

## **PRESENTER'S GUIDE**

# **"OSHA RECORDKEEPING FOR EMPLOYEES"**

*Part of MARCOM's Safety, Regulatory  
and Human Resources Library*

# **OUTLINE OF MAJOR PROGRAM POINTS**

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The following outline summarizes the major points of information presented in the program. The outline can be used to review the program before conducting a classroom session, as well as in preparing to lead a class discussion about the program.

- **You and your employer have a powerful tool for making your facility a safer place to work.**
  - It's OSHA's injury and illness recordkeeping system, often referred to as "Part 1904," after its Federal Regulation part number.
- **In addition to establishing a standard methodology for recording work-related injuries and illnesses, Part 1904 allows your employer to easily create statistics on any incidents that occur at your facility.**
  - These statistics help them to identify problem areas within your facility... and to correct any hazardous conditions that exist.
- **Part 1904 also gets you involved in the recordkeeping process.**
  - First, by requiring that the annual summary of workplace injuries and illnesses must be posted so that you may examine it.
  - Second, it protects the privacy of injured and sick workers by requiring that highly personal information, such as the identities of individuals, or detailed information on sensitive conditions such as genital infections, be kept confidential.
- **There's a "bigger picture" here, too. On a national level, OSHA relies on the data that companies like yours collect.**
  - Without this data, OSHA would have a much more difficult time determining when a new regulation was necessary, or if existing regulations needed to be modified.
  - And without appropriate regulations, workers might not be protected from serious injuries, or even death.

- **In order for this recordkeeping system to be successful, you have to be involved.**
  - You and your representatives play a crucial role in complying with Part 1904, because you are the "eyes and ears" of the recordkeeping system.
  - That's why you need to know how to report injuries or illnesses to management, as well as what information to give them.
  
- **To encourage your participation, OSHA prohibits employers from discriminating against anyone who:**
  - Reports a work-related fatality, injury or illness.
  - Files safety and health complaints.
  - Asks for appropriate access to health records.
  - Exercises any other rights afforded by Part 1904.
  
- **How do you know if you're affected by these regulations? Employees protected by the OSHA recordkeeping rule include everyone on your company's payroll, whether they are classified as:**
  - Labor.
  - Executive.
  - Hourly.
  - Salary.
  - Part-time.
  - Seasonal.
  - Contract.
  - Freelance.
  - Migrant.
  
- **Certain types of businesses are exempt, but if you are watching this program, it's a good bet that your business is covered.**

**You play an important role in OSHA's recordkeeping system, and there are some important things that you need to remember as you do your part.**

- For example, recording a work-related injury, illness, or fatality does not mean that an OSHA rule has been violated or that a particular person was at fault.
- Neither does this rule determine who is... or isn't... eligible for workers' compensation or other benefits.

- **The sole intent of the OSHA Recordkeeping Rule is to make your workplace safer, by providing a way to efficiently report and record work-related injuries or illnesses.**
- **But what does this term "work-related" really mean?**
  - Simply put, an injury or illness may be work-related if an event in the workplace caused it or made it worse.
  - That definition covers a lot of ground, so much so, in fact, that it will take less time to discuss when a condition is not work-related.
- **Medical problems are not work-related if they occurred in the workplace during off-hours, or took place when employees were doing tasks unrelated to their jobs.**
  - Let's say that a wood-worker in a small furniture-making company is building a chair for use in his own home.
  - One evening, outside of normal business hours, he is working on this personal project when he hurts his hand while using a lathe.
  - Since this injury didn't occur during the employee's normal work day, and did not involve a normal work activity, under Part 1904 this is not considered to be a work-related injury.
- **Conditions that result from voluntary participation in medical, fitness or recreational activities, like giving blood, getting a flu shot or playing on the company softball team, are also not work-related.**
  - If a medical condition develops as a result of your eating, drinking, or preparing food or drink for personal consumption, it is not considered to be work-related, either.
- **If, however, you or a coworker get sick from eating food that is contaminated by materials in your workplace such as lead, or the food was supplied by your employer, the resulting illness would be work-related.**

- **Neither the common cold nor the flu is classified as work-related.**
  - But contagious diseases such as tuberculosis or hepatitis are classified as work-related...if you were infected at work.
  
- **These are some of the most common categories of non-work-related medical conditions, there are a number of others.**
  - As you can imagine, with all this to consider your managers can sometimes have a difficult time determining if an incident is actually work-related.
  
- **Complicating the issue is whether or not the medical problem is recordable.**
  - This is one of the places that you can help, by gathering as much information as possible about an incident you see or are involved in.
  
- **Not all work-related injuries or illnesses are recordable.**
  - "Recordable" means that your employer is required by law to report the injury or illness to OSHA and must keep a record of the injury or illness on official OSHA recordkeeping forms.
  
- **An injury or illness is recordable if it results in:**
  - Days away from work.
  - Restricted work.
  - Transfer to another job.
  - Medical treatment beyond first aid.
  - Loss of consciousness.
  - Any significant injury or illness diagnosed by a physician or other licensed healthcare professional.
  - Death.
  
- **Now that you understand when an injury is both work-related and recordable, let's look at some of the most common types of work-related, recordable injuries.**

- **Musculoskeletal disorders (MSDs) are among the types of recordable illnesses that occur most frequently.**
  - MSDs tend to affect workers who are doing repetitive labor, such as some assembly-line jobs, or frequent heavy lifting.
  
