

## OSHA INJURY AND ILLNESS RECORDKEEPING



### Warning

Workers' Compensation determinations do NOT impact OSHA recordability.

**Cases maybe:**

- OSHA recordable and compensable
- OSHA recordable but not compensable
- Compensable but not OSHA recordable

### Who needs to do Recordkeeping?



- If your operation had more than
  - **10 (non-family) employees** at any one point during the last year
- Year is January 1-December 31

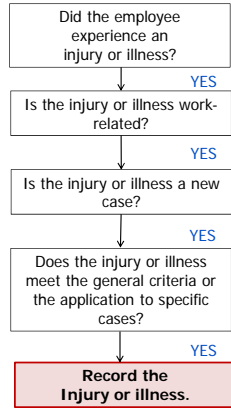
### Recordkeeping – OSHA.gov

<http://www.osha.gov/recordkeeping/index.html>





## 5 Steps to Determining Recordability



### Step 1: Did the employee experience an injury or illness?

**Scenario A:**

Your employee go to the first aid kit and get 2 Advil™

**Stop Here**  
OR  
**Go On To The Next Step?**



### Step 1: Did the employee experience an injury or illness?

**Scenario A:**

Your employee go to the first aid kit and get 2 Advil™

**Answer:** STOP

**Why:** First aid

**Best Practice:** Have employees record first aid use in a log.



### Step 1: Did the employee experience an injury or illness?

**Scenario B:**

You covered the corn silage pile and the next day 2 employees went out to repair tears. They reported puncturing a bubble and then feeling sick. They were rushed to the hospital and checked out for exposure to nitrogen dioxide. After being checked out in the emergency room, they were told to stay home the next day as a precautionary measure.

**Stop Here**  
OR  
**Go On To The Next Step?**



### Step 1: Did the employee experience an injury or illness?

#### Scenario B:

You were covering the silage pile and two (2) employees that were repairing holes weren't feeling well. They were rushed to the hospital. After being checked out in the emergency room, they were told to stay home the next day as a precautionary measure.

**Answer:** Yes

**Why:** Example exposure on September 21<sup>st</sup> with doctor's recommendation for September 22<sup>nd</sup> to have employees stay at home and return to work on September 23<sup>rd</sup>.

**Doctor's recommendation makes this a day away from work.**



### Step 2: Is the injury or illness work-related?

#### Determination of work-relatedness

You must consider an **injury or illness** to be work-related:

- ✓ if an event or exposure in the work environment either caused or contributed to the resulting condition
- ✓ or significantly aggravated a pre-existing injury or illness.

Work-relatedness is presumed for injuries and illnesses resulting from **events or exposures in the work environment** unless an exception specifically applies.

### 10 Situations when NOT work-related

1. There is **no discernable cause**. Injury/illness did not result from even/exposure at work.
2. Employee was present in the work environment as a **member of the general public** rather than as an employee when the injury or illness occurred.
3. The injury or illness involves signs or symptoms that surface at work but result **solely from a non-work related event or exposure** that occurs outside the work environment.
4. The injury or illness results **solely from voluntary participation** in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.

### 10 Situations when NOT work-related

5. The injury or illness is solely the result of an employee **eating, drinking, or preparing food or drink for personal consumption** (whether bought on the employer's premises or brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work related.

**Note:** If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.

### 10 Situations when NOT work-related

6. The injury or illness is solely the result of doing **personal tasks** (unrelated to their employment) at the establishment **outside of the employee's assigned working hours**.
7. The injury or illness is **solely the result of** personal grooming, self medication for a non-work-related condition, **or is intentionally self inflicted**.
8. The injury or illness is caused by a **motor vehicle accident** and occurs on a **company parking lot** or **company access road** while the employee **is commuting** to or from work.

### 10 Situations when NOT work-related

9. The illness is the **common cold or flu**  
(Note: Contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).
10. The illness is a **mental illness**. Mental illness will not be considered work-related unless the **employee voluntarily provides** the employers with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

### No Exceptions

There is **NO** exception for cases involving injuries or illnesses which occur as the result of:

- horseplay;
- acts of violence; or
- the fault of the employee.

**Step 2: Is the injury or illness work-related?**

**Scenario C:**

Employee slips on ice and sprains ankle in your employee parking area on their way in to work.

