

OSHA- Region 1
OSHA Recordkeeping
April 2024

OSHA Recordkeeping

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Region 1

Occupational Safety and Health Administration

Poll Question 1 – your industry

- **Construction**
- **Healthcare**
- **General Industry**
- **Maritime**
- **Consultant**

Requirements

- **Recordkeeping**
 - Recording
 - Maintaining
 - Posting
- **Fatality and Severe Injury Reporting**
- **Electronic submission of records (ITA)**

<https://www.osha.gov/recordkeeping>

Recordkeeping – Part 1

- **What is Recordkeeping?**
- **Review of RK standards**
- **Is it recordable? Using the decision tree**
- **Reporting of fatalities and severe injuries**

Recordkeeping - Part 2

- **Electronic Submission/ITA**
- **DART & TCR Calculations and Why important**
- **Case studies and workshop**
- **Resources**

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- This is not being recorded
- Presentation will be available at [Injury and Illness Recordkeeping Webinar – April 5, 2024 | Oshaedne](#)
- Please use Q & A function, not Chat
- [OSHA Recordkeeping FAQ Search](#)
- [OSHA ITA Frequently Asked Questions \(FAQs\)](#)

What is OSHA Recordkeeping?

- Requirements for recording and reporting of work-related fatalities, injuries and illnesses under 29 CFR 1904
- A nationally standardized system for employers to keep track of the work-related injuries and illnesses for each business establishment

What is OSHA Recordkeeping?

- A tool to monitor the performance of workplace safety programs used by:
- OSHA
- Employer
- BLS

[Recordkeeping Policies and Procedures Manual | Occupational Safety and Health Administration \(osha.gov\)](#)

What is it NOT?

- Does NOT determine whether an employer and/or employee is at fault
- Does NOT mean that an OSHA rule has been violated
- Does NOT mean the employee is eligible for workers' compensation or other benefits

Poll Question 2

- True or False ?

All Workers' Compensation Cases are also "Recordable" (i.e. should be recorded on the OSHA 300 log)

WARNING: DO NOT MIX **OSHA RECORDABILITY AND WORKERS'** **COMPENSATION**

- Workers' Compensation determinations do NOT impact OSHA recordability.
 - Some cases may be OSHA recordable and compensable.
 - Some cases may be compensable, but not OSHA recordable.
 - Some cases may be OSHA recordable, but not compensable.

Who must keep records?

- Many but not ALL Employers
- Exemptions are based on SIZE of entire company/firm and type of Industry (NAICS)

Poll Question #3

- I know our NAICS
 - Yes
 - No
 - What is a NAICS?

1904.1 – Size Exemption from OSHA Recording

- If the company/firm had 10 or fewer employees at **ALL** times during the previous calendar year, the employer is exempt from OSHA's injury and illness recording requirements
 - Based on the number of employees in the entire company/firm
 - May include temporary workers

1904.1 – Size – may include temp workers

- Includes temporary workers who are supervised on a day-to-day basis by host
- Supervising the details, means, methods and processes by which the work is to be accomplished

https://www.osha.gov/sites/default/files/OSHA_TWI_Bulletin.pdf

1904.2 – Industry Exemption (by NAICS) from OSHA Recording

- Facilities in certain low hazard industries are exempt from OSHA's injury and illness recording requirements regardless of size
- Partially Exempt Industries listed in Appendix A to 1904 Subpart B
- Low-hazard industry exemption – [see list of Partially Exempt Industries](#)

What forms must be completed?

- **OSHA Form 300** – Log of Work-Related Injuries and Illnesses
- **OSHA Form 301** – Injury and Illness Incident Report
- **OSHA Form 300A** – Summary of Work-Related Injuries and Illnesses
- [Recordkeeping Forms](https://www.osha.gov) (osha.gov)

1904.4 – Recording Criteria

- Covered employers must record each fatality, injury or illness that:
 - is work-related, and
 - is a new case, and
 - meets one or more of the criteria contained in sections 1904.7 through 1904.11.
- **Within 7 calendar days**

What is considered an injury or illness?

- An abnormal condition or disorder
- Not an exposure, unless it results in signs or symptoms
- *Can consist of subjective symptoms such as aches or pain.*

What cases are work related?

1904.5

- Cases caused by events or exposures in the work environment
- Cases contributed to by events or exposures in the work environment
- Cases significantly aggravated by events or exposures in the work environment

For a list of activities that are not work related, see section [1904.5\(b\)\(2\)](#)

1904.5 – Work Environment

- The work environment is defined as the establishment and other locations where one or more employees are working or present as a condition of employment.
- The work environment includes not only physical locations, but also the equipment or materials used by employees during the course of their work.

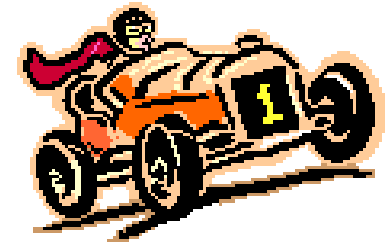
The following situations are not work-related: 1904.5 Exceptions

- Present as a member of the general public
- Symptoms arising in work environment that are solely due to non-work-related event or exposure (Regardless of where signs or symptoms surface, a case is work-related only if a work event or exposure is a discernable cause of the injury or illness or of a significant aggravation to a pre-existing condition.)
- Voluntary participation in wellness program, medical, fitness or recreational activity
- Eating, drinking or preparing food or drink for personal consumption



The following situations are not work-related (1904.5 – Exceptions)

- Personal tasks outside assigned working hours
- Personal grooming, self medication for non-work-related condition, or intentionally self-inflicted
- Motor vehicle accident in parking lot/access road during commute
- Common cold or flu
- Mental illness, unless employee voluntarily provides a medical opinion from a physician or licensed health care professional (PLHCP) having appropriate qualifications and experience that affirms work-relatedness



Violence, Horseplay, Employee Fault

The following are NOT exceptions in 1904.5.b.2

- Horseplay
- Acts of violence; or
- The fault of the employee

1904.6 New cases

- Worker has not previously experienced a recorded injury or illness of the same type that affects the same part of the body, or
- If same part of body but has recovered completely (all signs & symptoms have disappeared) from the previous injury or illness, and an event or exposure in the work environment caused signs & symptoms to reappear

1904.7 General Recording Criteria

- Death
- Loss of consciousness
- Lost workdays
- Restricted work or transfer
- Medical Treatment beyond first aid
- Significant injury or illness diagnosis

How do I count days away from work or restricted/transferred?

- 1904.7(b)(3) & 1904.7(b)(4)
- Do not count the day of the injury
- Count the number of **calendar days** the employee was away from work or restricted/transferred (include weekend days, holidays, vacation days, etc.).
- May cap calendar day count at 180 days away and/or days restricted.

How do I count days away from work or restricted/transferred?

- **May stop** day count if employee leaves company for a reason **unrelated** to the injury or illness.
- **Must estimate** day count when employee leaves company due to reasons **related** to the injury and illness.
- Only enter event once [if day count goes into a new year]

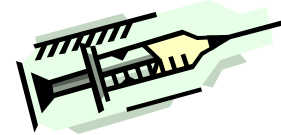
1904.7(b)(5) – Medical Treatment

- Medical treatment is the management and care of a patient to combat disease or disorder.
- It does not include:
 - Visits to a PLHCP solely for observation or counseling
 - Diagnostic procedures
 - First aid



1904.7(b)(5) – First Aid

- Using nonprescription medication at nonprescription strength
- Tetanus immunizations
- Cleaning, flushing, or soaking surface wounds
- Wound coverings, butterfly bandages, Steri-Strips
- Hot or cold therapy
- Non-rigid means of support
- Temporary immobilization device used to transport accident victims



1904.7(b)(5) – First Aid

- Drilling of fingernail or toenail, draining fluid from blister
- Eye patches
- Removing foreign bodies from eye using irrigation or cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Finger guards
- Massages
- Drinking fluids for relief of heat stress



1904.7(b)(6) – Loss of Consciousness

- All work-related cases involving loss of consciousness must be recorded



Significant Diagnosed Injury or Illness: 1904.7(b)(7)

- The following work-related conditions must always be recorded at the time of diagnosis by a PLHCP:
 - Cancer
 - Chronic irreversible disease
 - Punctured eardrum
 - Fractured or cracked bone or tooth

Additional Recording Criteria

1904.8 - Needlestick or sharps injury

1904.9 - Medical Removal under OSHA standards (for example Lead, Benzene, Formaldehyde, Methylene Chloride)

1904.10 - Occupational Hearing Loss

1904.11 - Work-related Tuberculosis (TB)

Criteria for COVID-19

COVID-19 is recordable illness if all of the following are true:

1. The case is a confirmed case of COVID-19.
2. The case is work-related (as defined by [29 CFR 1904.5](#)); and
3. The case involves one or more of the general recording criteria set forth in [29 CFR 1904.7](#) (e.g., medical treatment beyond first aid, days away from work).

