### **Brief Tutorial on Completing the OSHA Recordkeeping Forms**



Welcome to the Agency's tutorial on completing OSHA recordkeeping forms.

# **About the Tutorial**

# A review of the recordkeeping requirements and forms at a high level:

- Requirement to complete the forms and evaluate specific exceptions
- · Forms in OSHA's recordkeeping package
- · Recordability criteria for injuries and illnesses
- · Recording injuries/illnesses on the forms



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This brief presentation reviews OSHA recordkeeping requirements at a high level, with an emphasis on how to fill out the forms provided in OSHA's recordkeeping forms package. The tutorial covers what types of operations come under the recordkeeping rule and thus are required to complete the forms, what types of injury and illness incidents must be recorded, and what information is to be included in each of the three OSHA forms, respectively.

# Who must complete the OSHA injury and illness recordkeeping forms?

Many but not all employers must complete the OSHA recordkeeping forms. Exceptions are based on:

- Small employer exemption 10 or fewer employees at all times during the year
- Low-hazard industry exemption see list of partially exempt industries

Fatality and other serious event reporting as well as injury and illness surveys involve other considerations.

#### To Make a Report



- · Call the nearest OSHA office
- Call the OSHA 24-hour hotline at 1-800-321-6742 (OSHA)
- · Report online

Be prepared to supply: Business name; names of employees affected; location and time of the incident; brief description of the incident; contact person and phone number.

Many but not all employers must complete the OSHA injury and illness recordkeeping forms on an ongoing basis. Employers with 10 or fewer employees throughout the previous calendar year do not need to complete these forms. In other words, if there are more than 10 employees *at any time* during that calendar year, the employer may come under the requirement. When counting employees, you must include full-time, part-time, temporary, and seasonal workers. This exemption is based on the employment of the entire company rather than the establishment. For example, if a company has two establishments, one with five employees and one with seven employees, the company must fill out the

In addition to the small employer exemption, there is an exemption for establishments classified in certain industries. For example, the forms do not need to be completed for restaurants, banks, and medical offices. A complete list of exempt industries can be found by using the "Partially Exempt Industries" link.

forms for each establishment because the company employment is greater than 10.

Establishments normally exempt from keeping the OSHA forms must complete the forms if they are informed in writing that they need to do so by the Bureau of Labor Statistics or OSHA. Also, exempt establishments must report to OSHA within eight hours of any work-related fatality. Work-related amputations, inpatient hospitalizations, and the loss of an eye must be reported to OSHA within 24 hours of learning of the incident. These events can be reported by phone to the local OSHA Area Office, by calling the OSHA 800 number (1-800-321-6742), or by using the reporting application on OSHA's public website.

### Links:

 $Partially\ Exempt\ Industries: https://www.osha.gov/recordkeeping/ppt1/RK1exempttable.html$ 

OSHA Offices by State: https://www.osha.gov/contactus/bystate

Online reporting form: https://www.osha.gov/pls/ser/serform.html

# What forms must be completed?

### Familiarize yourself with these forms:

- OSHA Form 300 Log of Work-Related Injuries and Illnesses
- OSHA Form 301 Injury and Illness Incident Report
- OSHA Form 300A Summary of Work-Related Injuries and Illnesses









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There are three forms you—the employer—must complete. OSHA forms 300 and 301 are maintained on an ongoing basis. Recordable injuries and illnesses must be entered on these forms as they occur throughout the year. The OSHA Form 300A is completed after the end of the year, summarizing the number of recordable cases that occurred. Employers may use equivalent forms in place of these forms as long as the equivalent forms contain all of the same data elements and are as easy to read as the OSHA forms.

### Link:

OSHA Injury & Illness Recordkeeping Forms—300, 300A, 301 https://www.osha.gov/recordkeeping/forms

# What cases need to be recorded on the forms?

# Record cases within 7 calendar days of an incident if these conditions apply:

- Are injuries and illnesses
- Are work related
- Meet certain severity criteria



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Any work-related injury or illness that meets certain severity criteria must be entered on the forms within seven calendar days of learning about its occurrence. We'll talk about each of these bullet items on the next few slides.

# What is considered an injury or illness?

### OSHA defines an injury or illness as:

- An abnormal condition or disorder
- Not an exposure, unless it results in signs or symptoms







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OSHA defines an injury or illness as an abnormal condition or disorder. Injuries and illnesses include cases such as cuts, fractures, sprains, skin diseases, or respiratory conditions. For OSHA recordkeeping purposes, an injury or illness can also consist of only subjective symptoms such as aches or pain.

