

MAJOR PROGRAM POINTS

"AN EMPLOYEE'S VIEW OF OSHA RECORDKEEPING"

**Training for the
OSHA RECORDKEEPING STANDARD**

OUTLINE OF MAJOR PROGRAM POINTS

The following outline summarizes the major points of information presented in the videotape 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.

- **You and your employer have a powerful tool for making your facility a safer place to work.**
 - It's OSHA's revamped recordkeeping system, often referred to as "Part 1904," after its Federal Regulation Part Number.

- **In addition to establishing a standard method for recording work-related injuries and illnesses, Part 1904 allows your employer to easily create statistics on any incidents that occur at your facility.**
 - These stats help your employer to identify problem areas within your facility.
 - They also help them to correct any hazardous conditions that exist.

- **Part 1904 also gets you more involved in the recordkeeping process.**
 - First, by requiring that your facility's "Annual Summary of Workplace Injuries and Illnesses" must be posted for a longer period of time, so you have a better chance to examine it.

- **At the same time, Part 1904 protects the privacy of injured and ill workers by requiring that highly personal information be kept confidential, such as:**
 - The identities of involved individuals.
 - Sensitive conditions, such as bloodborne diseases.

- **There's a "bigger picture" here, too! On a national level, OSHA relies on the incident data that managers collect.**
 - Without this data, OSHA cannot create more regulations, or modify existing ones.
 - Without appropriate regulations, workers just like you might not be protected from serious injuries... or even death.

- **But for this recordkeeping system to be successful, you have to be involved.**
 - You and your representatives play a crucial role in complying with Part 1904, because you are the "eyes and ears" of the recordkeeping system.
 - That is why you need to know how to report injuries or illnesses to management, as well as what information to give them.

- **To encourage your participation, OSHA prohibits employers from discriminating against anyone who:**
 - Reports a work-related fatality, injury or illness.
 - Files safety and health complaints.
 - Asks for appropriate access to health records.
 - Exercises any other rights afforded by Part 1904.

- **How do you know if you're affected by these regs? Employees protected by the OSHA recordkeeping rule include everyone on your company's payroll, whether they are classified as:**
 - Labor.
 - Executive.
 - Hourly.
 - Salary.
 - Part-time.
 - Seasonal.
 - Contract.
 - Freelance.
 - Migrant.

- **Certain types of businesses are exempt, but if you are watching this program, it's a good bet that your business is covered.**

- **As we've said, you play an indispensable role in OSHA's recordkeeping system, and there are some important things that you need to remember as you do your part.**
 - For example, recording or reporting a work-related injury, illness or fatality does not mean that an OSHA rule has been violated, or that a particular person was at fault.
 - Neither does this recordkeeping activity determine who is or isn't eligible for workers' compensation or other benefits.

- **The sole intent of the OSHA recordkeeping rule is to make your workplace safer by providing a way to efficiently report and record work-related injuries or illnesses.**

- **But what does the term "work-related" really mean?**
 - Simply put, an injury or illness may be work-related if an event in the workplace caused it or made it worse.
 - This definition covers so much ground that it will take less time to discuss when a condition is not work-related.

- **Medical problems are not work-related if they occur in the workplace during off-hours or take place when employees are doing tasks unrelated to their jobs.**
 - For example, let's say that 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:**
 - One workday afternoon, an accountant attempts to repair the broken air-conditioning vent in her office, and 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.
- **Also, conditions that result from voluntary participation in medical, fitness or recreational activities are not work-related, such as:**
 - Giving blood.
 - Getting a flu shot.
 - Playing on the company softball team .
- **It is not considered work-related if a medical condition develops as a result of your eating, drinking or preparing food or drink for personal consumption.**
- **An illness would be work-related if, however, you or a coworker get sick from eating food that is:**
 - Contaminated by materials in your workplace, such as lead.
 - Supplied by your employer.
- **Neither the common cold nor flu is classified as work-related.**
 - But contagious diseases such as tuberculosis and hepatitis are classified as work-related... if you were infected at work.
- **These are just a few of the major categories of non-work-related medical conditions... there are many more.**
 - As you can imagine, with all this to consider your managers may have a difficult time determining if an incident actually is work-related.

- **Complicating the issue is whether or not the medical problem is "recordable." Not all work-related injuries or illnesses are.**
 - "Recordable" means that your employer is required by law to report the injury or illness to OSHA, and must keep a record of the injury or illness on official OSHA recordkeeping forms.
 - This is one of the places that you can help, by gathering as much information as possible about an incident that you see or are involved in.

- **An injury or illness is recordable if it results in:**
 - Days away from work.
 - Restricted work.
 - Transfer to another job.
 - Medical treatment beyond first aid.
 - Loss of consciousness.
 - Any significant injury or illness that is diagnosed by a physician or other licensed healthcare professional.
 - Death.

