OSHA Update

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Occupational Safety and Health Administration

OSHA's Continuing Mission

- OSHA and its state partners, coupled with efforts of employers, safety & health professionals, unions and advocates, have helped **dramatically reduce** workplace injuries and illnesses.

- Worker fatalities in America are **down**—
  on average, from 38 workers a day in 1970
  to **15** a day in **2019**.

- Worker injuries and illnesses are **down**—
  from 10.9 incidents per 100 workers in 1972
  to **2.8** per 100 in **2019.**

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Regional and Area Office Functions

- Inspections

- Compliance Assistance

- Outreach

- Training

- Penalty Collection

- Abatement Assurance

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Recordkeeping

- Many employers with more than 10 employees are required to keep a record of serious work-related injuries and illnesses.

- Certain low-risk industries are exempted

- Minor injuries requiring first aid only do not need to be recorded.

Recordkeeping

- Subpart C - Recordkeeping Forms and Recording Criteria
  - 1904.4   Recording criteria
  - 1904.5   Work-relatedness
  - 1904.6   New case
  - 1904.7   General recording criteria
  - 1904.8   Needlesticks and sharps
  - 1904.9   Medical removal
  - 1904.10 Hearing loss
  - 1904.11 Tuberculosis
  - 1904.29 Forms

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Recordkeeping 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. This form must be posted from Feb. to April every year.

What cases are work related?

- 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))

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1904.7 – General Recording Criteria

An injury or illness is recordable if it results in one or more of the following:

- Death
- Days away from work
- Restricted work activity
- Transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- Significant injury or illness diagnosed by a PLHCP

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First Aid or Medical Treatment

- First Aid list of procedures

- If a procedure is not on the list, it is not considered first aid for record keeping purposes.

First Aid or Medical Treatment

- If an employee is provided prescription medications or non-prescription medications at prescription strength, it is considered medical treatment.

- Butterfly bandages, and Steri-Strips are first aid. Use of wound closure methods such as sutures, medical glues or staples is considered medical treatment.

- Hot or cold therapy is first aid regardless of how many times it is used.

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1904.7(b)(5) – First Aid

- Using nonprescription medication at nonprescription strength
- Tetanus immunizations
- Cleaning, flushing, or soaking surface wounds
- Wound coverings, butterfly bandages, Steri-Strips
- Hot or cold therapy
- Non-rigid means of support
- Temporary immobilization device used to transport accident victims
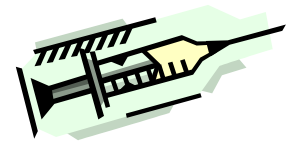
1904.7(b)(5) – First Aid

- Drilling of fingernail or toenail, draining fluid from blister
- Eye patches
- Removing foreign bodies from eye using irrigation or cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Finger guards
- Massages
- Drinking fluids for relief of heat stress

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1904.7(b)(5) – Medical Treatment

- Medical treatment is the management and care of a patient to combat disease or disorder.
- It does not include:
  - Visits to a PLHCP solely for observation or counseling
  - Diagnostic procedures
  - First aid

1904.31 – Covered Employees

- Exclude self-employed and partners

- Employees on payroll

- Employees not on payroll who are supervised on a day-to-day basis (temp or from another location)

- Temporary help agencies should not record the cases experienced by temp workers who are supervised by the host employer

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1904.32 Annual Summary

- Requires the annual summary to be posted from February 1 through April 30

- Requires certification of the summary by a company executive

Common Annual Summary Mistakes

OSHA 300A- Annual Summary

- Signed by highest ranking official onsite

- Matching 300 log

- Missing number of employees and hours worked

Common 300 Log Mistakes

OSHA's Form 300 (Rev. 01/2004)
Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year

U.S. Department of Labor
Occupational Safety and Health Administration

You must record information 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 listed in 29 CFR 1904.8 through 1904.12. Feel free to use two

Form approved OMB no. 1218-0176

Establishment name

City   State

	Identify the person			Describe the case		Classify the case										
						CHECK ONLY ONE box for each case based on the most serious outcome for that case:				Enter the number of days the injured or ill worker was:		Check the "injury" column or choose one type of illness:					
(A) Case No.	(B) Employee's Name	(C) Job Title (e.g., Welder)	(D) Date of injury or onset of illness (mo./day)	(E) Where the event occurred (e.g. Loading dock north end)	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g. Second degree burns on right forearm from acetylene torch)	Death	Days away from work	Remained at work		Away From Work (days)	On job transfer or restriction (days)	(M) Injury	Skin Disorder	Respiratory Condition	Poisoning	Hearing Loss	All other illnesse:
								Job transfer / restriction	Other record-able cases								
						(G)	**(H)**	(I)	(J)	**(K)**	(L)	(1)	(2)	(3)	**(4)**	(5)	(6)
1	Mark Bagin	Welder	5/25	basement	fell from ladder	✓						✓					
2	**Shana Alexander**	**Foundry man**	**7/2**	**pouring dock**	**poisoning from lead fumes**		✓			12					✓		

