



# OSHA Recordkeeping Basics

Employers are required to record and report work-related fatalities, injuries and illnesses. This is a great introduction to the requirements of 29 CFR 1904, Recordkeeping and Reporting, for recording injuries and illnesses on the OSHA 300 Log and the OSHA 300-A Summary. Emphasis is placed on entering data and maintaining the form. You'll also learn how to calculate OSHA's Days Away, Restricted, and Job Transferred (DART) Rates.

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# OSHAcademy Course 708 Study Guide

## OSHA Recordkeeping Basics

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

Read each module, answer the quiz questions, and submit the quiz questions online through the course webpage. You can print the post-quiz response screen which will contain the correct answers to the questions.

The final exam will consist of questions developed from the course content and module quizzes.

We hope you enjoy the course and if you have any questions, feel free to email or call:

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## Course Introduction

OSHA's regulation at [29 CFR part 1904 Subpart A](#) requires employers to record and report work-related occupational fatalities, injuries, and illnesses at their establishments.

- Employers covered by these rules must record each recordable employee injury and illness on an OSHA Form 300, which is the "Log of Work-Related Injuries and Illnesses," or equivalent.
- Employers must also prepare a supplementary OSHA Form 301, Injury and Illness Incident Report or equivalent that provides additional details about each case recorded on the OSHA Form 300.
- At the end of each year, employers are required to prepare a summary report of all injuries and illnesses on the OSHA Form 300A, which is the "Summary of Work-Related Injuries and Illnesses," and post the form in a visible location in the workplace.

This course is a great introduction to the requirements of 29 CFR 1904, Recordkeeping and Reporting. Emphasis is placed on entering data and maintaining the form. You'll also learn how to calculate OSHA's Days Away, Restricted, and Job Transferred (DART) Rates.

## Course Objectives

- Identify the purpose of OSHA's recordkeeping requirements.
- Define and give examples of work-related injuries and illnesses.
- Describe how to determine work-relatedness using the OSHA decision tree.
- List and give examples of the six conditions that require recording.
- Describe needlestick and sharps injury recording criteria.
- Describe the purpose of the OSHA Forms 300, 300-A, and 301.
- Discuss the requirements for maintaining and posting forms.
- Describe and give an example of calculating a DART incident rate.

Note: The 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.

## Module 1: The Basics

**Note:** The content and format for this course was updated on June 16, 2020. The Study Guide will also be updated shortly.

### OSHA's Mandate

The OSH Act of 1970 requires the Secretary of Labor to produce regulations that require employers in [certain industries](#) to keep records of work-related occupational fatalities, injuries, and illnesses. The records are used for several purposes.

- OSHA collected work-related 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 correct the hazards that are hurting workers.
- The records provide the base data for the [U.S. Bureau of Labor Statistics Annual Survey of Occupational Injuries and Illnesses](#), the Nation's primary source of occupational injury and illness data.
- The records are also 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.

### Quiz Instructions

After each section, there is a quiz question. Make sure to read the material in each section to discover the correct answer to these questions. Circle the correct answer. When you are finished go online to take the final exam. This exam is open book, so you can use this study guide.

**1. OSHA recordkeeping regulations require employers to keep records of fatalities, injuries, and illnesses that are \_\_\_\_\_.**

- a. compensable
- b. recordable
- c. work-related
- d. reportable

## Purpose of the Rule

The recordkeeping and reporting rule requires employers to record and report work-related fatalities, injuries and illnesses. ([Section 1904.0](#))

Although a specific work-related injury or illness may involve some or all of these factors, a record of an injury or illness entered on the OSHA recordkeeping forms only shows three things:

1. that an injury or illness has occurred;
2. that the employer has determined that the case is work-related; and
3. that the case is non-minor, i.e., that it meets one or more of the OSHA injury and illness recording criteria.

## No-Fault Reporting

It's important to know that recording or reporting a work-related injury, illness, or fatality does not mean:

- the employer or employee was at fault;
- an OSHA rule has been violated; or
- the employee is eligible for workers' compensation or other benefits. ([Note to Section 1904.0](#))

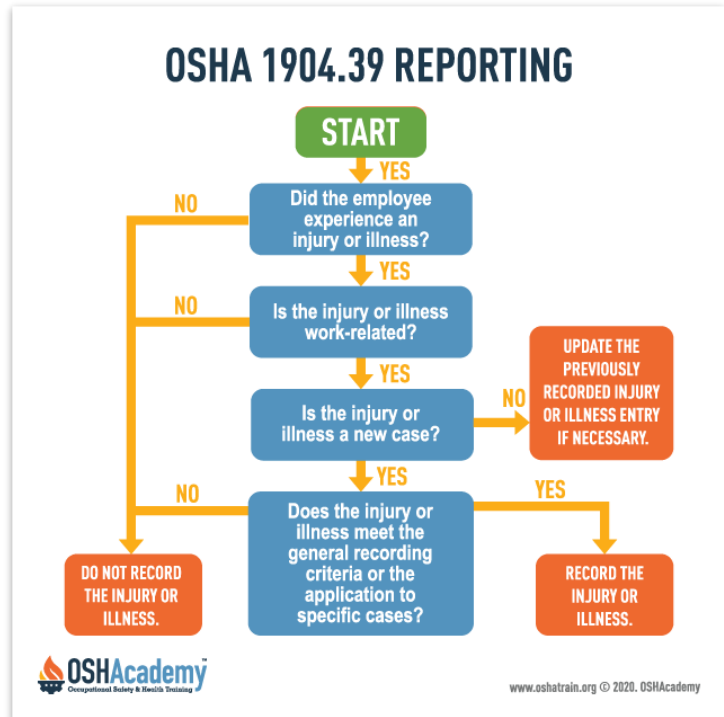
**2. A record of an injury or illness entered on the OSHA recordkeeping forms shows \_\_\_\_.**

