



# Safety Focus

January 2018

## OSHA Recordkeeping

It's that time again ... time to prepare and post your company's OSHA 300 Log information. Since it may have been a year since you've thought about your OSHA 300 Log, here is a refresher about the requirements.

**\*Note: In 2016, OSHA made a significant change regarding employer electronic reporting of workplace injuries. Please refer to the end of this newsletter for more details.**

### What is an OSHA 300 Log?

It is a log of your company's work-related injuries/illnesses and must be maintained on a calendar year basis. There are a few low-hazard industries that are exempted from these requirements but most companies in construction, manufacturing and transportation with more than 10 employees at any time during the calendar year must maintain the log. One of the purposes of the log is to capture data from many industries to develop national statistical data on injuries by industry NAICS (North American Industry Classification System) code.

- The OSHA 300A is the summary of the data on your OSHA 300 log. The 300A is what employers are required to post in a conspicuous location from February 1 to April 30 every year.
- The OSHA 301 form provides the injury details. Most state's First Report of Injury forms satisfy the 301 requirement.

### What makes an injury or illness recordable on the OSHA 300 Log?

There are a few key factors:

- Is the injury/illness work related?
- Did the employee receive medical treatment ***other than first aid?***  
*(See the linked document in the Resources section below for a list of treatments OSHA considers to be first aid even when administered by a healthcare professional.)*
- Did a licensed healthcare provider recommend work restrictions or days away from work?

These questions may seem simple enough to answer, but many situations are not clear-cut and can make reporting tricky. OSHA has published dozens of recordkeeping interpretations on their website to address how to handle specific situations. Feel free to call your Scott Risk Performance Specialist to discuss how to record a specific case.

**You are required to maintain 5 years of OSHA 300, 300A and 301 forms for inspection by OSHA.**

### Why is this important to you?

In recent years, OSHA has been conducting more frequent workplace inspections specifically to audit recordkeeping documentation. Also, you may be asked to provide incident rate data to your clients and customers for pre-qualification purposes. The information required to provide incident rate data comes directly from your OSHA 300 and 300A. Therefore, it is very important that the information on the log be correct and that you don't record an injury/illness that does not meet the definition of recordable. In some instances, you may have a case that warrants being reported as a workers' compensation claim but is not OSHA recordable. Try to keep in mind that workers' compensation rules and OSHA recordkeeping requirements are not synonymous.

A recent OSHA citation for recordkeeping is not having the 300A forms signed by a company executive. The log is not permitted to be signed by the preparer, unless the preparer is an officer or executive. OSHA's intent is to ensure that a senior company executive knows about the injuries and illness that have occurred. A company executive is defined as an owner of the company, an officer of the corporation, the highest ranking company official working at the establishment or the immediate supervisor of the highest ranking company official working at the establishment.

Another important area of OSHA focus is Column F (Description of Event) on the 300 log. OSHA is clear that they want to see the type of injury or illness, the body part(s) affected and the object or substance that was directly involved. They direct us to be as detailed as possible and to use two lines if needed.

### Resources

Linked below are some documents to assist you with your OSHA recordkeeping:

[OSHA 300 Form](#) - includes the OSHA 300, 300A and 301 in Excel format

[OSHA 300 Recordkeeping Flowchart](#) - use this document to help you determine whether an injury or illness is recordable; includes a list of treatments considered to be "first aid" even when administered by a healthcare provider

[OSHA Electronic Reporting Rule Compliance Overview](#)

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### ***\*Updated Rules for Reporting Fatalities and Serious Injuries***

Effective on January 1, 2015, OSHA enacted new rules for when employers must report injuries to OSHA. The revised rule retains the current requirement to report all work-related fatalities within 8 hours and adds the requirement to report all work-related inpatient hospitalizations, amputations or losses of an eye to OSHA within 24 hours. This rule was effective in all Federal OSHA Plan states on January 1, 2015, but some state plan programs have delayed implementation. See this website for more details about the new rule and the state plans programs:

<https://www.osha.gov/recordkeeping2014/index.html>

### ***\*Updated Rules for Electronic Reporting***

By July 1, 2018, employers in most industries with more than 20 employees will have to submit their 2017 OSHA 300A and the OSHA 300 log.

OSHA had previously proposed requiring employers with more than 250 employees to submit the actual OSHA 300 and 301 forms starting in 2018. That requirement is on hold for now. OSHA announced that it will issue a notice of proposed rulemaking (NPRM) to reconsider, revise or remove provisions of the Improve Tracking final rule, including the collection of the Forms 300/301 data. They are currently drafting that NPRM and will seek comment on those provisions. Submission of Form 300/301 data will not be required until a final rule is published.

See the link below for more information on the new electronic reporting regulation:

<https://www.osha.gov/recordkeeping/finalrule/index.html>

***\*You should monitor the OSHA website for electronic reporting due date changes. In 2017, they changed (extended) the due date three times.***