Vaccine related: [Are adverse reactions to the COVID-19 vaccine recordable on the OSHA recordkeeping log?](#)OSHA will not enforce 29 CFR 1904's recording requirements to require any employers to record worker side effects from COVID-19 vaccination at least through May 2024.....

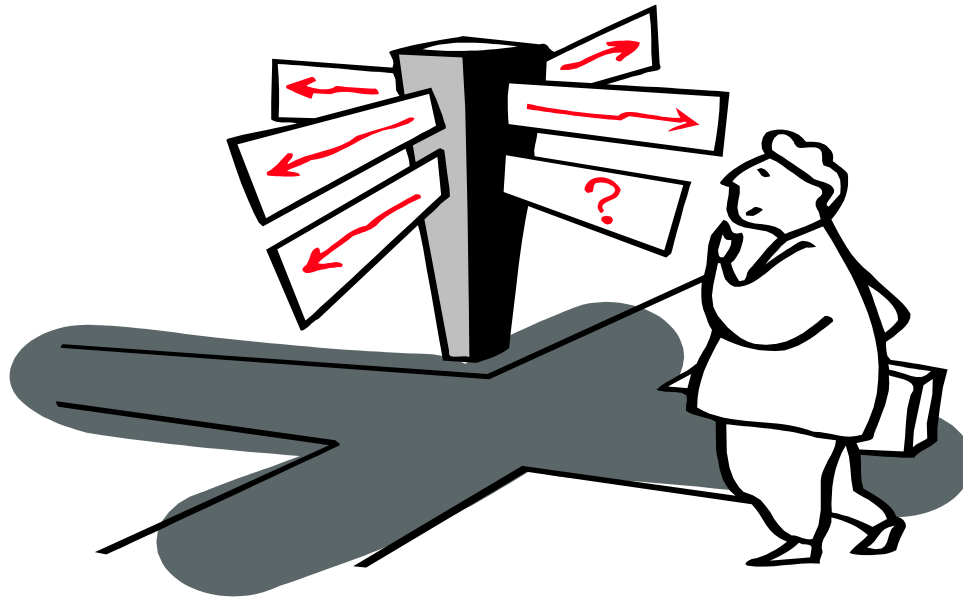
Breather



Is it recordable?

Decision tree in 1904.5

5 STEP PROCESS



STEP 1:

Did the employee
experience an
injury or illness?

STEP 2:

YES

Is the injury or
illness **work-related**?

STEP 3:

YES

Is the injury or
illness **a new case**?

STEP 4:

YES

Does the injury or illness **meet
the general criteria or the
application to specific cases**?

STEP 5:

YES

**Record the
Injury or illness.**

STEP 1:

Did the employee **experience an injury or illness?**

Definition

An injury OR illness is an abnormal condition or disorder. Injuries include cases such as, but not limited to, a cut, fracture, sprain, or amputation. Illnesses include both acute and chronic illnesses, such as, but not limited to, a skin disease, respiratory disorder, infectious disease or poisoning.

STEP 1:

Did the employee **experience an injury or illness?**

Scenario A:

A worker reports to nurses' station with complaint of painful wrists. Employee given 2 Advil™ and returned to job.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step.

Why: Painful wrists was the injury experienced.

1904.5 - Work-Relatedness

STEP 2:

Is the injury or illness **work-related**?

- Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment.
- A case is presumed work-related if, and only if, an event or exposure in the work environment is a discernable cause of the injury or illness or of a significant aggravation to a pre-existing condition. The work event or exposure need only be one of the discernable causes; it need not be the sole or predominant cause.

STEP 2:

Is the injury or illness **work related**?

Scenario A:

A worker reports to nurses' station with complaint of painful wrists. Employee given two Advil™ and returned to job.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step.

Why: Work related (employee's job involves repetitive motion)

DETERMINATION OF A NEW CASE

STEP 3:

Is the injury or illness **a new case**?

A work-related injury/illness is a **NEW** case if:

There has not been a recorded injury or illness of the same type that affects the same part of the body;

OR

The employee had a recorded injury/illness of the same type/body part but recovered completely;

AND

An event/exposure in the work environment caused the signs or symptoms to reappear.

STEP 3: Is the injury or illness **a new case?**

Scenario A:

A worker reports to nurses' station with complaint of painful wrists. Employee given 2 Advil™ and returned to job. This is the first visit to the nurses' station and first complaint.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step.

Why: This is first visit and first injury

DETERMINATION OF A NEW CASE

Step-4:

Does the injury or illness **meet the general criteria or the application to specific cases?**

- You must record a work-related injury/illness on the Log if it results in ONE OR MORE of the following:
 - Death
 - Days away from work
 - Restricted work or transfer to another job
 - Medical treatment beyond first-aid
 - Loss of consciousness
 - A significant injury or illness diagnosed by a physician or licensed health care provider (PLHCP)
 - Additional recording criteria (1904.8 to 1904.11)

GENERAL RECORDING CRITERIA

STEP 4:

Does the injury or illness **meet the general or application to specific cases?**

Scenario A:

A worker reports to nurses' station with complaint of painful wrists. Employee given 2 Advil™ and returned to job. This is the first visit to the nurses' station and first complaint.

Stop Here

OR

Go On To The Next Step?

Answer: Stop here – not recordable

Why: No lost time, no medical treatment, etc.

STEP 1: Did the employee experience an injury or illness?

Scenario B:

Employee sprains ankle in company parking lot on the way in to work. Goes to the doctor, given Rx and two days away from work.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step

Why: Ankle sprain is an injury

STEP 2:

Is the injury or illness **work related**?

Scenario B:

Employee sprains ankle in company parking lot on way in to work. Goes to the doctor, given Rx and two days away from work.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step

Why: There is no exception that applies. Parking lot exception applies only to motor vehicle accidents during commute.

STEP 3:

Is the injury or illness **a new case?**

Scenario B:

Employee sprains ankle in company parking lot on way in to work. Goes to the doctor, given Rx and two days away from work.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step.

Why: This is first sprained ankle from this incident.

GENERAL RECORDING CRITERIA

STEP 4:

Does the injury or illness **meet the general or application to specific cases?**

Scenario B:

Employee sprains ankle in company parking lot on way in to work. Goes to the doctor, given Rx and two days away from work.

**Stop Here
OR
Go On To The Next Step?**

Answer: Go on to the next step and Record the case

Why: Lost time (2 days away), medical treatment (Rx)

STEP 2:
Is the injury or illness **work-related**?

Scenario C:

Employee slips and falls in hallway, breaking arm while working on daughter's science project on Saturday, employee's day off.

Stop Here
OR
Go On To The Next Step?

Answer: Stop

Why?: Exception - 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**.

STEP 3:

Is the injury or illness **a new case?**

Scenario D: Five (5) weeks ago, masonry employee sprained wrist at work and received, prescription medication, and “light duty.” Two (2) weeks ago employee was back on normal job and **completely recovered**. Today (5 weeks after the injury) employee complains of pain in same wrist after moving bricks.

Stop Here

OR

Go On to the Next Step?