- a. that a violation has occurred
- b. verification of fault and liability
- c. that the case is non-minor
- d. establishes eligibility for compensation

## Criteria for Recording Injuries and Illnesses

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

- are work-related; and
- are new cases; and
- meet one or more of the following general recording criteria: ([Section 1904.7](#))
  - death;
  - days away from work;
  - restricted work or transfer to another job;
  - medical treatment beyond first aid;
  - loss of consciousness; or
  - a significant injury or illness diagnosed by a physician or other licensed health care professional
- or one or more of the following cases:
  - work-related needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material ([Section 1904.8](#));
  - if an employee is medically removed under the medical surveillance requirements of an OSHA standard ([Section 1904.9](#));
  - if an employee's hearing test (audiogram) reveals that the employee has experienced a work-related Standard Threshold Shift (STS) in hearing in one or both ears, and the employee's total hearing level is 25 decibels (dB) or more above



audiometric zero (averaged at 2000, 3000, and 4000 Hz) in the same ear(s) as the STS ([Section 1904.10](#)); or

- if an employee has been occupationally exposed 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 ([Section 1904.11](#)).

**3. Which of the following injuries would NOT be recordable on the OSHA 300 Log?**

- a. a worker fractures a leg during work on a construction project
- b. an employee cuts a hand and requires first aid treatment
- c. a worker falls off a ladder in the lunchroom and requires days away from work
- d. an employee loses consciousness during a required company meeting

### Scope of the Rule

All employers covered by the [Occupational Safety and Health Act of 1970](#) (OSH Act) are covered by [CFR 29 1904, Recording and Reporting Occupational Injuries and Illness](#). 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.

### Basic Requirements

Ten or fewer employees. If your company 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 OSHA or the BLS informs you in writing that you must keep records. ([Section 1904.1](#))

More than ten 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. ([Section 1904.2](#))

Exception. All employers covered by the OSH Act must report to OSHA any workplace incident that results in a fatality, in-patient hospitalization, amputation, or loss of an eye. ([Section 1904.39](#))

### Implementation

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.

See [OSHA's Partially Exempt Industries](#) web page for a list of partially exempted industries.

**4. Who must report to OSHA any workplace incident that results in a fatality, in-patient hospitalization, amputation, or loss of an eye?**

- a. Only employers with 10 or more employees
- b. All employers covered by the OSH Act of 1970
- c. All employers regardless of OSHA coverage
- d. Employers with 10 or fewer employees

### How Records are Used

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.

### Keeping Records for More Than One Agency

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:

1. OSHA accepts the other agency's records under a memorandum of understanding with that agency, or

2. if the other agency's records contain the same information as this Part 1904 requires you to record. ([Section 1904.3](#))

You may contact your nearest OSHA office or State agency for help in determining whether your records meet OSHA's requirements.

**5. The Log of Work-Related Injuries and Illnesses (OSHA Form 300) is used to \_\_\_\_.**

- a. disclose employees with the highest injury and illness rate
- b. calculate employee compensability for injuries and illnesses
- c. determine employer liability for work-related incident and accidents
- d. classify and note the severity of work-related injuries and illnesses

### Recordability and Compensability

Many cases that are recorded in the OSHA system are also compensable under the State workers' compensation system, but many others are not. However, the two systems have different purposes and scopes.

- **OSHA:** The OSHA recordkeeping system is intended to collect, compile and analyze uniform and consistent nationwide data on occupational injuries and illnesses.
- **Workers' Compensation:** The workers' compensation system, in contrast, is not designed primarily to generate and collect data but is intended primarily to provide medical coverage and compensation for workers who are killed, injured or made ill at work, and varies in coverage from one state to another.

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 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.

The employer must analyze the case in light of both the OSHA recording criteria and the requirements of the State workers' compensation system to determine whether the case is recordable or compensable, or both.



**6. Which of the following is TRUE regarding injury and illness case recordability and compensability?**

- a. A recordable case proves a violation has occurred
- b. A recordable case is not always compensable
- c. A compensable case is always recordable
- d. A recordable case is always compensable

### Employee Involvement

A basic requirement of the recordkeeping rule is to include employees. Your employees and their representatives must be involved in the recordkeeping system in several ways. The employer must:

- inform each employee of how he or she is to report a work-related injury or illness;
- provide employees with information regarding work-related injuries and illnesses;
- provide access to your injury and illness records for your employees and their representatives.

*What must I do to make sure employees report work-related injuries and illnesses?*

- establish a reasonable procedure for employees to report work-related injuries and illnesses promptly and accurately;
- inform each employee of your procedure for reporting work-related injuries and illnesses;
- inform each employee that:
  - employees have the right to report work-related injuries and illnesses; and
  - employers are prohibited from discharging or in any manner discriminating against employees for reporting work-related injuries or illnesses.

*Do I have to give my employees access to injury and illness records?*

- **Yes**, employees, former employees, their personal representatives, and their authorized employee representatives have the right to access the OSHA injury and illness records, with some limitations, as discussed in the next section.

**7. What is TRUE regarding employee reporting of a work-related injury or illness?**

- a. The injury must seriously injure the employee
- b. The employee must demonstrate proof
- c. The employee may be transferred
- d. Employees have the right to report

*If an employee or representative asks for access to the OSHA 300 Log, when must I provide it?*

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.

