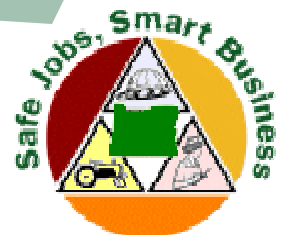


OSHA 300 Recordkeeping

Taking the guesswork out of OSHA recordkeeping...(well almost!)



Presented by the Public Education Section
Department of Business and Consumer Business
Oregon OSHA



OR-OSHA Mission Statement

To advance and improve workplace safety and health for all workers in Oregon.

Consultative Services

- Offers no-cost on-site safety and health assistance to help Oregon employers recognize and correct safety and health problems in their workplaces.
- Provides consultations in the areas of safety, industrial hygiene, ergonomics, occupational safety and health programs, new-business assistance, the Safety and Health Achievement Recognition Program (SHARP), and the Voluntary Protection Program (VPP).

Enforcement

- Offers pre-job conferences for mobile employers in industries such as logging and construction.
- Provides abatement assistance to employers who have received citations and provides compliance and technical assistance by phone.
- Inspects places of employment for occupational safety and health rule violations and investigates workplace safety and health complaints and accidents.

Appeals, Informal Conferences

- Provides the opportunity for employers to hold informal meetings with OR-OSHA on workplace safety and health concerns.
- Discusses OR-OSHA's requirements and clarifies workplace safety or health violations.
- Discusses abatement dates and negotiates settlement agreements to resolve disputed citations.

Standards & Technical Resources

- Develops, interprets, and provides technical advice on safety and health standards.
- Provides copies of all OR-OSHA occupational safety and health standards.
- Publishes booklets, pamphlets, and other materials to assist in the implementation of safety and health standards and programs.
- Operates a Resource Center containing books, topical files, technical periodicals, a video and film lending library, and more than 200 databases.

Public Education & Conferences

- Conducts conferences, seminars, workshops, and rule forums.
- Presents many workshops that introduce managers, supervisors, safety committee members, and others to occupational safety and health requirements, technical programs, and safety and health management concepts.

Additional Public Education Services

- Safety for Small Business workshops
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- Professional Development Certificates
- On-site training requests
- Access workshop materials
- Spanish training aids
- Training and Education Grants
- Continuing Education Units/Credit Hours

For more information on Public Education services, please call (888) 292-5247 Option 2

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Introduction

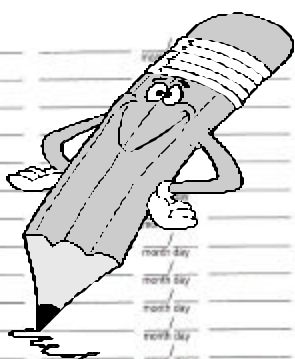
The purpose of this workshop is to introduce the requirements and procedures related to the OSHA 300 Log as contained in OAR 437, Division 1, Rule 0700. This class will help you develop skills to accurately report occupational injuries and illnesses. Resources and reference materials will be identified for recordkeeping concerns or questions affecting the workplace. To get the most out of the workshop, please participate fully in all the activities. We hope you have fun in your learning experience today.

Note: The OSHA 300 Log is not a workers' compensation form, so we will not be discussing workers' compensation topics.

Workshop goals

1. Introduce the rule requirements.
2. Determine if an injury or illness is work related and meets the criteria for a recordable case.
3. Make correct entries on the OSHA 300 log.

Identify the person		Describe the case			Classify the 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 illness	(E) Where the event occurred (e.g., "loading dock - south 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")	Off-site (0)	On-site (1)	Away from work (K)	On job neither on-site nor off-site (L)	Days	Days	Days	Days	Days	Days	Days	Days	
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Please take copious notes!

Please Note: This material or any other material used to inform employers of compliance requirements of Oregon OSHA standards through simplification of the regulations should not be considered a substitute for any provisions of the Oregon Safe Employment Act or for any standards issued by Oregon OSHA.

Why have a recordkeeping requirement?

- Obtains accurate information regarding workplace injuries and illnesses
- Provides a management tool for administering company safety and health programs
- Raises employer and employee awareness of workplace hazards
- Provides compliance staff with information to facilitate inspections

Who do the rules apply to?

