

OSHA RECORDKEEPING GUIDELINES

QUESTIONS REGARDING THIS FORM?

Call the Office of Research at 860-263-6272

OVERVIEW

The Occupational Safety and Health Administration (OSHA) Standard 29 CFR Part 1904 Recording and Reporting Occupational Injuries and Illnesses require employers to record and report work-related fatalities, injuries and illnesses. This handout is a general overview of OSHA recordkeeping. It does not address all the rules and regulations of OSHA recordkeeping, which are periodically updated.

You are responsible for upholding all OSHA regulations regarding the reporting and recording of occupational injuries and illnesses.

RECORDKEEPING REMINDERS

- ◆ Upon request, government representatives must be provided copies of OSHA records within 4 business hours.
- ◆ Enter OSHA recordable cases on your OSHA 300 Log within 7 calendar days.
- ◆ Post your completed OSHA Form 300A from February 1st through April 30th.
- ◆ Report your OSHA Form 300A to OSHA by March 2nd at www.osha.gov/injuryreporting. The website provides details on who needs to report, based on establishment size and NAICS code.
- ◆ Retain forms for the past 5 years, updating the OSHA Form 300 as needed.
- ◆ Days Away, Restricted, or Transferred (DART) Rate calculation
$$\text{DART Rate} = (\text{Column H} + \text{Column I}) \times 200,000 \div \text{Total Hours Worked}.$$

WEBSITES

- ◆ Downloadable OSHA Recordkeeping forms in PDF format are available at U.S. OSHA's Recordkeeping website: www.osha.gov/recordkeeping
- ◆ The complete recordkeeping standard is available at www.osha.gov/laws-regs/regulations/standardnumber/1904
- ◆ OSHA Injury Tracking Application is at www.osha.gov/injuryreporting

RECORDING CRITERIA DECISION TREE

To determine if an OSHA recordable case has occurred, answer these four questions:

1. Has an injury or illness occurred?

Yes → Continue to question 2.

No → An injury or illness has *not* occurred. Do not record this on your OSHA log.

2. Is the injury or illness work-related?

Work-relatedness is presumed for injuries and illnesses occurring in the work environment. *Assume the injury or illness is work-related* unless it is specifically addressed in the exceptions listed below.

Yes → Continue to question 3.

No → A recordable injury/illness has *not* occurred. Do not record this on your OSHA log.

Exceptions. The case is not considered work-related if it falls into one of these categories:

- ◇ Present as a member of the general public.
- ◇ Symptoms arise in workplace but are solely due to non-work related event or exposure.
- ◇ Voluntary participation in a wellness program.
- ◇ Eating, drinking, or preparing food or drink for personal consumption.
- ◇ Personal tasks outside assigned working hours.
- ◇ Personal grooming, self-medication for non-work-related conditions, or intentionally self-inflicted injuries.
- ◇ Motor vehicle accident occurring in a parking lot or access road during a normal commute to or from work.
- ◇ Common cold or flu.
- ◇ Mental illness, unless employee voluntarily provides a medical opinion from a physician or licensed health care professional (PLHCP) that affirms the mental illness is work-related.

3. Is the injury or illness a new case?

If an employee has *recovered completely* from a previous injury or illness, and an event or exposure in the work environment causes the symptoms to re-appear, the injury or illness is a new case.

Yes → Continue to question 4.

No → Do not record a new case. If necessary, update the previously recorded injury or illness entry.

4. Does the injury or illness meet the general recording criteria? Remember to check for rules that apply to special cases.

Yes → A recordable injury/illness has occurred. Record this as a case on your OSHA log.

No → A recordable injury/illness has *not* occurred. Do not record this on your OSHA log.

General recording criteria. A case is recordable if it involves one or more of the following:

- ◆ All fatalities occurring in the United States and her territories
- ◆ Occupational injuries and illnesses that resulted in:
 - ◇ days away from work, restricted work or job transfer
 - ◇ medical treatment (*see page four*)
 - ◇ loss of consciousness
- ◆ Other serious or significant cases diagnosed by a PLHCP
- ◆ Occupational injuries and illnesses that meet special recording criteria:
 - ◇ needlestick and sharps injuries
 - ◇ medical removal under OSHA standards
 - ◇ occupational hearing loss

COMPLETING THE OSHA LOG - FORM 300

New OSHA 300 Forms were established on January 1, 2004. The new form lists Column K as Number of Days Away from Work and has a Hearing Loss category in Column M. If you need a new form, please contact our office or visit www.osha.gov/recordkeeping to download a form.