*May I remove the names of the employees or any other information?*

- **No**, you must leave the names on the 300 Log. However, to protect the privacy of injured and ill employees, you may not record the employee's name on the OSHA 300 Log for certain "privacy concern cases," as specified in 1904.29(b)(6) through (9).

*If an employee or representative asks for access to the OSHA 301 Incident Report, when do I have to provide it?*

When an employee, former employee, or personal representative asks for a copy of the OSHA 301 Incident Report describing an injury or illness to that employee or former employee, you must give the requester a copy of the OSHA 301 Incident Report containing that information by the end of the next business day.

When an authorized employee representative that represents employees under a collective bargaining agreement, you must give copies of those the Form 301 to the authorized employee representative within 7 calendar days.

*What information on the Form 301 must I provide?*

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

*May I charge for the copies?*

**No**, you may not charge for these copies the first time they are provided. However, if one of the designated persons asks for additional copies, you may assess a reasonable charge for retrieving and copying the records.

**8. If an employee asks for access to the OSHA 300 Log, when must the employer provide it?**

- a. No later than 3 calendar days
- b. By the end of the next business day
- c. Within 24 hours
- d. Immediately

## Module 2: Work-Relatedness

In this module, we'll take a look at [Section 1904.5](#) to become more familiar with the concept of "work-relatedness" and how it applies to [OSHA 300 Log](#) Recordkeeping.

### When is an injury or illness work-related?

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. ([Section 1904.5](#))

Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the [work environment](#). The work environment includes not only physical locations, but also the equipment or materials used by the employee to perform work, unless an in 1904.5(b)(2) specifically applies. We'll discuss these exceptions shortly.

### When is a workers' compensation case work-related?

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.

**1. A case is work-related if, in the work environment, an event or exposure \_\_\_\_\_.**

- a. may have changed a pre-existing condition
- b. occurred within 24 hours of the injury or illness
- c. caused or contributed to the injury or illness
- d. influenced the injury or illness

### What does "significantly aggravated" mean?

A [preexisting injury or illness](#) has been significantly aggravated, for purposes of OSHA injury and illness recordkeeping, when an event or exposure in the work environment results in any of the following:

**Death**, provided that the preexisting injury or illness would likely not have resulted in death but for the occupational event or exposure.

**Loss of consciousness**, provided that the preexisting injury or illness would likely not have resulted in loss of consciousness but for the occupational event or exposure.

**One or more days away from work**, or days of restricted work, or days of job transfer that otherwise would not have occurred but for the occupational event or exposure.

**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.

### **Who Makes the Determination of Work-Relatedness?**

OSHA believes employers can best 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 pre-existing condition.

Employers are in the best position to obtain the information, both from the employee and the workplace, that is necessary to make this determination. Although expert advice may occasionally be sought by employers in particularly complex cases, the final rule provides that the determination of work-relatedness ultimately rests with the employer. (66 FR 5946-5962, Jan. 19, 2001)

**2. According to OSHA, who is best positioned to determine if the workplace somehow caused, contributed to, or significantly aggravated an injury or illness?**

- a. Safety committees
- b. Physicians
- c. Workers' compensation specialists
- d. Employers

### **Non-Work-Related Injuries**

To ensure non-work-related injury/illness cases are not entered on the [OSHA 300 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.

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.

## Exceptions

<p>1904.5 (b)(2)</p>	<p>You are not required to record injuries and illnesses if . . .</p>
<p>(i)</p>	<p>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.</p>
<p>(ii)</p>	<p>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.</p>
<p>(iii)</p>	<p>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.</p>
<p>(iv)</p>	<p>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). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related.</p> <p>Note: If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.</p>
<p>(v)</p>	<p>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.</p>
<p>(vi)</p>	<p>The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.</p>

(vii)	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.
(viii)	The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).
(ix)	The illness is a mental illness. Mental illness will not be considered 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 mental illness that is work-related.

**3. If an employee is injured by choking on a sandwich while in the employer's establishment, the case would \_\_\_\_\_.**

- a. most likely be considered work-related
- b. not be considered work-related
- c. might be considered work-related during work hours
- d. work-related if the employer made the sandwich

### Work Environments While Traveling

**Work in the interest of the employer.** Injuries and illnesses that occur while an employee is on travel status are work-related if, at the time of the injury or illness, the employee was engaged in work activities "in the interest of the employer." Examples of such activities include:

- Travel to and from customer contacts, conducting job tasks, training, work-related meetings, and entertaining or being entertained to transact, discuss, or promote business. Work-related entertainment includes only entertainment activities being engaged in at the direction of the employer.
- 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.

**Home Away from Home.** When a traveling employee checks into a hotel, motel, or into another temporary residence, for one or more days, he or she establishes a "home away from home." After he or she checks in, evaluate the employee's activities for their work-relatedness in the same manner as you evaluate the activities of a non-traveling employee. For example:

- When the employee checks into the temporary residence, he or she is considered to have left the work environment. When the employee begins work each day, he or she re-enters 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.

**Taking a Detour.** Injuries or illnesses are not considered work-related if they occur while the employee takes a detour for personal reasons from a reasonably direct route of travel. For example, the employee took a side trip for personal reasons.

**4. Work-related entertainment includes only entertainment \_\_\_\_.**

- a. that is paid for by the employee
- b. at the direction of the employer
- c. if the employee entertains while on a trip
- d. when the cost is within company limits

### Working at Home

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 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.