Answer: Go on – This is a new case

Why?: Employee had completely recovered from the previous injury and a new event or exposure occurred in the work environment.

STEP 3:

Is the injury or illness **a new case?**

Scenario E: Five (5) weeks ago, masonry employee sprained wrist at work and received, prescription medication, and “light duty.” Two weeks ago, employee was back on normal job, **but continued to take prescription** medication. Today (5 weeks after the injury) employee complains of pain in same wrist after moving bricks, and physician puts him back on light duty for 5 days.

Stop Here

OR

Go On to the Next Step?

Answer: Stop

Why?: Employee had not completely recovered from the previous injury and is still being treated for first injury ie taking Rx medication. Update the previously recorded entry.

GENERAL RECORDING CRITERIA

Step-4: Does the injury or illness **meet the general criteria or the application to specific cases?**

- You must record a work-related injury/illness on the Log if it results in ONE OR MORE of the following:
 - Death
 - Days away from work
 - Restricted work or transfer to another job
 - Medical treatment beyond first-aid
 - Loss of consciousness
 - A significant injury or illness diagnosed by a licensed health care provider (LHCP)
 - Additional recording criteria (1904.8 to 1904.11)

1904.29 – Forms

- **OSHA Form 300** – Log of Work-Related Injuries and Illnesses
- **OSHA Form 301** – Injury and Illness Incident Report
- **OSHA Form 300A** – Summary of Work-Related Injuries and Illnesses
- **[Recordkeeping Forms](https://www.osha.gov)** (osha.gov)

Privacy Concern Cases 1904.29(b)(6)

- OSHA has identified specific injuries and illnesses as a “privacy concern” due to the nature of the event or exposure and/or the resulting diagnosis.
- OSHA has specific requirements related to the documentation of privacy concern cases in order to protect the privacy of the employee

Privacy Concern Cases 1904.29(b)(6) through (9)

- Injury to intimate part/reproductive system
- Injury/illness resulting from a sexual assault
- Mental illnesses
- HIV infection, hepatitis, or tuberculosis
- Contaminated needlestick/sharps injuries or cuts involving exposure to another person's blood or OPIM, as defined in 1910.1030(b)
- Other illnesses, if the employee independently and voluntarily requests that his/her name not be entered

Privacy Concern Cases

- To document a Privacy Concern Case:
 1. Do NOT enter employee's name in column B, instead of name, enter "Privacy Case"
 2. If the information describing the case may be personally identifiable even though the employee's name has been omitted, use discretion in describing the injury or illness on the Incident Report and Log (e.g., describe an injury to a reproductive organ as "**injury to lower pelvic area**").
 3. Keep a separate confidential list

1904.30 – Multiple Business Establishments*

- Keep a separate OSHA Form 300 for each establishment that is expected to be in operation for more than a year
- For short-term operations (less than one year), do not have to keep a separate log
- May keep one OSHA Form 300 for all short-term establishments
- Each employee must be linked with one establishment

* See 1904.46 for definition of 'Establishment'

1904.31 – Covered Employees

- Employees on payroll
- Employees not on payroll who are supervised on a day-to-day basis
- Excludes self-employed and partners
- Temporary help agencies should not record the cases experienced by temp workers who are supervised by the using firm

1904.32 – Annual Summary

- Review OSHA Form 300 logs for completeness and accuracy, correct deficiencies
- Complete OSHA Form 300A
- Certify summary
- Post summary for 3-month period from February 1 to April 30 of the year following the year covered by the summary



1904.33 - Retention and Updating

- Save forms for 5 years following the year that they cover. Includes privacy case list.
- Required to update the OSHA Form 300 during that period (if new information becomes available).
- Need not update the OSHA Form 300A or OSHA Form 301.

1904.35 – Employee Involvement

- Employer must inform each employee of how to report an injury or illness
 - Must set up a way for employees to report work-related injuries and illnesses promptly; and
 - Must tell each employee how to report work-related injuries and illnesses to you



1904.35 – Employee Involvement

- Employer must inform each employee that:
 - Employees have a right to report work-related injuries/illnesses; and
 - Employers are prohibited from discharging or in any manner discriminating against employees for reporting



Incentive Programs 1904.35(b)(1)(iv)

THERE SHOULD BE NO INDICATION THAT INCENTIVE PROGRAMS PROMOTE OR ENCOURAGE NON-REPORTING OF HAZARDS, INCIDENTS, INJURIES, OR ILLNESSES.

Clarification of OSHA's Position on Workplace Safety Incentive Programs and Post-Incident Drug Testing Under 29 C.F.R. § 1904.35(b)(1)(iv)

** <https://www.osha.gov/laws-regs/standardinterpretations/2018-10-11>

Prohibition against discrimination

1904.36

- Section 11(c) prohibits discrimination for reporting a work-related fatality, injury, or illness.
- Also protects employees who file safety & health complaints or ask for access to the Part 1904 records
- **Resource:** [The Whistleblower Protection Programs | Whistleblower Protection Program \(whistleblowers.gov\)](https://www.whistleblowers.gov)

Fatality and Severe Injury Reporting



Poll Question #4

- Joe amputated his thumb at a roofing job while working. His employer says, we only have five employees, so we don't have to call OSHA.
- True
- False



To Make a Report

- Call the nearest [OSHA office](#).
- Call the OSHA 24-hour hotline at [1-800-321-6742](tel:1-800-321-6742) (OSHA).
- [Report online](#)

Reporting Fatalities and Severe Injuries

1904.39

- All employers – regardless of NAICS or size
- All employers are required to notify OSHA within 8 hours after the death of an employee on the job or within 24 hours for **hospitalization, amputation, or loss of an eye** as a result of a work-related incident.
- Employer must still record event on OSHA log if required to keep logs and criteria are met.



To Make a Report

- Call the nearest [OSHA office](#).
- Call the OSHA 24-hour hotline at [1-800-321-6742](tel:1-800-321-6742) (OSHA).
- [Report online](#)

Reporting Fatalities and Severe Injuries

1904.39

- Yes, must report work-related fatality or in-patient hospitalizations caused by a heart-attack.
- Not **reportable**:
 - Work-related motor vehicle accident (MVA-event) on public street or highway (if in construction work-zones, then reportable).
 - Work-related event on commercial or public transportation system (i.e. airplane, train, subway).
 - Employer must still record event on OSHA log if required to keep logs and criteria are met.



To Make a Report

- Call the nearest [OSHA office](#).
- Call the OSHA 24-hour hotline at [1-800-321-6742](tel:1-800-321-6742) (OSHA).
- [Report online](#)

OSHA definition “Loss of an Eye” 1904.39 (Reporting)

- Loss of sight/ loss of vision without removal of eye is not reportable
- Loss of an eye is the physical removal of the eye, including enucleation and evisceration.

OSHA definition “Hospitalization” for 1910.39 (Reporting)

- Formal admission to in-patient services for care or treatment
- Does not cover observation or diagnostic testing

How does OSHA define “Amputation”?

1904.39(b)(11):

- An amputation is the traumatic loss of a limb or other external body part.
- Amputations include a part, such as a limb or appendage, that has been severed, cut off, amputated (either completely or partially); fingertip amputations *with or without bone loss*; medical amputations resulting from irreparable damage; amputations of body parts that have since been reattached.

Amputations do not include: 1904.39(b)(11):

Avulsion Type Injuries:

Refers to a surface trauma where all layers of the skin have been torn away.

Enucleation:

Is the removal of the eye that leaves the eye muscles and remaining orbital contents intact.

A degloving:

Is a type of avulsion in which an extensive section of skin is completely torn off the underlying tissue

Scalping: Removing the scalp, or a portion of the scalp

What information needs to be provided?

1904.39(b)(2):



- (i) The establishment name;
- (ii) The location of the work-related incident;
- (iii) The time of the work-related incident;
- (iv) The type of reportable event;
- (v) The number of employees who suffered the reportable event;
- (vi) The names of these employees;
- (vii) The contact person and phone number/email;
- (viii) A brief description of the work-related incident.