- **Now that you understand when an injury is both work-related and recordable, let's look at some of the most common types of work-related, recordable injuries.**

- **Musculoskeletal Disorders (MSDs) are among the most common work-related, recordable illnesses.**
 - MSDs tend to affect workers who are doing repetitive labor, such as some assembly-line jobs or frequent heavy lifting.

- **MSDs are ailments of the:**
 - Muscles.
 - Nerves.
 - Tendons.
 - Ligaments.
 - Joints.
 - Cartilage.
 - Spinal discs.

- **Examples of MSDs include:**
 - Carpal tunnel syndrome.
 - Tendinitis.
 - Low back pain (which is prevalent among workers doing heavy labor).

- **All MSD reports must indicate the number of days that workers will be:**
 - Away from work.
 - Restricted from performing their normal jobs.

- **Another broad category of industrial injuries that are potentially recordable include:**
 - Lacerations.
 - Puncture wounds.
 - Fractures.
 - Burns.

- **What determines whether these types of injuries are recordable is their severity.**
 - For example, a mild scald from a hot water pipe would not be recordable.
 - But a third-degree burn from a high-pressure steam pipe would be.
 - Likewise, a tiny puncture wound from an office stapler would not be recordable.
 - But a deeply-penetrating puncture wound from a drill press would be.

- **When it comes to severity, the deciding factor is usually the degree of treatment that is necessary.**
 - So an injury that needs nothing more than an adhesive bandage or some first aid cream would probably not be recordable.

- **But a wound would be recordable if it required:**
 - Treatment from a physician.
 - Hospitalization.
 - Time off from work.

- **Any accident in which an employee is exposed to someone else's blood falls into the category of work-related injuries or illnesses as well. These types of incidents can lead to the transmission of deadly diseases, such as:**
 - The human immunodeficiency virus (HIV - the microorganism that causes AIDS).
 - Hepatitis C (an incurable liver disease).
- **Work-related tuberculosis (TB) cases are also common. A highly contagious respiratory disease, TB often strikes:**
 - Healthcare workers.
 - Firefighters.
 - Other "First Responders."
- **TB can also occur in industrial settings, especially where large groups of employees work in close proximity to one another.**
- **Now that you're familiar with some of the most common recordable illnesses and injuries, let's look at how these cases are recorded.**
 - Even though you probably won't be the person responsible for documenting medical incidents, it's still absolutely necessary for you to know how it's done.
 - You can't be the "eyes and ears" of the record-keeping process without being able to tell the difference between facts that must be recorded and useless information.
 - The best way to "get educated" is to look at the recordkeeping forms themselves.
- **OSHA 300, the "Log of Work-Related Injuries and Illnesses", contains one or two line descriptions of each recordable injury or illness in your facility.**

- **OSHA 301, the "Injury and Illness Incident Report", contains all of the details that are pertinent to a specific incident.**
 - OSHA feels that it is so important to fill out the 301 form while the information is fresh in everyone's mind that it must be completed within seven calendar days after management has been notified that a recordable injury or illness has occurred.
- **At the end of each year, your employer will use information on the 300 and 301 forms to fill out the third OSHA recordkeeping form, 300A.**
- **Form 300A is OSHA's official "summary" form, and shows the total number of incidents in specific illness and injury categories.**
 - The 300A is then posted from February 1 to April 30 of the following year.
 - It must be posted in a conspicuous place, where notices to employees are customarily displayed, so you and your coworkers can easily see it.
 - By law, it must never be altered, defaced or covered by other material.
- **OSHA requires that all injury and illness records be kept for at least five years, so they can be updated and referenced whenever necessary.**
- **You've learned the essentials of what work-related injuries and illnesses are, and why reporting them to your management is a crucial part of keeping your facility safe.**
 - What we haven't looked at yet is how to report these medical problems.

- **While OSHA hasn't established an official method for the reporting of workplace ailments by employees, there are some common sense guidelines to follow.**
 - First, be prompt. If you are hurt on the job, let your manager know about it as soon as you can (but make sure to get medical treatment first).
 - The faster your boss knows about a problem, the quicker action can be taken to fix it.
- **Don't give your manager too much information.**
 - Just include the basic facts at first.
 - If more information is needed, someone will ask for it.
- **Be patient.**
 - It might take a long time, and a lot of questions, to determine exactly what happened.
 - You may be even be asked to write down a description of the incident.
- **Keep in mind that the aim of reporting workplace incidents is to keep you and your coworkers safe.**
 - By cooperating to the fullest, you are playing an important role in this process.

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- **OSHA's recordkeeping rule makes it easier for your employer to keep you and your coworkers safe, and easier for OSHA to protect the rest of the country's workers.**
- **But it won't happen without your serious, ongoing participation!**
- **So, no matter where you work, or what job you do, get involved in the recordkeeping process.**
- **Do your part to ensure that millions of American workers end each day in the same condition as when they started it!**