

OSHA Recordkeeping and Reporting

Every employee should report work-related injuries and illnesses. Employers must RECORD these injuries and illnesses and REPORT them to the Occupational Safety and Health Administration (OSHA) using specific forms.

Why Records and Reports Matter

OSHA's recordkeeping rule (29 CFR 1904) requires employers with more than 10 employees (with some exceptions) to keep records about workplace incidents and report them to OSHA.

Reporting helps employers and OSHA:

- Meet regulatory requirements
- Improve the quality of workplace injury and illness data
- Better understand workplace and industry hazards
- Make the workplace safer by eliminating or reducing hazards
- Engage employees in workplace health and safety

Employers must establish a procedure and train employees to use it to report injuries and illnesses. The Occupational Safety and Health Act, Section 11(c) prohibits employers from discriminating against employees for reporting injuries and illnesses. Employers have 7 days to enter reports into their records using appropriate forms. Employers submit records to OSHA annually and retain records for at least 5 years. OSHA Compliance Safety and Health Officers (CSHOs) issue citations, penalties and fines, to employers who do not comply with the recordkeeping rule.

Employers must create a record for and report every injury or illness that is:

- A new case (if existing, update records rather than create new records)
- Work-related
- Recordable (meets one of the recording criteria found in the regulation)

Work-Related Injuries and Illnesses

Conditions are work-related if an event or exposure in the work environment caused or contributed to the condition or significantly aggravated an existing condition. Work environments are locations where an employer pays people to work or be present as part of their job, including where employees provide a service to customers and sell or deliver products.

Employers must record and report work-related injuries or illnesses that are diagnosed by a physician or licensed healthcare professional.

This includes work-related cases involving:

- Cancer
- Chronic, irreversible diseases
- Infections and communicable diseases
- Fractured or cracked bones
- Punctured eardrums
- Standard threshold shifts (STs) in hearing

You can find more information about recordable work-related diagnoses in 29 CFR 1904.7.

Employers must record and report work-related needlestick injuries or cuts involving another person's blood or other potentially infectious material.

Employers must record and report any case requiring an employee to be medically removed under the requirements of an OSHA health standard, such as being exposed to a hazardous material above the action level.

Employers do NOT have to record and report injuries and illnesses that happen at work if they are solely the result of:

- An employee eating, drinking or preparing food or drink for personal consumption
- Common colds and the flu
- Voluntary participation in a wellness program or in a medical, fitness, or recreational activity
- Personal tasks in the work environment that happen outside normal work hours

Other exceptions that employers do not have to record or report are when:

- The employee is present in the work environment as a member of the public rather than as an employee
- Symptoms appear at work but are the result of a non-work-related event or exposure
- Injuries or illnesses are the result of personal grooming, self-medication or self-harm

Employers do not have to record or report:

- An injury or illness caused by a motor vehicle incident that occurs on company property during a commute to or from work
- Mental illnesses (unless diagnosed as work-related)
- Motor vehicle incidents that occur in a public street outside of a construction work zone
- Commercial airplane, train, subway or bus incidents

NOTE: See 29 CFR Part 1904.5(b)(1) and 29 CFR Part 1904.5(b)(2) for more exceptions.

Recordable Injuries and Illnesses

Employers must record and report incidents that meet one of the recording criteria found in the recordkeeping rule. We call these recordable incidents.

Non-recordable incidents do not have to be reported, but employers should record them separately for recordkeeping, decision-making and future reporting purposes. Once an employee seeks medical treatment for a work-related injury or illness, the incident becomes reportable.

Recordable incidents are those that involve:

- Medical treatment beyond first aid
- Doctor-directed days away from work
- Doctor restricted work that may also lead to transfer to another job
- Loss of consciousness
- Death

We sometimes refer to non-recordable incidents as non-medical injuries or first aid injuries.

NOTE: The status of worker's compensation or insurance claims does NOT affect whether an incident is recordable.

Recordable **medical treatments** include prescriptions (even if unfilled), stitches and casts. Non-recordable, **non-medical treatments** include observation or counseling, diagnostic procedures (x-rays, lab tests, etc.) and first aid.

OSHA defines first aid as:

- Using over-the-counter medications at non-prescription strength
- Cleaning, flushing or soaking wounds on the skin surface
- Using wound coverings, such as bandages, gauze pads and butterfly bandages
- Using hot or cold therapy
- Using temporary immobilization devices while transporting an incident victim
- Drilling a fingernail or toenail to relieve pressure or draining fluids from blisters
- Using simple irrigation to remove foreign bodies from the eye
- Using irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas other than the eye
- Drinking fluids to relieve heat stress

Immediate Reports

Employers must report to OSHA any worker fatality within 8 hours and any amputation, loss of an eye, or hospitalization of a worker within 24 hours.