Severe Injury Reporting: FY2022 Findings

- **11,402** severe injuries reported, including **1,079** amputations and **10,112** hospitalizations
- This is an average of **31** worker injuries every day of the year
- Most reported injuries (**65%**) were addressed by **employer investigation**, *not* OSHA inspection
- [Memorandum/directive for SIR/RRI](#)

Double Reporting

- If an employer reports an in-patient hospitalization, amputation, or loss of an eye, and the employee subsequently dies, the employer is not required to report the fatality.
- Letter of interpretation:

<https://www.osha.gov/laws-regs/standardinterpretations/2021-01-08>

COVID Reporting: Healthcare facilities

1910.502 Emergency Temporary Standard

- Portions of ETS for Healthcare are still in effect:
- 1910.502(q)(2)(ii) – COVID logs.
- 1910.502(q)(3)(ii) –(iv) Availability of COVID logs
- 1910.502(r) Reporting COVID fatalities and hospitalizations

COVID Reporting: Healthcare facilities

1910.502 Emergency Temporary Standard

1910.502(r) Reporting COVID fatalities and hospitalizations

- Work-related fatality within 8 hours of learning
- Work-related hospitalization within 24 hours of learning
- Unlike 1904.39 no reporting exclusion if fatality occurs more than 30 days after exposure
- Unlike 1904.39 no reporting exclusion if hospitalization occurs more than 24 hours after exposure.
- Reminder – employer must still record event on OSHA log if required to keep logs and criteria are met.
- OSHA publication: [Reporting COVID-19 Fatalities and In-Patient Hospitalizations to OSHA](#)

COVID Reporting: All other employers

All other employers - 1904.39

Break



Recordkeeping - Part 2

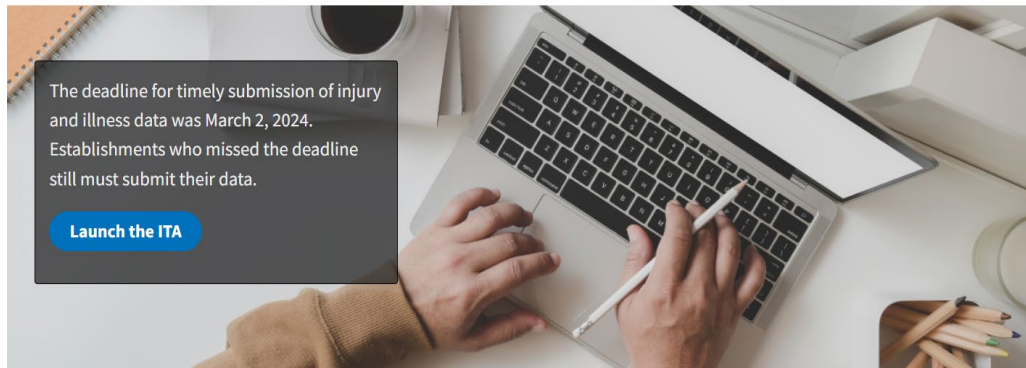
- Electronic Submission/ITA
- Calculating DART TCR
- Using DART and TCR data
- Workshop

Poll Questions #5

- My company has electronic submission/ITA responsibilities:
- Yes
- No
- What is an ITA?

Electronic Submission of records – ITA

1910.41 [OSHA ITA website](#)



- Applies to employers who must keep OSHA records
- Does not apply to federal facilities
- Not everyone who has to keep OSHA records has ITA responsibilities – only if 20 or more employees
- Targets specific high hazard industries
- Assists OSHA in targeting inspections

Electronic Submission of records – ITA

1910.41 [OSHA ITA website](#)

- Am I covered?
- ITA coverage is determined by size of establishment and NAICS.
- What do I submit?
- Covered employers must submit OSHA recordkeeping information annually.
- ITA Coverage Application at <https://www.osha.gov/itareportapp>
- Submit from January 2 to March 2.
- Even if late, employers are required to submit ITA – access is open until December 31.

Electronic Submission of records – ITA

1910.41 [OSHA ITA website](#)

- Employers will need an ITA account.
- Employer will get a confirmation email when upload is complete.
- On-site inspection – OSHA may request copy of confirmation
- Anyone can check [OSHA's public database](#):
- Technical issues with ITA application: [Help Request Form](#) for employers.

Electronic Submission of records – ITA

New rule effective January 1, 2024

- Covers CY2023 data
- Before – covered employees had to submit OSHA 300A only.
- Updated ‘[Appendix A to Subpart E](#)’ from 2012 NAICS to 2017 NAICS
- Created ‘[Appendix B to Subpart E](#)’ – Specific NAICS with high TCR/high fatality rate, subset of Appendix A.
- Establishments with 100 or more employees in App. B submit 300 and 301 in addition to 300A.
- ITA Coverage Application at <https://www.osha.gov/itareportapp>

Review and examples



For CY2023 and beyond

- (no change) Based on establishment size (single physical location)
- (no change) 19 or less employees – No ITA responsibilities.
- (no change) 20 to 249 employees: 300A for NAICS in Appendix A.
- **NEW** 100 or more employees in App. B (which is a subset of App. A): 300 and 301 in addition to 300A.
- (no change) Over 250 employees and required to keep records under 1904: submit 300A.
- **RESOURCE:** [ITA Coverage Application](#)

ITA- Protection of Worker Privacy

1904.41(b)(9)

- OSHA will not collect names and addresses of employees or healthcare providers.
- OSHA designed the data collection system to retain age instead of birthdate.
- OSHA will remind employers during the data submission process not to submit information that could directly identify workers, such as names, addresses, telephone numbers, etc.
- OSHA will not make public the data fields on worker age, gender, date hired, and whether the worker was treated in an emergency room and/or admitted to a hospital as an in-patient.
- OSHA uses automated information technology, as well as some manual review, to detect and remove any remaining information that could directly identify workers.
- Personally Identifiable Information (PII) questions?

See [OSHA PII Fact Sheet](#) AND [1904.41](#)

ITA- State Plans 1904.41(b)(7)

- **Do I have to submit information if I am located in a State Plan State?**
Yes, the requirements apply to employers located in State Plan States.
- **ITA Coverage Application at**
<https://www.osha.gov/itareportapp>

ITA Nuggets

- **First determine: Are you required to keep OSHA logs? Based on size of company and/or NAICS – [Appendix A to Subpart B](#).**
- **Then address ITA issues (which are based on size of establishment).**
- **If employer is not required to keep OSHA logs, then no ITA requirements.**
- **RK requirements based on size of company (firm) as a whole.**
- **Reporting requirements cover all employers regardless of size or NAICS.**
- **ITA requirements based on size of establishment (single location).**
- **Posting of 300A: February 1 to April 30**
- **ITA submission: Jan 2 to March 2 (open until Dec 31)**

Construction ITA nuggets

NAICS Sector 23

- **Listed in Appendix A to subpart E meaning that NAICS Sector 23 must submit injury and illness summary (Form 300A) data to OSHA electronically if 20-249 employees at the establishment.**
- **If 100 or more employees and in App. B, then 300 and 301 in addition to 300A**
- **If required to keep records by 1904 and site lasts less than a year the site does not have to keep separate logs (see 1904.30) but must still keep records.**
 - **If they send records to a central location, then they would electronically submit ITA for the central location if the central location meets the criteria for submission.**
 - **If they kept a separate log (even tho they don't have to), but the job is finished so the establishment closed, then they don't have to electronically submit ITA.**

ITA- Resources

- [OSHA ITA website](#)
- [ITA Coverage Application](#) (employers can use this ‘app’ to determine their ITA requirements)
- [1904.41](#)
- Federal Register Final Rule:
<https://www.federalregister.gov/documents/2023/07/21/2023-15091/improve-tracking-of-workplace-injuries-and-illnesses>
- ITA updates effective January 1, 2024.
- [OSHA Fact Sheet](#)
- [Injury Tracking Application \(ITA\) Demo \(youtube.com\)](#)

DART & TCR Rates

- Calculating rates helps to compare companies or departments of different sizes by normalizing the data
- DART (column H and I)
- TCR nonfatal (columns H, I and J)
- OSHA normalizes the data using $100 \text{ FTEs} \times 40 \text{ hrs/week} \times 50 \text{ weeks/year} = 200,000$



OSHA Form 300 Log case information

OSHA's Form 300 (Rev. 04/2004) Log of Work-Related Injuries and Illnesses

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#). In addition, the forms are programmed to auto-calculate as appropriate.

