

# OSHA 300'S

Recording Update  
February 12, 2020

# Overview

- Employers at their establishments must record the fatalities, injuries and illnesses of covered employees that
  - Are work-related;
  - Is a new case; and
  - Meets the recording criteria.




# Who are Covered Employees?

- All of your employees including day laborers.
- Others' employees if you provide day-to-day supervision

# What is the Establishment?

- Short-term sites (less than a year)
  - Can keep one OSHA 300 for all short-term sites
  - Can keep at headquarters if can meet time frames for production
- Typically, each physical site must have own records



# How do I decide whether a particular injury or illness is recordable?

- Did the employee experience an illness or injury?
- Definition “an abnormal condition or disorder”

# Is It Work-Related?

- Assume that injuries or illness from events or exposure in work environment is work-related.
- Not work-related if:
  - At work as member of general public
  - Results solely from a non-work-related event
  - Voluntary participation in wellness program or in a medical, fitness or recreational activity
  - Results from eating or drinking food

# Is It Work-Related?

- Not work-related if:
  - The employee was injured doing personal tasks at the establishment after work hours
  - A result of grooming, self medication for non-work related reason or intentionally self-inflicted
  - A motor vehicle accident while employee is commuting

# Is It Work-Related?

- Not work-related if:
  - The illness is the cold or flu – Note contagious diseases like the plague are work-related if the employee is infected at work
  - The illness is mental illness unless a HCP says the job is driving the employee crazy



# Is It a New Case?

- Most are obvious.
- If completely recovered and the injury or illness reoccurs, new case.
- If a recurrence of signs and symptoms from new event, new case.
- If more of the same signs or symptoms, do not record.

# General Recording Criteria

- 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 Health Care Professional (HCP)

# Days Away from Work

- Do not count the day of the injury.
- Calendar days not work days.
- If lengthy, estimate and update.
- Cap at 180 days.
- The HCP's opinion rules:
  - Employee hurt comes to work next day but HCP said stay out 5 days, record 5 days.
  - Employee stays out 5 days, HCP says return to work, record no days.

# Days Away from Work

- Employee injured on Friday and goes home, stays in bed all weekend and returns to work the next Monday, do you record?

# Days Away from Work

- Answer – that depends
  - If the employee brings a doctor's note saying that she should have taken two days off, record two days
  - If the employee simply returns to work, do not record any days

# Restricted Days

- An employee is doing “restricted work” when he or she is kept from performing one or more of the routine functions of the job, or works less than a normal workday.
- While HCP’s opinions rule, a restriction does not necessarily mean that it will be recorded.
- Only day after injury.

# Job Transfers

- A job transfer is treated the same as restricted duty.

# Medical Treatment vs. First Aid

- If a work-related injury or illness requires *medical treatment beyond first aid*, it must be recorded on the OSHA 300 log.

Medical treatment includes the management and care of a patient, but does *not* include visits to a doctor or other licensed health care provider solely for observation or counseling, tests such as x-rays and blood tests or other diagnostic tests, even if they include medication, or “first aid.”



# Medical Treatment vs. First Aid

- First Aid is limited solely to the following:
- Nonprescription medications taken at nonprescription strength (e.g., Tylenol, aspirin);
- Immunizations or vaccines, including tetanus shots;
- Bandages such as band-aids, (BUT stitches would be medical treatment);

# Medical Treatment vs. First Aid

- Hot or cold packs;
- Ace bandages, supports, or back belts (BUT a wrist brace would be medical treatment);
- Temporary immobilization devices such as splints, neck collars, back boards;
- Drilling a fingernail to relieve pressure (ouch!) or draining a blister;

# Medical Treatment vs. First Aid

- Eye patch;
- Removing foreign body from eye using irrigation or swab;
- Removing splinters from areas other than the eye;
- Use of finger guards

# Medical Treatment vs. First Aid

- Massage (BUT chiropractic treatment or physical therapy would be medical treatment); or
- Fluid intake to relieve heat stress
- Status of person giving “medical treatment” does not matter

# Significant Injury or Illness

- Work-related cases involving *cancer*, *chronic irreversible disease*, a *fractured or cracked bone*, or a *punctured eardrum* always must be recorded at the time of diagnosis, even if they do not result in death, days away from work, work restrictions, job transfer, medical treatment, or loss of consciousness.

# Musculoskeletal disorders (ERGONOMICS)

- Unless (or until) OSHA enacts specific ergonomics regulations defining musculoskeletal disorders (MSDs) and setting standards and limits for their control, there are no specific criteria for recording such injuries.
- However, *MSDs still must be recorded in the same manner as other work-related injuries and illnesses.*

# OSHA 300's

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