### Work-Relatedness While Telecommuting

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:

- **Work-related:** If an employee drops a box of work documents and injures his or her foot, the case is considered work-related.
- **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.
- **Non-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.
- **Non-work-related:** If an employee working at home is electrocuted because of faulty home wiring, the injury is not considered work-related.

**5. Which of the following situations would be considered a work-related injury or illness while telecommuting?**

- a. An employee is hurt falling down at home during an earthquake
- b. An employee is shocked by faulty house wiring while plugging in a computer
- c. An employee falls down the stairs on the way to the basement office
- d. An employee suffers a strain from picking up a heavy box of work documents

### Recording Unclear Injuries and Incidents

If an employee reports a condition but cannot say whether the symptoms first arose during work or during activities off work, the employer must evaluate the employee's work duties and environment to decide how to record the report. For instance:

- if condition is reported and it is determined to be an isolated incident, it may not be work-related nor recordable;
- if one or more events or exposures in the work environment caused or contributed to an injury or illness, or it significantly aggravated a preexisting condition, the condition is both work-related and recordable.

Below are examples of work-related and non-work-related incidents:

- **Work-related:** If the employee is diagnosed with Lyme disease, the employer would determine the case to be work-related if the employee was a groundskeeper with regular exposure to outdoor conditions likely to result in contact with deer ticks.
- **Work-related:** 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.
- **Non-work-related:** If an employee has a staph infection, the employer would consider the case not work-related if the infection is an isolated incident - no other employees with whom the newly infected employee had contact at work had been out with a staph infection.
- **Non-work-related:** If an employee reports a swollen joint, but cannot say whether it resulted from an event that occurred at work or at home, 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.

**6. If an employee has a staph infection, the employer would consider the case not work-related if \_\_\_\_\_.**

- a. social distancing has been maintained
- b. the infection is an isolated incident
- c. a previous staph infection has not occurred for in the last week
- d. the employee washed hands and face prior to work

## New Cases

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 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 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.

**7. If an employee has an injury, which of the following would most likely be recorded as a new case?**

- a. The employee has recurring signs and symptoms of the injury
- b. The employee injures the same part of the body
- c. The employee has no history of previous injuries
- d. The employee has recovered from an earlier injury

## Module 3: Introduction to Forms

### What are the required forms?

You must use the [OSHA 300](#), [300A](#), and [OSHA Form 301](#) or equivalent forms as described below:

- The **OSHA 300 Log** is the Log of Work-Related Injuries and Illnesses. 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 300A at the end of the year.
- The **OSHA 300A** is the Summary of Work-Related Injuries and Illnesses
- The **OSHA Form 301** or equivalent is the Injury and Illness Incident Report. 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 complete an OSHA Form 301, or equivalent form, for each recordable injury or illness entered on the OSHA 300 Log.
- 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.

### How quickly must each injury or illness be recorded?

**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: for example, if a new case is discovered.

### May I keep my records on a computer?

Yes, if the computer can produce equivalent forms when they are needed, as described under [1904.35](#) and [1904.40](#), you may keep your records using the computer system.

**1. How soon must the employer enter a recordable injury or illness on the OSHA 300 Log?**

- a. Within 7 business days after the OSHA report
- b. No longer than 7 days after the injury or illness
- c. Within 7 calendar days after being notified
- d. Up to 7 days after the completion of the accident investigation

**Employee Privacy**

**Are there situations where I do not put the employee's name on the forms for privacy reasons?**

- **Yes**, if you have a "privacy concern case," you may 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 is provided access to the OSHA 300 Log under 1904.35(b)(2). 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.

**How do I determine if an injury or illness is a privacy concern case?**

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, only if the employee voluntarily requests that his or her name not be entered on the log.

## Important Tips

**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 an "injury from assault"
- 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;
- the extent necessary for processing a claim for workers' compensation or other insurance benefits; or
- 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](#).

**2. What is the correct entry on the OSHA 300 Log if the name of the employee must remain confidential?**

- a. Leave the name and job title column blank
- b. "See Human Resource Manager" in name and job title columns"
- c. "Confidential" in each appropriate column
- d. "Privacy Case" instead of the employee's name

## Multiple Business Establishments

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

*Do I need to keep OSHA records for short-term establishments?*

- **Yes**, however, you do not have to keep a separate OSHA 300 Log for each such establishment. 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.

*May I keep the records for all of my establishments at my headquarters location or at some other central location?*

**Yes.** You may keep the records for an establishment at your headquarters or other central location if you can:

- transmit information about the injuries and illnesses from the establishment to the central location within seven (7) calendar days of receiving information that a recordable injury or illness has occurred; and
- produce and send the records from the central location to the establishment within the time frames required by [1904.35](#) and [1904.40](#) when you are required to provide records to a government representative, employees, former employees or employee representatives.

*What about employees working at different locations?*

- 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 at which 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 at which the employee normally works.

**3. Keep a separate OSHA 300 Log for each establishment that you expect to operate for**

\_\_\_\_\_.

- a. six months or longer
- b. 1-year or longer
- c. at least 2 years
- d. five years or more

### Covered Employees

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 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.

Covered employees include:

- **Self-employed persons:** You also must record the recordable injuries and illnesses that occur to employees who are not on your 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.



**4. Self-employed persons, sole proprietors, employers with temporary employees, contractors, and employers must record employee injuries and illnesses if \_\_\_\_\_.**

- a. employees work at least 8-hour shifts
- b. they pay the employees' wages
- c. they supervise 2 or more of employees
- d. they supervise employees on a day-to-day basis

### Annual Summary

[Click here to view and print the OSHA 300 Summary.](#)

At the end of each calendar year, you must:

- Review the OSHA 300 Log to verify that the entries are complete and accurate;
  - Total the columns (enter zeros if a column has no cases.)
  - Enter the company name, establishment name, address, annual average number of employees, and total hours worked by all employees.
  - 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.
  - Include the employee access and employer penalty statements found on the 300A form.
- 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.