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

Please Record:

- Information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid.
- Significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional.
- Work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12.

Reminders:

- Complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.
- Feel free to use two lines for a single case if you need to.
- Complete the 5 steps for each case.

Establishment name

City State

Step 1. Identify the person

Step 2. Describe the case

Step 3. Classify the case

Step 4.

Step 5.

SELECT ONLY ONE circle based on the most serious outcome:

Enter the number of days the injured or ill worker was:

Select one column:

| (A) Case no. | (B) Employee's name | (C) Job title (e.g., Welder) | (D) Date of injury or onset of illness (e.g., 2/10) | (E) Where the event occurred (e.g., Loading dock north end) | (F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., Second degree burns on right forearm from acetylene torch) | Remained at Work | | | | Away from work (K) ____ days | On job transfer or restriction (L) ____ days | Days | | | | | | | |
|-----------------|------------------------|------------------------------------|---|---|--|---------------------------------------|---|---|--|------------------------------------|--|-----------------------|-----------------------|--------------------------|--------------------------|-----------------------|-----------------------|-------------------------|-----------------------|
| | | | | | | Death (G) <input type="radio"/> | Days away from work (H) <input type="radio"/> | Job transfer or restriction (I) <input type="radio"/> | Other recordable cases (J) <input type="radio"/> | | | (M) Days | Use descriptor (1) | Temporary disability (2) | Permanent disability (3) | Job transfer (4) | Medical leave (5) | All other illnesses (6) | |
| Reset | | | ____ / ____ / ____ month / day | | | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | ____ days | ____ days | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
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| Reset | | | ____ / ____ / ____ month / day | | | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | ____ days | ____ days | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
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| Reset | | | ____ / ____ / ____ month / day | | | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | ____ days | ____ days | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
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| Reset | | | ____ / ____ / ____ month / day | | | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | ____ days | ____ days | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Reset | | | ____ / ____ / ____ month / day | | | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | ____ days | ____ days | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Reset | | | ____ / ____ / ____ month / day | | | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | ____ days | ____ days | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspect of this data collection, contact US Department of Labor, OSHA Office of Statistical Analysis, Room 3700, 200 M Street, N.W., Washington, DC 20512.

Add a Form Page

Page totals ▶ 0

Be sure to transfer these totals to the Summary page (Form 300A) before you post it.

DART & TCR Rates – why important?

- The rates indicate how many recordable cases per 100 employees.
- For DART - cases with lost or restricted or transferred indicate that event was serious
- Higher rates or increasing rates are a negative indicator, and need to be evaluated

DART Rate

Days Away, Restricted, or Transferred (DART) Rate:

This includes cases involving days away from work (column H), and restricted work activity, and transfers to another job (column I)

DART is calculated based on $(N/EH) \times (200,000)$ where

1. N is the number of cases involving days away and/or job transfer or restriction, Column (H +I)
2. EH is the total number of hours worked by all employees during the calendar year, and
3. 200,000 is the base for 100 full-time equivalent employees.

TCR(non-fatal)

Total Case Rate (TCR)**nonfatal**:

This includes cases involving days away from work (column H), and restricted work activity, and transfers to another job (column I) and other recordable cases (Column J)

TCR(non-fatal) formula is calculated based on $(N/EH) \times (200,000)$ where:

1. N is the **number of cases** involving days away and/or job transfer or restriction, and other recordable cases Columns (H+I+J)
2. EH is the total **number of hours worked** by all employees during the calendar year, and
3. 200,000 is the base for 100 full-time equivalent employees.

¹⁰²*Note: TCR(**fatal**) includes columns **G**, H, I, J

POP QUIZ #6 and Practice:

Employees of XYZ Company, including temporary and leased workers, worked 645,089 hours.

There were 9 cases involving days away and 13 cases involving restricted work activity and/or job transfer. The total of column H plus column I is $(9+13)=22$.

| Column H Totals | Column I Totals | Total Hours | Dart |
|---------------------|-----------------------------|-------------|------|
| Days away from work | Job transfer or restriction | Worked | Rate |
| 9 | 13 | 645,089 | ??? |

$$\frac{(\text{Days away, restricted or transferred: Columns H + I})}{(\text{Hours Worked})} \times 200,000 = \text{DART Rate}$$

POP QUIZ #6 Answer

$$\frac{(\text{Days away, restricted or transferred: Columns H + I}) \times 200,000}{(\text{Hours Worked})} = \text{DART Rate}$$

$$\frac{(9+13) \times 200,000}{645,089} = 6.82 \text{ or } 6.8 \text{ DART rate}$$

What does this mean?

- **XYZ Company has 6.8 DART**
- **BLS National DART for Private industries is 1.7 in 2022**
- **XYZ Company is 4 times the National average**
- **[Injury & Illness Incidence Rate Calculator and Comparison Tool \(bls.gov\)](#) ***



What does this mean?

| XYZ Company DART | YEAR |
|---------------------|------|
| 5.8 | 2020 |
| 7.5 | 2021 |
| 6.8 | 2022 |
| 10.5 | 2023 |

- **Need to investigate further**



Next step - review the OSHA logs

- 1. Interdisciplinary team (for example: HR, Risk, Loss Control, management, employee representatives, safety committee, WC carrier)**
- 2. Trends ie departments, shifts**
- 3. Type and severity of injury/illness**
- 4. Confirm that corrective action was taken and is ongoing.**
- 5. Re-interview employees, supervisors, witnesses if needed**
- 6. Any changes between 2020 and 2024 that might account for increase?**
- 7. Other questions that might be helpful**

Breather



Workshop



REPORTABLE INCIDENTS - PRACTICE

Please complete the following and be prepared to support your answers.

1. A carpenter suffers an amputation injury while cutting trim on a residential construction site. There are three people total in the company. Does supervisor have to notify OSHA?

_____ YES _____ NO

2. A Foreman falls off the roof at work on day one and escapes with just a headache. Five days later, she is formally admitted to the hospital with a concussion. Does supervisor have to notify OSHA?

_____ YES _____ NO

3. A machinist suffers a crushing injury in a power press at a 100-employee manufacturing facility and is hospitalized immediately. The supervisor reports the hospitalization to OSHA. The machinist dies from complications from the injury two weeks later. Is the employer required to report the fatality to OSHA?

_____ YES _____ NO

4. A tow truck driver for a big towing company is involved in a motor vehicle accident on a highway while working and dies at the scene. Is the employer required to notify OSHA?

_____ YES _____ NO

REPORTABLE INCIDENTS - PRACTICE

Please complete the following and be prepared to support your answers.

1. A carpenter suffers an amputation injury while cutting trim on a residential construction site. There are three people total in the company. Does supervisor have to notify OSHA?

YES NO

All employers regardless of size must follow 1904.39. Less than ten employees exempt from recording but not exempt from reporting fatalities and serious injuries.

2. A foreman falls off the roof at work on day one and escapes with just a headache. Five days later, she is formally admitted to the hospital with a concussion. Does supervisor have to report this to OSHA?

YES NO

Hospitalization occurred more than 24 hours after the incident – (would still need to be entered on OSHA 300 log if company is required to keep records under 1904)

3. A machinist suffers a crushing injury in a power press at a 100-employee manufacturing facility and is hospitalized immediately. The supervisor reports the hospitalization to OSHA. The die from complications from the injury two weeks later. Is the employer required to report the fatality to OSHA?