For every case recorded on your log, you must also complete OSHA Form 301: Injury and Illness Incident Report. *All fields are required:* date of birth, date hired, time employee began work, time of event, etc. You may substitute an equivalent form, such as the Connecticut Workers' Compensation First Report of Injury, if it includes all of the information requested on the OSHA Form 301.

Column G: Death

Each year, nearly five thousand U.S. workers lose their lives to work injuries. **All employers, regardless of size or industry, are required to report these deaths.** Reporting and recording deaths are separate actions – a reportable death may not be a recordable case. Consult the decision tree to determine if a death should be recorded on your OSHA log.

◆ Reporting

- ◇ Within 8 hours, you must report any work fatality to OSHA. This includes fatal heart attacks and other incidents that may not be recordable on the OSHA Log.
- ◇ Report to your local OSHA office. If after business hours, call 1-800-321-OSHA (1-800-321-6742).
- ◇ You are not required to report:
 - highway or public street motor vehicle accidents unless they are in a construction work zone.
 - commercial airplane, boat, train, subway, or bus accidents.
- ◇ You are also required to report within 24 hours amputations, loss of eye, and hospitalizations.

◆ Recording

- ◇ If appropriate, record the case on your OSHA 300 Log with a check in Column G: Deaths. Do not record any days away from work related to the death (*see example on page six*).
- ◇ Transportation fatalities occurring outside of an employee's normal commute are recordable, even if you have not reported them.

Column H: Days Away from Work

When an injury or illness involves one or more days away from work, you must record the case on your OSHA 300 Log with a check in *Column H: Cases with Days Away from Work*.

- ◆ If a job restriction or transfer is recommended, but the employer cannot offer restricted work or a job transfer, the case will be counted as a days away from work case.
 - ◇ Example: A doctor recommends 3 days of light duty for Gina. There is no light work available, so the employer tells her to stay home instead. This is a recordable case with 3 days away from work.
- ◆ **If a case has both days away and job transfer/restriction days**, record the case once and only once in *Column H: Cases with Days Away from Work*. Leave *Column I: Cases with Job Transfer or Restriction* blank. This is true even when the job transfer/restriction days exceed the number of days away from work.
 - ◇ Example: Rob falls from an extension ladder to a concrete patio and breaks his arm. He is out of work for 7 days and on restricted duty for 10 days. Check Column H, record 7 days in Column K and 10 days in Column L. Leave Column I blank (*see example on page six*).

Column I: Job Transfer or Restriction

If a work injury or illness prevents an employee from performing one or more routine functions of his or her job, the case involves days of job restriction or transfer. If the case does not have *any* days away from work, record the case in *Column I: Cases with Job Transfer or Restriction*.

- ◆ A routine function is defined as a task performed at least once per week.
 - ◇ Example: Every Friday, Cindy moves 15-40 lb delivery boxes. A work-related injury prohibits her from lifting over 20 lbs. for five days. The injury is recordable with 5 days of restriction.
 - ◇ Example: The doctor tells Aaron not to lift anything over 40 lbs. His normal workweek does not require any lifting over 15 lbs. The restriction is *not* recordable.
- ◆ If an employee is kept from working a full workday, the days are counted as restrictions.
 - ◇ Example: Todd is injured at work and is told to work only four-hour shifts for 2 days. The injury is recordable with 2 days of restriction.

OTHER RECORDABLE CASES VS. FIRST AID

Column J: Other Recordable Cases

If a case falls into one of the categories below, it is OSHA recordable. If the employee did not have days away from work (Column H), job transfer or restriction (Column I), the case is recorded in *Column J: Other Recordable Cases*. You must also record the appropriate category under *Column M: Injury and Illness Types*.

◆ **Medical treatment beyond First Aid:**

- ◇ Prescription medication. The use of non-prescription medication at prescription strength as recommended by a physician or licensed health care professional (PLHCP) is considered prescription medication.
- ◇ Immunizations (except tetanus) such as hepatitis B or rabies vaccines.
- ◇ Wound-closing devices such as surgical glue, sutures, staples, etc.
- ◇ Any device with rigid stays or other systems designed to immobilize parts of the body.
- ◇ Physical therapy or chiropractic treatment.
- ◇ Removal of foreign material that is embedded in the eye.
- ◇ Any treatment not specifically defined as First Aid (listed below)

◆ **Significant Diagnosed Injury or Illness:** Any serious or significant work-related disorder that is diagnosed by a PLHCP or identified by a positive medical test. These include cases of cancer, chronic irreversible disease, a fractured or cracked bone or tooth, or a punctured eardrum. Specific guidelines on recordable hearing loss injuries may be found online @ www.osha.gov/recordkeeping

◆ **Needlestick injuries** and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious materials. Potentially infectious materials include human bodily fluids, tissues and organs, and materials infected with the HIV or hepatitis B virus.

