Recordkeeping and Reporting

- 29 CFR 1904
Objectives

- Who must comply with standards
- Criteria for recording
- Other issues related to recordkeeping
- Review forms
Who Must Record?

- All employers in North Carolina **except**:
  - Any employer with 10 or fewer employees for the previous calendar year
  - Any employer who is listed in the SIC code appendix (regardless of size)
Who Must Report?

- All employers must still report work-related fatalities/catastrophes. (1904.39)

- All employers must participate in OSH surveys when requested. (1904.41 & .42)
Four standards:

- §1904.39 Reporting fatalities and multiple hospitalizations
- §1904.40 Providing records to government representatives
- §1904.41 Annual survey
- §1904.42 Request from Bureau of Labor Statistics (BLS)
Reporting

- Death or inpatient hospitalization of three or more employees
  - Report within 8 hours to:
    - 1-800-NCLABOR (1-800-625-2267) or
    - State Capitol Police (919) 733-4646
Not reportable, however still recordable if:

- Motor vehicle accident (except in a construction work zone)

- Commercial or public transportation accident
What Is Recordable?

- Fatality, injury, or illness
  - Work-related
  - New case
  - Meets one or more of the general recording criteria
An event or exposure in a work environment that:

- Caused or contributed to the condition
- Significantly aggravated pre-existing condition

Work-relatedness presumed while on employer’s premises, except...
Non-Work-Related

When injury or illness is solely a result of:

- Non-work-related event or exposure
- Voluntary participation in wellness, medical, fitness, or recreation program
- Eating, drinking, or preparing food
- Personal tasks outside of working hours

(cont...)
Non-Work-Related

- Personal grooming, self-medication, or self-inflicted
- Motor vehicle accident in parking lot or company access road while commuting
- Common cold or flu
- Injury or illness occurs while an employee is on premises as a member of general public
New Case

A case is “new” if:

- No previous record of injury or illness of the same type, affecting same body part

- All signs and symptoms of a previous injury had disappeared and the work environment caused a reappearance

- Advice of a physician or other licensed health care professional can be followed to determine new or old
General Recording Criteria

- Death
- Days away from work
- Restricted work or transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- Diagnosed as a significant injury or illness
Enter details about the person in columns (A) through (G)
- No other entries are required on a 300 log for a death

Follow all reporting guidelines
Days Away From Work

- Do not count the day of injury
- Do count calendar days not business days
  - 180 day cap
- You may estimate days if end of year and update amount later
- The count stops when employee leaves company for reasons other than the injury
  - If the employee leaves due to the injury, the days must be recorded
Restricted Work

- If the employer or a physician keeps employee from performing one or more “routine functions” or from working a full workday
  - Counted same as days away from work
    - Not to exceed 180 days
Transfer to Another Job

- If the employer or a physician assigns an employee to another job for part of a day or a full day
  - Counted same as days away from work
    » Not to exceed 180 days
Medical Treatment

- Management and care of patient to combat disease or disorder. Does not include:
  - Observation or counseling
  - Diagnostic procedures
  - First aid procedures
First Aid

- First aid as listed in the standard
  - Non-prescription/OTC (over the counter) drugs at non-prescription strength
    » Note: An OTC drug prescribed by a physician at prescription strength is medical treatment.
  - Oxygen administered for precautionary reasons is not considered medical treatment.
Loss of Consciousness

- Must record complete loss of consciousness
  - Must be work-related
  - Duration of time not a factor
  - Disorientation, incoherency or a diminished level of awareness not recordable
Some injuries and illnesses may seem to have no recording criteria for medical treatment or time lost, however they are still recordable if diagnosed by a physician.