YES NO

The employer must report the initial hospitalization but not the subsequent death. Double reporting is not required – but the employer is required to update the OSHA log if the employer is required to keep records.

4. A tow truck driver for a big towing company is involved in a motor vehicle accident on a highway while working and dies at the scene. Is the employer required to notify OSHA?

YES NO

Motor Vehicle Accidents resulting in fatalities or hospitalization do not have to be reported to OSHA (except those occurring in Work Zones) 11. But the fatality will need to be entered on the employer's 300 log if the employer is required to keep OSHA logs.

REPORTABLE INCIDENTS (cont.)

5. A worker at a logistics company was found unresponsive at his desk, and later declared dead from an apparent heart attack. Does this need to be reported to OSHA?

_____YES _____NO

6. There is an outbreak of COVID-19 at a manufacturing facility. Several employees are diagnosed with work-related COVID and are recovering at home. The employer learns that machinist died from COVID on the 35th day after exposure. Does the employer need to call this in?

_____YES _____NO

7. There is an outbreak of COVID-19 at a skilled nursing facility which is covered by the sections of the Emergency Temporary Standard (ETS) that are still in effect for health care. Several employees are diagnosed with work-related COVID and are recovering at home. The employer learns that one of the employees died from COVID on the 35th day after exposure. Does the employer need to call this in?

_____YES _____NO

8. You are the owner of a temp agency and hear that one of your temp employees working at and supervised by the host employer, is severely injured while working at the host facility and is hospitalized. Who is responsible for reporting the hospitalization to OSHA? Whose log does the injury go on?

_____YES _____NO

5. A worker at a logistics company was found unresponsive at his desk, and later declared dead from an apparent heart attack. Does this need to be reported to OSHA?

YES NO

1904.29(b)(5) 'Your local OSHA Area Office Director will decide whether to investigate the event, depending on the circumstances of the heart attack'.

6. There is an outbreak of COVID-19 at a manufacturing facility. Several employees are diagnosed with work-related COVID and are recovering at home. The employer learns that Meredith died from COVID on the 35th day after exposure. Does the employer need to call this in?

YES NO

Death occurred more than 30 days after exposure (may still needs to be recorded on 300 log if employer is required to keep records)].

7. There is an outbreak of COVID-19 at a skilled nursing facility which is covered by the sections of the Emergency Temporary Standard (ETS) that are still in effect for health care. Several employees are diagnosed with work-related COVID and are recovering at home. The employer learns that Nurse Nancy died from COVID on the 35th day after exposure. Does the employer need to report this to OSHA?

YES NO

Death from work-related COVID-19 that occurred any time after work-related exposure in a facility covered by ETS must be reported. And still needs to be recorded on 300 log and on COVID Log if required by the standard.

8. You are the owner of a temp agency and hear that one of your temp employees working at and supervised by the host employer, is severely injured while working at the host facility, and is hospitalized. Who is responsible for reporting the hospitalization to OSHA? Whose log does the injury go on?

The employer who has day to day supervision of employees is responsible for reporting - the purpose of SIR/SER is to abate the hazard and the questions that OSHA asks about the accident are worksite specific. Meaning the employer who directs the means, methods, and processes of the work.. Injury goes on host log since day-to-day supervision of employee is done by the host employer. Host/temp agency share a joint responsibility to train workers to report accidents and injuries to them. The host and Temporary agency have a responsibility to share information regarding the accident.

WORK-RELATED PRACTICE

Please complete the following and be prepared to support your answers.

1. The accountant is in the company lunchroom during his morning break. He trips on a loose tile and breaks his wrist. Is this case work-related?

_____ YES _____ NO

2. A law clerk is playing an impromptu game of baseball on the company ball field during lunch and twists her ankle. She misses three days from work as a result of her injury. Is this case work-related?

_____ YES _____ NO

3. The janitor is sent to the company parking lot to do some repair work. While on the job, he is struck by a car and is hospitalized for several weeks. Is this case work-related?

_____ YES _____ NO

4. Lois Lane, a store clerk, returns to her store during off hours solely for the purpose of shopping. She falls down a flight of stairs and suffers a concussion. Is this case work-related?

_____ YES _____ NO

WORK-RELATED PRACTICE

Please complete the following and be prepared to support your answers.

1. The accountant is in the company lunchroom during his morning break. He trips on a loose tile and breaks his wrist. Is this case work-related?

YES NO

Yes, he is at work, on the premises.

2. A law clerk is playing an impromptu game of baseball on the company ball field during lunch and twists her ankle. She misses three days from work as a result of her injury. Is this case work-related?

YES NO

No, this meets the 1904.5 work-relatedness exception for voluntary participation in a recreational activity.

3. The janitor is sent to the company parking lot to do some repair work. While on the job, he is struck by a car and is hospitalized for several weeks. Is this case work-related?

YES NO

Yes, this is work-related. He was working on behalf of his employers and no exceptions apply. The parking lot commuting exception does not apply here.

4. Lois Lane, a store clerk, returns to her store during off hours solely for the purpose of shopping. She falls down a flight of stairs and suffers a concussion. Is this case work-related?

YES NO

No, this meets the work-relatedness exception because she was present as a member of the general public.

WORK-RELATED PRACTICE (cont.)

5. Taylor and Travis start a rubber band fight when they should be working. Travis is hit in the face with a rubber band and receives a serious eye injury requiring stitches. Is this case work-related?

_____ YES _____ NO

6. A convenience store clerk, was working alone at night and was shot dead during a store robbery. Is this case work-related?

_____ YES _____ NO

7. A technician and her family decided to attend a company picnic at the zoo. She falls against the barbeque and receives second-degree burns. The technician misses one week from work as a result of her injury. Is this case work-related?

_____ YES _____ NO

8. Louisa burns her ear while using her curling iron to curl her hair while at the office. As a result, she requires a prescription burn cream. Is this case work-related?

_____ YES _____ NO

WORK-RELATED PRACTICE (cont.)

5. Taylor and Travis start a rubber band fight when they should be working. Travis is hit in the face with a rubber band and receives a serious eye injury requiring stitches. Is this case work-related?

YES NO

This would be considered work-related – there are no exemptions for horseplay. Also, stitches are medical treatment

6. A convenience store clerk, was working alone at night and was shot dead during a store robbery. Is this case work-related?

YES NO

This would be considered work-related – there are no exemptions for violence. For OSHA purposes this is considered WPV and falls under high-risk industry – late night retail and may result in an inspection.

7. A technician and her family decided to attend an employee picnic at the zoo. She falls against the barbeque and receives second-degree burns. She misses one week from work as a result of her injury. Is this case work-related?

YES NO

No. Exception: Voluntary participation in a recreational activity

8. Louisa burns her ear while using her curling iron to curl her hair while at the office. As a result, she requires a prescription burn cream. Is this case work-related?

YES NO

Determining OSHA Recordability

Instructions: Determine whether or not a case must be recorded on an OSHA log. If recordable, determine how to classify it and whose log it should go on.

Scenario: Micky Mantle, a machine operator was injured while working at ACME Innovators – the host employer. The machine operator was a temporary employee hired from Short Timers, a personnel lending agency, but supervised by the host employer (Acme).

The glove the operator was wearing on his right hand was snagged by the tool on his drill press, drawing his right hand into the drill. The injuries to his hand included two broken fingers and numerous cuts. The physician sutured the cuts and applied splints to his fingers.

Method for Analysis –use the five steps, decision tree from 1904.4

1. **Did employee experience an injury or illness?** A case must involve a death, illness, or injury to an employee.

Yes – operator experienced an injury, two broken fingers and numerous cuts.

2. **Is it work-related?** Did it result from an occupational event - one occurring in the work environment or while on agency business?

