

January 2019

## Risk Management Bulletin

### OSHA Reporting

Happy 2019! Time is quickly dwindling to get your numbers together and injury statistics calculated for 2018 and posted for your staff to see. If you employed more than 10 workers during the past year and are not included on the “exempted industries list” (sorry no contractors are on the exempt list) you must post the OSHA 300A injury and illness summary by the February 1<sup>st</sup>.

There have been a few recordkeeping changes over the past couple of years related to online reporting of injury data. In addition to the hard copy posting, you must register and utilize the Injury Tracking Application (ITA) to post your summary data by March 2<sup>nd</sup> (<https://www.osha.gov/injuryreporting/index.html>)

Good news... OSHA published a Final Rule removing the requirement for larger employers (over 250 per establishment) to electronically submit their 300 log and 301 accident reports. The requirement to keep and maintain OSHA Forms 300, 300A, and 301 for five years is not changed by this Final Rule.

The severe injury reporting requirements remain. Employers must report any worker fatality within 8 hours and any amputation, loss of an eye, or hospitalization of a worker within 24 hours directly to OSHA.

There always seem to be a few questions about the recordkeeping process. Below is a brief Q&A outlining some of the common questions:

***Is each site where employees are assigned considered an "establishment" as defined in the standard?***

Answer: Employers must keep a separate OSHA 300 log for each establishment that is expected to be in operation for one year or longer. This includes a location even with a single employee.

***Where should employers maintain records for jobs that are less than 1 year?***

Answer: Employers are required to keep injury and illness records, but are not required to keep separate OSHA 300 logs for each of these sites. Employers can keep injury and illness records for all these type establishments at their headquarters. The offsite locations must have the ability to produce copies of the injury and illness forms when requested by a government representative, an employee, or former employee.

***What should be recorded?***

Including all your incidents on the log will result in worse statistics than other employers and not including the appropriate information may result in a fine.



Record those work-related injuries and illnesses that result in:

- death,
- loss of consciousness,
- days away from work,
- restricted work activity or job transfer, or
- medical treatment beyond first aid.

The injuries or illnesses “beyond first aid” are those diagnosed by a physician or other licensed health care professional if contributed by the work environment. Examples include:

- respiratory illnesses (silicosis, asbestosis, tuberculosis etc.)
- cancer due to a work related exposure
- fractured or cracked bone
- a Standard Threshold Shift in hearing
- a strain due to repetitive motion or over exertion

***"Was the injury beyond First Aid?"*** The following are examples of claims that are typically first aid and should not be recorded on the OSHA 300:

- using nonprescription medications at nonprescription strength; (*i.e. over the counter*)
- cleaning, flushing, or soaking a surface wound;
- using wound coverings, including butterfly bandages; (*but no stitches*)
- administering a tetanus immunizations; (*even if after a work related cut or scrape*)
- using hot or cold therapy or messages;
- using any totally non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts; (*but only non-rigid*)
- using temporary immobilization devices while transporting an accident victim (splints, slings, neck collars, or back boards); (*but only during transportation*)
- drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters;
- using simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye or using eye patches;
- using irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas other than the using finger guards;
- drinking fluids to relieve heat stress. (*but not an IV*)

Below are links to resources to assist in the completion of required recordkeeping:

Recordkeeping Handbook: <http://www.osha.gov/recordkeeping/new-osh300form1-1-04.pdf>

Forms 300,300A & 301: <http://www.osha.gov/recordkeeping/RKforms.html>

On line calculator: <http://data.bls.gov/iirc/>

I have also created a spreadsheet with the ability to track injury trends by month, if you are interested and would like a copy of this Excel file, drop me a note. If you are looking for any other resources to assist with your record keeping process or assistance with other risk management issue, please feel free to call.

Thanks,

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