**Stop Here  
OR  
Go On To Next Step?**

**Step 2: Is the injury or illness work-related?**

**Scenario C:**

Employee slips on ice and sprains ankle in your employee parking area on their way in to work.

**Answer:** Yes

**Why?:** Injury happened on the work property.

**If injury or illness caused by a motor vehicle crash in your employee parking area while commuting to work, not recordable.**

**Step 2: Is the injury or illness work-related?**

**Scenario D:**

Employee slips and falls in shop, breaking an arm while working on his car. It was the employee's day off from work.

**Stop Here  
OR  
Go On To Next Step?**



**Step 2: Is the injury or illness work-related?**

**Scenario D:**

Employee slips and falls in shop, breaking an arm while working on his car. It was his day employee's day off from work.

**Answer:** No

**Why?:** Not recordable, not work-related.

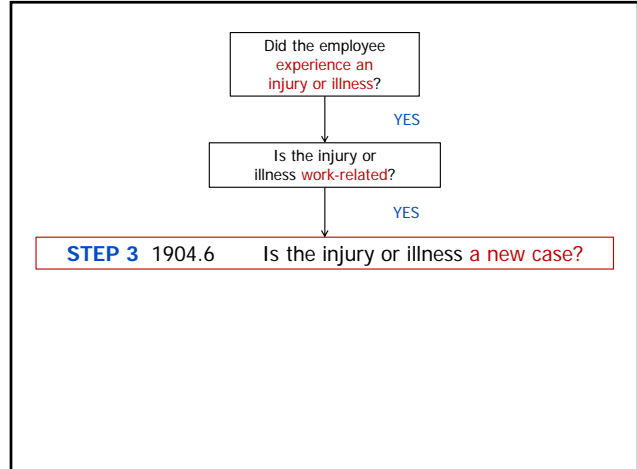
Doing a personal task outside of their employment.



**WARNING: DO NOT MIX  
OSHA RECORDABILITY AND  
WORKERS' COMPENSATION**

Workers' Compensation determinations do NOT impact OSHA recordability.

- Some cases may be OSHA recordable and compensable.
- Some cases may be compensable, but not OSHA recordable.
- Some cases may be OSHA recordable, but not compensable.



**Step 3: Is the injury or illness a new case?**

Consider an injury or illness as "new case" if the employee has not previously experienced a recorded injury or illness of the same type that affects the same part of the body.

**OR**

Employee previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely (all signs and symptoms had disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.

**Step 3: Is the injury or illness a new case?**

**Scenario E:**

- 5 weeks ago, employee sprained wrist at work and received support, prescription medication and "light duty."
- 2 weeks ago employee was back on normal job.
- Today (5 weeks after the injury) employee complains of pain in same wrist after scraping stalls.

**Stop Here  
OR  
Go On To The Next Step?**



**Step 3: Is the injury or illness a new case?**

**Scenario E:**

- Five (5) weeks ago, employee sprained wrist at work and received support, prescription medication and "light duty."
- Two (2) weeks ago employee was back on normal job.
- Today (5 weeks after the injury) employee complains of pain in same wrist after scraping stalls.

**Answer:** Yes

**Why?:** Employee was back to regular duty and released by medical professional.

**Step 3: Is the injury or illness a new case?**

**Scenario F:**

Employee fractures foot exiting a skid steer after cleaning barns.

Every 6 months or so it bothers him and he is placed on light duty for a day or two.

**Stop Here  
OR  
Go To The Next Step?**



**Step 3: Is the injury or illness a new case?**

**Scenario F:**

Employee fractures foot exiting a skid steer after cleaning barns.

Every six months or so it bothers him and he is placed on light duty for a day or two.

**Answer:** Yes and No

**Why?:** The reoccurrence was caused by an event at work.

Remember, once physician clears employee, the next injury or illness event is a new case.

Did the employee experience an injury or illness?

YES

Is the injury or illness work-related?

YES

Is the injury or illness a new case?

YES

**STEP 4** 1904.7 Does the injury or illness meet the general criteria or the application to specific cases?



#### Step 4: Does the injury or illness meet the general criteria or the application to specific cases?

##### General Recording Criteria

An injury or illness meets the **general recording criteria** and therefore to be **recordable**, if it results in any of the following:

- ✓ death,
- ✓ days away from work,
- ✓ restricted work or transfer to another job,
- ✓ medical treatment beyond first aid,
- ✓ or loss of consciousness.