Exposures that do not result in signs or symptoms are not considered injuries or illnesses and should therefore not be recorded on the OSHA forms. For example, if an employee is exposed to chlorine and does not exhibit any signs or symptoms due to the exposure, the case would not be recorded on the log, even if it involved prophylactic—that is, preventative—medical treatment.

### What cases are work-related?

### OSHA defines work-related as:

- Cases caused by events or exposures in the work environment
- Cases contributed to by events or exposures in the work environment
- Cases significantly aggravated by events or exposures in the work environment



(For a list of activities that are not work-related, see section 1904.5(b)(2).)

Cases that are caused, contributed to, or significantly aggravated by events or exposures in the work environment are considered work-related for OSHA recordkeeping purposes.

Work-relatedness is presumed for injuries and illnesses occurring in the workplace or in locations where the employee is located as a condition of employment. It's important to remember that if work makes any contribution to the injury or illness, it is considered work-related for OSHA recordkeeping purposes.

There are certain activities that occur in the work environment that OSHA does not consider work-related. For example, injuries resulting directly from eating, drinking, or preparing one's own food at the workplace are not considered work-related. For a complete list of these activities, refer to section 1904.5(b)(2) using the regulatory text link below.

### Link:

Section 1904.5(b)(2):

https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.5#1904.5(b)(2)

# What are the severity criteria for recording a work-related injury or illness?

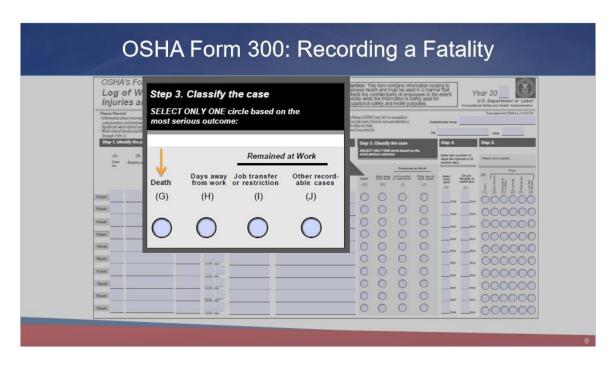
### **OSHA** defines severity criteria as:

- Death
- Loss of consciousness
- Days away from work
- Restricted work activity or job transfer
- Medical treatment beyond first aid

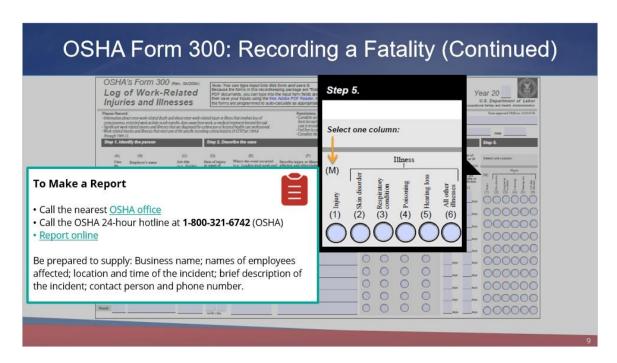


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Work-related injuries and illnesses that result in death, loss of consciousness, days away from work, restricted work activity, transfer to another job, or medical treatment beyond first aid must be recorded on the OSHA forms. We'll talk about these criteria on the next few slides.



For cases involving a fatality, enter a check mark in column G on the OSHA Form 300.

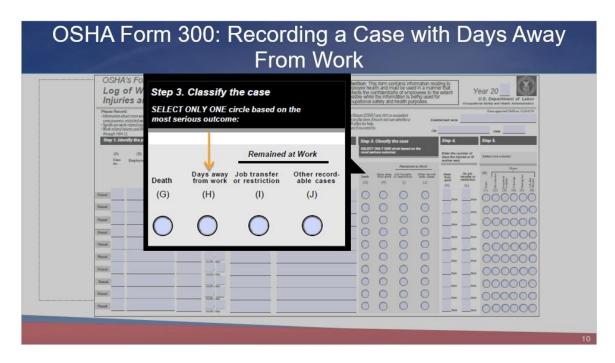


Note in column M whether the case involved an injury or an illness. Also, remember that you must report the fatality to OSHA within eight hours of learning of its occurrence. The event can be reported by phone to the local OSHA Area Office, by using the OSHA 800 number (1-800-321-6742), or by using the reporting application on OSHA's public website.

