the employee during work
- d. other physical locations

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18. Which of the following would be considered a work-related injury while traveling?

- a. trips while walking in a motel room
- b. slips and falls getting out of the motel hot tub
- c. strains back while loading sales material into a vehicle
- d. cut while preparing in-room meal

19. Which of the following is not considered a new case?

- a. employee strains left shoulder and right lower back in one week
- b. employee strains left shoulder twice in one week from lifting boxes
- c. employee hits his head twice on an overhead pipe
- d. a cut to the hand

20. For occupational illnesses, record the case only once: _____.

- a. if symptoms recur or continue due to workplace exposure
- b. when different symptoms occur with workplace exposure
- c. where symptoms may recur or continue in the absence of a workplace exposure
- d. when new symptoms surface and spread to new parts of the body

■ MODULE 3: GENERAL RECORDING CRITERIA

In this module, we'll take a closer look at the third criteria, general and specific recording criteria.

(8) General Recording Criteria.

An injury or illness meets the general recording criteria, and is recordable, if it results in any one of the following six conditions:

1. death;
2. days away from work;
3. restricted work or job transfer;
4. medical treatment beyond first aid;
5. loss of consciousness; and
6. a significant injury or illness diagnosed by a physician or other licensed health care professional.

Death

You must record an injury or illness that results in death by entering a check mark in column (G) of the OSHA 300 Log. You must also report any work-related fatality to OSHA within 8 hours.

Days Away From Work

When an injury or illness involves one or more days away from work, you must record the injury or illness in Column (H) on the OSHA 300 Log and enter the number of calendar days away from work in Column (K).

- If the employee is out for an extended period of time, you must enter an estimate of the days that the employee will be away and update the day count when the actual number of days is known.
- Begin counting days away on the day after the injury occurred or the illness began.
- End the count of days away from work on the date the physician or other licensed health care professional recommends that the employee return to work. This applies regardless of whether the employee returns earlier or later than recommended. If there is no recommendation from the physician or licensed health care professional, enter the actual number of days the employee is off work.
- You must count the number of calendar days the employee was unable to work as a result of the injury or illness, regardless of whether or not the employee was scheduled to work on those day(s). Include

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weekend days, holidays, vacation days or other days off in the total number of days recorded if the employee would not have been able to work on those days because of a work-related injury or illness.

- You may stop tracking the number of calendar days away from work once the total reaches 180 days away from work and/or days of job transfer or restriction. Entering 180 in the total days away column is adequate.
- If the employee leaves your company for a reason unrelated to the injury or illness such as; retirement, a plant closing, or to take another job you may stop counting days away from work or days of restriction/job transfer. If the employee leaves your company because of the injury or illness, you must estimate the total number of days away or days of restriction/job transfer and enter the day count on the 300 Log.
- You must enter the number of calendar days away for the injury or illness on the OSHA 300 Log that you prepare for the year in which the incident occurred. If the time off extends into a new year, estimate the number of days for that year and add that amount to the days from the year of occurrence. Do not split the days between years and enter amounts on the logs for two different years. Use this number to calculate the total for the annual summary and then update the initial log entry later when the day count is known or reaches the 180-day cap.

Restricted Work or Job Transfer

When an injury or illness involves restricted work or job transfer but does not involve death or days away from work, you must record the injury or illness on the OSHA 300 Log by placing a check mark in the space for job transfer or restriction and an entry of the number of restricted or transferred days in the restricted workdays column.

Restricted work occurs when, as the result of a work-related injury or illness:

1. you keep the employee from performing one or more of the routine functions of their job;
2. you keep the employee from working the full day that they would otherwise work; or
3. a physician or other licensed health care professional (HCP) recommends that the employee not perform one or more of the routine functions of their job, or not work the full workday that they would otherwise work.

For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week.

A recommended work restriction is recordable only if it affects one or more of the employee's routine job functions. To determine whether this is the case, you must evaluate the restriction in light of the routine functions of the injured or ill employee's job.

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A partial day of work is recorded as a day of job transfer or restriction for recordkeeping purposes, except for the day on which the injury occurred or the illness began.

Record job transfer and restricted work cases in the same column (I).

You must count days of job transfer or restriction in the same way you count days away from work. The only difference is that, if you permanently assign the injured or ill employee to a job modified or permanently changed to eliminate the routine functions the employee was restricted from performing, you may stop the day count when the modification or change is permanent. You must count at least 1-day of restricted work or job transfer for such cases.

Medical Treatment Beyond First Aid

“Medical treatment” is the management and care of a patient to combat disease or disorder. For OSHA 300 recordkeeping purposes, medical treatment does not include:

1. visits to a physician or other licensed health care professional solely for observation or counseling;
2. the conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications solely for diagnostic purposes (e.g., eye drops to dilate pupils); or
3. [“First aid”](#)

Loss of Consciousness

You must record a work-related injury or illness if the worker becomes unconscious, regardless of the length of time they remain unconscious.