Also consider a case to meet the general recording criteria if it involves a **significant injury or illness diagnosed by a physician or other licensed health care professional (LHCP)**, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.

#### Day Counts

- Count the number of **calendar days** the employee was away from work or restricted/transferred include:
  - ✓ workdays
  - ✓ scheduled days off
  - ✓ holidays
  - ✓ vacation days
- **Don't count the day that it happens or the day that they return.**
- May cap day count at 180 days away and/or days restricted
- **May stop** day count if employee leaves company for a reason **unrelated** to the injury or illness.
- **Must estimate** day count when employee leaves company due to reasons **related** to the injury or illness.

#### Restricted Work Activity (RWA)

- If work restriction/transfer is limited to **day of** injury/illness onset **not recordable**-includes employee being sent home during shift.
- Production of **fewer** goods or services **not** considered RWA
- Vague restriction from physician or LHCP (e.g., "light duty" or "take it easy for a week") are to be **recorded as RWA** if no further information is obtained.

#### Medical Treatment vs First Aid

Medical treatment **DOES NOT include**:

1. Visits to a physician or LHCP only for observation or counseling
2. Diagnostic procedures (x-rays, blood tests) including administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils)
3. First Aid



### Medical Treatment vs First Aid – cont'd.

First Aid list is comprehensive. Any other procedure is medical treatment.

- Using temporary immobilization devices while transporting an accident victim
- Drilling a finger- or toenail
- Using eye patches
- Removing foreign bodies from the eye using only irrigation or a cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Using finger guards
- Using massages
- Drinking fluids for relief of heat stress

### Medical Treatment vs First Aid – cont'd

- Using any non-rigid means of support, as elastic bandages, wraps, back belts, etc.
- Over the Counter (OTC) non-prescription med at non-prescription strength

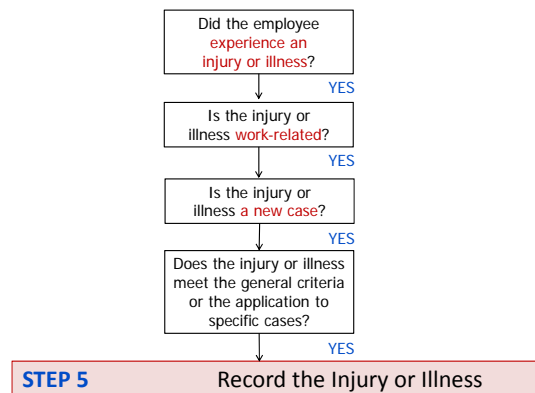
1 dose prescription med is <b>Medical Treatment</b>	
• Ibuprofen (such as Advil™)	Greater than 467 mg
• Diphenhydramine (such as Benadryl™)	Greater than 50 mg
• Naproxen Sodium (such as Aleve™)	Greater than 220 mg
• Ketoprofen (such as Orudis KT™)	Greater than 25 mg

- Administering **tetanus** immunizations
- Cleaning, flushing, or soaking wounds on the surface of the skin
- Using wound covering such as Band-Aids; Butterfly bandage/Steri-Strip (the only kind of wound closures)
- Any number of hot-cold treatments

### Automatically recordable if work related:

1904.7(b)(7)

- ✓ Fracture of bones or teeth
- ✓ Punctured ear drum
- ✓ Cancer
- ✓ Chronic irreversible disease (e.g. work related asthma)



### Determining Case **Severity**

Employee has a work-related injury or illness, sees doctor, told she can only work on light duty for the next 2 weeks.

She's normally scheduled for a 5-day work week.

How many days of restricted work activity should be entered on the OSHA Log?