Yes - operating a machine

3. **Is it a new case?**

Yes

Method for Analysis –use the five steps (continued)

4. Is it recordable? Does it meet one of these criteria:

- X All work-related fatalities
- Occupational injuries and illnesses that resulted in:
 - X Days away from work,
 - X Restricted work or job transfer
 - ✓ Medical treatment
 - X Loss of consciousness.
- X Significant cases diagnosed by a physician or LHCP
- X Occupational injuries and illnesses that meet special recording criteria
 - X needlestick and sharps injuries
 - X medical removal under OSHA standards
 - X occupational hearing loss
 - X work-related tuberculosis

Yes - Recordable because medical treatment required: Sutures/stitches and rigid splints are considered to be medical treatment beyond first aid.

Method for Analysis –use the five steps (continued)

5. For Column M - Is it an injury or an illness?

- ✓ Injuries include cases such as, but not limited to, a cut, fracture, sprain or amputation.
- X Illnesses include both acute and chronic illnesses, such as, but not limited to, a skin disorder, respiratory conditions, poisoning, hearing loss, or all other illnesses.
If an illness, record and check the appropriate illness category.

Answer: Injury, column (M1)

Who should record the injury? **The employer who provides day-to day supervision must record this injury meaning that this goes on the host Acme's OSHA log, since Acme supervised the day-to-day means and processes of work and activities of the temp worker.**

The event is only recorded once, and it does not go on the Short Timer's (the temporary agency) OSHA log.

OSHA's Form 300 (Rev. 04/2004)

Log of Work-Related Injuries and Illnesses

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#). In addition, the forms are programmed to auto-calculate as appropriate.

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20

U.S. Department of Labor
Occupational Safety and Health Administration



Form approved OMB no. 1218-0176

Please Record:

- Information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid.
- Significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional.
- Work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12.

Reminders:

- Complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.
- Feel free to use two lines for a single case if you need to.
- Complete the 5 steps for each case.

Establishment name

City State

Step 1. Identify the person **Step 2. Describe the case** **Step 3. Classify the case** **Step 4.** **Step 5.**

| (A) Case no. | (B) Employee's name | (C) Job title <i>(e.g., Welder)</i> | (D) Date of injury or onset of illness <i>(e.g., 2/10)</i> | (E) Where the event occurred <i>(e.g., Loading dock north end)</i> | (F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill <i>(e.g., Second degree burns on right forearm from acetylene torch)</i> |
|-----------------|------------------------|---|--|--|--|
| Reset | | | ____/____/____ month / day | | |
| Reset | | | ____/____/____ month / day | | |
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| Reset | | | ____/____/____ month / day | | |
| Reset | | | ____/____/____ month / day | | |

SELECT ONLY ONE circle based on the most serious outcome:

| Death (G) | Remained at Work | | |
|-----------------------|----------------------------|------------------------------------|-------------------------------|
| | Days away from work (H) | Job transfer or restriction (I) | Other recordable cases (J) |
| <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
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Enter the number of days the injured or ill worker was:

| Away from work (K) | On job transfer or restriction (L) |
|-----------------------|---------------------------------------|
| ____ days | ____ days |
| ____ days | ____ days |
| ____ days | ____ days |
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| ____ days | ____ days |
| ____ days | ____ days |

Select one column:

| Injury (1) | Illness | | | | |
|-----------------------|-----------------------|-------------------------------|-----------------------|-----------------------|----------------------------|
| | Skin disorder (2) | Respiratory conditions (3) | Poisoning (4) | Hearing loss (5) | All other illnesses (6) |
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Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

Add a Form Page

Page totals ▶ 0 0 0 0 0 0 0 0 0 0 0 0

Be sure to transfer these totals to the Summary page (Form 300A) before you post it.

Recording Number of Days

Instructions: Determine the number of days away, restricted or transferred as a result of the injury/illness and record on the OSHA log.

Scenario Pat Green, an electrician in the maintenance department of Tool-N-Die Company, slipped on oil on the floor on Monday, January 10 at 7:05 a.m., just 5 minutes after starting work. Pat suffered a bad sprain (right leg) and went to the doctor. Pat returned to work on the 14th as directed by the doctor.

Pat felt okay over the weekend, and worked on Monday, the 17th. On Tuesday, the 18th Pat phoned in. His leg was hurting, and he returned to the doctor's office that day. Pat was again released by the doctor and returned to work on the 20th with the doctor's permission but had to stay off the foot. Pat was given restricted duty and placed on inspection work instead of on the assembly line. As an inspector, Pat could remain seated with the right leg raised on a support. Pat was able to return to regular job duties on the 27th.

| Sun | Mon | Tues | Wed | Thu | Fri | Sat |
|------------|------------|-------------|------------|------------|------------|------------|
| 9 | 10 | 11 | 12 | 13 | 14 | 15 |
| 16 | 17 | 18 | 19 | 20 | 21 | 22 |
| 23 | 24 | 25 | 26 | 27 | 28 | 29 |

| Sun | Mon | Tues | Wed | Thu | Fri | Sat |
|-----|-----|------|-----|-----|-----|-----|
| 9 | 10 | 11* | 12* | 13* | 14 | 15 |
| 16 | 17 | 18* | 19* | 20x | 21x | 22x |
| 23x | 24x | 25x | 26x | 27 | 28 | 29 |

Activity Answers: Recordable number of days

Pat was injured on the 10th. The initial day is not counted.

Pat was not at work on the 11th, 12th and 13th, but returned on the 14th.

The 15th, 16th and 17th are excluded as Pat had returned to work with doctor's permission.

Pat phoned in and was not at work on the 18th and 19th (physician approved). So at this point, Pat has been away from work for **5 days.**

Pat returns to work on the 20th but is placed on restricted activity through the 26th, returning to regular activities on the 27th. **Seven (7) days of restricted work.**

Entering Information on the OSHA 300 Log

Are the following 11 cases recordable? If so, how would they be entered?

Case 1: Jon Johnson, Packer, Warehouse. Sprained right wrist in falling over a box. The doctor said that Mr. Johnson was not to use their right arm for the next two days. The employee's scheduled work requires use of left arm for those 2 days and employee was able to continue working. No days away from work. The employee's routine job functions include tasks that require the use of both arms.

Entering Information on the OSHA 300 Log

Are the following 11 cases recordable? If so, how would they be entered?

Case 1: Jon Johnson, Packer, Warehouse. Sprained right wrist in falling over a box. The doctor said that Mr. Johnson was not to use their right arm for the next two days. The employee's scheduled work requires use of left arm for those 2 days and employee was able to continue working. No days away from work. The employee's routine job functions include tasks that require the use of both arms.

Answer: Recordable. His routine job functions require the use of both hands. Day of incident is not counted. This is a one-time event, so it is an injury resulting in two days of job restriction

References: 1904.7(b)(4)(i)(A) and 1904.7(b)(4)(ii); (an employee's routine functions are those work activities the employee regularly performs at least once per week).

Recordable? If so, how would it be entered on log?

Case 2: On January 1, 2024, Pat James, Electrician in Maintenance, was shot in the left shoulder by a member of the public. The incident occurred at the loading dock while Pat was working. Pat was hospitalized and off work for several weeks, returning to full duty on January 22, 2024.

Recordable? If so, how would it be entered on log?

Case 2: On January 1, 2024, Pat James, Electrician in Maintenance, was shot in the left shoulder by a member of the public. The incident occurred at the loading dock while Pat was working. Pat was hospitalized and off work for several weeks, returning to full duty on January 22, 2024.

*Answer: Recordable – FAQ 5-2, (No exemption for acts of violence)
Days away, Injury. Do not count the date of the incident: 20 days away. The employer must also report the hospitalization.*

Recordable? If so, how would it be entered on log?

Case 3: February 14, 2024, Sam Smith, Accounting Clerk, slipped on ice in the company-owned parking lot while leaving work to attend a business meeting. Broke left ankle and was off work returning to full duty on February 28, 2024.

Recordable? If so, how would it be entered on log?

Case 3: February 14, 2024, Sam Smith, Accounting Clerk, slipped on ice in the company-owned parking lot while leaving work to attend a business meeting. Broke left ankle and was off work returning to full duty on February 28, 2024.

