

OCCUPATIONAL SAFETY & HEALTH

OSHA Injury and Illness Recordkeeping

WHITE PAPER



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BACKGROUND

The Occupational Safety and Health (OSH) Act covers nearly all private sector employers and their workers in all 50 states, the District of Columbia, and other U.S. jurisdictions directly through Federal OSHA or an OSHA-approved state plan. In addition, companies under the OSH Act are covered by Part 1904, Recording and Reporting Occupational Injuries and Illnesses. This whitepaper will help you to understand your requirements under Part 1904 on recording and reporting injuries and illnesses.



PURPOSE

The purpose of Part 1904 Recording and Reporting Occupational Injuries and Illnesses is to require employers to document and report work-related fatalities, injuries, and illnesses. Even though recording and reporting injuries is a crucial OSHA requirement, it also helps companies keep track of the types of injuries and illnesses arising in the workplace.

Identifying how workers are hurt or ill is a critical first step to developing a safer and healthier workplace. In addition, employers can use the data on injury and illness forms to improve the safety program by focusing on those areas where employees are getting hurt.

It's important to note that documenting or reporting a work-related injury, illness, or fatality does not mean that an OSHA regulation has been violated, the employer was at fault, or that the employee is eligible for workers' compensation.



Identifying how workers are hurt or ill is a critical first step to developing a safer and healthier workplace.

SCOPE

Part 1904 regulations cover all employers under the OSH Act. However, some establishments do not have to keep OSHA injury and illness records unless the Bureau of Labor Statistics (BLS) or OSHA informs them in writing to keep records.

Businesses with ten or fewer employees and companies in particular industry categories are partially exempt from keeping OSHA injury and illness records.

For example, suppose a company meets one of the partial exemptions. In that case, they do not have to keep the OSHA injury and illness forms such as OSHA's Form 300 (Log of Work-Related Injuries and Illnesses), OSHA Form 300A (Summary of Work-Related Injuries and Illnesses), or OSHA's Form 301 (Injury and Illness Incident Report).



PARTIAL EXEMPTIONS

There are partial exemptions for maintaining OSHA injury and illness records that may apply to your workplace, including size and low-hazard industries.

COMPANY SIZE

Suppose your business had 10 or less employees at all instances during the last calendar year. In that case, you are not required to keep injury or illness records unless the Bureau of Labor Statistics (BLS) or OSHA informs you in writing that you must maintain records. In addition, the size exemption is based on the number of employees in the entire company, not only at one individual establishment. Therefore, if you have two individual business establishments, and each location has nine employees, then you must keep injury and illness records for each establishment because, as a company, you have 18 employees.

If a company typically has eight employees, but during the peak holiday season, they add five temporary workers, totaling thirteen employees, then the company would be required to keep injury or illness records. They need to keep injury and illness records because they had more than ten employees during the calendar year. Temporary employees you supervised daily, part-time, full-time, and seasonal workers must be included in the count.

Bottom line: If your company had eleven employees or more at any time throughout the calendar year, your company does not qualify for the size exemption. Your company qualifies for the size exemption if it only has ten or fewer employees throughout the calendar year. If your company is covered under the partial size exemption, OSHA Form 300, OSHA Form 300A, and OSHA Form 301 do not need to be maintained.

LOW-HAZARD INDUSTRY

Suppose your company is classified in a specific industry group listed in [Appendix A](#). In that case, you do not need to keep OSHA injury and illness records unless OSHA or the Bureau of Labor Statistics (BLS) informs you in writing that you must keep records. These employers are classified by the North American Industry Classification System (NAICS) codes. If you know your company's NAICS code, you can check the Appendix to see if your company is exempt due to the industry type.

EXEMPTION EXAMPLES

Some examples of industries that are partially exempt from keeping injury and illness records are:

- Florists
- Gas Stations
- Banks
- Full-Service Restaurants
- Clothing Stores
- Dentist Office

You can check out the complete list here in [Appendix A](#).

[Appendix A](#) →

Important note: Even if employers are partially exempt from the recordkeeping requirements because of their size or industry type, they still must comply with reporting fatalities, amputations, the loss of an eye, or the in-patient hospitalizations of one or more employees to OSHA.

See Section below on OSHA Reporting.



RECORDKEEPING FORMS

There are three forms that an employer must complete.