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Recordkeeping Mistakes

OSHA 300 log

- Injury and illness description (column F)

- Event location (column E)

- Classification of injury (column G,H,I, J)

- Column Totals

- Not including supervised temporary workers

Recordkeeping Mistakes

OSHA 301 – Incident Reports

- Missing information

- Can use State of Ohio FROI or OSHA 301 equivalent

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Maintaining Records

OSHA 300, 300A, 301 – retention requirements

- Must maintain five full calendar years

- Update when new information is received

- Maintain signed/posted annual summaries

WC Claim vs OSHA Recordable

- Recording or reporting a work-related injury, illness, or fatality does not mean that the employer or employee was at fault, or that an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits.

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WC Claim vs OSHA Recordable

- Denied WC claims may not cause a case to be a OSHA non-recordable

- Employer cannot use WC as the only reason to keep an injury off their OSHA log

- WC may link cases together to consolidate claims but OSHA has specific criteria on when a case is new and when it is a re-occurrence of the same injury

Suggestions

- Maintain in electronic format
- Have in central location
- Take a recordkeeping class
- Call an OSHA office if there are questions

Remember the log should be a trending tool.

Reporting Fatalities and Severe Injuries

- All employers are required to notify OSHA when an employee is **killed** on the job or suffers a work-related **hospitalization, amputation, or loss of an eye**.

- A fatality must be reported **within 8 hours**.

- An in-patient hospitalization, amputation, or eye loss must be reported **within 24 hours**.

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How to Report Fatalities and Hospitalizations

OSHA Offices by State
Click on a state to locate your local offices.

- During business hours,
  call the nearest OSHA office

- Or call the OSHA 24-hour
  hotline 1-800-321-6742 (OSHA)

- Or report online at **osha.gov/report**

- 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.

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Electronically Submitting Injury and Illness Data

- Covered employers must electronically submit data from their OSHA Form 300A to OSHA using OSHA's **Injury Tracking Application**

- Applies to establishments with **250 or more employees** that are currently required to keep OSHA injury and illness records, and establishments with **20-249 employees** that are classified in certain industries with historically high rates of occupational injuries and illnesses

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Electronic Submittal Reporting Dates

- Beginning in 2019, those establishments required to submit will have to submit the Form 300A information by **March 2** of the year after the calendar year covered.

- Reports submitted through OSHA's Injury Tracking Application (ITA). https://www.osha.gov/injuryreporting/

- ITA stays open until December 31 of each year.

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Recordkeeping Compliance Assistance

- News and updates to the recordkeeping rule: https://www.osha.gov/recordkeeping/index.html
  - Recordkeeping Requirements
  - Maintaining and Posting Records
  - Electronic Submission of Records
  - Severe Injury Reporting

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OSHA Recordkeeping Webpage

OSHA Injury and Illness Recordkeeping: Q & A Search

Use key words to search Q & As on OSHA's injury and illness recordkeeping requirements for employers. From this page you can search a repository of questions and answers from the regulation rule itself as well as from requests for information submitted to the Agency. Simply type any key word(s) into the input field below, then select the Search button to view a list of resulting questions that link to answers. If a search on this page does not answer your question, you can submit your question using OSHA's e-correspondence form.

Keyword Search | Input Search Term | Search | Clear | Search Basics and Hints

https://www.osha.gov/recordkeeping/faq_search/index.html

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Coronavirus Disease (COVID-19)

Learn about the new Emergency Temporary Standard for Healthcare along with updated (8/13) OSHA guidance for mitigating and preventing the spread of COVID-19 in all industries.

OSHA Requirements

Regulations
NEW Emergency Temporary Standard for Healthcare
UPDATED National Emphasis Program
UPDATED Enforcement
Recording and Reporting
- Non-ETS Reporting and Recording FAQ
Workers' Rights

Guidance

For Everyone
- **UPDATED 8/13** Mitigating and Preventing the Spread of COVID-19 in the Workplace
  - Summary
- Hazard Recognition
- Control and Prevention
By Industry
By Topic
FAQ

Highlights and Tools

Vaccines.gov
CDC Coronavirus (COVID-19) Page
CDC Workplaces and Businesses Page
Job Accommodation Network (COVID-19)
OSHA Newsroom

OSHA Data
- Enforcement Data including inspections with COVID-19 related violations
- Whistleblower Data

Archived OSHA Resources

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https://www.osha.gov/coronavirus

Help for Small Businesses:
OSHA's On-Site Consultation Program

On-Site Consultation is OSHA's preeminent compliance assistance program for small employers. In all 50 States and most Territories.

- **Services**
  - Hazard identification and correction
  - Assistance in Safety and Health Program development

- **Benefits**
  - No-cost and confidential
  - Exemption from OSHA's programmed inspections
 - Training and technical assistance available

www.osha.gov/dcsp/smallbusiness/consult.html

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Compliance Assistance Specialists

- Work out of OSHA's Area Offices

- Provide general information about OSHA's standards and compliance assistance resources

- Available for seminars, workshops, and speaking events

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Help for Small Businesses:
Publications
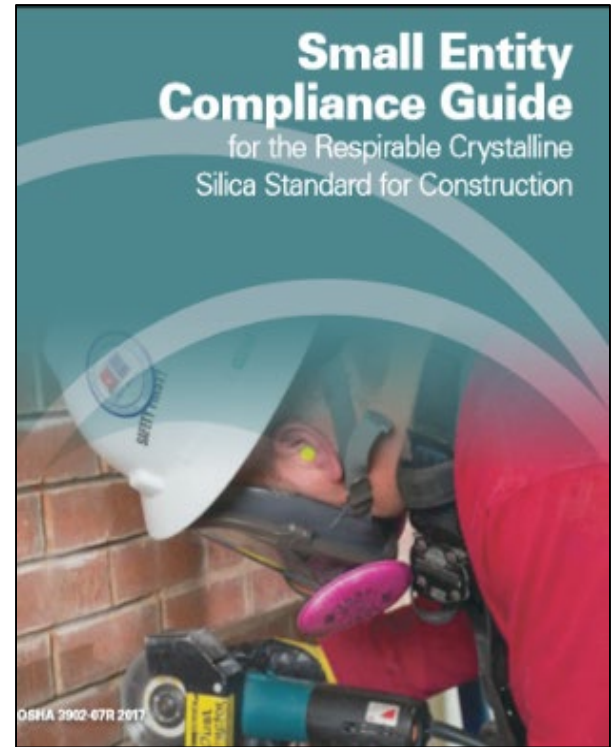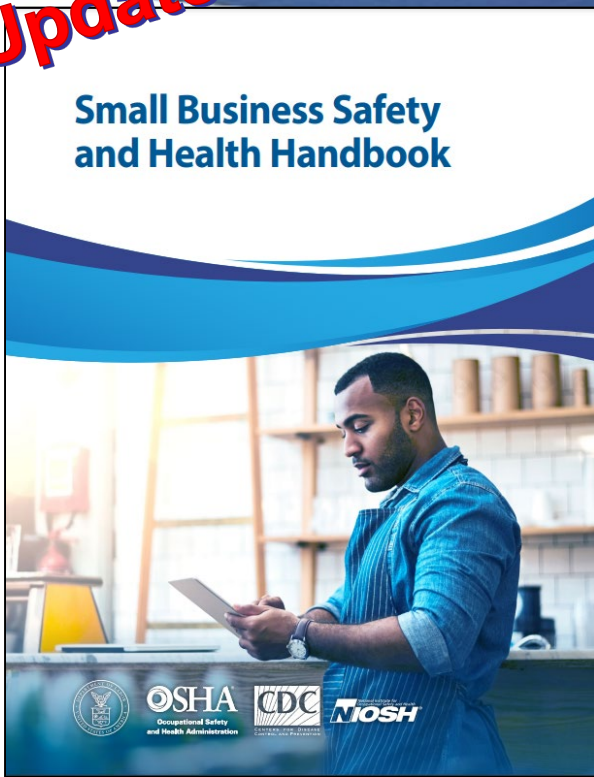
Spanish-Language Resources

- OSHA Webpage

- OSHA Poster

- Publications

- Videos

- 800 Number

- Dictionaries

OSHA QuickTakes

- **Free** OSHA e-newsletter delivered twice monthly to more than 200,000 subscribers

- **Latest news** about OSHA initiatives and products to help employers and workers find and prevent workplace hazards

- Sign up at **www.osha.gov**

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Toledo, OH 43604

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Cleveland Area Office
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Independence, OH 44131-6964

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OSHA Occupational Safety and Health Administration

Working Together, We Can Help

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