◆ **An OSHA standard requires medical removal** of an employee for medical surveillance.

◆ **Loss of consciousness** from a work-related injury or illness is recordable. Loss of consciousness due *solely* to personal health conditions (diabetes, epilepsy, narcolepsy, etc.) is not recordable.

Not Recordable

If a case is limited to First Aid treatment AND there are no days away from work, job transfer, or job restriction, do not include the case on your OSHA 300 Log. The case is not OSHA recordable, even if the First Aid treatment is administered at a health clinic, emergency room, hospital, or other medical treatment facility. First Aid treatment is defined as:

- | | |
|---|--|
| ◆ Visits to a PLHCP solely for observation or counseling. | ◆ Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.). |
| ◆ 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). | ◆ Drilling of fingernail or toenail to relieve pressure, or draining fluid from a blister. |
| ◆ Using non-prescription medications at non-prescription strength (per box instructions). | ◆ Removing splinters or foreign material from areas other than the eyes by irrigation, tweezers, cotton swabs or other simple means. |
| ◆ Cleaning, flushing or soaking wounds on the surface of the skin. | ◆ Removing foreign bodies from the eye using only irrigation or a cotton swab. |
| ◆ Using wound coverings such as bandages, Band-Aids, gauze pads, butterfly bandages, Steri-Strips, and other similar coverings (Note: wound <i>closing</i> devices listed above are medical treatment). | ◆ Using eye patches or finger guards. |
| ◆ Using any non-rigid means of support such as elastic bandages, wraps, non-rigid back belts, etc. | ◆ Non-therapeutic massages (spa treatment). |
| | ◆ Using hot or cold therapy. |
| | ◆ Drinking fluids for relief of heat disorder. |
| | ◆ Tetanus immunizations. |

Examples

- ◆ Sue cuts her hand and goes to the emergency room. A nurse cleans and covers the wound with a Band-Aid and sends Sue back to work. This is *not* a recordable case.
- ◆ Henry has a piece of metal embedded in his eye. A doctor removes it and sends him back to work. This case should be recorded in *Column J: Other Recordable Cases*.
- ◆ Joan falls at work, bruising her leg. She does not receive medical treatment but the doctor tells her to stay home for two days before returning to work. This case should be recorded in *Column H: Cases with Days Away from Work*.

NUMBER OF DAYS & INJURY OR ILLNESS TYPES

Columns K & L: Number of Days

- ◆ **Start counting with the day *after* the injury and count calendar days.** Count all the days the person is unable to work, or work with restrictions/transfer, even if the person is not scheduled to work on those days.
 - ◇ Example: An employee's workweek is Monday through Friday. The employee is injured on Thursday morning and goes home for the rest of the day. She stays home on Friday and Monday, but returns to full duty Tuesday morning. This case involves lost time and should be recorded in *Column H: Cases with Days Away from Work*. Also record 4 days (Friday, Saturday, Sunday, and Monday) in *Column K: Number of Days Away From Work*.
 - ◇ Example: On Monday morning, an employee punches in at 8:05 a.m. and is injured at 8:15 a.m. He goes home for the rest of the day but returns on Tuesday to work a complete shift without restrictions/transfer. This injury does not involve lost time. If the injury required treatment beyond First Aid, you would record it in *Column J: Other Recordable Cases*.
- ◆ **A case has days away from work that continue into the next year. Record the case and all related days on the log for the year the injury or illness occurred.**
 - ◇ Example: An employee is injured on December 23, 2020, and does not return to work until January 27, 2021. The case and the 34 days away from work would be recorded on the 2020 log. Do *not* include the case or lost days on the 2021 log.
- ◆ **If an individual case has a large amount of lost time, you may stop counting at 180 days.**
 - ◇ Example: An employee is injured and stays home for 150 days, followed by 120 days of job transfer. You may record 150 days in *Column K: Number of Days Away From Work* and 30 days in *Column L: Number of Days of Transfer or Restriction* for a total of 180 days.
- ◆ **If a person leaves your company for reasons unrelated to the injury or illness, stop counting the number of days.**
 - ◇ Example: A clerk typist falls in the parking lot and breaks her leg. The doctor recommends she stay home for two weeks. After one week, she accepts a clerk typist position at a company with better benefits. Record the case in *Column H: Cases with Days Away from Work* and 7 days in *Column K: Number of Days Away From Work*.
 - ◇ Example: A carpenter's leg is amputated after suffering a work-related accident and will be out of work for 120 days. The carpenter decides to pursue a safer career and leaves the company. Record the case in *Column H: Cases with Days Away from Work*. Since he left because of the injury, the full 120 days are recorded in *Column K: Number of Days Away From Work*.

Column M: Injury and Illness Types

For every case entered in columns G, H, I, and J, there must be a corresponding checkmark in *Column M: Injury and Illness Type*. **The total number of cases (G+H+I+J) must equal the total for Column M (1+2+3+4+5+6).** Examples of each category are provided below.

- ◆ Injuries
 - ◇ M1 Injuries: Amputations, animal and insect bites, broken bones, burns, concussions, electrocutions, heat stroke, hernias, lacerations, muscle strains and sprains, etc.
- ◆ Illnesses
 - ◇ M2 Skin Disorders: dermatitis, rosacea, psoriasis, poison ivy, etc.
 - ◇ M3 Respiratory Conditions: avian or swine flu, COVID, emphysema, asthma, tuberculosis, etc.
 - ◇ M4 Poisonings: carbon monoxide, lead, or cadmium poisoning, medical removal due to an OSHA standard, etc.
 - ◇ M5 Hearing Loss: Specific guidelines may be found online @ www.osha.gov/recordkeeping
 - ◇ M6 All Other Illnesses: Repetitive motion illnesses such as carpal tunnel syndrome or tendonitis, mental illness, varicose veins, chicken pox, etc.

LOG EXAMPLE, PRIVACY CONCERNS & HEALTHCARE RECOMMENDATIONS

Log Example

For your reference, a sample OSHA 300 Log is provided below. Notice that each case has *one and only one* check mark in columns G-J.

(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., <i>Second degree burns on right forearm from acetylene torch</i>)	Classify the case CHECK ONLY ONE box for each case based on the most serious outcome for that case:				Enter the number of days the injured or ill worker was:		Check the "Injury" column or choose one type of illness:					
	Remained at Work				Away from work (K)	On job transfer or restriction (L)	Injury (1)	Skin disorder (2)	Respiratory condition (3)	Poisoning (4)	Hearing loss (5)	All other illnesses (6)
	Death (G)	Days away from work (H)	Job transfer or restriction (I)	Other recordable cases (J)								
Fell from extension ladder onto concrete patio. Fractured lower arm.	☐	☒	☐	☐	7 days	10 days	☒	☐	☐	☐	☐	☐
Cut hand on rotary table saw. Received stitches and returned to work.	☐	☐	☐	☒	-- days	-- days	☒	☐	☐	☐	☐	☐
Strained lower back lifting 80lb bags of concrete-no lifting over 50lbs for 2 weeks.	☐	☐	☒	☐	-- days	14 days	☒	☐	☐	☐	☐	☐
Carpal tunnel in wrists due to daily typing.	☐	☒	☐	☐	30 days	15 days	☐	☐	☐	☐	☐	☒
Rash on arm from exposure to cutting oil – prescription meds	☐	☐	☐	☒	-- days	-- days	☐	☒	☐	☐	☐	☐
Carbon monoxide poisoning-hospitalized 2 weeks before death.	☒	☐	☐	☐	-- days	-- days	☐	☐	☐	☒	☐	☐

Privacy Concerns

If you wish to share your OSHA records with unauthorized persons, you must first remove the employees' names from the records. Authorized persons include representatives from OSHA, Workers' Compensation, Public Health, law enforcement agencies, insurance auditors, or consultants.

Privacy concern cases require the removal of an employee's name and identifying information from OSHA Forms. Instead of the person's name, list "privacy concern". You must keep a separate, confidential list identifying the case number and employee name. Privacy concern cases are:

- ◆ Injury or illness to an intimate body part
- ◆ Injury or illness resulting from a sexual assault
- ◆ Mental illness
- ◆ HIV infection, hepatitis, tuberculosis
- ◆ Needlestick and sharps injuries that are contaminated with another person's blood or other potentially infectious material
- ◆ Employee requests to keep name off of an *illness* case

Healthcare Recommendations

You are not required to obtain the recommendation of a physician or licensed health care professional (PLHCP). However, if a recommendation is available, you must record the case accordingly. This is true even if the employee does not follow the recommendation.

- ◆ Example: George is injured at work and is told not to lift anything over 30 lbs for five days, but he immediately resumes his full job duties. The injury is a recordable case with five days of restriction.
- ◆ Example: Carl slips and falls at work. The plant nurse instructs him to return to work, but he stays at home for two days. The injury is *not* recordable.