OSHA'S FORM 300

(LOG OF WORK-RELATED INJURIES AND ILLNESSES)

Must be completed and maintained on an ongoing basis. Recordable injuries and illnesses must be entered on these forms as they occur throughout the year.

OSHA'S FORM 301

(INJURY AND ILLNESS INCIDENT REPORT)

Must be completed and maintained on an ongoing basis. Recordable injuries and illnesses must be entered on these forms as they occur throughout the year.

THE OSHA FORM 300A

(SUMMARY OF WORK-RELATED INJURIES AND ILLNESSES)

Is completed after the end of the year that summarizes the number of recordable injuries and illnesses that arose the previous year.

Employers can use equivalent forms instead of the OSHA forms if they contain the same data elements and are as easily read as the OSHA forms. The recordkeeping forms help the employer and OSHA understand the extent and severity of work-related incidents.

Forms must be kept on file for five years and made available to employees, former employees, their representatives, and OSHA officials upon request.



RECORDKEEPING CRITERIA

Any work-related injury or illness that is a new case and meets a severity criterion must be recorded on the OSHA Forms within seven calendar days of learning about the injury or illness.

INJURY OR ILLNESS

OSHA defines an injury or illness as an abnormal condition or disorder. Injuries and illnesses can include sprains, cuts, amputations, fractures, skin diseases, poisoning, or respiratory disorders.

NEW CASE

You must consider an injury or illness a new case if:

- An employee has not previously experienced a recorded injury or illness of the same type that affects the same part of the body, or
- The employee previously experienced a recorded injury or illness that affected the same part of the body but had recovered entirely, and an event or exposure in the work environment caused the signs or symptoms to resurface.

WORK-RELATED

OSHA defines work-related as injuries or illnesses that are caused, contributed to, or significantly aggravated by events or exposure in the workplace. The injury or illness could have occurred where the employee works or in a location as a condition of their employment, such as a break area or parking lot. If work contributes to the injury or illness, it is considered work-related for OSHA recordkeeping purposes.

There are nine activities that occur in the workplace that OSHA does not consider work-related and, therefore, would not need to be recorded on an OSHA form. The nine exemptions and examples of non-work-related situations are listed on the next page.

EXEMPTIONS – NON-WORK-RELATED SITUATIONS

1. At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.

Example: An employee came into the workplace on their day off to pick up a check. While walking into the facility, they slipped on the floor and sprained their wrist from the fall.

2. The injury or illness involves signs or symptoms that occur at work but result from a non-work-related event or exposure outside the work environment.

Example: An office worker is complaining of back pain because, over the weekend, he performed hours of strenuous yard work.

3. The injury or illness results solely from voluntary participation in a wellness program or a medical, fitness, or recreational activity such as blood donation or an exercise class.

Example: Your company hosted a voluntary family fun day for employees and their families. An employee obtained ant bites and had an allergic reaction.

4. The injury or illness results from an employee eating, drinking or preparing food or drink for personal consumption. This could include if the food or drink was bought on the employer's property or brought in.

Example: An employee was making coffee at work when they put their cup under the coffee maker. The boiling water dripped on their hand, causing second-degree burns.

! Important note: If the employee obtains an illness by eating food contaminated by workplace contaminants (chemicals such as lead, mercury, or sodium hydroxide), or gets food poisoning from food supplied by the employer, the case would be considered work-related.

5. The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.

Example: An employee decides to change their oil in the work parking lot after their shift. Oil splashes in the employees' eyes and causes severe eye irritation.

6. The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.

Example: An employee reads a text message on their lunch break that makes them very angry. They punch a locker out of personal frustration and break three fingers.

7. The injury or illness is caused by a motor vehicle accident, and it occurs in a company parking lot or company access road while the employee is commuting to or from work.

Example: An employee leaving work did not stop at a stop sign in the parking lot. They hit another employee in their car. The employee who was hit suffered severe neck pain.

8. The illness is the common cold or flu.

Example: An employee is sick with the flu and is exhibiting symptoms of shortness of breath and difficulty breathing.

! Important note: Contagious diseases such as tuberculosis, brucellosis, or hepatitis A are considered work-related if the employee is infected at work.

9. The illness is a mental illness.

Example: An employee with Post-Traumatic Stress Disorder (PTSD) takes a few days off work.

! Important Note: Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed healthcare professional with appropriate training and experience (psychiatrist, psychologist, or psychiatric nurse practitioner) stating that the employee has a work-related mental illness.