- All employers covered by the Oregon Safe Employment Act, **however:**
- Most employers will not be keeping the 300 log unless directed in writing to do so.



Definitions

Partially Exempt Employers

- Employers with 10 or fewer employees during the last calendar year. (count peak employment including temporary employees)
- Employers with the Standard Industrial Classification (SIC) codes listed in Table 1 on the following page need not keep OR-OSHA injury and illness records for any establishment in the list (regardless of size) unless OR-OSHA asks them in writing to do so. (Primarily retail & service sectors)
- If your company has several business establishments engaged in different business activities, some of the establishments may be required to keep records while others may be exempt.
- Does not eliminate requirement to report serious injuries, fatalities and catastrophes to Oregon OSHA

Table 1 - Partially Exempt Industries

SIC Code	Industry Description	SIC Code	Industry Description
525	Hardware Stores	725	Shoe Repair and Shoeshine Parlors
542	Meat and Fish Markets	726	Funeral Service and Crematories
544	Candy, Nut, & Confectionery Stores	729	Miscellaneous Personal Services
545	Dairy Products Stores	731	Advertising Services
546	Retail Bakeries	732	Credit Reporting and Collection Services
549	Miscellaneous Food Stores	733	Mailing, Reproduction & Stenographic Services
551	New and Used Car Dealers	737	Computer and data Processing Services
552	Used Car Dealers	738	Miscellaneous Business Services
554	Gasoline Service Stations	764	Reupholstery and Furniture Repair
557	Motorcycle Dealers	78	Motion Picture
56	Apparel and Accessory Stores	791	Dance Studios, Schools, and Halls
573	Radio, Television, & Computer Stores	792	Producers, Orchestras, Entertainers
58	Eating and Drinking Places	793	Bowling Centers
591	Drug Stores and Proprietary Stores	801	Offices & Clinics of Medical Doctors
592	Liquor Stores	802	Offices and Clinics of Dentists
594	Miscellaneous Shopping Goods Stores	803	Offices of Osteopathic Physicians
599	Retail Stores, Not Elsewhere Classified	804	Offices of Other Health Practitioners
60	Depository Institutions (banks	807	Medical and Dental Laboratories
61	Nondepository Institutions (credit institutions)	809	Health and Allied Services, Not Elsewhere Classified
62	Security and commodity Brokers	81	Legal Services
63	Insurance Carriers	82	Educational Services (schools, colleges universities and libraries)
64	Insurance Agents, Brokers & Services	832	Individual and Family Services
653	Real Estate Agents and Managers	835	Child Day Care Services
654	Title Abstract Offices	839	Social Services, Not Elsewhere Classified
67	Holding and Other Investment Offices	841	Museums and Art Galleries
722	Photographic Studios, Portrait	86	Membership Organizations
723	Beauty Shops	87	Engineering, Accounting, Research, Management and Related Services
724	Barber Shops	899	Services, not elsewhere classified

What are Privacy Cases

- Those injuries and illnesses listed in 437-001-0700(14)(h).
 - Do not enter employees name on the log, but keep a separate, confidential list of case numbers and employee names. Use discretion in describing the injury or illness on the 300 Log and 801 (First Report of Injury or Illness) form.
-
-

Who are Covered Employees

- All employees on your payroll. (and/or)
 - All employees you supervise on a day-to-day basis even if they aren't on your payroll if they receive any type compensation including being covered by your Workers' Compensation coverage.
-
-

What is an Injury or illness

- Abnormal condition or disorder.
 - Illness includes both acute and chronic conditions.
-
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Physician or other licensed health care professional (HCP)