Other significant injuries or illnesses

In addition, you must record a case if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional (HCP), even if it does not result in any of the other five conditions described above.

OSHA believes that most significant injuries and illnesses will result in one of the five events listed above. However, there are some significant injuries, such as a punctured eardrum or a fractured toe or rib, for which neither medical treatment nor work restrictions may be recommended.

In addition, there are some significant progressive diseases, such as byssinosis, silicosis, and some types of cancer, for which medical treatment or work restrictions may not be recommended at the time of diagnosis but are likely to be recommended as the disease progresses.

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Cancer, chronic irreversible diseases, fractured or cracked bones, and punctured eardrums are generally considered significant injuries and illnesses, and must be recorded at the initial diagnosis even if medical treatment or work restrictions are not recommended, or are postponed, in a particular case.

Work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum must always be recorded under the general criteria at the time of occurrence.

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MODULE 3 QUIZ

21. Which of the following is not one of the six general recording criteria that an injury or illness must meet to be considered a "recordable"?

- a. death
- b. medical treatment, including some first-aid
- c. restricted work or job transfer
- d. loss of consciousness

22. Which of the following does not describe one of the six general recording criteria that an injury or illness must meet to be considered a "recordable"?

- a. death
- b. days away from work
- c. job review
- d. significant injury diagnosed by a physician

23. In which column of the OSHA Log 300 must you record an injury or illness that results in death?

- a. Column (C)
- b. Column (F)
- c. Column (G)
- d. Column (H)

24. Any work-related fatality must be reported to OSHA within _____ hours.

- a. 4
- b. 8
- c. 16
- d. 24

25. Which columns on the OSHA 300 Log must you record an entry when an injury involves one or more days away from work?

- a. (H) and (K)
- b. (K) and (L)
- c. (M) and (N)
- d. (N) and (O)

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26. When would you begin counting days away from work on the OSHA 300 Log?
- a. day of the injury
 - b. day after the injury
 - c. two days after the injury
 - d. three days after the injury (for lost-day claims)
27. When would you end the count of days away from work on the OSHA 300 Log?
- a. on the date the HCP recommends return to work
 - b. on the day the employee is scheduled to return
 - c. the day the employee actually returns
 - d. either b or c above
28. When counting days away from work, include all of the following, except: _____.
- a. calendar days
 - b. holidays
 - c. the day the injury occurred
 - d. vacation days
29. You may stop tracking the number of days away from work once the total reaches _____ away from work and/or job transfer or restriction.
- a. 180 calendar days
 - b. 180 workdays
 - c. total workdays
 - d. total workdays excluding holiday/vacation days
30. If the time off from an injury sustained in 2005 extends into 2006, be sure to: _____.
- a. end the count on December 31st, 2005
 - b. enter estimated days away on the OSHA 300 Log for 2005
 - c. split the days between 2005 and 2006
 - d. continue the count on the OSHA 300 Log for 2006

■ MODULE 4: ADDITIONAL RECORDING CRITERIA

(9) Needlestick and Sharps Injury Recording Criteria.

- When an injury is diagnosed later as an infectious bloodborne disease, you must update the classification on the 300 log to reflect the new status or classification.
- You must record all work-related needlestick injuries and cuts from sharp objects contaminated with a person's blood or other potentially infectious material (OPIM) (See 29 CFR 1910.1030, Bloodborne Pathogens, Course 755, Bloodborne Pathogens).
- You must enter the case on the OSHA 300 Log as an injury.
- To protect the employee's privacy, do not enter the employee's name on the OSHA 300 Log (see the requirements for privacy cases in 29 CFR 1904(14)(a) through (14)(i)).

NOTE: If you have a sharps exposure incident that is not a needle stick, you must still record it if it results in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, or diagnosis of a significant injury or illness, such as HIV, hepatitis B, or hepatitis C.

(10) Medical Removal Recording Criteria. If another OSHA standard requires the medical removal of an employee, you must record the case on the OSHA 300 Log.

- (a) You must enter each medical removal case on the OSHA 300 Log as either a case involving days away from work or a case involving restricted work activity, depending on how you decide to comply with the medical removal requirement. If the medical removal is the result of a chemical exposure, you must enter the case on the OSHA 300 Log by checking the "poisoning" column.
- (A) If the case involves voluntary medical removal before reaching the medical removal levels required by an OSHA standard, do not record the case on the OSHA 300 Log.

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(11) Occupational Hearing Loss Recording Criteria.

