

On-Line Safety Contest ... See p. 64

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MERCHANDISING ISSUE

- 2014 Merchandising Outlook
- OSHA Recordkeeping Checklist
- GEAPS Exchange 2014 Coverage

Save The Date ... 2014 Safety Conference ... July 29-31 ... Kansas City, MO

Recordkeeping Checklist

This series of seven articles (pages 92-102) is based on a white paper written by Eric Conn, head of the OSHA Practice Group at the Washington, DC law firm Epstein Becker & Green (202-861-5335).



Eric Conn

The Occupational Safety and Health Administration (OSHA) regulations at 29CFR 1904 and 1952 set forth a maze of injury and illness recordkeeping and reporting requirements applicable to approximately 1.5 million U.S. workplaces.

OSHA places significant emphasis on injury and illness recordkeeping, because the date culled from employers' injury and illness logs is used by OSHA

to identify workplace safety and health problems and to track progress in solving those problems.

OSHA also uses recordkeeping data to improve standards, tailor enforcement programs, and focus individual inspections.

This checklist is intended to help employers decode OSHA's complex recordkeeping regulations and simplify the process.

It highlights key issues for employers, such as exemptions from recordkeeping, required OSHA forms for recording certain work-related injuries and illnesses, recordkeeping protocols, updating/verifying records, and creation of record-

keeping policies and practices.

The checklist reflects the collective experience of the OSHA Practice Group at Epstein Becker & Green, P.C., which manages and counsels employers through hundreds of OSHA inspections of all types across the nation.

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Scope of Recordkeeping Rule

Determine Whether a Partial Exemption Applies

Employers are required to record certain work-related injuries and illnesses unless the employer:

- Has 10 or fewer employees (companywide) at all times during the previous calendar year.
- Operates in one of the specific low-hazard industries identified by OSHA (e.g., retail, service, finance, insurance, or real estate).

Grain elevators and feed mills are *not* considered low-hazard. They are considered "partial" exemptions because:

- Regardless of size or industry, all employers must report any workplace

incident that results in a fatality or the hospitalization of three or more employees.

- An otherwise exempted employer nevertheless may be required to keep injury and illness records upon written notice from OSHA or the Bureau of Labor Statistics.

Determine Whether Injured Employees are Covered

Recordkeeping requirements apply to an injury or illness for:

- All employees on the payroll (whether labor, executive, hourly, salary, part-time, seasonal, or migrant).
- Employees not on the payroll but who are supervised on a day-to-day ba-

sis (e.g., temporary employees, subcontractors, borrowed employees, etc.).

- All contractor employees who work in process areas covered by OSHA's Process Safety Management standard, even if the employer does not supervise the contract employees on a day-to-day basis.

The OSH Act does not treat any of the following as employees for recordkeeping purposes:

- Contractors not supervised by the employer.
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OSHA Recordkeeping Forms

OSHA 300—Log of Work-related Injuries and Illnesses

- An annual, cumulative chart of work-related injuries and illnesses.
- Used to document and classify injuries and illnesses and note the severity of each case.

• Within seven calendar days of receiving notice that a covered employee has sustained a recordable injury or illness, record the injury or illness on the 300 Log.

• Employees must record all of the required information on the 300 Log for each recordable case, including:

- Case number.
- Employee's name (unless it is a privacy case).
- Date of the injury or illness.
- Where in the workplace the injury occurred (e.g., warehouse).
- Brief description of the injury or illness.
- Classification of the injury or illness (e.g., death, days away from work, etc).
- Number of calendar days away from work or on restricted duty (including weekends and holidays).

At the end of each calendar year, employers must create an annual summary of injuries and illnesses recorded on the OSHA 300 Log.

OSHA 301 – Injury and Illness Incident Report

- For each injury or illness recorded on the OSHA 300 Log, the employer must complete an incident report within seven calendar days of receipt of information that a recordable injury or illness has occurred.

• The 3201 Report supplements the 300 Log by providing more detailed information about a particular case.

• The 301 Report must include information about the:

- Employee's identity.
- Nature and cause of the injury (e.g., what the employee was doing at the time of the accident and what happened).
- Identity of the treating medical professional.
- Treatment provided to the employee.

OSHA 300-A – Annual Summary of Work-Related Injuries and Illnesses

- At the end of each calendar year, employers must create

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an annual summary of injuries and illnesses recorded on the OSHA 300 Log.

- The 300-A Summary Form must be completed even if there are no recordable injuries during the calendar year.

- The 300-A Summary Form must summarize the following data from the 300 Log:

- Total number of workplace fatalities.
- Total number of cases with days away from work (and the number of days).
- Total number of cases with job transfer or restriction (and the number of days).