- An individual who's legally permitted scope of practice (license, registration, certification) allows them to independently perform or be delegated responsibility to perform the activities described by this regulation.
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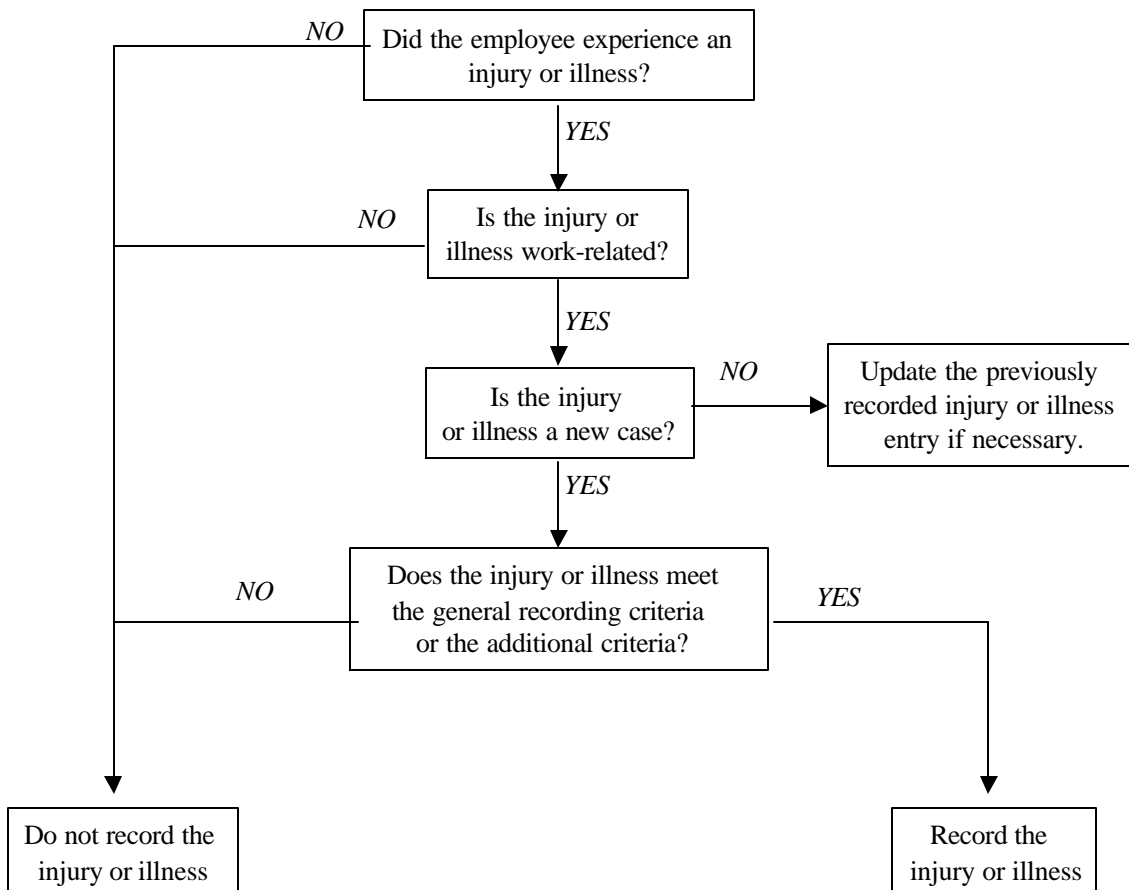


Employers who are required to keep the OSHA 300 must record fatalities, injuries and illnesses that:

- Are **work-related**; and
- Are **new cases**; and
- Meet one or more of the **general recording criteria**.

Note: Special reporting criteria applies to Needlestick and sharps injury cases, tuberculosis cases, hearing loss cases and medical removal cases.

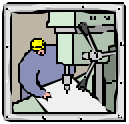
DECISION PROCESS FOR DETERMINING 300 LOG RECORDABILITY





When is an injury or illness considered work related?

- An injury or illness is 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.
 - You presume work-relatedness for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception in Table 3 in the rule (see page 8) specifically applies.
 - Note: A case is presumed work-related if, and only if, an event or exposure in the work environment is a discernable cause of the injury or illness or of a significant aggravation to a pre-existing condition. The work event or exposure need only be one of the discernable causes; it need not be the sole or predominant cause.
-
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What is the work environment?

- OR-OSHA defines the work environment as the establishment and other locations where one or more employees work or are present as a condition of their employment.
 - The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of their work.
 - Injuries occurring during travel are work-related if the employee was engaged in work activities in the interest of the employer and it is not one of the exceptions in Table 4 of the rule.
-
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What about when employees are on travel status or work from their home?

What does the information from Table 4 in Division 1 say?