Hearing loss must be recorded on the OSHA 300 Log by checking the hearing loss column when:

- An annual audiogram reveals a Standard Threshold Shift (STS) in either or both ears; and
- The hearing level in the same ear is 25 dB above audiometric zero.
- In determining whether an STS has occurred, you may correct for the age of the employee. Use the appropriate table in Appendix A to determine the age adjustment. If the STS is 10 dB or more after the age correction, it still meets the criteria for recordability.

If you retest the employee's hearing within 30 days of the first test, and the retest does not confirm the recordable STS, you are not required to record the hearing loss case on the OSHA 300 Log. If the retest confirms the recordable STS, you must record the hearing loss case within 7 calendar days of the retest. If subsequent audiometric testing performed under the testing requirements of the noise standard (See CFR 29 1910.95) indicates that an STS is not persistent, you may erase, delete, or line-out the recorded entry.

If a physician or other licensed health care professional determines that the hearing loss is not work-related or has not been significantly aggravated by occupational noise exposure, the case is not work-related. Do not record it on the OSHA 300 Log.

(12) Tuberculosis Reporting Criteria.

If any of your employees has an occupational exposure to anyone with a known case of active tuberculosis (TB), and that employee subsequently develops a tuberculosis infection, as evidenced by a positive skin test or diagnosis by a physician or other licensed health care professional, you must record the case on the OSHA 300 Log by checking the "respiratory condition" column. Do not record a pre-employment positive skin test because the exposure was not in your workplace. Line out or erase a recorded case if you prove that:

- the worker lives in a household with a person diagnosed with active TB;
- the Public Health Department identifies the worker as a contact of an individual with a case of active TB unrelated to the workplace; or
- a medical investigation shows that the employee's infection was caused by exposure to TB away from work, or proves that the case was not related to the workplace TB exposure.

(13) You are in luck. This paragraph in the rule was removed!

There are a lot of detailed requirements discussed above. Now let's see how well you've mastered the material. Remember, don't stress out over the module quizzes: they're only for your review. I don't grade them! ;-)

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MODULE 4 QUIZ

31. You must record all work-related needlestick injuries and cuts from sharp objects if they are contaminated with which of the following?
- a. your blood
 - b. other potentially infectious material (OPIM)
 - c. another person's blood
 - d. b and c above
32. According to the rule, if you have a sharps exposure incident that is not a needle stick, you must still record it if it results in all of the following, except: _____.
- a. skin irritation
 - b. treatment beyond first aid
 - c. loss of consciousness
 - d. days away from work
33. Which column on the OSHA 300 Log would you check if a medical removal is the result of a chemical exposure?
- a. all other illnesses
 - b. skin disorder
 - c. poisoning
 - d. days away from work
34. Hearing loss must be recorded on the OSHA 300 Log by checking the "hearing loss" column when all of the all of the following occur, except: _____.
- a. hearing level in the same ear is 10 dB above audiometric zero
 - b. STS is 10 dB or more after the age correction
 - c. hearing level in the same ear is 25 dB above audiometric zero
 - d. Standard Threshold Shift (STS) in either or both ears
35. If any of your employees has an occupational exposure to anyone with a known case of active tuberculosis (TB), and that employee subsequently develops a tuberculosis infection, as evidenced by a positive skin test or diagnosis by a physician or other licensed health care professional, you must: _____.
- a. record the case by checking the "respiratory condition" column.
 - b. record the case by checking the "infectious condition" column.
 - c. record the case as a privacy issue.
 - d. record the case on a separate OSHA 300 Form.

MODULE 5: MAINTAINING FORMS

In this module, we'll begin discussing the requirements for use of the various OSHA recordkeeping and reporting forms in Paragraphs (29) through (36), (39), (40), and (42).

(29) Forms. What forms must I use to record and report injuries and illnesses?

Use OSHA 300, 300-A, and OSHA Form 301 or equivalent forms, for recordable injuries and illnesses.

- The OSHA 300 form is the Log of Work-Related Injuries and Illnesses
- the OSHA 300-A is the Summary of Work-Related Injuries and Illnesses
- OSHA Form 301 or equivalent is the Worker's and Employer's Report of Occupational Injury or Disease

Keep the OSHA Form 301. Even if you are exempt from recordkeeping, you must have at each establishment, a copy of OSHA Form 301 or equivalent for each occupational injury or illness that may result in a compensable claim.

You must enter information about your business at the top of the OSHA 300 Log, enter a one or two line description for each recordable injury or illness, and summarize this information on the OSHA 300-A at the end of the year.

You must complete an OSHA Form 301, or equivalent form, for each recordable injury or illness entered on the OSHA 300 Log.