**5. Where must you post a copy of the OSHA 300A, Summary of Work-Related Injuries and Illnesses?**

- a. Anywhere convenient
- b. The company's website
- c. A conspicuous place
- d. The human resources department

**Paperwork Retention and Updating**

You must save the following [forms](#) for at least 5 years following the end of the calendar year to which the records pertain:

- 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.

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.

*Do I have to update the OSHA 300/300A/301 forms during the five-year storage period?*

- **Yes**, during 5-year storage period, you must update your stored OSHA 300 Logs to include newly discovered recordable injuries or illnesses and to show any changes that have occurred in the classification of previously recorded injuries and illnesses. If the description or outcome of a case changes, you must remove or line out the original entry and enter the new information.
- **No**. You are not required to update the OSHA 300A Annual Summary or the OSHA 301 Incident Reports, but you may do so if you wish.

**Change of Business 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.

**6. How long must you save the OSHA 300/300A/301 forms following the end of the calendar year?**

- a. No longer than 2 years
- b. At least 5 years
- c. Up to 10 years
- d. Until the establishment closes

## Module 4: Recording Criteria

In this module, we'll take a closer look at general and specific recording criteria. As we mentioned earlier, 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
6. A significant injury or illness diagnosed by a physician or other licensed health care professional.

### 1. 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](#) for cases resulting in death. You must also report any work-related fatality to OSHA within 8 hours.

- 1. Which of the following is required for an injury to be classified as a recordable case?**
- a. It must require a diagnosis by a licensed health care professional
  - b. It must require treatment beyond first aid
  - c. Within must be reported within 24 hours
  - d. It must result in serious pain

### 2. Days Away From Work

When an injury or illness involves one or more days away from work, place a checkmark in [column \(H\) of the OSHA 300 Log](#) and an enter the number of calendar days away from work in [column \(K\)](#).

- If the employee is out for an extended period of time, enter an estimate of the days the employee will be away and update the day count when the actual number of days is known.

- Start 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.
- Count the number of calendar days the employee was unable to work as a result of the injury or illness, regardless of whether the employee was scheduled to work on those day(s). Include 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.
- 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 in [column \(L\)](#).
- 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 days away extend 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.

**2. You may stop tracking the number of days away from work on the OSHA 300 Log \_\_\_\_\_.**

- a. the employee is on restricted duty after returning to work
- b. when the total number of business days away is 100
- c. after the employee has been away more than 30 days
- d. once the total reaches 180 calendar days

### 3. 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 column (I) and enter the number of restricted or transferred days in column (L).

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, or from working the full day that they would otherwise work; or
2. 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.

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).

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.

**3. A recommended work restriction is recordable only if it affects \_\_\_\_\_.**

- a. the ability of the employee to work an 8-hour shift
- b. one or more of the employee's routine job functions
- c. a workers ability wear adequate PPE
- d. multiple routine job responsibilities

#### 4. Medical Treatment Beyond First Aid

Medical treatment means any treatment not contained in the list of first aid treatments. Examples of first aid include: the use of non-prescription medications at non-prescription strength, the application of hot or cold therapy, eye patches or finger guards, and others. 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, which includes only those treatments specifically listed in [1904.7](#). Examples of first aid include: the use of non-prescription medications at non-prescription strength, the application of hot or cold therapy, eye patches or finger guards, and others.

#### 5. 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.

#### 4. Where would you look to determine if a treatment is considered first-aid?

- a. In the OSHA 300 Log instructions
- b. In OSHA 1904.7, General Recording Criteria
- c. In the company's recordkeeping guidelines
- d. In the CDC first-aid handbook

#### 6. Significant Injuries or Illnesses

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 we have been discussing.

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.

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

**5. Which of the following conditions must be recorded under the general criteria at the initial diagnosis?**

- a. Infected thyroid gland
- b. Cancer
- c. Trigger finger
- d. Sinusitis

### Needlestick and Sharps Injury Recording Criteria

You must record all work-related needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material (OPIM) (as defined by [29 CFR 1910.1030](#)). Enter the case on the OSHA 300 Log as an injury (Column (M)(1)).

To protect the employee's privacy, you may not enter the employee's name on the OSHA 300 Log (see the requirements for privacy cases in paragraphs [1904.29\(b\)\(6\)](#) through [1904.29\(b\)\(9\)](#))

The term "other potentially infectious materials" is defined as:

- human bodily fluids, tissues and organs; and
- other materials infected with the HIV or hepatitis B (HBV) virus such as laboratory cultures or tissues from experimental animals.

*Do I have to record all cuts, lacerations, punctures, and scratches?*

- **No**, you need to record cuts, lacerations, punctures, and scratches only if they are work-related and involve contamination with another person's blood or other potentially infectious material. If the injury is later diagnosed as an infectious bloodborne disease, you must also update the description to identify the infectious disease and change the classification of the case from an injury to an illness.

*What about splashes or exposure to OPIM without being cut or scratched?*

You need to record such an incident on the OSHA 300 Log as an illness if:



- It results in the diagnosis of a bloodborne illness, such as HIV, hepatitis B, or hepatitis C; or
- It meets one or more of the recording criteria in [1904.7](#).

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.

**6. Record cuts, lacerations, punctures, or scratches on the OSHA 300 Log as an injury if**

\_\_\_\_\_.