Privacy Concern List

- Enter “Privacy Case” on the 300 Log in lieu of the injured employee’s name, if the injury relates to:

- Intimate body part or reproductive system.
- Sexual assault.
- Mental illness.
- HIV, hepatitis, or tuberculosis in-

For each injury or illness recorded on the OSHA 300 Log, the employer must complete an incident report within seven calendar days of receipt of information that a recordable injury or illness has occurred.

fection.

- Needlestick or cut by a sharp object contaminated with another person’s blood or potentially infectious material.

- Another illness (not injury) for which the employee independently and voluntarily requests that he not be named on the 300 Log.

- Maintain a separate confidential list of the case numbers and employee names of the privacy concern cases.

- If the employee’s job title or description of the nature of the injury or illness may enable others to identify the employee, employers should leave the job title blank or limit the description on the log.

Within seven calendar days of receiving notice that a covered employee has sustained a recordable injury or illness, record the injury or illness on the 300 Log.

Alternate Forms May Be Permissible

- Employers may use alternate forms or electronic records for recording injuries and illnesses, incident re-

ports, and annual summaries, so long as the forms:

- Are “equivalent” (i.e., include the same information as the OSHA form they substitute).

- Are readable and understandable.

- Can be updated with new recordable data within seven days of an occurrence.

- Can be accessed and produced within required time periods.

- Are completed using the same instructions as the OSHA form they substitute. ■

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Recording Injuries and Illnesses

Five Basic Steps for Recording Injuries and Illnesses

- Obtain a report of every workplace injury.
- Record injuries and illnesses (300 Log).
- Complete the First Report of Injury (Form 301).
- Prepare and certify the Annual Summary (Form 300A).
- Retain and maintain records for five years.

Basic Recordkeeping Requirements

- Within seven calendar days, employers must record every injury, illness, or fatality that:
 - Is work-related.
 - Is a new case.
 - Meets one or more of the general

recording criteria in 29 CFR 1904.

- Meets one or more of the special recording criteria in 29 CFR 1904.8-1904.12.

What is an Injury or Illness?

- An abnormal condition or disorder.
- Injuries include cases such as “a cut, fracture, sprain, or amputation.”
- Illnesses “include both acute and chronic illnesses, such as but not limited to a skin disease, respiratory disease, or poisoning.”
- Exposure is not an injury or illness, unless the exposure results in signs or symptoms.

What is Work-Related?

- An injury or illness is work-related

if the injury or illness is:

- Caused by events or exposures in the work environment.
- Contributed to by events or exposures in the work environment.
- Significantly aggravated by events or

Injuries and illnesses are presumed to be work-related, if they result from an event occurring where employees 1) work or 2) are present as a condition of employment.

exposures in the work environment.

- There is no eggshell or reasonable employee exception to work-relatedness (i.e., an injury is recordable if it meets the criteria for the specific injured employee, even if the occurrence would not have impacted other employees at all or as severely.).

- An injury or illness is *not* work-related if the injury or illness occurs:
 - Solely as a result of a personal task.
 - Outside assigned work hours (i.e., time employee is expected to work plus overtime).

Geographic Presumption

- Injuries and illnesses are *presumed* to be work-related, if they result from an event occurring, where employees:

- Work.
- Are present as a condition of employment.

- Exceptions to the geographic presumption (employers are not required to record illnesses or injuries resulting from):

- An auto accident in the company parking lot or access road during a commute.
- Symptoms that surface at work but result solely from a non-work event.

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– Voluntary participation in a wellness program or in a medical, fitness, or recreational activity (e.g., blood donation, physical exams, flu shots, or exercise classes).

– Eating or preparing food for personal consumption (unless the employee contracted food poisoning from employer-provided food, or the food was tainted by workplace contaminants such as lead).

– Personal grooming, self-medication for non-work-related conditions, or intentionally self-inflicted harm.

– The common cold or flu.

– The employee's presence at the workplace as a member of the public rather than as an employee.

– Mental illness (unless the employee voluntarily provides an opinion from a medical professional that the mental illness is work-related).

– Personal tasks unrelated to employment at the workplace outside assigned working hours.

Work Relatedness: "Significant Aggravation"

• "Significant aggravation" of a pre-existing condition makes the injury or illness work-related, if:

– A workplace event aggravates the pre-existing injury

enough that it yields greater consequences than would have occurred but for the aggravating event.

– A workplace event or exposure results in death, loss of consciousness, one or more days away from work, restricted work, job transfer, or medical treatment.

• In summary, if on-the job aggravation independently meets recordability criteria, it is a work-related recordable injury/illness (e.g., an employee is able to work on Monday after injuring his back playing football at home on the weekend, but at work on Monday, wrenches his back lifting a box, which causes him to miss three days of work) 29 CFR 1904.5(b)(4).

Five Basic Steps for Recording Injuries and Illnesses:

- Obtain a report of every workplace injury.
- Record injuries and illnesses (300 Log).
- Complete the First Report of Injury (Form 301).
- Prepare and certify the Annual Summary (Form 300A).
- Retain and maintain records for five years.