Home away from home

- Evaluate the employee’s activities after they check into the hotel, motel, or other temporary residence for their work-relatedness in the same manner you evaluate the activities of a non-traveling employee.
 - If the employee has established a “home away from home” and is reporting to a fixed worksite each day, do not consider injuries or illnesses work-related if they occur while the employee is commuting between the temporary residence and the job location.
-
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Detour for personal reasons

- Injuries or illnesses are not work-related if they occur while the employee is on a personal detour from a reasonably direct route of travel.
-
-

Work at home

- Injuries and illnesses that occur while an employee works at home, including work in a home office, is work-related if the injury or illness relates directly to the work rather than to the general home environment or setting.
-
-



Table 3

An injury or illness occurring in the work environment that falls under one of the following exceptions is not work-related, and is not recordable.

Do not record injuries and illnesses if . . .

- At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
-
-
- 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.
-
-
- 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.
-
-
- 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 is not 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 is work-related.

- The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
-
-

- The injury or illness is solely the result of personal grooming, self medication for a nonwork-related condition, or is intentionally self-inflicted.
-
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- 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.
-
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- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are work-related if the employee is infected at work).
-
-

- The illness is a mental illness. Mental illness is not work-related unless the employee voluntarily provides the employer 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 work-related mental illness.
-
-



Exercise: Is the situation work-related? Indicate with a "Yes" or "No."

- _ Employee is swimming with his family at the pool where he is employed, slips and breaks his arm.

- _ Employee is diagnosed with a mental illness.

- _ Employee slams fingers in their car door in company parking lot on way to work.

- _ Employee is working at home (telecommuting) and the chair she is sitting on collapses injuring her.

- _ Employee trips on the curb when walking from the public parking area toward his office.

- _ Employee is injured in the lunch room at the worksite when he slips on some water while walking up to a fellow employee.

- _ Employee is doing stretching exercises in the company lounge as part of the companies voluntary wellness program when she is injured.

- _ Employee is driving a company truck delivering gravel to a worksite when injured.

- _ Employee gets food poisoning from pizza provided by her employer as a safety reward.

- _ Employee is cleaning his ears and punctures his eardrum with a q-tip while sitting at his desk.



How do I decide if this is a “new case”?

An injury or illness is a “new case” if:

- The employee has no previous recorded injury or illness of the same type that affects the same part of the body, or
- The employee previously had a recorded injury or illness of the same type that affected the same part of the body but recovered completely (all signs and symptoms disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.
- For occupational illnesses where the signs or symptoms may recur or continue in the absence of a workplace exposure, record the case only once. Examples include occupational cancer, asbestosis, byssinosis and silicosis.



Exercise: Is it a “new case” if it occurred in the workplace? Indicate with a "Yes" or "No."

- Employee fell and broke an arm.
- An employee had previously suffered from a back injury and has had no restrictions for the past two years. He tried to move a box of metal parts and is now unable to work and will require surgery.
- Employee has had previous problems with asthma. He is an electrician and has an asthma attack requiring medical attention after being exposed to dust in the attic he is rewiring. He receives no ongoing medication or treatment for his asthma.
- Employee was diagnosed with occupational cancer last year. She has not previously had lost time due to this illness, but is now off work due to chemotherapy treatments she is receiving.



What qualifies as a recordable case?

General Recording Criteria

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

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

Record a case if it involves a significant injury or illness diagnosed by a physician or other licensed health care professional, 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. Classify each case on the 300 Log in accordance with the most serious outcome associated with the case.



Recording a death on the OSHA 300 Log

- Record an injury or illness that results in death by entering a check mark in Column G for cases resulting in death.
- Report any work-related fatality to OR-OSHA within 8 hours.



Exercise: Fatality at XYZ

Instructions: Record the following fatality on the OSHA 300 Log Worksheet.

On 2/16/04, Jim James, maintenance worker, was cleaning out a conveyor belt jam in the corn processing area when he was pulled into the cutting blades. He was pronounced dead at the scene.