- a. they are work-related and involve contamination with another person's blood or OPIM
- b. whether or not they are work-related or involve your own blood or OPIM
- c. only if they involve contamination with blood or OPIM from any source
- d. if the injury results in first aid treatment

### 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.

- You must enter each medical removal case on the OSHA 300 Log as either a case involving days away from work (Column H) or restricted work activity (Column I), 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 injury as a poisoning (Column (M)(4)).
- 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.

**7. You must enter each medical removal case on the OSHA 300 Log as a case involving**

\_\_\_\_\_.

- a. both days away from work and restricted work activity
- b. only days away from work
- c. only restricted work activity
- d. days away from work or restricted work activity

### Occupational Hearing Loss Recording Criteria

If an employee's hearing test (audiogram) reveals that the employee has experienced a work-related Standard Threshold Shift (STS) in hearing in one or both ears, and the employee's total hearing level is 25 decibels (dB) or more above audiometric zero (averaged at 2000, 3000, and 4000 Hz) in the same ear(s) as the STS, you must record the case on the OSHA 300 Log.

*What is a Standard Threshold Shift?*

A Standard Threshold Shift, or STS, is defined in the occupational noise exposure standard at [29 CFR 1910.95\(g\)\(10\)\(i\)](#) as a change in hearing threshold, relative to the baseline audiogram for that employee, of an average of 10 decibels (dB) or more at 2000, 3000, and 4000 hertz (Hz) in one or both ears.

*Do I have to record the hearing loss if I am going to retest the employee's hearing?*

- **No**, if you retest the employee's hearing within 30 days of the first test, and the retest does not confirm the recordable STS.
- **Yes**, if the retest confirms the recordable STS. Record the hearing loss case within 7 calendar days of the retest.
- **Update**, if subsequent audiometric testing performed under the testing requirements of the noise standard (See [1910.95](#)) indicates that an STS is not persistent. Update by erasing, deleting, or lining-out the recorded entry.

*When do I record a hearing loss case on the OSHA 300 Log?*

- **Yes**. When a hearing loss is work-related or has been significantly aggravated according to [1904.5](#), enter it in the column for hearing loss ((M)(5)).

- **No.** When 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.

**8. If an employee has a recordable Standard Threshold Shift, you are required to enter the hearing loss on the OSHA 300 Log unless a retest that fails to confirm the recordable STS is conducted within \_\_\_\_.**

- a. 24 hours
- b. 7 days
- c. 30 days
- d. 45 days

### 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 ((M)(3)).

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.

**9. A recordable case of tuberculosis (TB) is recorded on the OSHA 300 Log as \_\_\_\_.**

- a. skin condition
- b. respiratory condition
- c. other recordable case
- d. all other illnesses

## Module 5: Reporting Requirements

### *What am I required to report?*

All employers under OSHA jurisdiction must report work-related fatalities, in-patient hospitalizations, amputations, and losses of an eye to OSHA, even if they are exempt from routinely keeping OSHA records.

Employers have to report the following events to OSHA:

1. All work-related fatalities
2. All work-related in-patient hospitalizations of one or more employees. OSHA defines in-patient hospitalization as a formal admission to the in-patient service of a hospital or clinic for care or treatment.
3. All work-related amputations. An amputation is the traumatic loss of a limb or other external body part. Amputations include a part, such as a limb or appendage, that has been severed, cut off, amputated (either completely or partially); fingertip amputations with or without bone loss; medical amputations resulting from irreparable damage; amputations of body parts that have since been reattached. Amputations do not include avulsions (tissue torn away from the body), enucleations (removal of the eyeball), degloving (skin torn away from the underlying tissue), scalpings (removal of the scalp), severed ears, or broken or chipped teeth.
4. All work-related losses of an eye

### *When do I have to report work-related fatalities, injuries, and illnesses?*

Employers must report work-related fatalities within 8 hours of finding out about it.

For any in-patient hospitalization, amputation, or eye loss, employers must report the incident within 24 hours of learning about it.

Only fatalities occurring within 30 days of the work-related incident must be reported to OSHA. For an inpatient hospitalization, amputation or loss of an eye, the incident must be reported to OSHA only if they occur within 24 hours of the work-related incident.

**1. After you learn about an in-patient hospitalization, amputation, or eye loss, you must report the incident \_\_\_\_\_.**

- a. no later than 8 hours
- b. within 24 hours
- c. within 30 days
- d. as soon as possible

*What information do I need to give to OSHA?*

You must give OSHA the following information for each fatality, in-patient hospitalization, amputation, or loss of an eye:

1. The establishment name;
2. The location of the work-related incident;
3. The time of the work-related incident;
4. The type of reportable event (i.e., fatality, in-patient hospitalization, amputation, or loss of an eye);
5. The number of employees who suffered a fatality, in-patient hospitalization, amputation, or loss of an eye;
6. The names of the employees who suffered a fatality, in-patient hospitalization, amputation, or loss of an eye;
7. Your contact person and his or her phone number; and
8. A brief description of the work-related incident.

*How do I report work-related incidents to OSHA?*

You can use one of the following methods to report to OSHA:

1. By telephone to the nearest OSHA Area Office during normal business hours. You may not report using an answering machine, faxing, or sending an email.
2. By telephone to the 24-hour OSHA hotline (1-800-321-OSHA or 1-800-321-6742).