Record within 7 days. You must enter each recordable injury or illness on the OSHA 300 Log and OSHA Form 301 or equivalent within 7 calendar days of receiving information that a recordable injury or illness has occurred.

Equivalent forms. An equivalent form is one that has the same information, is as readable and understandable, and is completed using the same instructions as the OSHA form it replaces. Many employers use an insurance form instead of the OSHA Form 301 or supplement an insurance form by adding any additional information required by OSHA.

Computer forms. Use a computer to keep your records if it can produce equivalent forms when needed.

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What about employee privacy?

If you have a “privacy concern case,” do not enter the employee’s name on the OSHA 300 Log. Instead, enter “privacy case” in the space normally used for the employee’s name. This will protect the privacy of the injured or ill employee when another employee, a former employee, or an authorized employee representative has access to the OSHA 300 Log.

You must keep a separate, confidential list of the case numbers and employee names for your privacy concern cases so you can update the cases and provide the information to the government if asked to do so.

The following is a complete list of injuries or illnesses that are considered privacy concern cases:

- An injury or illness to an intimate body part or the reproductive system;
- An injury or illness resulting from a sexual assault;
- Mental illnesses;
- HIV infection, hepatitis, or tuberculosis;
- Needlestick injuries and cuts from sharp objects contaminated with another person’s blood or other potentially infectious material; and
- Other illnesses, if the employee voluntarily requests that his or her name not be entered on the log.

Use discretion in privacy cases. If you reasonably believe that information describing the privacy concern case may be personally identifiable even though the employee’s name is omitted, use discretion in describing the injury or illness on both the OSHA 300 and OSHA 301 Forms. Enter enough information to identify the cause of the incident and the general severity of the injury or illness, but you do not need to include details of an intimate or private nature. For example:

- describe a sexual assault case as “injury from assault”; or
- an injury to a reproductive organ could be described as “lower abdominal injury.”

Disclosing personal identification. If you voluntarily disclose the forms to persons other than government representatives, employees, former employees, or authorized representatives, you must remove or hide the employees’ names and other personally identifying information except for in the following cases:

- to an auditor or consultant hired by the employer to evaluate the safety and health program;
- to the extent necessary for processing a claim for workers’ compensation or other insurance benefits;
or
- to a public health authority or law enforcement agency for uses and disclosures for which consent, an authorization, or opportunity to agree or object is not required under Department of Health and Human Services Standards for Privacy of Individually Identifiable Health Information, 45 CFR.164.512.

(30) Multiple Business Establishments. What if you have multiple business establishments?

Keep a separate OSHA 300 Log for each establishment that you expect to operate for 1-year or longer.

- You may keep one OSHA 300 Log that covers all of your short-term establishments. You may also include the short-term establishments' recordable injuries and illnesses on an OSHA 300 Log that covers short-term establishments for individual company divisions or geographic regions.
- You may keep the records for an establishment at your headquarters or other central location if:
 1. you can transmit information about the injuries and illnesses from the establishment to the central location within 7 calendar days of receiving information that a recordable injury or illness has occurred; and
 2. produce and send the records from the central location to the establishment within the time frames required by 29 CFR 1904(35) and 29 CFR 1904(40) when you are required to provide records to a government representative, employees, former employees or employee representatives.
- You must link each employee with one of your establishments, for recordkeeping purposes. You must record the injury and illness on the OSHA 300 Log of the injured or ill employee's establishment or on an OSHA 300 Log that covers that employee's short term establishment.
- If the injury or illness occurs at one of your establishments, you must record the injury or illness on the OSHA 300 Log of the establishment where the injury or illness occurred. If the employee is injured or becomes ill and is not at one of your establishments, you must record the case on the OSHA 300 Log at the establishment where the employee normally works.

(31) Covered Employees. Who are "covered employees" and when am I required to keep records?

Covered employees include:

1. anyone on your payroll; or
2. if they're not on your payroll, you supervise them on a day-by-day basis.

You must record on the OSHA 300 Log the recordable injuries and illnesses of all employees on your payroll, whether they are labor, executive, hourly, salary, part-time, seasonal, or migrant workers.

You also must record the recordable injuries and illnesses that occur to employees who are not on your

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payroll if you supervise these employees on a day-to-day basis. If your business is organized as a sole proprietorship or partnership, the owner or partners are not considered employees for recordkeeping purposes.

Temporary help agencies. Record the injuries and illnesses to workers from temporary help agencies or employee leasing services only if you supervise these employees on a day-to-day basis.

Contractor employees. If a contractor's employee is under the day-to-day supervision of the contractor, the contractor is responsible for recording the injury or illness. If you supervise the contractor employee's work on a day-to-day basis, you must record the injury or illness.