SEVERITY CRITERIA

OSHA has specific severity criteria for recording new cases of work-related injuries and illnesses on the OSHA logs. Work-related injuries and illnesses that result in death, loss of consciousness, days away from work, restricted work activity, job transfer, a significant injury or illness diagnosed by a physician or other licensed health care provider, or medical treatment beyond first aid must be recorded on OSHA forms.

An employee is considered restricted if they are unable to work a complete shift or are unable to perform all the work activities they would be expected to do at least once during the week.

Some examples of a significant injury or illness diagnosed by a physician or other licensed health care provider include cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum. Other significant work-related injuries or illnesses that must be recorded on the OSHA logs include the following:

- Needlestick injuries contaminated with another person's blood or bodily fluid
- An employee who is medically removed under the medical surveillance rules of an OSHA standard, such as the lead or methylene chloride standard
- Occupational hearing loss
- Tuberculous



MEDICAL TREATMENT

Medical treatment is any treatment for an injury or illness except observation or counseling, diagnostic procedures such as x-rays and blood tests, or first aid injuries or illnesses.

OSHA lists fourteen specific treatments as first aid. It is all-inclusive, meaning if an employee received medical treatment for a work-related injury or illness not on the list below, it is recordable because it meets the severity criteria as medical treatment beyond first aid.

If an injury or illness is a new case, work-related, and meets the above severity criteria, it must be recorded on the OSHA logs.

The following are first aid treatments and are not recordable because they do not meet the severity criteria.

FIRST AID TREATMENTS INCLUDE:

01. Using a non-prescription medication at non-prescription strength.
02. Administering tetanus immunizations.
! Important Note: Other immunizations, such as the rabies vaccine, are considered medical treatment.
03. Cleaning, flushing, or soaking wounds on the surface of the skin.
04. Using wound coverings such as bandages, Band-Aids™, gauze pads, butterfly bandages or Steri-Strips™.
! Important Note: Other wound-closing devices such as stitches, sutures, and staples are considered medical treatment
05. Using hot or cold therapy such as a heating pad or ice packs.
06. Using any non-rigid means of support, such as elastic bandages, wraps, or non-rigid back belts.
! Important Note: Support devices with rigid components or other systems designed to immobilize parts of the body, such as a cast, are considered medical treatment.
07. Using temporary immobilization devices while transporting an incident victim, such as a splint, slings, neck collars, or backboards.
08. Drilling of a fingernail or toenail to relieve pressure or to drain fluid from a blister.
09. Using eye patches.
10. Removing foreign bodies from the eye using only a cotton swab or irrigation, such as using an eyewash station.
11. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs, or other simple means.
12. Using finger guards.
13. Using massages.
! Important Note: Physical therapy or chiropractic treatment is considered medical treatment.
14. Drinking fluids for relief of heat stress.

ANNUAL SUMMARY

Employers must follow other recordkeeping requirements, including posting the OSHA Form 300A Log Annual Summary. At the end the year, you should review your OSHA 300 Log to validate that the entries are complete and correct. From the OSHA Form 300 Log, you then complete the OSHA Form 300A annual summary log. Finally, you must certify the summary with a signature from a company executive and post the summary from February 1st until April 30th.

For example, if you are completing the OSHA Form 300A Summary of Work-Related Injuries and illnesses for the year 2022, then the log must be posted from February 1st, 2023, until April 30th, 2023. The summary must be posted in each organization in a visible location. The summary must still be posted if there were no injuries or illnesses throughout the year.



OSHA REPORTING

You must report work-related fatalities to OSHA within 8 hours following the death of any employee. In addition, you must report work-related in-patient hospitalizations of one or more employees, loss of an eye, or amputation to OSHA within 24 hours.

If your local OSHA office is closed, you must report using the 1-800 number or electronic submission.

WAYS TO REPORT AN INJURY:

- ✓ Telephone or in-person to your local OSHA office
- ✓ Telephone by calling the OSHA 24-hour hotline at: 1-800-321-6742
- ✓ Electronic submission using the reporting application at www.osha.gov

SUBMITTING 300A FORMS TO OSHA

In addition to reporting injuries or illnesses to OSHA within a specific timeframe, some establishments must submit their OSHA 300A Summary data to OSHA electronically. However, establishments that meet any of the following conditions do not have to report their information electronically:

- The company's peak employment during the previous calendar year was 19 or fewer, regardless of the company's industry.
- The company's industry is on Appendix A to Subpart B of OSHA's recordkeeping regulation, regardless of the size of the company.
- The company had peak employment between 20 and 249 employees during the previous calendar year, and the company's industry is not on Appendix A to Subpart E of OSHA's recordkeeping regulation.