- **MSDs include ailments of the:**
  - Muscles.
  - Nerves.
  - Tendons.
  - Ligaments.
  - Joints.
  - Cartilage.
  - Spinal discs.
  
- **Examples of MSDs include:**
  - Carpal tunnel syndrome.
  - Tendinitis.
  - Low back pain.
  
- **All MSD reports must indicate the number of days that the employee will be away from work or restricted from performing their normal jobs.**
  
- **Lacerations, puncture wounds, fractures and burns form another broad category of workplace injuries.**
  
- **What determines whether these types of injuries are recordable is their severity.**
  - For example, a mild scald from a hot water pipe would not be recordable.
  - But a third-degree burn from a high-pressure steam pipe would be.
  - Likewise, a tiny puncture wound from an office stapler would not be recordable.
  - But a deeply-penetrating puncture wound from a drill press would be.

- **When it comes to "severity," the deciding factor is usually the degree of treatment that is necessary.**
  - So an injury that needs nothing more than an adhesive bandage or some first aid cream would probably not be recordable.
  - While a wound requiring stitches or other treatment from a physician, hospitalization or time off from work would be.
  
- **Any accident in which an employee is exposed to someone else's blood falls into this category of work-related injuries or illnesses, as well. These types of incidents can lead to the transmission of deadly diseases, such as:**
  - HIV, the human immunodeficiency virus that causes AIDS.
  - Hepatitis C, a liver disease.
  
- **Work-related tuberculosis cases are also recordable.**
  - A highly-contagious respiratory disease, TB often strikes healthcare workers, firefighters and other "first responders."
  - It can also occur in industrial settings, especially where large groups of employees work in close proximity to one another.
  
- **Now that you're familiar with some of the most common recordable injuries and illnesses, let's look at how these incidents are recorded.**
  - Even though you probably won't be the person responsible for documenting recordable incidents, it is still absolutely necessary for you to know how it's done.
  - You can't effectively be the "eyes and ears" of the recordkeeping process without being able to tell the difference between facts that must be recorded... and superfluous information.
  - The best way to "get educated" is to look at the recordkeeping forms themselves.

- **There are three main forms that are used to keep illness and injury records.**
  - The "OSHA 300", the "Log of Work-Related Injuries and Illnesses", contains one- or two-line descriptions of each recordable injury or illness in your facility.
  - The "OSHA 301", the "Injury and Illness Incident Report", contains all of the details that are pertinent to a specific incident.
  - Form 300A is OSHA's official "summary" form, and shows the total number of incidents in specific injury and illness categories.
- **OSHA feels that it is so important to fill out the 301 form while the information is fresh in everyone's mind, it must be completed within seven calendar days after management has been notified that the recordable injury or illness has occurred.**
- **At the end of each year, your employer will use the information on the 300 and 301 forms to fill out the third OSHA recordkeeping form, the 300A.**
- **The Form 300A must be posted in your facility from February 1 to April 30 of the following year.**
  - It must be in a conspicuous place, where notices to employees are customarily displayed, so you and your coworkers can easily see it. And by law, it must never be altered, defaced or covered by any other material.
  - To help OSHA track injury and illness trends better in real time, some companies must also submit electronic copies of their Form 300A to the agency by March 2 of that year.
- **OSHA requires all injury and illness records to be kept on file for at least five years, so they can be updated and referenced whenever necessary.**

- **We've discussed the essentials of what work-related injuries and illnesses are, and why reporting them is a crucial part of keeping your facility safe.**
  - What we haven't looked at yet is how to report these incidents.
  
- **While OSHA hasn't established an official method that should be used to report workplace injuries and illnesses, there are some common-sense guidelines to follow.**
  - The first criterion for reporting workplace injuries and illnesses is to be prompt. If you are hurt on the job, let your manager know about it as soon as you can (but make sure you get medical treatment first).
  - The faster your boss knows about a problem, the quicker they can move to fix it.
  
- **Don't give your manager too much information.**
  - Just include the basic facts.
  - If more information is needed, someone will ask for it.
  
- **You need to be patient.**
  - It might take a while, and a lot of questions, for people to determine exactly what happened.
  - You may be even be asked to help out by writing down a description of the incident.
  
- **Keep in mind that the aim of reporting workplace incidents is to keep you and your coworkers safe.**
  - By cooperating to the fullest, you are playing an important role in this process.

**\* \* \* SUMMARY \* \* \***

- **OSHA's Recordkeeping Rule makes it possible for your employer to keep you and your coworkers safer on the job, and to keep employees safer in workplaces across the country as well.**
  - But your help is required to make this process work best for everyone.

- **OSHA's Recordkeeping Rule requires employers to keep track of work-related injuries and illnesses.**
- **Collecting this information helps companies to identify problem areas within their facilities, and correct any hazardous conditions that exist.**
  
- **It also helps OSHA to identify hazards that exist in businesses across the country, and update existing standards or create new ones, to control or eliminate them.**
  
- **Employees play a crucial role as the "eyes and ears" of the recordkeeping system, by reporting the injuries and illnesses that occur in their facility.**
  
- **Now that you understand OSHA's recordkeeping requirements, and know how you can participate in gathering important injury and illness information, you can help create a safer workplace for yourself and your coworkers... as well as other employees across America... every day!**