Record the injury once. You and the temporary help service, employee leasing service, personnel supply service, or contractor should coordinate your efforts to make sure that each injury and illness is recorded only once. Either on:

1. your OSHA 300 Log if you provide day-to-day supervision; or
2. on the other employer's OSHA 300 Log if that company provides day-to-day supervision.

(32) Annual Summary. What are the requirements for posting the annual summary?

Below is a list of actions that must be taken at the end of each calendar year.

- Review the OSHA 300 Log to verify that the entries are complete and accurate. Correct any problems.
- Use the OSHA 300A or equivalent form to create an annual summary of injuries and illnesses from the OSHA 300 Log.
- Certify that the highest ranking manager at the location where the log is compiled has examined the OSHA 300 Log and believes based on knowledge of the process by which the information was recorded, that it is correct and complete. If there is no management at the compiling location, any manager with jurisdiction over that location may conduct the examination of the OSHA 300 Log.
- 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 ensure that the posted annual summary is not altered, defaced or covered by other material. You must post the summary no later than February 1 of the year following the year covered by the records and keep it posted until April 30.

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MODULE 5 QUIZ

36. Which form is not used to record and report injuries and illnesses?

- a. OSHA 300
- b. OSHA 300-A
- c. OSHA 301-B
- d. OSHA 301

37. Which of the forms below is the Worker's and Employer's Report of Occupational Injury or Disease?

- a. OSHA 300
- b. OSHA 300-A
- c. OSHA 301-B
- d. OSHA 301

38. Which of the following forms must you keep a copy of at each establishment even if you are exempt from recordkeeping?

- a. OSHA 300
- b. OSHA 300-A
- c. OSHA 301-B
- d. OSHA 301

39. How soon, upon receiving information that a recordable injury or illness has occurred, must you enter each recordable injury or illness on the OSHA 300 Log and OSHA Form 301 or equivalent?

- a. 8 hours
- b. 24 hours
- c. 7 days
- d. 14 days

40. Each of the following are considered OSHA 300 Log privacy cases, except: _____.

- a. an injury or illness to an intimate body part or the reproductive system
- b. an injury or illness resulting from a physical assault
- c. needlestick injuries and cuts from contaminated sharp objects
- d. other illnesses, if the employee requests that his or her name not be entered on the log

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41. Which one of the following is not considered an OSHA 300 Log privacy case?
- a. an injury or illness an intimate body part or the reproductive system
 - b. an injury or illness resulting from being struck by an object
 - c. HIV infection, hepatitis, or tuberculosis
 - d. mental illnesses
42. When must you record the recordable injuries and illnesses that occur to employees who are not on your payroll?
- a. if you supervise the employees on a day-to-day basis.
 - b. if they perform work on your worksite
 - c. if you have offered them a full-time job
 - d. if they have asked to be covered by workers' compensation insurance
43. Which of the following best defines "covered employees"?
- a. all volunteers
 - b. all seasonal employees
 - c. anyone on your payroll
 - d. contractor employees
44. The employer must certify that the highest ranking manager at the location where the OSHA 300 Log is compiled has accomplished all of the following, except: _____.
- a. records have been distributed
 - b. records are complete
 - c. records are correct
 - d. records have been examined
45. For what period of time, during the following year covered by the records, must the OSHA 300-A, Summary of Work-Related Injuries and Illnesses be posted?
- a. February 1st until February 30th
 - b. February 1st until March 1st
 - c. February 1st until April 30th
 - d. February 15th until April 15th

MODULE 6: MAINTAINING FORMS (CONTINUED)

In this module, we'll continue with an overview of the requirements related to retaining forms, involving employees, access to forms, and safeguards against discrimination.

(33) Paperwork Retention and Updating. How long must I keep records?

You must save:

- OSHA Form 300, Log of Work-Related Injuries and Illnesses,
- privacy case list (if one exists),
- OSHA Form 300A, Summary of Work-Related Injuries and Illnesses, and
- OSHA Form 301, Injury and Illness Incident Reports

You must save these forms for five years following the end of the calendar year to which the records pertain. See forms...

The five-year time period enables employers, employees, and researchers to obtain sufficient data to discover patterns and trends of illnesses and injuries and, in many cases, to demonstrate the statistical significance of such data.

Updating during storage. Employers must update their OSHA 300 Logs under two circumstances.

1. If the employer discovers a recordable injury or illness that has not previously been recorded, the case must be entered on the forms.
2. If a previously recorded injury or illness turns out, based on later information, not to have been recorded properly, the employer must modify the previous entry.

For example, if the description or outcome of a case changes (a case requiring medical treatment becomes worse and the employee must take days off work to recuperate), the employer must remove or line out the original entry and enter the new information.

The intent of this rule is to ensure Log updates are made on a continuing basis, i.e., as new information is discovered during the retention period, it should be recorded within 7 calendar days of discovery, the same interval required for the recording of any new case. If new information about an existing case is discovered, it should be entered within 7 days of receiving the new information.

(34) Change of Business Ownership. What must I do if the business changes ownership?

If your business changes ownership, you are responsible for recording and reporting work-related injuries and illnesses only for that period of the year during which you owned the establishment. You must transfer the records to the new owner. The new owner must save all records of the establishment kept by the prior owner, but need not update or correct the records of the prior owner.

The phrase “change of ownership,” for the purposes of this section, is relevant only to the transfer of the responsibility to make and retain OSHA-required injury and illness records. In other words, if one employer transfers ownership of an establishment to a different employer, the new entity becomes responsible for retaining the previous employer’s past OSHA-required records and for creating all new records required by this rule. The new owner is not required to update or correct the records of the prior owner, even if new information about old cases becomes available.

(35) Employee Involvement. Who must be informed and have access to the records?

You must involve your employees and their representatives in the recordkeeping system.

- Inform each employee of how they are to report an injury or illness to you.
- Provide limited access to your injury and illness records for your employees and their representatives. Your employees, former employees, their personal representatives, and their authorized collective bargaining representatives have the right to access the OSHA injury and illness records, with some limitations, as below. A personal representative is anybody designated in writing by the employee or former employee. It also is the legal representative of a deceased or legally incapacitated employee.
- When an employee, former employee, personal representative, or authorized employee representative asks for copies of your current or stored OSHA 300 Log(s), for an establishment the employee or former employee has worked in, you must give the requester a copy of the relevant OSHA 300 Log(s) by the end of the next business day. You must leave the names on the 300 Log. However, to protect the privacy of injured and ill employees, do not record the employee’s name on the OSHA 300 Log for certain privacy concern cases.
- When an employee, former employee, or personal representative asks for a copy of the OSHA Form 301 or equivalent describing an injury or illness to that employee or former employee, you must give the requester a copy of the OSHA Form 301 or equivalent containing that information by the end of the next business day.
- When an authorized employee representative asks for copies of the OSHA Form 301 or equivalent, for an establishment where the agent represents employees under a collective bargaining agreement, you

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must give copies of those forms to the authorized employee representative within 7 calendar days.

You are only required to give the authorized employee representative information from the releasable part of the OSHA Form 301 or equivalent section titled "Tell us about the case" or a similar section. You must remove all other information from the copy of the OSHA Form 301 or equivalent form that you give to the authorized employee representative.

- You may not charge for these copies the first time. However, if one of the designated persons asks for additional copies, you may assess a reasonable charge for retrieving and copying the records.

(36) Prohibition against discrimination. What are employee safeguards against discrimination?

29 CFR 1977, Discrimination against Employees under OSHA Act of 1970, prohibits discrimination against an employee for reporting a work-related fatality, injury or illness. It also protects the employee who files a safety and health complaint, asks for access to this rule, records, or otherwise exercises any rights afforded by law or rule.

(39) Reporting Fatalities and Hospitalizations to OSHA. What are the requirements for reporting fatalities and hospitalizations?

- Fatalities 8 hours after occurrence or employer knowledge. Report a fatality only if it occurs within 30 days of the accident.
- Catastrophe (three or more hospitalizations) 8 hours after occurrence or employer knowledge. NOTE: You must report a fatality caused by a heart attack at work. The local OSHA field office safety or health manager will decide whether to investigate the incident, depending on the circumstances of the heart attack.
- Overnight Hospitalization 24 hours after occurrence or employer knowledge. Overnight hospitalization if for medical treatment only. Hospitalization for observation is not reportable, nor is emergency room treatment.

What information do I need to give to OSHA about the incident?

You must give OSHA the following information for each fatality or multiple hospitalization incident:

1. establishment name;
2. location of the incident;
3. time of the incident;
4. number of fatalities or hospitalized employees;

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5. names of any injured employees;
6. Your contact person and his or her phone number; and
7. A brief description of the incident.

Do I have to report every fatality or multiple hospitalization incident resulting from a motor vehicle accident?

No, you do not have to report all of these incidents. If the motor vehicle accident occurs on a public street or highway, and does not occur in a construction work zone, you do not have to report the incident to OSHA. However, these injuries must be recorded on your OSHA injury and illness records, if you are required to keep such records.

Do I have to report a fatality or multiple hospitalization incident that occurs on a commercial or public transportation system?

No, you do not have to call OSHA to report a fatality or multiple hospitalization incident if it involves a commercial airplane, train, subway or bus accident. However, these injuries must be recorded on your OSHA injury and illness records, if you are required to keep such records.

Do I have to report a fatality caused by a heart attack at work?

Yes, your local OSHA Area Office director will decide whether to investigate the incident, depending on the circumstances of the heart attack.

Do I have to report a fatality or hospitalization that occurs long after the incident?

No, you must only report each fatality or multiple hospitalization incident that occurs within thirty (30) days of an incident.

What if I don't learn about an incident right away?

If you do not learn of a reportable incident at the time it occurs and the incident would otherwise be reportable under paragraphs (a) and (b) of this section, you must make the report within eight (8) hours of the time the incident is reported to you or to any of your agent(s) or employee(s).

(40) Providing Records to Government Representatives. Do I have to provide records to government representatives?

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When an authorized government representative asks for the records you keep in compliance with this standard, you must provide copies of the records within 4 business hours. Authorized government representatives are:

- a representative of the Department of Consumer and Business Services;
- a representative of the Secretary of Labor conducting an inspection or investigation under the Act; or
- a representative of the Secretary of Health and Human Services (including the National Institute for Occupational Safety and Health - NIOSH) conducting an investigation under Section 35(b) of the Act.

(42) Requests from the Bureau of Labor Statistics. What if I receive a survey from the Bureau of Labor Statistics?

If you receive a Survey of Occupational Injuries and Illnesses Form from the Bureau of Labor Statistics (BLS), or a BLS designee, you must promptly complete the form and return it following the instructions on the survey form.

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MODULE 6 QUIZ

46. All of the following must be retained by the employer for five years following the end of the calendar year that these records cover, except: _____.

- a. OSHA 300 Log
- b. OSHA 200 Log
- c. OSHA 300-A
- d. OSHA Form 27

47. If the employer discovers a recordable injury that has not previously been recorded, the employer: _____.

- a. must update the OSHA 300 Log
- b. need not update the OSHA 300 Log
- c. may update the OSHA 300 Log
- d. may update the OSHA 300 Log and Form 301

48. According to the text, if a previously recorded injury or illness turns out, based on later information, not to have been recorded properly, the employer: _____.

- a. must update the OSHA 300 Log
- b. need not update the OSHA 300 Log
- c. must modify the previous entry
- d. may update the OSHA 300 Log

49. Deleted.

50. All of the following are true if your business changes ownership, except: _____.

- a. the new owner need not update prior owner's records
- b. the new owner must keep records of prior owner
- c. the prior owner must transfer records to the new owner
- d. the new owner must maintain records for the entire calendar year

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51. Which of the following persons does not have the right to access a particular employee's OSHA injury and illness records?

- a. employees
- b. personal representative
- c. co-workers
- d. authorized collective bargaining representatives

52. When an employee, former employee, personal representative, or authorized employee representative asks for copies of your current or stored OSHA 300 Log(s) or OSHA Form 301, you must give the requester a copy: _____.

- a. within seven days
- b. within 24 hours
- c. by the end of the next business day
- d. by the end of the current business day

53. What are you required to give the authorized employee representative if he or she requests a copy of the OSHA Form 301?

- a. the releasable part of the form only
- b. the entire form
- c. two copies of the form
- d. whatever the employee needs

54. The employer must report a fatality if it occurs within _____ of the accident.

- a. seven days
- b. 14 days
- c. 21 calendar days
- d. 30 days

55. Which of the following employee actions is not protected by 29 CFR 1977, Discrimination against Employees under OSHA Act of 1970?

- a. reports a work-related fatality, injury or illness
- b. refuses to warn co-workers of hazards
- c. asks for access to OSHA rules
- d. files a safety and health complaint

MODULE 7: CALCULATING INJURY AND ILLNESS INCIDENCE RATES

Are these rates really important?

Injury and illness rate statistics can be useful as a measure in evaluating your organization's safety management system. However, it's important to understand that these "trailing indicators" do not measure the most direct effects of the design a safety management system as do "leading indicators". (Take Course 700 to learn more about trailing and leading indicators.)

But, it's useful to be able to evaluate your firm's injury-and-illness statistics over time to compare your firm's statistics with that of your industry as a whole. To do that you need to compute your incidence rate. Incidence rates can, to a certain degree, help you identify problems in your workplace or progress made toward preventing work-related injuries and illnesses. This is also the same information used by OSHA to calculate potential penalty reductions, so I guess that makes it important too.

What is an incidence rate?

An incidence rate is the number of recordable injuries and illnesses occurring among a given number of full-time workers (usually 100 full-time workers) over a given period of time (usually one year). It's important to note that in Europe the incident rate may be based on 500 full-time workers.

How do I calculate an incidence rate?

You can quickly and easily compute an occupational injury and illness incidence rate for all recordable cases or for cases that involved days away from work and days of restricted work using the steps below.

