OSHA: Work-Related Injury and Illness Recordkeeping

Key Takeaways:

– Understanding the purpose of OSHA requirements for work-related injury and illness recordkeeping and fatality reporting by employers.
– Learning which types of organizations must comply with work-related injury and illness recordkeeping and fatality reporting regulations.
– Comprehending the criteria for work-related injury and illness.
– Appreciating the purpose and guidelines for the basic work-related injury and illness record types required under 29CFR Part 1904.
– Identifying OSHA safeguards for privacy in employer recording of work-related illness and injury.
-Observing reporting requirements for work-related fatalities, severe injuries (amputations, losses of an eye), and hospitalizations.
– Acknowledging employee involvement and rights related to work-related injury and illness reporting and recordkeeping.
– Recognizing employer responsibilities for providing work-related injury, illness and fatality records for OSHA inspection and investigation.

Course Description

OSHA standards require approximately 1.5 million employers within the United States to record their employees' work-related injuries and illnesses. Any safety professionals can tell you the importance of OSHA injury and illness recordkeeping requirements.

Now, the OSHA website supplies an employer workplace violation history. An important part of accountability, injury and illness recordkeeping should be incorporated into every safety plan; with present software, reporting and recordkeeping easier than ever. There's no excuse for not doing it, especially when the regulations in the OSHA Recordkeeping Handbook clearly establish the requirements and criteria for recording and reporting occupational injuries and illnesses.

For all employers under the Occupational Safety and Health Act of 1970, Part 1904 demands they keep records of work-related injuries and illnesses and report

fatalities and multiple hospitalizations. In addition, it requires participation in annual surveys. The resulting survey information of workplace injuries assists OSHA's establishment of training initiatives and new safety regulations.

Every employer covered by the Act is regulated by Part 1904 regulations. Although, companies with no more than 10 employees and companies with certain industry classifications are partially exempt from keeping OSHA injury and illness records, unless OSHA or the Bureau of Labor Statistics communicates in writing that they must do so.

Every employer covered by OSHA, regardless the number of employees or industry classification, needs to report any workplace incident which results in a fatality or the hospitalization of three or more employees.

Recording criteria in general refer to injuries or illnesses in the workplace causing in:
– Death
– Days off work
– Reduced work or transfer to another job
– Medical treatment beyond first aid
– Issuance of prescription medication
– Loss of consciousness
– A notable injury or illness diagnosed by a physician or other licensed health care professional, even if it does not result in any of the other listed criteria

Employers under Part 1904 need to utilize three specific OSHA forms for recordable workplace injuries and illnesses: OSHA Form 301 (Injury and Incident Report), OSHA Form 300 (Log of Work-Related Injuries and Illnesses), and OSHA Form 300-A (Summary of Work-Related Injuries and Illnesses).

Below are the usual order of events and the forms needed to report an occupational injury or illness:
1. If an injury happens, many employers will ask their employees to fill a "first report of injury" form.
2. Following that, the employee fills out OSHA Form 301 (Injury and Incident Report) or a safety director may complete the form for the employee by transferring the information from the "first report of injury" form.
3. Proceeding that the injury claim, medical treatment and/or rehabilitation can be provided. Afterward, the OSHA Form 300 (Log of Work-Related Injuries and Illnesses) is updated to record restricted or lost work days, in addition to document the injury cause.
4. Lastly, at the end of the calendar year, OSHA Form 300-A (Summary of Work-Related Injuries and Illnesses) must be completed and posted.

A company is allowed to keep the records for all establishments at headquarters, or another central location, permitting that information about injuries and illnesses can be passed from the establishment to headquarters within seven days of learning of the recordable incident. Any analog records should be kept in a fire-safe filing cabinet, and it is a good idea to convert them to digital records for ease of access and data management.

Similarly, headquarters need to be able to produce and send records to the establishment within the timeframes specified for access by government and employee representatives, in addition to employees and former employees.

Businesses need to save all forms and the privacy case list (if it exists) for five years following the end of the calendar year they cover. In the case that the business changes ownership, the previous owner needs to transfer all Part 1904 records to the new owner.

In the case that your company undergoes an OSHA inspection or investigation, your employer needs to provide copies of all Part 1904 records within four business hours, if requested.

Q. What must employers know about OSHA's updated reporting and recordkeeping rule?
A. Federal OSHA's revised reporting and record keeping (R&R) requirements went into effect January 1, 2015. To find the rule and its new requirements, look at the federal standard, 29 CFR 1904.39. Requirement changes will permit OSHA to track and more appropriately respond to serious and fatal incidents, such as hospitalizations, amputations, or the loss of an eye. As well, the data collection will help OSHA develop prevention programs and modify rules wherever necessary. All industries except where exempt are under this revised rule. State-plan-state OSHA programs are allotted the time needed to review the new rule which may delay implementation in those states.

Reporting
Now, this revised rule requires all employers to report, regardless of size or industry type, for the following circumstances:
– Every work-related fatality within 8 hours.
– Every work-related inpatient hospitalization, all amputations and all losses of an eye within 24 hours.

OSHA is reachable by:
– Calling OSHA's free and confidential number at 1-800-321-OSHA (6742)
– Calling your closest OSHA Area Office within normal business hours
– Using the new online form soon to be available

It should be noted that only fatalities occurring within 30 days of the work-related incident need to be reported to OSHA. As well, for an inpatient hospitalization, amputation, or loss of an eye, such incidents need to be reported to OSHA only if they occur within 24 hours of the work-related incident.

Record Keeping
Employers with no more than 10 employees and certain establishment types, based on their North American Standard Industrial Classification (NAICS) code, are exempt from record keeping requirements. For your use, OSHA has prepared a printable fact sheet which includes lists of industry types that were previously exempt and new industries that have been granted exemption.