Answer: Recordable – FAQ 5-10, (commuting exception does not apply) Days away, Injury. Do not count the day of the accident: 13 lost workdays

Recordable? If so, how would it be entered on log?

Case 4: March 1, 2024, Shea Butter, Maintenance Supervisor was working in boiler room when he was found unconscious inside the boiler. He was taken by ambulance to the nearest hospital and died March 5, 2024. Diagnosis was death due to carbon monoxide poisoning.

Recordable? If so, how would it be entered on log?

Case 4: March 1, 2024, Shea Butter, Maintenance Supervisor was working in boiler room when he was found unconscious inside the boiler. He was taken by ambulance to the nearest hospital and died March 5, 2024. Diagnosis was death due to carbon monoxide poisoning.

Answer: Recordable - 1904.7(b)(2), Death, Poisoning. Also the initial hospitalization was reportable.

Recordable? If so, how would it be entered on log?

Case 5: Leslie Temple, Administrative Assistant, works in the front office and reported to his supervisor that he was experiencing severe pain in both wrists. Plant nurse provided immobilizing wrists splints to use for both wrists. He had no time off and was able to perform all his job duties.

Recordable? If so, how would it be entered on log?

Case 5: Leslie Temple, Administrative Assistant, works in the front office and reported to his supervisor that he was experiencing severe pain in both wrists. Plant nurse provided immobilizing wrists splints to use for both wrists. He had no time off and was able to perform all his job duties.

Answer: Recordable - 1904.7(b)(5)(ii)(F) – (devices with systems designed to immobilize parts of the body are considered medical treatment) – Other recordable cases (column J), All other illnesses (MSD) Column (6)

Recordable? If so, how would it be entered on the 300 Form?

Case 6: Bob Roberts, Shipping Department Forklift Operator. A forklift ran over his foot and broke his right big toe on Monday. He was unable to walk but he was able to continue driving the forklift. Another employee was able to cover for him and perform Bob's work that required walking until Friday when Bob was able to walk again. Bob did not lose any workdays.

Recordable? If so, how would it be entered on the 300 Form?

Case 6: Bob Roberts, Shipping Department Forklift Operator. A forklift ran over his foot and broke his right big toe on Monday. He was unable to walk but he was able to continue driving the forklift. Another employee was able to cover for him and perform Bob's work that required walking until Friday when Bob was able to walk again. Bob did not lose any workdays.

Answer: Recordable – 1904.7(b)(4)(i)(A),

Job restriction, Injury (Do not count the day of the incident): He was unable to walk and perform all functions of his job on Tuesday, Wednesday, Thursday and returned to full duty Friday so 3 (three) days of job restriction.

Recordable? If so, how would it be entered on the 300 Form?

Case 7: Axyl Rose, maintenance employee in the Maintenance Department. Foreign object in right eye (not embedded). Doctor flushed the eye and said employee could return to work, but Axyl Rose did not return for 2 days because of eye pain.

Recordable? If so, how would it be entered on the 300 Form?

Case 7: Axyl Rose, maintenance employee in the Maintenance Department. Foreign object in right eye (not embedded). Doctor flushed the eye and said employee could return to work, but Axyl Rose did not return for 2 days because of eye pain.

Answer: Not recordable – 1904.7(b)(3)(iii); (follow recommendation of physician or health care professional)

However, the employer has the final responsibility for recordkeeping. If employer told employee to stay home for two days to recover from the eye incident, then this would be recordable, injury, two lost workdays.

Recordable? If so, how would it be entered on the 300 Form?

Case 8: March 17, 2024, Carmel Latte, maintenance employee amputated two fingers on left hand while servicing the punch press. EMS transported her to nearest hospital for treatment. She was out of work and did not return until March 31, 2024, when she returned to full duty.

Recordable? If so, how would it be entered on the 300 Form?

Case 8: March 17, 2024, Carmel Latte, maintenance employee amputated two fingers on left hand while servicing the punch press. EMS transported her to nearest hospital for treatment. She was out of work and did not return until March 31, 2024, when she returned to full duty.

Answer: Recordable - Days away, Injury (Do not count the day of the accident, 13 days away)

Recordable? If so, how would it be entered on the 300 Form?

Case 9: On the same day as the previous case, March 17, 2024, Betsy Ross, a maintenance employee who is also a designated first aider was stuck with a needle. She told her supervisor that during clean up of the punch press and surrounding area after the double amputation, she received a needlestick to her left hand after the EMS team removed employee and transported her to hospital.

Recordable? If so, how would it be entered on the 300 Form?

Case 9: On the same day as the previous case, March 17, 2024, Betsy Ross, a maintenance employee who is also a designated first aider was stuck with a needle. She told her supervisor that during clean up of the punch press and surrounding area after the double amputation, she received a needlestick to her left hand after the EMS team removed employee and transported her to hospital.

Answer: Recordable – 1904.8(a) - (all work- related needlestick injuries/cuts contaminated with another’s blood must be recorded); Other recordable cases, Injury - Privacy Case

Recordable? If so, how would it be entered on the 300 Form?

Case 10: Two months later, May 17, 2024, Betsy Ross, designated first aider/maintenance employee, who was stuck with needle March 17, 2024, seroconverts. She is diagnosed with Hepatitis C. Off work 21 days.

Recordable? If so, how would it be entered on the 300 Form?

Case 10: Two months later, May 17, 2024, Betsy Ross, designated first aider / maintenance employee, who was stuck with needle March 17, 2024, seroconverts. She is diagnosed with Hepatitis C. Off work 21 days.

*Answer: **Not a new case** – 1904.8(b)(3) - update OSHA log to identify the disease, change classification from injury to illness, and add days away. Still remains “Privacy Case”. Update privacy log as needed.*

Recordable? If so, how would it be entered on the 300 Form?

Case 11: Billy Eyelash, sales manager, was on a business trip to New Orleans and had completed his training session for the day. While having dinner with friends, he fell off a barstool and sustained severe head injuries. He was unable to work for one month.

Recordable? If so, how would it be entered on the 300 Form?

Case 11: Billy Eyelash, sales manager, was on a business trip to New Orleans and had completed his training session for the day. While having dinner with friends, he fell off a barstool and sustained severe head injuries. He was unable to work for one month.

Answer: Not recordable – Injuries or illnesses that occur when the employee is on travel status do not have to be recorded if they meet one of the exemptions in (i) Checked into a hotel or motel for one or more days (ii) taken a detour for personal reasons - 1904.5(b)(6); (activity was not in the interest of the employer) ie – having dinner with friends.

Injuries and illness that occur while an employee is on travel status are work-related if, at the time of injury or illness, the employee was engaged in work activities in the interest of the employer. Examples of such activities include travel to and from customer contacts, conducting job task and entertaining or being entertained to transact, discuss or promote business (work-related entertainment includes only entertainment activities being engaged in at the direction of the employer).

Our favorite nuggets



- RK depends on size of company/firm
- ITA – depends on size of establishment
- Reporting – not size dependent.
- Pain is sign/symptom
- Employer has ultimate responsibility for maintaining RK
- Employer can put employee on restricted /transferred work
- COVID healthcare – if covered by 1910.502 (ETS) portions are still in effect

Still have questions?

- Visit [OSHA.gov](https://www.osha.gov) the “Topics” links to Recordkeeping under “Key Topics” (standard, directive, forms, FAQs, training and more)
- Contact your local Compliance Assistance Specialist (CAS) –visit OSHA.gov open the “Help and Resources” tab for a CAS list.
- Contact your state 21(d) Consultation office - from OSHA.gov click on the “OSHA” tab then “Find an OSHA Office”– for a link to the free, confidential On-site Consultation Program in every state.
- If you are covered by a State Plan contact the State Plan – from OSHA.gov click on the “OSHA tab” then “State Plans” or “Find an OSHA Office.”
- Visit OSHA.gov, open the “Help and Resources” tab and look for the OSHA Training Institute Education Centers (OTIEC) -yours may have a class. Keene State is the OTIEC in New England and offers a full day class on recordkeeping.

Thank you and QUESTIONS?