Important Note: *These criteria apply at the establishment level, not the whole business.*

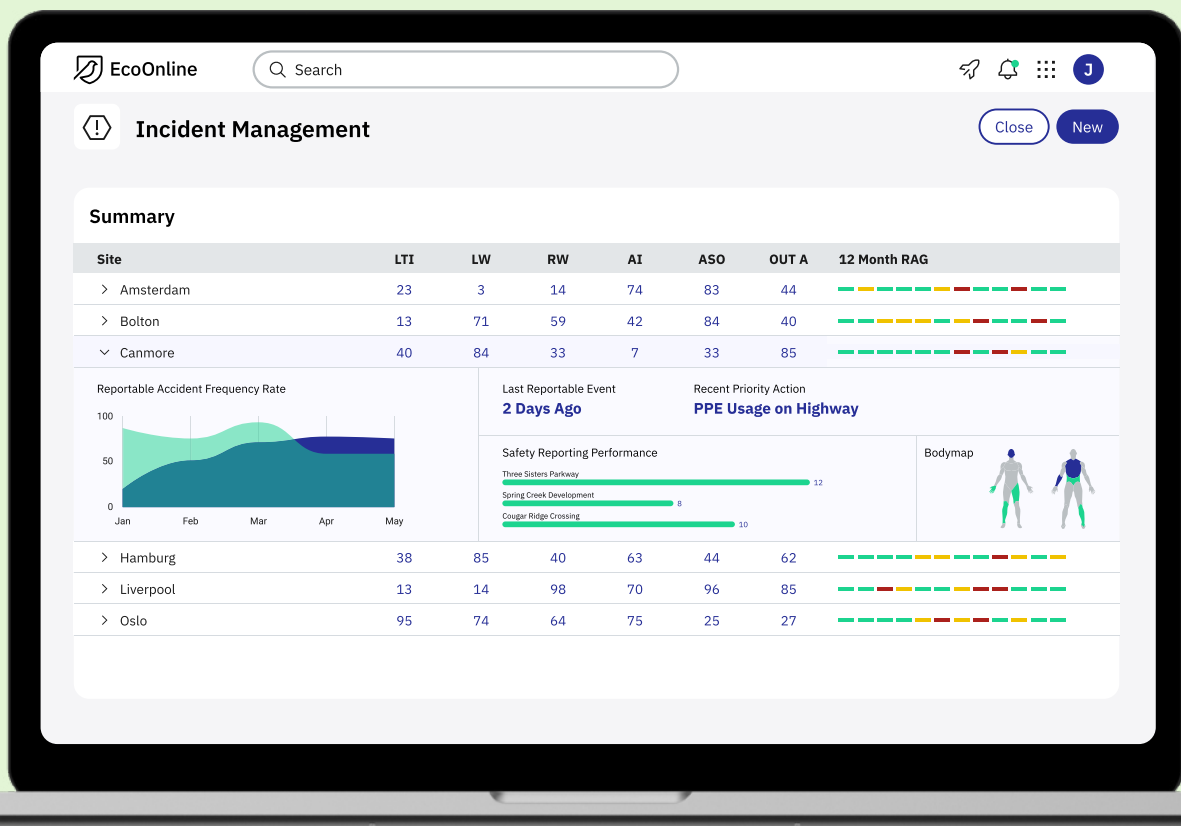
If your establishment is required to submit your 300A Form Summary data to OSHA electronically, you must submit it by March 2nd of the next year covered by the forms. For example, if you're electronically submitting your 300A Form for injuries and illnesses in 2022, you must submit your data electronically by March 2nd, 2023.



MANAGE ALL YOUR EHS RESPONSIBILITIES

Promote behavioural change, build a strong safety culture:

- ✓ Build a deeper understanding of your operational, EHS and chemical risks.
- ✓ Empower your employees to make safe choices and engage in a lasting safety culture.
- ✓ Make the transition to a resource-efficient economy.
- ✓ Streamline and simplify the way you educate your teams.



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