What is a New Case?

- A workplace injury or illness is a new case, when an employee:
 - Has *never before reported* similar symptoms.
 - Has completely recovered (i.e., all signs and symptoms disappeared) from a previous injury or illness of the same type that affected the same part of the body, and a *workplace event or exposure causes the signs or symptoms to reappear*. ■

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Recording Workplace Injuries/Illnesses

Categories of General Recording Criteria – 29 CFR 1904.7

- An injury or illness in the following categories must be recorded on the 300 Log:
 - Death.
 - Days away from work.
 - Restricted work or transfer to another job.
 - Loss of consciousness.
 - Significant injury or illness diagnosed by a physician or other licensed medical professional.
 - Medical treatment beyond first aid.

Death

- Report all work-related fatalities to OSHA within eight hours.

– Note: All employers must report work-related fatalities, even if excluded from the duty to record injuries.

– Report fatalities by telephone to OSHA's Emergency Notice Line: 800-321-6742.

– Do *not* send an e-mail.

• Record work-related injuries and illnesses resulting in death by entering a check mark in the 300 Log's column for death cases.

• Employers are required to *record* the following work-related fatalities but are not required to *report* them:

- Non-construction-related automobile fatalities.
- Work-related incidents resulting in an employee's death 31 or more days after the incident.

Days Away From Work Injuries

Record injuries or illnesses resulting in days away from work (DAFW) by:

Report all work-related fatalities to OSHA within eight hours.

NOTE: All employers must report work-related fatalities, even if excluded from the duty to record injuries.

– Entering a check mark in the 300 Log's column for "days away from work" cases.

– Entering total calendar days of missed work (including weekends, holidays, and other days the employee is not otherwise expected to work) in the 300 Log's column for number of days.

– For lengthy absences, entering estimated DAFW within seven calendar days of an injury and then updating, if the estimate is not accurate.

– *Not* counting the day on which the injury occurred.

• If a medical professional recommends days away, entering the number of days recommended, even if the actual DAFW turns out to be fewer.

– Capping DAFW at 180 days, even if the actual DAFW turns out to be greater.

Restricted Work/Job Transfer

• An injury or illness is a restricted work or job transfer case if:

– The employee is limited in performing one or more routine functions (i.e., a work activity "the employee regularly performs at least once per week").



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– The employee is restricted from working one or more full days (not counting the day of their injury).

– A medical professional recommends restricting one or more routine functions for one or more full days of work (even if the employee does not follow the recommendation).

• *Exception:* Employers are not required to record “minor musculoskeletal discomfort” as restricted work, if a medical professional determines that the employee is able to perform all routine functions but recommends a work restriction just to prevent a more serious condition.

• Record injuries or illnesses resulting in restricted work or job transfer by:

– Entering a check box in the 300 Log’s column for job transfer or restriction.

– Entering total *calendar* days of work missed (including weekends, holidays, and other days the employee is not otherwise expected to work) in the 300 Log’s column on job transfer

or restriction days.

For lengthy restrictions/transfers, entering estimated time in the 300 Log’s column on job transfer or restriction days within seven calendar

“Employers are required to record the following work-related fatalities, but are not required to report them: 1. Non-construction-related automobile fatalities. 2. Work-related incidents resulting in an employee’s death 31 or more days after the incident.”

days of the injury, and then update if the estimate is not accurate.

– *Not* counting the day on which

the injury occurred.

– Recording partial days (except the day of the injury) as a full day.

– If a medical professional recommends restriction or transfer, entering the recommended number of days (even if actual time turns out to be less).

– Clarifying vague medical recommendations (e.g., light duty).

– Choosing the most authoritative of competing medical opinions.

– Capping restricted/transferred days at 180 days (even if actual time is greater).

Loss of Consciousness

• Record every work-related injury or illness resulting in unconsciousness:

– It does not matter for how long the worker was unconscious.

– Feeling “woozy” is *not* recordable as loss of consciousness.

– By entering a check box in the 300 Log’s column for loss of consciousness. ■

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Miscellaneous Recording Procedures

Recording Procedures

- Record each work-related injury or illness in only one outcome column of the 300 Log.

- Select the outcome column reflecting the *most serious outcome* (columns on the 300 Log descend in order of seriousness from left to right).

- Corrections to errors or updates due to an outcome increasing in severity must be made by lining out (not erasing) the previous entry.

Multiple Establishments

- Maintain a separate 300 Log for each separate establishment expected to operate for one year or longer.

- Establishments include:
 - Single physical locations where business is conducted.

- For industries with employees working at multiple locations (e.g., construction, utility, transportation, etc.), the main/branch office and the terminal or station from where activities are supervised or based.