Make these reports by calling the local OSHA office or the national OSHA hotline or completing an online form on the OSHA website.

The reporter should be prepared to provide the name of the business, the names of employees affected, the location and time of the incident, a brief description of the incident and a contact person and phone number.

After they make these reports, employers will enter the incidents in their records within 7 days and submit them to OSHA annually.

Putting It All Together

As you review incidents, ask:

- Is the injury or illness work-related?
- Does the injury or illness meet at least one of the recording criteria in the recordkeeping rule?

If the answer to these questions is "yes," then the employer must record and report the incident.

Remember, employers must only create records for new cases. If there are changes to existing cases, they will update the appropriate forms and report the information in that way.

Forms

OSHA Form 300: Log of Work-Related Injuries and Illnesses is an account of recordable injuries and illnesses for the year. Keep separate records for each physical location that you expect to remain in operation for one year or longer. Employees, former employees and employee representatives have a right to a copy of the OSHA Form 300.

OSHA Form 301: Injury and Illness Incident Report is the individual record of each work-related injury or illness. Many employers use an equivalent workers' compensation form or internal reporting form, which is acceptable to OSHA. Employees have a right to access OSHA Form 301 for their own injuries and illnesses. Employee representatives have a right to access those parts of the OSHA 301 forms relevant to workplace safety and health.

OSHA Form 300A: Summary of Work-Related Injuries and Illnesses includes totals of cases, days of missed or adapted work, and injury and illness types from OSHA Form 300 along with information about the workplace. Employers post this form annually where employees can easily see it, such as in a break area.

OSHA Form 300

Employers must add or update entries in OSHA Form 300 within 7 calendar days of receiving information indicating that a reportable work-related injury or illness occurred. There are five steps to completing OSHA Form 300: Log of Work-Related Injuries and Illnesses.

Step 1: Identify the Person

To identify the person in an entry, include the case number, the employee's name and job title. The **case number** is a number that the employer generates. This number is also located on the OSHA Form 301 about the incident. OSHA Form 300 also has fields in which you enter the employee's name and job title.

When employees, former employees and employee representatives request copies of OSHA Form 300, we must protect **employee privacy**. There are two ways to protect employee privacy: replace the name with "privacy case" and change the job title or description.

Include the cause of the incident and the general severity of the injury or illness, but you do not need to include details of an intimate or private nature. Privacy concern cases include:

- Intimate body parts or the reproductive system
- Sexual assault
- Mental illness
- HIV infection, hepatitis or tuberculosis
- Potentially contaminated needlesticks or cuts
- Employee requests for privacy

Keep a separate, confidential list of the case numbers and corresponding employee names for privacy concern cases so that you can update the cases and provide information to the government if they ask you to do so.

Step 2: Describe the Case

Note the **date** of the injury or onset of the illness. Explain **where** the event occurred. **Describe** the injury or illness. Include affected body parts and the objects and substances that caused the injury or illness.

Step 3: Classify the Case

Each case should be a death, an injury, or an illness that results in days away from work, a job transfer or restriction, or another recordable case. Choose ONE classification for the case. When more than one classification applies or conditions change, choose the most severe option.

Step 4: Enter Days Away or Restricted

Enter the number of days the employee spent away from work or on restricted activity. Count the number of **calendar** days, not **workdays**, starting on the day after the incident occurred. Restricted work activity occurs when employees do not perform routine functions of their jobs or do not work full shifts due to an injury or illness. If a single incident involves both days away from work and days of restricted work activity, enter the total number of days for each up to 180 days each or in combination.

Step 5: Classify the Injury or Illness

Classify the injury or illness as an injury, skin disorder, respiratory condition, poisoning, hearing loss or all other illnesses. Choose only ONE option to classify injuries or illnesses. If multiple classifications apply, choose the best fit or the most severe.

Injuries are wounds to the body. **Skin disorders** are caused by exposure to chemicals, plants or other substances. **Respiratory conditions** are associated with breathing hazardous biological agents, chemicals, dust, gases, vapors or fumes. **Poisoning** is the ingestion or absorption of toxic substances leading to abnormal concentrations in blood, tissues, bodily fluids or the lungs. **Noise-induced hearing loss** is a change in the hearing threshold relative to a baseline hearing test within certain parameters. See 29 CFR 1910.95 Appendix F for more information. Any illness that does not fall into the categories we already mentioned belongs in the "**all other illnesses**" category.