3. You can report events electronically on [OSHA's Electronic Submission](#) website.

**2. It is NOT appropriate to report workplace fatalities, in-patient hospitalizations, amputations, and losses of an eye to OSHA by \_\_\_\_.**

- a. calling the nearest OSHA office
- b. reporting on OSHA's website
- c. calling the OSHA 24-hour hotline
- d. faxing or emailing

*Must I report a recordable incident that resulted from a motor vehicle accident on a public street or highway?*

- **Yes.** If the accident occurred in a construction work zone.
- **No.** If the accident occurred on a public street or highway, but not in a construction work zone. However, the fatality, in-patient hospitalization, amputation, or loss of an eye must be recorded on your OSHA injury and illness records, if you are required to keep them.

*Do I have to report to OSHA if the incident occurred on a commercial or public transportation system?*

- **No,** you do not have to report the fatality, in-patient hospitalization, amputation, or loss of an eye to OSHA if it occurred on a commercial or public transportation system (e.g., airplane, train, subway, or bus). However, the fatality, in-patient hospitalization, amputation, or loss of an eye must be recorded on your OSHA injury and illness records, if you are required to keep them.

*Do I have to report a work-related fatality or in-patient hospitalization caused by a heart attack?*

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

**3. What must the employer do if an employee has a recordable motor vehicle accident on a construction site?**

- a. Report it and record it
- b. Record it, but don't report it
- c. Report it, but don't record it
- d. Neither record it nor report it

*What if the reportable fatality, injury, or illness does not occur during or right after the work-related incident?*

You must only report a fatality to OSHA if the fatality occurs within 30 days of the work-related incident.

For an in-patient hospitalization, amputation, or loss of an eye, you must only report the event to OSHA if it occurs within 24 hours of the work-related incident.

However, the fatality, in-patient hospitalization, amputation, or loss of an eye must be recorded on your OSHA injury and illness records, if you are required to keep such records.

*What if I don't learn about a reportable or work-related incident right away?*

If you do not learn about a reportable incident at the time it takes place or a work-related incident right away, you must make a report to OSHA within the following time period after the incident is reported to you or to any of your agent(s):

- 8 hours for a fatality, and
- 24 hours for an in-patient hospitalization, an amputation, or a loss of an eye.

**4. According to OSHA, you must only report a fatality to OSHA if it occurred \_\_\_\_.**

- a. the same day
- b. within 8 hours of being notified
- c. within 30 days of the work-related incident
- d. within 24 hours

How does OSHA define "in-patient hospitalization"?

OSHA defines in-patient hospitalization as a formal admission to the in-patient service of a hospital or clinic for care or treatment.

*Do I have to report an in-patient hospitalization that involves only observation or diagnostic testing?*

- **No**, you do not have to report an in-patient hospitalization that involves only observation or diagnostic testing. You must only report to OSHA each inpatient hospitalization that involves care or treatment.

*How does OSHA define "amputation"?*

An amputation is the traumatic loss of a limb or other external body part. Amputations include a part, such as a limb or appendage, that has been severed, cut off, amputated (either completely or partially); fingertip amputations with or without bone loss; medical amputations resulting from irreparable damage; amputations of body parts that have since been reattached. Amputations do not include avulsions, enucleations, degloving, scalping, severed ears, or broken or chipped teeth.

**5. Which of the following in-patient services would NOT require reporting to OSHA?**

- a. Observation and diagnostic testing
- b. Care and treatment
- c. Minor in-patient treatment of illnesses
- d. In-patient stays of 24 hours or less

**Electronic Submission of Records to OSHA**

There are two categories of employers who must routinely submit information from their injury and illness records to OSHA:

1. If your establishment had **250 or more employees** at any time during the previous calendar year, and the standard requires your establishment to keep records, then you must electronically submit information from OSHA Form 300A Summary of Work-Related Injuries and Illnesses to OSHA or OSHA's designee. You must submit the information once a year, no later than March 2 of the year after the calendar year covered by the form (for example, submit the 2021 300A by March 2, 2022).
2. If your establishment had **20 or more employees but fewer than 250 employees** at any time during the previous calendar year, and your establishment is classified in an industry listed in appendix A to subpart E of the standard, then you must electronically submit information from OSHA Form 300A Summary of Work-Related Injuries and Illnesses to OSHA or OSHA's designee. You must submit the information once a year, no later than March 2 of the year after the calendar year covered by the form.



Upon notification, you must electronically submit the requested information from your part 1904 records to OSHA. For each establishment that is subject to these reporting requirements, you must provide the employer identification number (EIN) used by the establishment.

For more information on electronically submitting records to OSHA be sure to [29 CFR 1904.41, Electronic submission of injury and illness records to OSHA.](#)

**6. If your company has more than 250 employees, when must the 2021 300A Summary Form information be electronically submitted to OSHA?**

- a. By December 15, 2021
- b. By April 15, 2022
- c. By January 30, 2022
- d. By March 2, 2022

## Module 6: Incident Rates

### How does your company compare?

It's useful to evaluate your company's injury-and-illness experience over time to compare the company's experience with that of the industry as a whole. To do that you need to compute your incident rate.

### Incident Rates Only Measure What Happened

Incident rates are lagging indicators measure the occurrence and frequency of events in the past. They help you identify what happened, but they are not useful in telling you why it happened. Relying solely on incident rates is like driving down the road and looking in the rear-view mirror to stay in your lane. In addition to incident rates, examples of trailing indicators include workers compensation rates, equipment failure rates, unsafe behavior rates.

### Activity Rates Give Clues About Why it Happened

To improve safety, you must know why incidents are occurring in your workplace. It's more important to analyze leading indicators because they uncover why events happen and they can help predict the occurrence of future events. Leading indicators measure behaviors and activities such as the number of employees trained, the number of hazard reports submitted, employee participation in safety committees, and the number of safety inspections completed. Measuring these activities help to reveal the underlying surface and root causes for injuries and illnesses.