- **Calculate total recordable injuries and illnesses.** To find out the total number of recordable injuries and illnesses that occurred during the year — count the number of line entries on your OSHA Form 300 or refer to the OSHA Form 300A and sum the entries for columns (G), (H), (I), and (J).
- **Calculate total workhours.** The number of hours all employees actually worked during the year — refer to OSHA Form 300A and optional worksheet to calculate this number.
- **Calculate the DART Rate.** The "DART" (**D**ays **A**way, **R**estricted, or **J**ob **T**ransferred) is used to express the incident rate. To determine the DART Rate, count the number of line entries on your OSHA Form 300 that received a check mark in columns (H) and (I), or refer to the entry in columns (H) and (I) on the OSHA Form 300A.

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The Equation

You can compute the incidence rate for all recordable cases of injuries and illnesses using the following equation:

Total number of injuries and illnesses (N) ÷ number of hours worked by all employees (EH) x 200,000 hours = total recordable case rate.

(The 200,000 figure in the formula represents the number of hours 100 employees working 40 hours per week, 50 weeks per year would work and provides the standard base for calculating incidence rates.)

You can compute the incidence rate for recordable cases involving days away from work, days of restricted work activity, or job transfer using the following formula:

Calculating the DART Rate

As of January 1, 2002 the term "lost workday" was no longer used for recordkeeping purposes. The new language is DART.

DART = Days Away, Restricted, or Transferred.

The **DART** rate is calculated using the following formula:

$$(N \div EH) \times 200,000$$

where:

N = number of injuries and/or illnesses with days away, restricted work, or job transfer
EH = total hours worked by all employees during calendar year
200,000 = base for 100 full-time equivalent workers (working 40 hours per week, 50 weeks per year).

The DART rate can be used to compare statistics with the earlier LWDI.

For instance, if you have 50 employees who work a total of 100,000 hours during the year and have experienced 10 recordable injuries, the DART rate would be $(10 \div 100,000) \times 200,000 = 20$. The number of employees doesn't matter. The total number of injuries and the total number of hours the employees work during the year are the two important figures entered into the formula.

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You can use the same formula to calculate incidence rates for other variables such as cases involving restricted work activity (column (I) on OSHA Form 300A), cases involving skin disorders (column (M-2) on OSHA Form 300A), etc. Just substitute the appropriate total for these cases, from OSHA Form 300A, into the formula in place of the total number of injuries and illnesses.

What can I compare my incidence rate to?

The Bureau of Labor Statistics (BLS) conducts a survey of occupational injuries and illnesses each year and publishes incidence-rate data by various classifications (e.g., by industry, by employer size, etc.). You can get the data at www.bls.gov or by calling a BLS regional office.

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MODULE 7 QUIZ

56. Which of the following is not true concerning injury and illness rates?

- a. they help the employer compare accident statistics with industry average
- b. they help measure injury and illness statistics
- c. they help evaluate the safety management system
- d. they are very useful leading indicators

57. Injury and illness rates are useful for all the following reasons, except: _____.

- a. they help identify progress toward preventing injuries and illnesses
- b. they're the most direct effects of an effective safety management system
- c. they're used by OSHA to calculate penalty reductions
- d. they help measure injury and illness statistics

58. Which of the following best defines an "incidence rate"?

- a. number of non-injury events occurring among 100 workers over a year
- b. number of recordable injuries/illnesses per 100 full-time workers per year
- c. number of non-injury events minus injury events per 100 full-time workers in a year
- d. number of injuries/illnesses per number of full-time workers per year

59. To find out the total number of recordable injuries and illnesses that occurred during the year using the OSHA 300-A, you would sum the entries for columns: _____.

- a. (A), (C), (D), (H)
- b. (C), (E), (H), (I)
- c. (G), (H), (I), (J)
- d. (H), (I), (J), (K)

60. To find out the number of injuries and illnesses that involved days away from work and days of restricted work (DART) using the OSHA 300 Log, you would refer to the entries in columns: _____.

- a. (A), (C), (D), (H)
- b. (C), (E), (H)
- c. (G), (H), (I)
- d. (H), (I)

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61. Which formula below is used to determine the DART rate?

- a. $\text{DART} = (\text{N} \div \text{EH}) \times 200,000$
- b. $\text{DART} = 50,000 \div (\text{N} \times \text{EH})$
- c. $\text{DART} = \text{EH} \div (\text{N} \times 100,000)$
- d. $\text{DART} = \text{N} + (\text{EH} \div 300,000)$

62. What is the DART Rate for a company that had 10 injuries and 80 employees who worked a total of 150,000 hours during the year?

- a. 5.5
- b. 10.2
- c. 13.3
- d. 18.5