



# OSHA<sup>®</sup> RECORD-KEEPING REQUIREMENTS

## LOSS CONTROL BULLETIN

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Record-keeping is one of the most cited violations of OSHA standards every year. This can be either a lack of or improper record-keeping.

Employers are required to document work-related injuries, illnesses, and fatalities following the guidelines in 29 CFR, Part 1904. If an employer has 10 or fewer employees, they are not required to keep OSHA injury and illness records. There are also particular types of business establishments that are not required to keep these records. A list of the partially exempt industries can be found at: [www.osha.gov](http://www.osha.gov).

### OSHA INJURY AND ILLNESS RECORD-KEEPING FORMS

Each business establishment that does not meet either of the partial exceptions above must maintain the OSHA 300 Log of Work-Related Injuries and Illnesses, the OSHA 300-A Summary of Work-Related Injuries and Illnesses and the OSHA 301 Injury and Illness Incident Report or equivalent forms. An equivalent form is one that requires the same information as the particular OSHA form.

Businesses that have multiple establishments must keep a separate OSHA 300 Log for each establishment (if the establishment is expected to be in operation for one year or more). The injury or illness must be recorded on the OSHA 300 Log for the particular establishment at which the incident occurred.

### OSHA 300 LOG OF WORK-RELATED INJURIES AND ILLNESSES

This form is used to classify work-related injuries and illnesses and notes the extent and severity of each case. The following work-related injuries and illnesses should be recorded:

- Death
- Loss of consciousness
- Incidents that require days away from work
- Incidents that require restricted work activity or job transfer
- Incidents that require medical treatment beyond first aid
- Injury or illness diagnosed by a physician or other licensed health professional
- Any work-related case involving cancer, irreversible disease, fractured or cracked bone or punctured eardrum
- Any needle-stick injury or cut from a sharp object that is contaminated with another person's blood or other potentially infectious material
- A tuberculosis infection as evidenced by a positive skin test or diagnosis by a physician or other licensed health professional after an exposure to a known case of tuberculosis

Incidents where basic first aid such as cleaning wounds on the skin surface, using wound covering such as bandages, using heat or cold therapy and others are not considered medical treatment and do not need to be recorded on the OSHA 300 Log.

Restricted work activity occurs when, as the result of a work-related injury or illness, the employer or health-care professional recommends keeping an employee from doing the routine functions of their job or from working the full day that the employee would normally work. Count the number of calendar days the employee was on restricted work activity or was away from work as a result of the recordable injury or illness. Do not count the actual day of the injury or illness in this number.

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The OSHA 300 Log, the OSHA 300A Summary and the OSHA 301 Injury and Illness Report must be kept for five years following the year to which they pertain. These forms do not need to be sent to OSHA unless an employer is specifically asked to do so.

### OSHA 300A SUMMARY OF WORK-RELATED INJURIES AND ILLNESSES

At the end of each calendar year, the results of the OSHA 300 Log should be reviewed to see that they are complete and accurate. These results should then be summarized on the OSHA 300A Summary. Once the summary has been completed, it must be posted in a conspicuous place by Feb. 1 of the following year covered by the form through April 30. The OSHA 300 Log does not need to be posted, just the OSHA 300A Summary.

### ADDITIONAL RECORD-KEEPING REQUIREMENTS

All employers must report the death of an employee from a work-related incident within eight hours. In-patient hospitalizations, amputations, and losses of an eye must be reported within 24 hours.

The employer must orally report to OSHA via telephone or in person to the area office of OSHA that is nearest to the incident. Reports may also be filed using OSHA's toll-free phone number (800-321-6742) or an online form.

OSHA may send out an Annual OSHA Injury and Illness Survey form to employers. If you receive this form, you are required

to complete it and return it to OSHA. If you do not receive this form, you do not need to send your injury and illness information to OSHA.

Records should be kept for any employee safety training and any safety meetings that are held. These records should indicate the topic(s) covered, the names and signatures of attendees, and the name of the trainer/presenter. A log or file should be kept of all the documents that pertain to any safety training sessions or safety meetings.

Employee medical records must be kept for the duration of employment plus 30 years and employee exposure records must be kept for at least 30 years.

Many of the OSHA Standards have particular record-keeping requirements such as the Hazard Communication Standard. The Hazard Communication Standard requires that the employer develop a written hazard communication program which includes a list of hazardous chemicals in the workplace and the employer must maintain a file of material safety data sheets (MSDS) for all the chemicals used in the workplace.

To determine any additional record-keeping requirements, job hazards particular to each employer should be determined. Once these job hazards have been identified, the OSHA Standards that apply to those hazards should be reviewed to determine what record-keeping requirements may apply.

## PREVENTION IS EVERYONE'S BUSINESS. TRUST IN TOMORROW.® CONTACT YOUR AGENT TODAY TO LEARN ABOUT OUR LOSS PREVENTION PROGRAMS.

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