- Maintain a separate 300 Log for individual divisions or geographical regions.

- If an employee is injured at an establishment of the employer where he or she does not normally work, record the case on the 300 Log for the establishment where the injury occurred, not where the employee normally works.

- For employees injured at a location other than one of the employer's establishments, record the case on the 300 Log where the employee normally works.

- Link employees who telecommute to one of the employer's establishments.

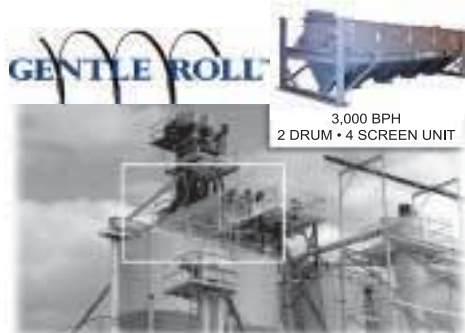
Competing Medical Opinions

- When contemporaneous and conflicting recommendations by two or more health care professionals are obtained (by the employee, the employer, or both) the employer:
 - May determine which recommendation is the most authoritative.
 - Record (or not record) based on the best documented, best reasoned, and most persuasive recommendation.

- Once medical treatment beyond first aid is provided for an injury or illnesses (even if a subsequent medical professional concludes it was unnecessary), the case is recordable. ■

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Updating and Verifying Records

Verify, Summarize, Certify, Post, and Maintain

- By Feb. 1 of each calendar year, employers must:
 - Review the 300 Log from the previous calendar year for accuracy (and update or correct, if necessary).
 - Summarize the data from the 300 Log on the 300-A Summary Form.
 - Certify the 300-A Summary Form.
 - Have the certification done only by a company executive who can be any of the following: owner of a sole proprietorship, partner of a partnership, officer of a corporation, highest-ranking official at a jobsite, or supervisor of the highest-ranking official.
 - Post the 300-A Summary Form for three months (from Feb. 1 to April 30).

Updating and Maintaining OSHA Forms

- Keep all injury and illness recordkeeping forms for five years.
- Employers are permitted to maintain past years' records at a central location, rather than at each establishment provided that:
 - Information regarding a recordable injury can be transmitted from the establishment to the central location within seven calendar days; and
 - Records can be produced to government representatives, employees, former employees, and employee representatives within required timeframes (see below).
- Employers must continue to update 300 Logs for five years, if new information becomes available (e.g., outcomes change, or new facts are learned that lead to different recording conclusions.).
- Employers need not update 300-A Forms or 301 Reports.
- Do *not* submit recordkeeping forms to OSHA for the Bureau of Labor Statistics unless specifically requested.

- Upon request by OSHA during a workplace inspection, recordkeeping forms must be produced within four business hours of receipt of the request.

Employee Participation and Access to Records

- Establish a procedure for employees to report injuries.
- Inform employees how and to whom to report injuries.
- Provide access to 300 Logs and 301 Reports:
 - To employees, former employees, and employee representatives (e.g., union representatives).
 - By the end of the next business day.
 - At no charge for first-time copies.

Penalties

- OSHA citations can be classified in one of five ways:
 - Other-than-serious.
 - Serious.
 - Repeat.
 - Willful.
 - Failure to abate.
- In general, recordkeeping violations are not classified as serious citations, because they do not create a substantial probability of death or serious physical harm.
- They are, however, often classified as repeat or willful, which carry maximum penalties of \$70,000 per violation.



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Recordkeeping Action Plan

Implement Comprehensive Recordkeeping Plan

- Ensure recordkeeping policies are current, accurate, compliant, and implemented.
- Train recordkeeping staff on OSHA requirements and internal policies.
- Develop a policy requiring employees to report to management all workplace injuries and illnesses, and train all employees about the policy.
- Avoid policies that discourage reporting/recording of injuries (e.g., tying bonus payments to recordable rates).
- Train your recordkeeping staff on all relevant OSHA requirements and internal recordkeeping procedures. They should be familiar with the following:
 - Recordkeeping regulations: www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=1&p_part_number=1904.
 - Handbook on recordkeeping: www.osha.gov/recordkeeping/handbook/index.html.

- Recordkeeping forms: www.osha.gov/recordkeeping/RKforms.html.
- Interpretation letters: www.osha.gov/recordkeeping/RKinterpretations.html.

Conduct Periodic Recordkeeping Audits

- Conduct periodic internal or third-party recordkeeping audits that include cross-checking medical records (e.g., first-aid logs, worker's compensation reports, sick leave requests, accident reports, medical records, etc.) against OSHA injury and illness recordkeeping forms.
- When possible, audits should be conducted at the direction of in-house or outside legal counsel to protect findings under the attorney-client privilege.
- Review prior safety and health audits and recommendations, and ensure that all recommendations regarding recordkeeping are addressed. ■

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