**Bottom line: As long as you measure both leading and lagging indicators, you're on the right track.**

**1. To improve safety, it's best to place emphasis on leading indicators because they are better at determining \_\_\_\_.**

- a. those who have caused incidents
- b. what incidents have occurred
- c. why incidents have occurred
- d. where incident have occurred

## Two Common Statistical Measurements

There are two basic ways to calculate required incident rates for [annual OSHA reporting](#), the [OSHA SHARP](#) program, and the [OSHA VPP](#) program:


1. the Days Away, Restricted, or Job Transferred (DART) Rate which is used for OSHA recordkeeping and reporting, and to qualify for the OSHA SHARP.
2. the Total Case Incident Rate (TCIR) which is required to qualify for the VPP

### Days Away, Restricted, or Transferred (DART) Rate

Since the DART Rate is the most common incident rate used in the safety profession, it's important to know how to calculate it. The DART is based on the number of recordable DART cases among 100 full-time equivalent (FTE) workers over one year. It is a required calculation for companies applying for VPP status. You can compute the incident rate for recordable cases involving days away from work, days of restricted work activity, or job transfer using the following formula:

**Calculating the DART**  
**DART** = Days Away, Restricted, or Transferred  
**DART Rate =  $\frac{N \times 200,000}{EH}$**

**Where:** **N**=Number of DART incidents  
**EH**=Total hour worked by all employees during the calendar year.  
**200,000**=The number of hours for 100 full-time-equivalent workers (working 40 hours per week, 50 weeks per year.)

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### How to Calculate the DART Rate

The formula above is quite simple and easy to use. Just follow these steps:

1. **Determine the DART (N):** 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.
2. **Calculate total work hours:** The number of hours all employees actually worked during the year. Use the OSHA Form 300A and optional worksheet to calculate this number. Notice that the number of employees is not considered in the calculation. The total number of DART cases and the total number of hours the employees work during the year are the only two important figures. If actual hours worked are not available for employees paid on commission, salary, by the mile, etc., hours worked may be estimated on the basis of scheduled hours or 8 hours per workday.
3. The 200,000 figure in the formula represents the number of hours 100 full-time-equivalent (FTE) employees working 40 hours per week, 50 weeks per year would work and provides the standard base for calculating incident rates.

**2. Which of the following calculations is most commonly used in the safety profession to evaluate the company's injury and illness experience over time?**

- a. Days Away, Restricted, or Transferred (DART) Rate
- b. Total Case Incident Rate (TCIR)
- c. Annual Injury and Illness Experience Rate (AIIE) Rate
- d. OSHA Serious Accident Experience Rate (OSHA-SAER)


### **Total Case Incident Rate (TCIR)**

The Total Case Incident Rate (TCIR) is based on the number of recordable injury and illness cases occurring among 100 full-time equivalent (FTE) workers over one year. It is also a required calculation for companies applying for VPP status.

# Calculating the TCIR

$$\text{TCIR} = \frac{N \times 200,000}{EH}$$

Where: **N**=Number of injuries and illnesses  
**EH**=Total hour worked by all employees during the calendar year.  
**200,000**=The number of hours for 100 full-time-equivalent workers (working 40 hours per week, 50 weeks per year.)



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## How to Calculate the TCIR

As you can see, the calculation for the TCIR is similar to the DART. You can calculate the TCIR using the following steps:

- **Determine the number of TCIR cases (N):** Count the number of line entries on your OSHA Form 300 or use the OSHA Form 300A and sum the entries for columns (G), (H), (I), and (J).
- **Determine total work hours (EH):** The number of hours all employees actually worked during the year. Use the OSHA Form 300A and optional worksheet to calculate this number. If actual hours worked are not available for employees paid on commission, salary, by the mile, etc., hours worked may be estimated on the basis of scheduled hours or 8 hours per workday. Again, the number of employees is not considered in the calculation. The total number of TCIR cases and the total number of hours the employees work during the year are the only two important figures.
- The 200,000 figure in the formula represents the number of hours 100 full-time-equivalent (FTE) employees working 40 hours per week, 50 weeks per year would work and provides the standard base for calculating incident rates.

**3. The Total Case Incident Rate (TCIR) is based on the number of recordable injury and illness cases occurring \_\_\_\_\_.**

- a. during the actual number of weeks worked over one year
- b. among 100 workers over 40 weeks working full time
- c. among 100 full-time-equivalent (FTE) workers over one year
- d. during 200,000 hours during 52 weeks of full-time work

### Examples

**DART Rate.** If you have 50 employees who work a total of 100,000 hours during the year and have experienced 5 DART cases (Columns H and I), the DART rate would be  $(5 \times 200,000) \div 100,000 = 10$ . So, in this example, the DART rate indicates there are 10 DART cases per 100 FTE employees per year.

**TCIR.** You can use the same formula to calculate the TCIR. If you have 50 employees who work a total of 100,000 hours during the year and have experienced 10 recordable TCIR cases (Columns, G, H, I, and J), the TCIR would be  $(10 \times 200,000) \div 100,000 = 20$ . So, in this example, the TCIF indicates there are 20 recordable injuries and illness incidents per 100 FTE.

**4. What is the Days Away, Restricted, or Transferred (DART) Rate if your company had 5 DART cases during the previous year, and 70 employees who worked a total of 100,000 hours? (Hint:  $(N \times 200,000) / EH$ )**

- a. 1
- b. 5
- c. 10
- d. 20