### Determining Case **Recordability**

A physician recommends medical treatment, but the employee does not follow the recommendation, is the case recordable? **Y N**

An injured employee has repeated sessions of hot or cold therapy, does this case involve medical treatment? **Y N**

Steri-Strips and butterfly bandages (wound closures) are considered First Aid. This mean that staples, surgical glue, or other wound closures are also first aid? **Y N**

### Determining Case **Recordability**

Employee receives prescription medication in her eye to facilitate examination. Is this considered medical treatment? **Y N**

Employees exposed to slight release of non-toxic chemical. Several feel "light headed", receive simple administration of oxygen and return to work. Are these cases recordable? **Y N**

Employee's ankle is injured at work; a slight hairline fracture is detected in a positive X-ray diagnosis. Is this case recordable? **Y N**

### Conditions for Recordability 1904.10

#### Hearing Loss

Record all work-related hearing loss cases that meet BOTH of the following conditions on the same audiometric test for either ear:

1. The employee has experienced a Standard Threshold Shift (STS)
2. The employee's total hearing level is 25 dB or more above audiometric zero (averaged at 2000, 3000, & 4000 Hz) in the same ear(s) as the STS.

### Relationship to Bloodborne Pathogen Standard

#### Needlesticks and "sharps injuries"

ALL needlesticks and sharps injuries that are contaminated with **another person's blood or other potentially infectious material are recordable**. Record splashes or other exposures to blood or other potentially infectious material if it results in diagnosis of a bloodborne disease or meets the general recording criteria.

#### What about animal blood or potentially infectious materials? **Y N**

- Employers **may elect** to use the OSHA 300 and 301 forms to meet the sharps injury log requirements, **provided two conditions are met**:
  1. The employer must enter the **type and brand of the device** on either the 300 or 301 form.
  2. The employer must maintain the records in a way that **segregates sharps injuries** from other types of work-related injuries and illnesses, or **allows sharps injuries to be easily separated**.

### Other Recording Issues

- TB – Positive skin test recordable when known work place exposure to active TB disease. NO presumption of work relationship in any industry.
- MSD (musculo-skeletal disease) recordable when General Recording Criteria is met.
- Covered employees (temporary/contract employees supervised on a day-to-day basis)
- Certification by a senior establishment management official on OSHA 300 A Summary Form

### Forms – 1904.29

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

### Forms – 1904.29

- Employers must enter each recordable case on the forms within **7** calendar days of receiving information that a recordable case occurred
- An equivalent form can be used if it has the same information, is as readable and understandable, and uses the same instructions as the OSHA form it replaces.
- Forms can be kept on a computer as long as they can be produced when they are needed (i.e., meet the access provisions of 1904.35 and 1904.40)

### Subpart D – Other Requirements

- 1904.30 Multiple business establishments
- 1904.31 Covered employees
- 1904.32 Annual summary
- 1904.33 Retention and updating
- 1904.35 Employee involvement

### Multiple Business Establishments – 1904.30

Keep a separate OSHA Form 300 for each establishment that is expected to be in operation for more than a year

Each employee must be linked with 1 establishment

### Multiple Business Establishments – 1904.30

Employer may keep records at a central location if:

- Information about the injury or illness can be transmitted to the central location within 7 days; and
- The records can be produced at the establishment within time frames in 1904.35 and 1904.40.

### Different Locations?

- If an employee normally reports to an establishment and is injured there, the case goes on that establishment's log.
- If an employee is injured or made ill while visiting or working at another of the employer's establishments, then the injury or illness must be recorded on the 300 log of the establishment at which the injury or illness occurred (e.g., heifer raising facility)
- Cases for employees injured at another employer's establishment go on the log of the employee's home establishment (e.g., custom operator's employee injured on your farm, not recordable for your establishment.)

### Covered Employees – 1904.31

- ✓ Employees on payroll
- ✓ Employees not on payroll who are supervised on a day-to-day basis

### Annual Summary – 1904.32

- Form 300A
- Senior establishment management official signature
- Must post from February 1 to April 30 of the year following the year covered by the summary  
(e.g. For 2012, form 300A posted Feb 1-April 30, 2013)

### Summary Worksheet

**Optional Worksheet to Help You Fill Out the Summary**

**How to Report the Average Number of Employees**

**How to Report the Total Hours Worked by All Employees**

**Optional Worksheet**

**Number of Days**

**Injury and Illness Types**

**Post this Summary page from February 1 to April 30 of the year following the year covered by the form.**

### Form 300A

OSHA's Form 300A (Rev. 01/2009)  
**Summary of Work-Related Injuries and Illnesses**

**Number of Cases**

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
(A)	(B)	(C)	(D)

**Number of Days**

Total number of days away from work	Total number of days of job transfer or restriction
(E)	(F)