- **Examples:** Cancers, all fractures or cracked bones (including teeth), and punctured ear drums
  » Significant and always recordable
Specific Recording Criteria

- 1904.8 Needlesticks and sharps injuries
- 1904.9 Cases involving medical removal
- 1904.10 Hearing loss
- 1904.11 Work-related tuberculosis
Needlesticks and Sharps Injuries §1904.8

• Record exposure to blood or other potentially infectious material when:
  – Results in diagnosis of a bloodborne illness or meets one or more of the general recording criteria

• Record needlesticks and sharps injuries when:
  – Contaminated with another person’s blood or contaminated with other potentially infectious material (as defined by 29 CFR 1910.1030)
Recording cases involving medical removal of an employee

- Record if employee was removed under the medical surveillance requirements of an OSHA standard
  - Enter each case as either involving days away from work or involving restricted work activity
  - If result of chemical exposure, enter case in “poisoning” column
- Do not have to record if voluntarily removed by employer
Hearing Loss

Standard Threshold Shifts (STS)

- Record hearing loss when both:
  - Work-related STS (10+ dB at 2-4 kHz)
  - 25 dB at or above audiometric zero
Hearing Loss Recordability

Has the employee suffered a STS (an average 10 dB or more loss relative to the most current baseline audiogram averaged at 2000, 3000 and 4000 Hz) in one or both ears according to the General Industry noise standard 1910.95?

↓ YES

Is the employee’s overall hearing level at 25 dB or more above audiometric zero averaged at 2000, 3000 and 4000 Hz in the affected ear(s)?

↓ YES

Is the hearing loss work-related?

↓ YES

Record on the Form 300; check the “Hearing loss” column
Has the employee suffered a STS (an average 10 dB or more loss relative to the most current baseline audiogram averaged at 2000, 3000 and 4000 Hz) in one or both ears according to the General Industry noise standard 1910.95?

Is the employee’s overall hearing level at 25 dB or more above audiometric zero averaged at 2000, 3000 and 4000 Hz in the affected ear(s)?

Is the hearing loss work-related?

Do Not Record
## Hearing Loss Recordability

- **Baseline**

<table>
<thead>
<tr>
<th>2K</th>
<th>3K</th>
<th>4K</th>
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</thead>
<tbody>
<tr>
<td>10</td>
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</table>

- **Year 1 results**

<table>
<thead>
<tr>
<th>2K</th>
<th>3K</th>
<th>4K</th>
<th>Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>20</td>
<td>20</td>
<td>20 dB</td>
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</table>

  STS of 10 dB, but not above 25 dB:
  - NOT RECORDABLE

- **Year 2 results**

<table>
<thead>
<tr>
<th>2K</th>
<th>3K</th>
<th>4K</th>
<th>Average</th>
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</thead>
<tbody>
<tr>
<td>30</td>
<td>30</td>
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<td>30 dB</td>
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</tbody>
</table>

  STS of 10 dB above 25 dB:
  - RECORDABLE
Work-Related Tuberculosis

Work-related tuberculosis (TB) cases must be recorded when:

- Employee occupationally exposed to a known case of active TB in the workplace and subsequently develops TB infection as evidenced by positive skin test or diagnosis

Note: TB cases may be lined out when non-work-related contact can be proven
Recordkeeping Forms

- Form 300—Log of work-related injuries and illnesses
- Form 300A—Summary of work-related injuries and illnesses
- Form 301—Injury and illness incident report
### Log of Work-Related Injuries and Illnesses

**OSHA's Form 300 (Rev. 01/2004)**

**Form 300**

You must 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. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria in 29 CFR Part 1904 through 1904.12. Feel free to use two lines for a single case if you need to. You must 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 unsure whether a case is recordable, call your local OSHA office for help.

