Recordkeeping Requirements – Quick Tips



Understand how OSHA’s extensive recordkeeping and reporting rules affect your business.

The Occupational Safety and Health Administration’s (OSHA’s) recordkeeping requirements in place since 1971 (29 Code of Federal Regulations CFR Part 1904) are designed to help employers recognize workplace hazards and correct hazardous conditions by keeping track of work-related injuries and illnesses and their causes. These requirements were updated in 2002, 2015, 2016 and 2019.

2002 Changes

The 2002 revision was written in plain language using a question and answer format. OSHA changed the injury and illness reporting forms, eliminating the 200 form and replacing it with the new 300 series of forms: OSHA Form 300 (Log of Work-Related Injuries and Illnesses), Form 300A (Summary of Work-Related Injuries and Illnesses) and Form 301 (Injury and Illness Incident Report) were introduced. The list of exempted industries was updated to reflect then recent industry data. The revised rule included provisions for recording needlestick and sharps injuries, musculoskeletal disorders (MSDs), standard threshold shift (STS) hearing loss cases and tuberculosis transmission cases. It also clarified the definition of restricted work or light duty making it easier to record those cases; promoted employee awareness and involvement in the process; and addressed employee privacy concerns. Medical treatment and first aid definitions were also modified to simplify recording decisions.

2015 Changes

In 2015, OSHA updated the recordkeeping rule to include two key changes. The first change updated the list of industries exempt from the requirement to routinely keep OSHA injury and illness records due to relatively low occupational injury and illness rates.

The second change expanded the list of severe work-related injuries and illnesses that all covered employers must report to OSHA. This revision retained the requirement to report all fatalities within 8-hours and added a requirement to report all inpatient hospitalizations, amputations and loss of an eye within 24-hours to OSHA.

Reporting Flowchart



HOW DO I REPORT?

1. Call 1-800-321-OSHA (6742) or
2. Call your nearest area office during normal business hours or
3. Report online at: www.osha.gov/report_online

To Make a Report

- Call the nearest OSHA office.
- Call the OSHA 24-hour hotline at 1-800-321-6742(OSHA).
- Report online(https://www.osha.gov/pls/ser/serform.html)

Source: OSHA

2016 Changes

On May 12, 2016, OSHA published the injury and illness reporting rule, known as "Improved Tracking of Workplace Injuries and Illnesses" and it became effective January 1, 2017. This rule does not change the core requirements of the existing recordkeeping rule but required identified establishments to submit their OSHA 300, 300A, or 301 forms to OSHA on an annual basis. The forms required are dependent on the size (number of employees) of each establishment covered:

- Establishments with 250 or more employees in industries covered by the recordkeeping regulation must submit the 300, 300A and all 301 forms by March 2 of the year following data has been recorded.
- Establishments with 20-240 employees in certain high-risk industries must submit the 300A form by March 2 of the year following data has been recorded. Establishments of less than 20 employees do not need to report.

2019 Changes

On January 25, 2019 OSHA published a final rule that eliminates the requirement for establishments with 250 or more employees to electronically submit information from OSHA Form 300 and OSHA Form 301 to OSHA each year. It became effective on February 25, 2019. These establishments are still required to electronically submit information from OSHA Form 300A.

OSHA felt this change was necessary to eliminate the possibility of sensitive information found on Forms 300 and 301 such as descriptions of workers' injuries and body parts affected being disclosed to the public. OSHA felt it will better protect personally identifiable information or data that could be re-identified with a particular worker. OSHA also felt this change will allow it to focus on information gathered from their severe injury reporting initiative along with data collected from Form 300A. This rule also eliminated the requirement to electronically submit an

Employer Identification Number (EIN) with the 300A form.

Scope of Recordkeeping Standard

Employers are classified by OSHA's injury and illness recordkeeping requirements into one of three groups: employers regularly exempt from OSHA recordkeeping; employers exempted from preparing and maintaining injury and illness records; and employers that are not classified under the prior two groups.

Employers regularly exempt from OSHA recordkeeping includes small businesses with fewer than 11 full- or part-time employees during the previous calendar year and employers classified in low-hazard industries. However, these employers are required to report all inpatient hospitalizations and fatalities as required by 29 CFR 1904.39. In addition, if the employer is notified in writing by OSHA to participate in a statistical survey, the employer must maintain injury and illness records in accordance with 29 CFR 1904.41. Employers who receive a Survey of Occupational Injuries and Illnesses Form from the Bureau of Labor Statistics (BLS) must promptly complete the form and return it (29 CFR 1910.42).

Employers exempted from preparing and maintaining injury and illness records include industries listed in Appendix A of Subpart B of the revised recordkeeping standard.

OSHA Form 300

The OSHA Form 300 log is used by each employer's establishment to record and maintain information about employee injuries and illnesses. An establishment, as defined by OSHA, is a single physical location where business is conducted, or where services or industrial operations are performed; the place where employees report for work, operate from or from which they are paid.