Recording days away from work

When an injury or illness involves one or more days away from work:

- Record the injury or illness on the OSHA 300 Log with a check mark in Column H for cases involving days away, and
 - Enter the number of calendar days away from work in Column K. Counting calendar days provides a more accurate and consistent measure of disability duration and will generate more reliable data.
 - Begin counting days away on the day after the injury occurred or the illness began.
-
-
-



Updating days away from work

If the employee is out for an extended period of time:

- Enter an estimate of the days the employee will be away, and
- Update the day count when the actual number of days is known.
- End the count of days away from work on the date the physician or other licensed health care professional recommends that the employee return to work. This applies regardless of whether the employee returns earlier or later than recommended.
- If there is no recommendation from the physician or licensed health care professional, enter the actual number of days the employee is off work.

- Count the number of calendar days the employee was unable to work as a result of the injury or illness, regardless of whether or not the employee was scheduled to work on those day(s).
- Include weekend days, holidays, vacation days or other days off in the total number of days recorded if the employee would not have been able to work on those days because of a work-related injury or illness.
- Stop tracking the number of calendar days away from work once the total reaches 180 days away from work and/or days of job transfer or restriction. Entering 180 in the total days away column is adequate.
- If the employee leaves your company for some reason unrelated to the injury or illness, such as retirement, a plant closing, or to take another job, you may stop counting days away from work or days of restriction/job transfer.
- If the employee leaves your company because of the injury or illness, you must estimate the total number of days away or days of restriction/job transfer and enter the day count on the 300 Log.
- You must enter the number of calendar days away for the injury or illness on the OSHA 300 Log that you prepare for the year in which the incident occurred.
- If the time off extends into a new year, estimate the number of days for that year and add that amount to the days from the year of occurrence. Do not split the days between years and enter amounts on the logs for two different years. Use this number to calculate the total for the annual summary, and then update the initial log entry later when the day count is known or reaches the 180-day cap.



Exercise: Injuries at XYZ

Instructions: Record the following injuries on the OSHA 300 Log Worksheet.

Beth Martin was hit by a limb and received a head injury on 4/28/04 while working trimming trees in Sherwood. She was off work for 30 days. It was determined she would be permanently disabled and took early retirement under a disability clause.

Don Hardy, welder, received burns to his right arm in the shop on 6/20/04 from his torch. It appeared that he would not be able to return to work for at least four months. On 6/30/04 the plant he worked for was closed and all employees were laid off at the end of their shift.

Tammy Newly, a chemist, inhaled chemicals in the lab on 7/5/04. She immediately had difficulty breathing, became dizzy and disoriented and was seen by a doctor who recommended she not work for 2 weeks. After one week, Tammy went back to work as she was feeling fine.



What about when there is a restriction in work or job transfer?



Recording restricted work or job transfers

When an injury or illness involves restricted work or job transfer but does not involve death or days away from work:

- Record the injury or illness on the OSHA 300 Log by placing a check mark in Column I for job transfer or restriction
- Enter the number of days of job transfer or restricted duty in Column L.



What is restricted work?

Restricted work occurs when, as the result of a work related injury or illness:

- You keep the employee from performing one or more of the routine functions of their job, or from working the full day that they would otherwise work; or
- A physician or other licensed health care professional recommends that the employee not perform one or more of the routine functions of their job, or not work the full workday that they would otherwise work.



When is a work restriction recordable?

A recommended work restriction is recordable only if it affects one or more of the employee's routine job functions.

To determine whether this is the case, you must evaluate the restriction in light of the routine functions of the injured or ill employee's job.

- A partial day of work is recorded as a day of job transfer or restriction for recordkeeping purposes, except for the day on which the injury occurred or the illness began.
- Once the employee is transferred to another job, stop counting days.
- Record job transfer and restricted work cases in the same box on the OSHA 300 log.
- Count days of job transfer or restriction in the same way you count days away from work.
- If you permanently assign the injured or ill employee to a modified job or a job permanently changed to eliminate the routine functions the employee was restricted from performing, you may stop the day count when the modification or change is permanent. You must count at least one day of restricted work or job transfer for such cases.



Exercise: More Injuries at XYZ

Instructions: Record the following injuries on the OSHA 300 Log Worksheet.