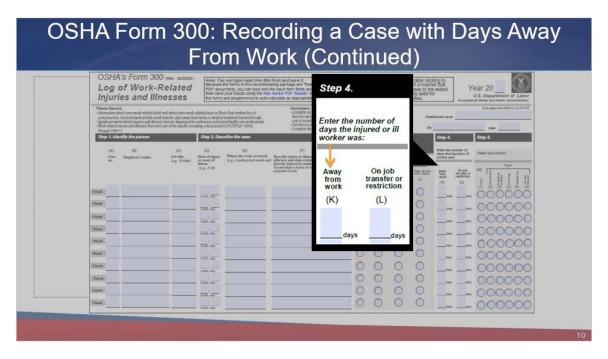
### Links:

OSHA Offices by State: https://www.osha.gov/contactus/bystate

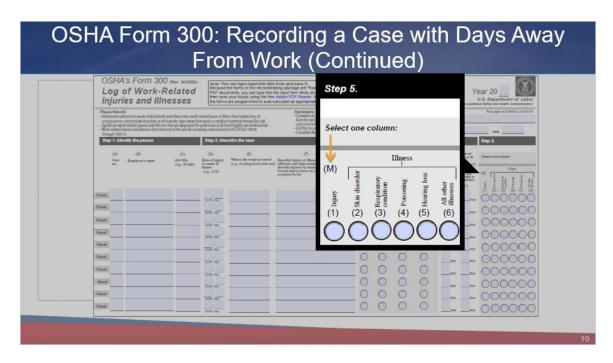
Online reporting form: https://www.osha.gov/pls/ser/serform.html



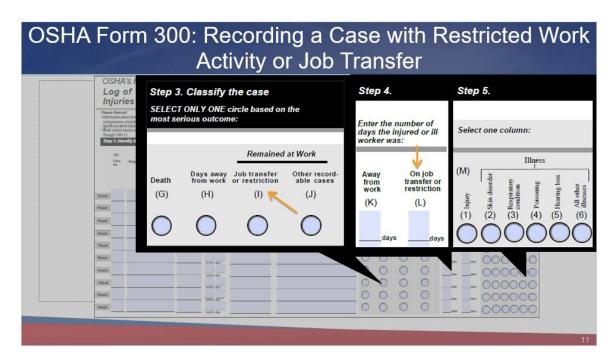
For cases that involve one or more days away from work, you must place a check mark in column H on the OSHA Form 300.



Enter the number of calendar days the employee was away from work in column K.

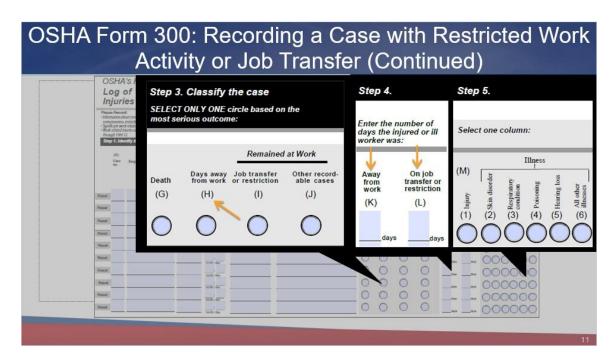


Then note in column M whether the case involves an injury or an illness. When counting days, be sure to count the days the employee would not have been able to work, regardless of whether they were scheduled to work. This would include weekends and holidays. Do not count the day of the injury. If the day count reaches 180 calendar days, you may stop counting subsequent days and enter "180" in column K.

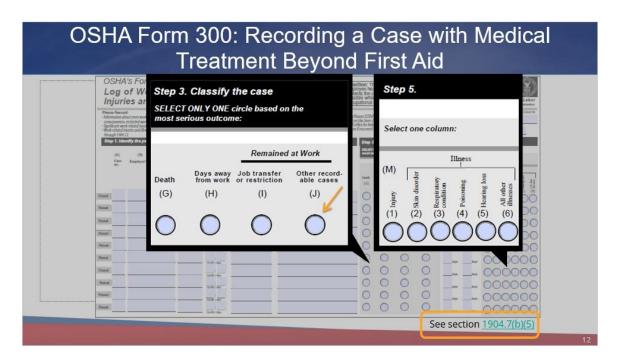


For cases that involve restricted work activity or job transfer, you must place a check mark in column I on the OSHA Form 300 and enter the number of calendar days the employee was restricted in column L. You count the days in the same manner as you would when counting days away from work. Then note in column M whether the case involves an injury or an illness.

An employee is considered restricted if they are unable to work a full shift or are unable to perform all the work activities they would be expected to do at least once during a week.



If a case involves both days away from work *and* days of restricted work activity, place a check mark in column H, leave column I blank, and enter the correct day counts in both columns K and L. For example, if an employee had three days away from work and two days of restricted work activity, place a check mark in column H and enter a three in column K and a two in column L. Again, note in column M whether the case involves an injury or an illness.



For cases that involve medical treatment beyond first aid, you must place a check mark on the OSHA Form 300 in column J, which is for "other recordable cases." Then note in column M whether the case involves an injury or an illness.

For OSHA recordkeeping purposes, medical treatment is any treatment for an injury or illness except diagnostic procedures, observation and counseling, and first aid. First aid consists of 14 specific treatments listed in section 1904.7(b)(5) of the regulatory text. It includes items such as non-prescription medication, wound coverings, and hot and cold treatment. You can access the complete list using the regulatory text link below or by looking in the "Overview" section of the recordkeeping forms package, available on OSHA's Recordkeeping web page.

### Link:

Section 1904.7(b)(5):

https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.7#1904.7(b)(5)

## Other Recording Criteria

### Additional qualifying criteria:

- Significant diagnosed injury or illness
- Needlestick and sharps injuries section 1904.8
- Medical removal section <u>1904.9</u>
- Hearing loss section <u>1904.10</u>
- Tuberculosis section 1904.11





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Work-related cases of cancer, chronic irreversible disease, fractured or cracked bones or teeth, or a punctured eardrum must be entered on the OSHA forms. These are considered significant injuries and illnesses.

The recordkeeping rule also contains special criteria for recording occupational hearing loss, tuberculosis, injuries from needlesticks and sharps potentially contaminated with bloodborne pathogens, and cases involving medical removal required by other OSHA standards. For the specific requirements, refer to sections 1904.8 through 1904.11 using the regulatory text links below.

### Links:

Section 1904.8: https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.8

Section 1904.9: https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.9

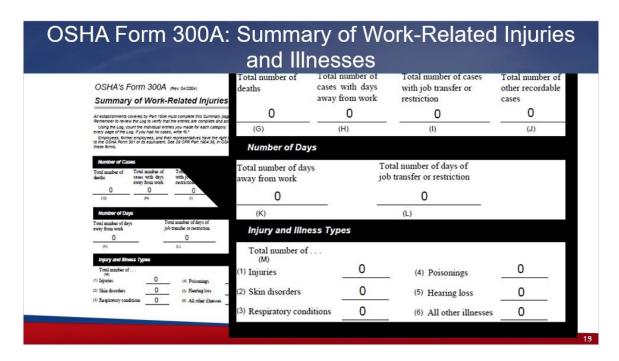
Section 1904.10: https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.10

Section 1904.11: https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.11

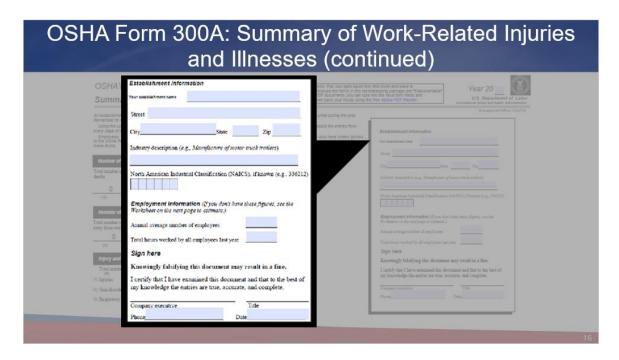
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This Injury and Illness Incident Report is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the Log of Work-Related Injuries and Illnesses and the accompanying Summary, these forms help the simployer and OSFA develop a picture of the extent and seventy of work-related incidents.  Within T calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. To see until the work-related injury or illness has occurred, you must fill out this form or an equivalent. To see until the owner from any substitute must contain all the information asked for on this form.  According to Public Law 91-996 and 20 CFR. 1940. OSFA is recordiscipal rule, you must keep this form on file for 3 years following the year to which it pertains a proper than the part of the control of the form, you may photocopy the printsure or insert additional form pages in the PDF, and then use as many as you need.	information about the employee  1) Pull name  2) Street  City Storm ZSF  3) Due offerth  Mouth Day You  4) Dain hand  Mouth Day You  5) (1) Make (2) Francis  Information about the physician or other health care professional  6) Name of physician or other health care professional  7) If treatment was given every from the workelin, where was it given?  Facility.  Street	### Appendix of the Code    The Code member from the Log
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You must fill out an Injury and Illness Incident Report for every recordable work-related injury or illness. Together with the Log of Work-Related Injuries and Illnesses and the accompanying summary, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within seven calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.



All establishments covered by Part 1904 must complete the Summary of Work-Related Injuries and Illnesses, even if no injuries or illnesses occurred during the year. Remember to review the log to verify that the entries are complete and accurate before completing this summary. Using the Form 300, count the individual entries you made for each category. Then write the totals on the left side of the Form 300A, making sure you've added the entries from every page of the log. If you had no cases, write in a zero.



On the right side of the Form 300A, fill in the establishment information. Also, in this section of the form, a company official must certify that the entries on the summary are true, accurate, and complete. The certifying official must be the owner of the company, an officer of the corporation, the highest-ranking company official at the establishment, or that person's supervisor.

You must post a copy of the annual summary in each establishment in a conspicuous place or places where notices to employees are customarily posted. You must post it no later than February 1 of the year following the year covered by the records and keep the posting in place for three months until April 30.

# Keep the Forms on File

#### Make sure to:

- File and update for 5 years
- Not send copies to OSHA unless asked to do so
- Allow access to the records
- Protect confidentiality



(For details on access provisions, see sections 1904.35 and 1904.40.)

You must keep these forms on file for five years following the year to which they pertain. You must also update the Form 300 with any changes that may occur to the recorded cases during that period. Do not send completed copies of the forms to OSHA. You must make the forms available to employees, former employees, their representatives, and to OSHA officials upon request. Note, however, that both the Log 300 and Form 301 incident reports will include information relating to employee health and thus can only be used in a manner that protects confidentiality to the extent possible while promoting occupational safety and health. For details concerning the access provisions, refer to sections 1904.35 and 1904.40 using the regulatory text links below.

### Links:

Section 1904.35:

https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.35#1904.35

Section 10904.40:

https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.40#1904.40

# Who Must Electronically Report Data to OSHA?

Many, but not all, establishments must electronically report injury and illness data to OSHA by March 2 of each year.

- The reporting requirements are based on the size and industry of your establishment. You can use
  the "ITA Coverage Application" at <a href="https://www.osha.gov/itareportapp">https://www.osha.gov/itareportapp</a> to determine if your
  establishment is covered by the reporting requirements.
- OSHA provides a secure website, called the Injury Tracking Application (ITA), where employers
  create accounts, then enter and submit their data. Information about and access to the ITA is
  available at <a href="https://www.osha.gov/injuryreporting">https://www.osha.gov/injuryreporting</a>.

Many but not all establishments must electronically report data from their completed OSHA forms. The data must be reported by March 2 of each year.

The size and industry of the establishment determines who needs to report and what information needs to be reported. Establishments in certain industries with a peak employment of 20 or more employees are required to report data from the 300A Summary Form. Establishments in certain industries with a peak employment of 100 or more employees are required to report data from the OSHA 300, 301, and 300A Forms. Use the "OSHA ITA Coverage Application" to determine if your establishment is subject to these reporting requirements.

Note that the reporting criteria are based on the size and industry of each individual establishment, not the firm as a whole. For example, if a company has two manufacturing establishments, one with 17 employees and one with 25 employees, the company only needs to report the Form 300A data for the establishment with 25 employees. While manufacturing is a covered industry, establishments with fewer than 20 employees are not required to report their Form 300A data.

### Links:

ITA Coverage Application: https://www.osha.gov/itareportapp

Injury Tracking Application: https://www.osha.gov/injuryreporting

### Resources

- Recordkeeping web page (<a href="https://www.osha.gov/recordkeeping">https://www.osha.gov/recordkeeping</a>)
- Q&A search application (<a href="https://www.osha.gov/recordkeeping/faq">https://www.osha.gov/recordkeeping/faq</a> search/index.html)
- Contact us (https://www.osha.gov/contactus)

Call OSHA to report emergencies, unsafe working conditions, safety and health violations; to file a complaint; or to ask safety and health questions.

1-800-321-6742 (OSHA)









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In conclusion, this presentation reviewed OSHA's injury and illness recordkeeping requirements at a very high level. The Recordkeeping page, however, includes links to reference documents that address the specific requirements of the recordkeeping rule and answer many reoccurring questions, as well as providing a link to the recordkeeping forms package itself. To learn the details of what you need to do to comply with the recordkeeping rule, you can review the regulatory text, Frequently Asked Questions, or FAQs, and the Letters of Interpretation linked from the Recordkeeping page.

If you have specific questions that you cannot find direct guidance for in these documents, you may try the recordkeeping Q&A search application using the link below. Also, feel free to call your local OSHA office or submit your question to OSHA using the "Contact Us" link below.

Thanks for helping to make the nation's workplaces safer.

### Links:

Recordkeeping web page: https://www.osha.gov/recordkeeping

Q&A search application: https://www.osha.gov/recordkeeping/faq-search

Contact Us: https://www.osha.gov/contactus