The form itself is divided into three general sections: Identity (e.g. name, case number, job title), Descriptive (e.g. date, injury location, description of incident) and Classification (e.g. type of injury, days away from work, days on restriction).

Every injury or illness that meets the recording criteria must be entered as a new case on the OSHA 300 form and maintained as the case conditions change such as the number of days accumulated as transfer, restricted or away from work. If the status of the case changes, then the entry must be changed. For example, if the injured employee is experiencing days away from work, then dies, the employer must remove (or line out) the days away entry and the day count and check the box for a fatality.

OSHA Form 301

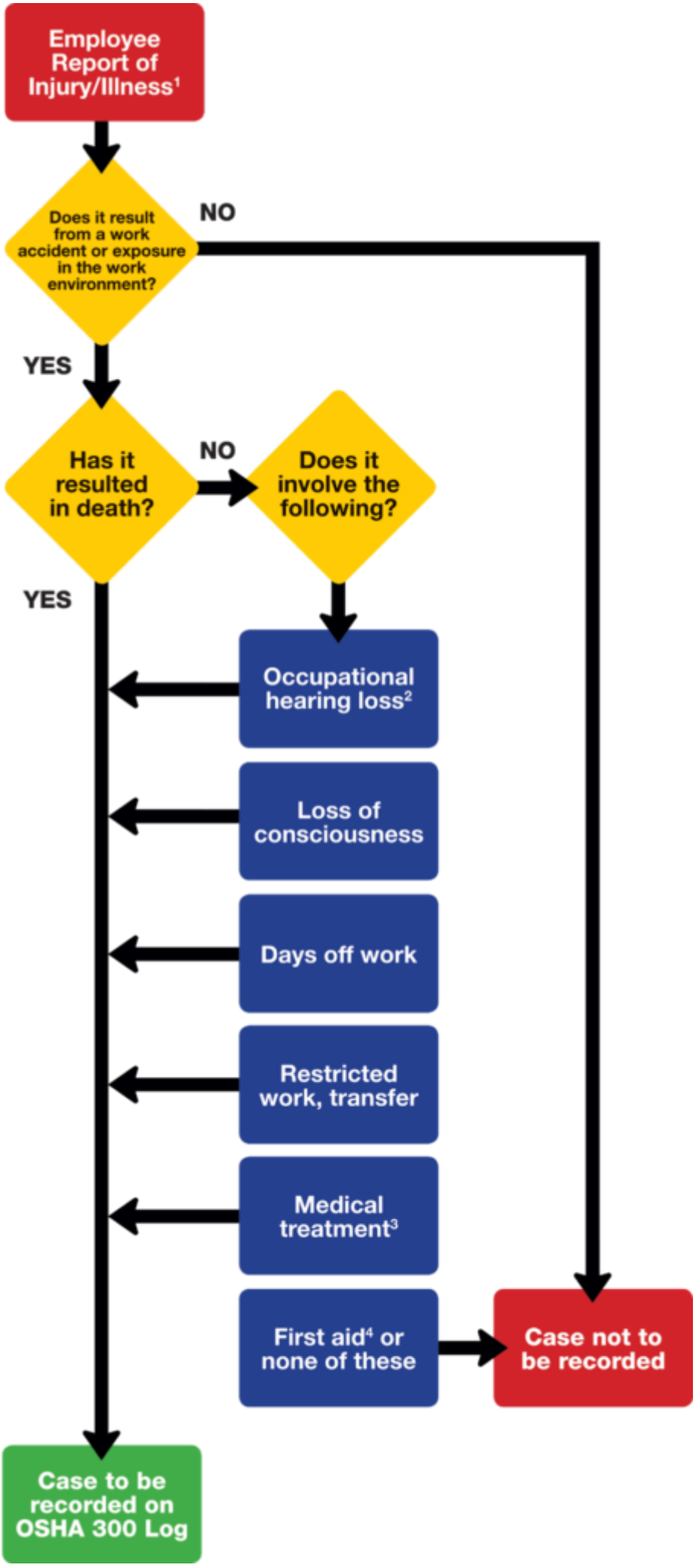
If an injury or illness is recordable, a supplementary form (e.g. OSHA Form 301) must be completed. This form provides more information about the case. Such information as the events leading up to the injury or illness, body parts affected, object(s) or substance(s) involved, etc., must be included on this form.

Within seven calendar days after receiving information that a recordable work-related injury or illness has occurred, a 301 incident report or equivalent must be completed. Equivalent forms may be used if it contains the same information as OSHA Form 301. Examples of equivalent forms may come from: state workers' compensation reports, insurance claim reports or the employer's incident report form.

Process to Determine if a Case is Recordable

Employers are responsible for reporting all recordable injuries and illnesses. To help determine if an injury or illness is recordable, refer to the flow chart below.

If you are unable to determine if an injury or illness is recordable, call the OSHA area office nearest you.