If the outcome or extent of an injury or illness changes after you have recorded the case in OSHA Form 300, strike through the original entry and add a new entry. Record the most serious outcome for each case. Note why you made the change.

OSHA Form 301

Employers must complete OSHA Form 301, or an equivalent form, within 7 calendar days of receiving information indicating that a reportable work-related injury or illness occurred. Some state workers' compensation, insurance or other forms may be acceptable substitutes, as long as they contain all the information that appears in OSHA Form 301.

There are four sections in OSHA Form 301: Injury and Illness Incident Report. They include information about the person completing the form, the employee, the physician or other health care professional, and the case.

The person completing the form will include their name, title, phone number and the date on which they completed the form.

Employee information includes their name, home address, date of birth, hiring date and sex. Remove the identity or address of the employee before providing copies to employee representatives.

Include the name of the facility in which the physician or other health care professional practices as well as its address. Use the checkboxes to indicate if the employee was treated in an emergency room or was hospitalized overnight.

Enter the case number that matches the corresponding entry in the OSHA Form 300 log.

Use the fields to describe the date of the injury or illness, the time at which the employee began work and the time of the event, if you know it. Describe what the employee was doing just before the incident, what happened, what the injury or illness was, and what object or substance directly harmed the employee. Provide as much detail as possible. You can add more pages to the form, if needed. If the employee died, note the date of the death. Protect the privacy of all employees. Do not include any personally identifiable information (PII) such as names, phone numbers or social security numbers.

OSHA Form 300A

Employers will fill out OSHA Form 300A: Summary of Work-Related Injuries and Illnesses after the end of the year and post it where employees can easily see it by February 1. Keep it posted until April 30. Complete the form even if there were no injuries or illnesses for the year.

There are four sections in OSHA Form 300A: number of cases, number of days, injury and illness types, and establishment information. The letters below each blank indicate the columns in OSHA Form 300 where you can find the information.

Under Number of Cases, enter totals from OSHA Form 300, including the number of deaths, cases with days away from work, cases with job transfers or restrictions and other recordable cases. Under Number of Days, enter the total number of days away from work and days of job transfer or restriction. Under Injury and Illness Types, enter the totals numbers of injuries and illnesses by category.

In the establishment information section, enter the name and address of the establishment, the North American Industrial Certification (NAICS) number, if known and employment information. The NAICS is the standard used by federal statistical agencies to classify, collect, analyze and publish statistical data.

A company executive must sign their name and include their title, phone number and the date to certify that the information in the form is true, accurate and complete.

OSHA Form 300A also includes a worksheet in which you can calculate the injury and illness incidence rate so that you may compare it to others in your industry. An incidence rate is the number of recordable injuries and illnesses among a given number of full-time workers over a given period.

Incidence rate = Total number of injuries and illnesses x 200,000 hours ÷ Hours worked by all employees

You can find comparative information on the website for the Bureau of Labor Statistics (BLS).

Completing and Submitting Forms

Employers should add or update entries in the OSHA Form 300 log and OSHA Form 301 within 7 days of becoming aware of them. Submit OSHA Form 300, OSHA Form 301, and OSHA Form 300A between January 2 and March 2 every year. Retain these forms in your records for at least 5 years. If any case changes during those 5 years, update the forms even though you already submitted them. Anyone may submit these forms electronically and many employers are required to do so.

Employers must submit forms **electronically** if they:

- Have ≥ 250 employees and are in industries that are required to routinely keep OSHA injury and illness records
- Are in a listed industry and have 20-249 employees (see 29 CFR 1904, Appendix A, subpart E)
- Are an OSHA-covered entity with ≥ 100 employees (see 29 CFR 1904, Appendix B, subpart E)
- Receive a request from OSHA or the Bureau of Labor Statistics (BLS) to submit their records electronically

If you are not sure, contact a safety professional or OSHA or refer to the OSHA website for more information.

Remember that employers must report any worker fatality within 8 hours and any amputation, loss of an eye, or hospitalization of a worker within 24 hours to OSHA. Make these reports by calling the local OSHA office or the national OSHA hotline or completing an online form on the OSHA website.

REMINDER: You must RECORD anything that you REPORT in the appropriate forms.