#### Identify the person

<table>
<thead>
<tr>
<th>Case no.</th>
<th>Employee's name</th>
<th>Date of injury or onset of illness</th>
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<tbody>
<tr>
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#### Describe the case

Describe injury or illness, parts of body affected, and objective evidence that directly affected or made person ill (e.g., second-degree burn on right forearm from granular chain)

| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |
| __________ | ________________ | ________________ |

#### Classify the case

**CHECK ONLY ONE box for each case based on the most serious outcome for that case**

<table>
<thead>
<tr>
<th></th>
<th>.logout of Work</th>
<th>Away from work</th>
<th>On job transfer or restriction</th>
<th>Other recordable cases</th>
</tr>
</thead>
<tbody>
<tr>
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<td>(d)</td>
<td>(e)</td>
<td>(f)</td>
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**Page totals**

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

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Public reporting burden for this collection of information is estimated to average 4 minutes per response, including time to review the instructions, search, gather the data needed, and complete and send in the collection of information. If you have any comments about this estimate or any other aspects of this data collection, contact OSHA, Office of Standards Analysis, Room N-3564, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.
<table>
<thead>
<tr>
<th>Column</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>A</td>
<td>Case number</td>
</tr>
<tr>
<td>B</td>
<td>Employee’s name</td>
</tr>
<tr>
<td>C</td>
<td>Employee’s job title</td>
</tr>
<tr>
<td>D</td>
<td>Date of injury or onset of illness (month/day)</td>
</tr>
<tr>
<td>E</td>
<td>Where the event occurred</td>
</tr>
</tbody>
</table>
Describe injury, illness, cause and body part affected and enter a detailed description for each recordable injury or illness (be specific):

- Mechanism of injury (hammer, broken glass or vehicle)
- Part of body injured (left hand, right eye, forehead, etc.)
- How injury occurred (lifting boxes, assault, or training)
Form 300 Columns G thru J

Make **ONLY** one entry in these columns with an **X**:

(G) Death (if an employee death has occurred)

(H) Days away, if incident involves missed workdays

(I) Job transfer or restriction or if placed on limited duties

(J) Mark if other than a death, lost time, transfer or job restriction

- **Example:** “medical treatment only”
Form 300 Columns K through L

Enter the total amount of days:

(K) Total number of days away from work

(L) Total number of job transfer or job restriction days

Not to exceed 180 total days in column K, L or both columns combined
(M) Choose either injury or the type of illness in this section:

1) Injury
2) Skin disorder
3) Respiratory condition
4) Poisoning
5) Hearing loss
6) All other illnesses
A calendar year injury log form

- Must be kept up to date
  - Within seven calendar days of a change or event

- Retain for five years
  - Update (as changes occur) within seven days

- Must be provided to a government investigator upon request within four business hours
Form 300A

- Summarizes information from form 300
  - Must be completed and signed at the end of each year
  - Post for employees to view from *February 1 through April 30 of following year*
  - Retain with form 300 and provide access for five years
Form 301

- An injury report form
  - Must be completed within seven calendar days of the injury
  - Completed for each form 300 entry
  - An equivalent form may be used
  - Retain and provide access for five years
Privacy Case List

- Not an established form
- Must be used only with privacy concern cases
- Enter “privacy case” instead of name on form 300
  - A person’s job title on a form 300 may reveal their identity
- Make a separate list with these names and case numbers
Determining Privacy Concern Cases

- An injury to an intimate body part or the reproductive system
- A sexual assault
- Mental illnesses
- HIV infection, hepatitis, or tuberculosis
- Needlesticks or sharps injuries
- All illnesses upon employee request
Other Recordkeeping Issues

- 1904.35 Employee involvement
- 1904.36 Prohibition against discrimination
- Other privacy issues
Summary

In this course, we discussed:

- Reporting
- Recording
- Required forms
- Recording criteria
- Other requirements
- Employer responsibilities and employee involvement
Additional Information

- NCDOL OSH Division
  - Education, Training and Technical Assistance
    » Toll free: 1-800-NCLABOR
    » Direct phone: 919-807-2875
  - E-mail: ask.osh@labor.nc.gov

- Federal OSHA website: www.osha.gov
  - Under Recordkeeping on far right side of page, choose “Assistance”
Thank You For Attending!

Final Questions?