Employee Report of Injury/Illness[1]
Does it result from a work accident or exposure in the work environment?
NO
YES
Has it resulted in death?
NO
Does it involve the following?
YES
Occupational hearing loss[2]
Loss of consciousness
Days off work
Restricted work, transfer
Medical treatment[3]
First aid[4] or none of these
Case not to be recorded
Case to be recorded on OSHA 300 Log

Source: OSHA

Definitions

- Employee Report of Injury/Illness: Injury or illness reported assumes the individual reporting the injury or illness is an employee of host employer. If the employee is a temporary employee from a temporary staffing agency, incidents are to be recorded in the OSHA Form 300 log; however, the temporary staffing agency would be responsible for reporting workers' compensation claims to the carrier.
- Occupational Hearing Loss:
    - A change in hearing threshold relative to the baseline audiogram as an average of 10 decibels (dB) or more in either ear at 2000, 3000 and 4000 hertz.
    - An employee's total hearing level of 25dB or more above audiometric zero in both ears at the same hertz levels.
- Medical Treatment: The management and care of a patient to combat disease or disorder. It does not include:
    - Visits to practitioners for observation and/or evaluation only
    - Diagnostic procedures
    - First aid
- First Aid: Treatments that are considered first aid include:
    - The use of nonprescription medication at nonprescription strength
    - Tetanus immunizations
    - Cleaning, flushing or soaking surface wounds
    - Use of wound coverings, butterfly bandages, Steri-Strips tape
    - Hot or cold therapy
    - Use of non-rigid means of support
    - Temporary immobilization devices used to transport victims
    - Drilling of fingernails, toenails or draining fluid from a blister
    - Eye patches
    - Removal of foreign bodies from eye using irrigation or cotton swab
    - Removal of splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
    - Finger guards
    - Massage therapy
    - Drinking fluids for relief of heat stress

OSHA Form 300A

The employer is responsible for preparing an annual summary of injuries and illnesses that occurred during the calendar year. The annual summary, OSHA Form 300A, displays the totals from columns G through M of the OSHA Form 300 log. The summary also displays the calendar year covered, company name and address, annual average number of employees and total hours worked by all employees covered by the OSHA Form 300 log. OSHA Form 300A is a separate form and does not display any of the personal information, shown on the OSHA Form 300 log. OSHA Form 300A also makes it easier to calculate incident rates. The annual summary must be:

- Posted by February 1 and remain posted until April 30th
- Posted in areas where other notices are normally placed
- Certified (signed) by a company executive, stating that the information is correct and complete to the best of the employers ability
- Retained for five years following the calendar year to which they relate

If no cases are recorded during a reporting period, a summary must still be posted. Zeros are entered into all spaces provided on form 300A.

Sources for More Information

OSHA FactSheet: Updates to Recordkeeping Rule: An Overview
OSHA FactSheet: Final Rule to Improve Tracking of Workplace Injuries and Illness, May 2016
U.S. Department of Labor
OSHA – Injury Tracking Application (ITA) Landing Page
OSHA – Report a Fatality or Severe Injury
OSHA Injury and Illness Recordkeeping and Reporting Requirements

Frequently Asked Questions

Q: Where can I get a copy of OSHA Form 300, 301 and 300A?

A: Contact the area OSHA office nearest you, or download the information off of the OSHA website.

Q: What is restricted work activity?

A: When the employee is kept from performing one or more routine (regularly performed at least once per week) functions of his or her job, or when the employee is kept from working a full workday. Production of fewer goods or services is not considered restricted work activity.

Q: Our company is closed on Saturday and Sunday. Do these still need to be counted as days away?

A: Yes, all calendar days the employee was unable to work including weekend days, holidays, vacation days, etc., must be counted. Cap day count at 180 days. The day the illness or injury occurred is not counted as a day away.

Q: If an employee is injured and misses the remainder of the work shift, is this a day away?

A: No, injuries and illnesses are not considered lost-time cases until they affect the employee beyond the day of injury or onset of illness.

Q: How are days away calculated if an employee works a normal shift that is longer than 8 hours?

A: A single workday for record keeping purposes is 12 hours.

Q: Does the tracking of workplace injuries and illnesses rule require employers to start keeping new records or change how they keep the records?

A: No. The new requirement does not add to or change an employer’s obligation to complete, retain, and certify injury and illness records. It only requires certain employers to electronically submit some of the information from these records to OSHA.

Q: Are the electronic reporting requirements based on the size of the establishment or the firm?

A: The electronic reporting requirements are based on the size of the establishment. The OSHA injury and illness records are maintained at the establishment level. An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed. A firm may be comprised of one or more establishments. To determine if you need to provide OSHA with the required

data for an establishment, you need to determine the establishment’s peak employment during the last calendar year. Each individual employed in the establishment at any time during the calendar year counts as one employee, including full-time, part-time, seasonal, and temporary workers.

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