**Injury and Illness Types**

Total number of ...	(H) Poisoning	(I) All other illnesses
(G) Injuries	(J) Hearing loss	(K) All other illnesses
(L) Skin disorders	(M) Respiratory conditions	

**Establishment Information**

Name: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_  
Federal Agency (e.g., Mine, OSHA, etc.): \_\_\_\_\_  
OSHA District Office (e.g., OSHA Region 10): \_\_\_\_\_  
NAEP (e.g., NAEP 1000): \_\_\_\_\_

**Employment Information** (If you don't have any data, or are uncertain as to the year entered)

Annual average number of employees: \_\_\_\_\_  
Total hours worked by all employees last year: \_\_\_\_\_

**Sign here**  
Knowledge:  I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_

### Subpart E – Reporting Information to the Government

- Fatality and catastrophe reporting – 1904.39
- Access for Government representatives – 1904.40



### Fatality/Catastrophe Reporting – 1904.39

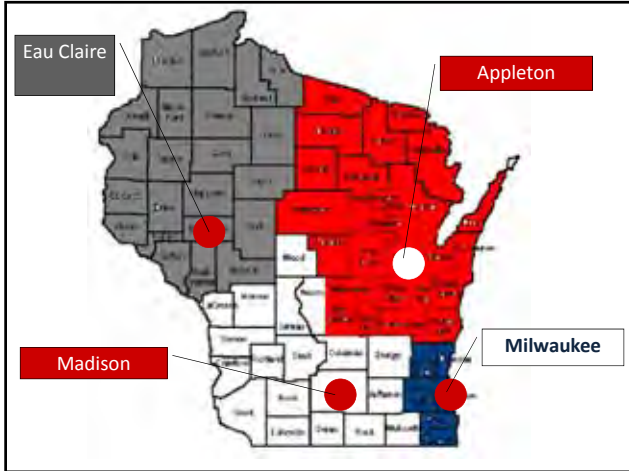
- Report orally within 8 hours any work-related fatality or incident involving 3 or more in-patient hospitalizations
- Do not need to report highway or public street accidents
- Do not need to report commercial airplane, train, subway, or bus accidents

### Providing Records to Government Representatives – 1904.40

- Must provide copies of the records within 4 business hours
- Based on the business hours of the establishment where the records are located

### For More Help

- OSHA's Recordkeeping Page-  
– <http://www.osha.gov/recordkeeping/index.html>
- OSHA Regional Recordkeeping Coordinators



## Wisconsin Compliance Assistance Specialists (CAS)

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OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION

## Further LEP Information

<http://fyi.uwex.edu/agsafety>

A screenshot of a website titled "AGRICULTURAL SAFETY & HEALTH". A blue arrow points from the URL above to a specific document on the page titled "OSHA WI Dairy Farm LEP Guidance Documents". The document text includes: "The following information relates to the OSHA directive CPL 04-05 (LAP 902) for Wisconsin Dairy Farms. This information is intended to help direct individuals to the sources of the guidance documents. In some cases notes have been added to guidance materials that have been updated or revised from those referenced in the original LEP." Below this, it lists "FROM DIRECTOR NUMBER: OSHA 04-05 LEP AND" and "APPLYING DATE: 10/01/11".

## Questions?



## References

Materials for OSHA Injury and Illness Recordkeeping Webinar were prepared by Kelly Bubolz, Compliance Assistance Specialist, Appleton Area Office and Cheryl A. Skjolaas, Interim Director and Agricultural Safety Specialist, UW Madison/Extension Center for Agricultural Safety and Health, December 13, 2012

Additional information on OSHA Recordkeeping is available at <http://osha.gov>  
 Further agricultural safety and health information is available at <http://fyi.uwex.edu/agsafety>

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University of Wisconsin-Madison/Extension, U.S. Department of Agriculture, and Wisconsin counties cooperating. UW-Madison/Extension provides equal opportunities in employment and programming, including Title IX and ADA.

## Disclaimer

This information has been developed by an OSHA Compliance Assistance Specialist and is intended to assist employers, workers, and others as they strive to improve workplace health and safety. While we attempt to thoroughly address specific topics or hazards, it is not possible to include discussion of everything necessary to ensure a healthy and safe working environment in a presentation of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer's legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations. Finally, over time, OSHA may modify rules and interpretations in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, you can visit OSHA's website at [www.osha.gov](http://www.osha.gov).



OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION