

MAJOR PROGRAM POINTS

"OSHA RECORDKEEPING FOR MANAGERS AND SUPERVISORS"

**Training for the
OSHA RECORDKEEPING STANDARD**

Quality Safety and Health Products, for Today...and Tomorrow

OUTLINE OF MAJOR PROGRAM POINTS

The following outline summarizes the major points of information presented in the program. The outline can be used to review the program before conducting a classroom session, as well as in preparing to lead a class discussion about the program.

- **Employers and managers have a powerful tool for making their facilities safer.**
 - It makes documenting workplace injuries and illnesses easier, and helps you to make the right long-term decisions about your safety program.
- **It's OSHA's revamped recordkeeping system... often referred to as "Part 1904," after its federal regulation part number.**
- **There are three forms at the heart of Part 1904.**
 - Two of these are updates of previous forms.
 - The third is a new addition.
- **The first form is OSHA's Form 300, better known as the "Log of Work-Related Injuries and Illnesses."**
 - This is the ongoing record of all illnesses and injuries that occur in a facility.
 - It has been simplified, and reformatted to fit legal size paper so that you can include more detailed information than before.
- **OSHA's Form 301, the "Injury and Illness Incident Report", must be filled out for each incident.**
 - Like Form 300, it also includes room for even more data about a specific injury or illness.
- **The new form, 300A, is called the "Summary of Work-Related Injuries and Illnesses."**
 - It allows you to create a statistical overview of employee injury patterns.
 - This enables you to make informed decisions about your safety programs.

- **All of these OSHA recordkeeping forms are written in plain language, and use a "question-and-answer" format.**
 - They also include helpful flowcharts and checklists.
- **But forms aren't all there is to the revised Part 1904. It also gets employees more involved in the recordkeeping process.**
 - It mandates that they be provided with appropriate access to accident information.
 - It also requires that the annual summary of workplace injuries and illnesses be posted for a longer period of time... so employees have a better chance to examine it.
- **How can a few more records or some accident statistics actually make a facility safer to work in? Why is this recordkeeping so important?**
- **By gathering more information on work-related injuries and illnesses, you can determine whether they form patterns.**
 - This allows you to more easily identify problems, and take steps to eliminate them.
- **Workplace injury and illness records can also help employees to focus on the hazards that are common in their facilities.**
 - Once they have this information, they are more likely to follow proper procedures and report dangerous conditions.
 - That attitude makes workplaces safer for everyone.
- **There's another advantage to doing more comprehensive recordkeeping, though.**
 - The data that people like you collect helps OSHA get a sense of the hazards that are common to a variety of work environments... and to do something about these hazards.

- **In other words, by keeping good health records, you are helping protect not only your employees... but also millions of others across the country.**
- **But there are some misconceptions about recordkeeping that you should be aware of.**
 - For example, recording a work-related injury or illness does not necessarily mean that an OSHA rule was violated.
 - These records are not meant to "point a finger" at any particular person.
 - They also don't determine who is eligible for workers' compensation or other benefits.
 - The records exist for one reason only, and that is to make all companies safer.
- **Of course, even with this information, making all types companies safer can be a difficult job... because there are so many different kinds of businesses.**
 - This is why another common question about OSHA recordkeeping is "which recordkeeping requirements apply to me?"
- **There are a number of criteria that determine whether you have to keep injury and illness records, and, if so, what kind.**
 - Your organization does not have to keep records if it had ten or fewer employees during all of the last calendar year.
 - Your business may also be exempt from recordkeeping if it falls into one of OSHA's specific "low-hazard" classifications (such as the retail, service, finance, insurance or real estate industries).
- **OSHA uses a series of numbers that it calls Standard Industrial Classification (SIC) codes to categorize all business establishments.**
 - It then divides all of these SIC codes into two groups.
 - One of the groups consists of organizations exempt from recordkeeping requirements.
 - The other is made up of companies that are not exempt.

- **Examples of exempt businesses and their SIC codes include:**
 - 58: Eating and drinking places.
 - 60: Banks and savings institutions.
 - 64: Insurance agents.
 - 544: Candy stores.
 - 551: New and used car dealers.
 - 573: Radio, TV and computer stores.
 - 724: Barber shops.
 - 725: Shoe repair shops.
 - 726: Funeral homes.
 - 793: Bowling centers.
 - 835: Child day care centers.
 - 841: Museums and art galleries.

- **OSHA's website at www.osha.gov provides descriptive information for all SICs, so you can determine if your organization is exempt from recordkeeping requirements.**
 - You can also get information on SIC codes and recordkeeping exemptions by contacting your nearest regional OSHA office.

- **But what if the SIC code for your company shows that it is not exempt from OSHA's recordkeeping requirements. What does this mean for you?**
 - The short answer to this question is that you must prepare and maintain OSHA-required records of work-related injuries and illnesses.

- **But how do you know if an injury is "recordable?"**
 - First of all, minor medical problems aren't recordable.
 - If a cut requires only an adhesive bandage, or a burn doesn't blister and just needs first-aid cream, then they aren't recordable injuries.

- **On the other hand, injuries or illnesses may well be recordable if the employee:**
 - Loses workdays.
 - Is restricted from doing certain tasks.
 - Requires special medical treatment or hospitalization.

- **Keep in mind that no one you hire can be automatically excluded from having a recordable ailment solely on the basis of their position with your company.**
- **This means that all types of employees are protected under Part 1904, whether they are classified as:**
 - Labor.
 - Executive.
 - Hourly.
 - Salary.
 - Part-time.
 - Seasonal.
 - Migrant.
- **Recordable injuries and illnesses must also be documented for employees who are not on your payroll, such as contractors, if you supervise these employees on a day-to-day basis.**
- **Once you've determined that an injury or illness may be serious, and that the affected worker is covered by the recordkeeping guidelines, you must make sure that the problem is:**
 - Work-related.
 - A new case.
- **Part 1904 states that an injury or illness may be work-related if an event in the workplace caused it or made it worse.**
 - That definition covers a lot of ground.
 - So much so, in fact, that it will take less time to discuss when a condition is not work-related.
- **Obviously, a medical problem is not work-related if it is a result of events that take place outside of work. But a health issue is also not work-related if it:**
 - Occurs in the workplace during off-hours.
 - Is unrelated to the injured employee's job.

- **For example, a woodworker in a small furniture-making company is building a chair for use in his own home.**
 - One evening, outside of normal business hours, he is working on this personal project when he accidentally hurts his hand while using the lathe.
 - Because this injury didn't occur during the employee's normal work day, under Part 1904 this is not a work-related injury.

- **Here's another scenario. An accountant attempts to repair the broken air-conditioning vent in her office.**
 - In the process, she seriously cuts herself.
 - Because the accountant is not an air-conditioning technician, this isn't a work-related injury under Part 1904... even though the injury happened in her office, during normal business hours.

- **If an injury or illness is due to voluntary participation in a recreational activity, such as playing softball, it is also not considered to be work-related.**

- **Medical conditions that result from eating or drinking in the workplace are not work-related.**

- Also not considered to be work-related and therefore not covered are:
 - Health problems due to personal grooming.
 - Self-medication for a non-work-related condition.
 - Intentionally self-inflicted injuries.
 - Injuries caused by motor vehicle accidents on company parking lots while an employee is commuting to or from work.

- **Common cold or flu infections aren't work-related.**
 - Contagious diseases such as tuberculosis, or Hepatitis A can be considered work-related, however, if the employee is infected while performing his or her job.

- **As you can see, determining whether or not a condition is work-related can be complicated.**
 - Nor is it always easy to figure out if a health problem meets the other major recording requirement... being "new."

- **An injury or illness is considered "new" if the employee:**
 - Hasn't had an injury or illness like it before.
 - Had a health problem like it before, and recovered from it, only to have something in the workplace cause it to reappear.

- **With all of these criteria to take into account, determining that a medical problem is both work-related and new can take a bit of detective work. For each case, you'll need to talk to:**
 - The sick or injured employee, to get the basic facts.
 - Your company's designated physician, for an expert medical opinion.
 - Coworkers, some of whom may have observed something that others missed.

- **No matter what, never speculate when you are investigating an illness or injury.**
 - If you don't have all of the facts, get them.

- **Once you've established that an injury or illness is both work-related and new, it's time to proceed to the next step:**
 - Filling out Form 300, the "Log of Work-Related Injuries and Illnesses."

- **When filling out Form 300, stick with solid information:**
 - Who was injured, or became sick?
 - When did it happen?
 - What was the person doing at the time?
 - Was the activity a part of the victim's job?
 - Was anyone else present at the time of the incident?
 - Were any other workers harmed?
 - What medical treatment did the victim receive?

- **Be sure to indicate the probable number of days that any injured or sick employee will be on medical leave, or restricted from performing normal work.**

- **After filling out Form 300, use Form 301, the "Injury and Illness Report", to record supplementary information about the incident.**

- **Remember, while an OSHA 300 form can contain information about multiple incidents, each OSHA 301 form deals with a single incident only.**
 - One 301 form must be filled out for each listing on the 300 form.
 - This allows you to provide more detail about the injury or illness, such as whether ongoing medical treatment is required or if things that have been done to prevent similar incidents in the future.
 - 301 forms must be filled out within seven days after management has been informed that an incident has occurred.

- **Toward the end of the calendar year, the third OSHA form, 300A, comes into play.**
 - This "Summary of Work-Related Injuries and Illnesses" allows you to create an overview of injuries and illnesses that occurred in your facility during the year.

- **As a manager or supervisor, you would also use 300A to record information on patterns of medical conditions in your department.**
 - Uncovering these conditions doesn't require you to be a detective.
 - In fact, Form 300A is designed to make this an easy task .

- **Here's how it works. 300A divides all recordable medical problems into five categories:**
 - Injuries.
 - Skin disorders.
 - Respiratory conditions.
 - Poisonings.
 - A miscellaneous category, "all other illnesses."

- **You simply assign each recordable incident to the category that describes it best.**
 - Once you've done that, add up the totals in each category and enter them on the 300A.

- **After Form 300A is complete, it must be certified as accurate by high-ranking executives within your organization, like the:**
 - Owner
 - President
 - Other officers.

- **To insure that this information is visible to employees the summary must:**
 - Be posted in a conspicuous place, where notices to employees are normally displayed.
 - Be displayed from February 1 to April 30 of the following year.
 - Be visible at all times.
 - Never be altered, defaced or even covered by other material.

- **Employees must also have limited access to company injury and illness records, in case they want even more detailed information.**

- **But you need to remember that reading reports isn't the only, or the most important, way that other employees are involved in the recordkeeping process.**
 - They have an active role to play, as well.
 - They are really your "eyes and ears" as far as injury and illness situations are concerned.
 - They need to know how to report these incidents to management.

- **To encourage employees' participation in the process, Part 1904 prohibits companies from discriminating against anyone who reports a work-related fatality, injury or illness.**

- **The standard also protects workers who:**
 - File safety and health complaints.
 - Ask for access to Part 1904 records.
 - Exercise any rights afforded by OSHA.

- **That's the core of OSHA's updated recordkeeping process.**
 - But there are some other important things to remember about recordkeeping as well.

- **If your company must comply with another government agency's injury and illness recordkeeping requirements, OSHA will accept those records in place of its "300 series" reports as long as:**
 - OSHA officially recognizes the other agency's records.
 - The records contain all of the information that OSHA requires.

- **OSHA is also flexible regarding the "300" forms themselves. If official 300, 300A and 301 forms are not available, equivalent forms may be used as long as they:**
 - Contain the same information as an official form.
 - Are as readable and understandable as an official OSHA form.
 - Are completed by following the same instructions that are used with the official forms.

- **Record retention is also important to OSHA.**
 - Once 300, 300A, and 301 forms are completed, they must be retained for five years following the end of the calendar year that they cover.

- **During this storage period, OSHA 300 forms must be updated to include any new information about the ailments they record, such as recurring illnesses or other medical conditions.**
 - If the description or outcome of a case changes, the original entry must be removed and the new information entered.
 - Keep in mind, however, that these rules apply to OSHA 300 forms only.
 - OSHA 300A and 301 forms do not have to be updated.

- **OSHA also wants to make sure that it has access to all of the information your company has recorded.**
 - When an authorized government representative asks for the records kept under Part 1904, your company must provide copies within four business hours.
 - If OSHA sends you their annual "audit and verification program" survey form, you must fill it out and return it in a timely fashion.

- **Your response to the audit and verification survey must include:**
 - The number of people employed at your facility in the specified year.
 - The number of hours worked by these employees.
 - Any information OSHA requests from the records kept under Part 1904.

- **Finally, some states operate their own OSHA programs (under the authority of a "state plan" approved by OSHA).**
 - Records kept for these state programs are acceptable to OSHA as long as the state's occupational injury and illness reporting requirements are identical to the requirements of Part 1904.

*** * * SUMMARY * * ***

- **OSHA's revised recordkeeping forms are simple to fill out and easy to update.**
- **The revised forms make the recordkeeping process easier and more straightforward than ever before.**
- **The forms also ensure that the information that should be recorded is recorded... and that it can be used where it will do the most good.**
- **Above all else, by using these new forms you'll not only help your facility to identify and eliminate workplace hazards, you'll also be helping to keep millions of American workers whole, healthy... and safe on the job!**