On 8/28/04 John Johnson, glue foreman developed blisters on his hands due to an allergic reaction to the glue he was working with on the reject line. He went to the doctor who ordered him to be restricted from any job activity that could expose him to the glue for a period of one week (7 days). John did not believe this was necessary, so he returned to the reject line the next day and started using a better quality of protective gloves.

On 9/30/04 Rita Royal, bag mover, was hurt while moving bags on the loading dock. She was diagnosed with a hernia and ordered not to lift more than 20 pounds. That same day, she was transferred to a permanent office job which would not require lifting over 10 pounds.



Recording other recordable cases

If a work-related injury or illness results in medical treatment beyond first aid, you must record it on the OSHA 300 Log.

If the employee received medical treatment but remained at work without transfer or restriction and the injury or illness did not involve death, one or more days away from work, one or more days of restricted work, or one or more days of job transfer, you enter a check mark in the box for other recordable cases.

NOTE: You must record the case even if the injured or ill employee does not follow the physician or other licensed health care professional's recommendation.

“Medical treatment” is the management and care of a patient to combat disease or disorder. For this rule, medical treatment does not include:

- Visits to a physician or other licensed health care professional solely for observation or counseling;
- The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications solely for diagnostic purposes (e.g., eye drops to dilate pupils; or
- First aid as listed in Table 6 of the rule.

TABLE 6 – First Aid List

- Using a nonprescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is medical treatment for recordkeeping purposes);
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, is medical treatment);
- Cleaning, flushing or soaking wounds on the surface of the skin;
- Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc. are medical treatment);
- Using hot or cold therapy;
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are medical treatment for recordkeeping purposes);
- Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- 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 (physical therapy or chiropractic treatment are medical treatment for recordkeeping purposes); or
- Drinking fluids for relief of heat stress.



This is a complete list of all first aid treatments for this standard. These treatments are considered first aid regardless of the professional status of the person providing the treatment.

The rule identifies specific things that are NOT considered medical treatment. If it is not listed, it is considered medical treatment.



Exercise: Is it medical treatment? Indicate with a "Yes" or "No."

- Employee is x-rayed and it is found there are no broken bones.
- Employee receives chiropractic treatment for a shoulder injury.
- Doctor cleans a cut with water and antiseptic and places a butterfly bandage over the wound.
- Employee is prescribed 800 mg. of Ibuprofen every 4 hrs. to treat a sprain. The employee purchases the drug over the counter at the local drug store. Package instructions recommend a dosage of up to 400 mg. every 4 hrs.
- As a result of a compressed gas canister falling on employees foot, the toenail is drilled to remove blood which accumulated under his toenail.
- Employee is immobilized by a back board in order to transport her to the hospital.
- Physician removes a wood splinter imbedded in an employees eye.



What other things have to be recorded?



Record instances when a worker becomes unconscious

Record a work-related injury or illness if the worker becomes unconscious, regardless of the length of time they remain unconscious.



Other work-related cases

Record work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum must always be recorded under the general criteria at the time of occurrence.



Special criteria for Needlestick and Sharps Injury Recording

When an needlestick injury is diagnosed later as an infectious bloodborne disease, update the classification on the 300 log to reflect the new status or classification. Record all work-related needlestick injuries and cuts from sharp objects contaminated with another person's blood or other potentially infectious material (as defined by OAR 437-002-1910.1030).

- Enter the case on the OSHA 300 Log as an injury.
 - To protect the employee's privacy, do not enter the employee's name on the OSHA 300 Log (see the requirements for privacy cases in OAR 437-001-0700(14)(a) through (14)(i))
-
-



Medical Removal Recording Criteria

If another OR-OSHA standard requires the medical removal of an employee, you must record the case on the OSHA 300 Log.

- Enter each medical removal case on the OSHA 300 Log as either a case involving days away from work or a case involving restricted work activity, depending on how you decide to comply with the medical removal requirement.
 - If the medical removal is the result of a chemical exposure, you must enter the case on the OSHA 300 Log by checking the “poisoning” column.
 - If the case involves voluntary medical removal before reaching the medical removal levels required by an OR-OSHA standard, do not record the case on the OSHA 300 log.
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Occupational Hearing Loss Recording Criteria

- Hearing loss must be recorded on the OSHA 300 Log when:
 - ✓ An annual audiogram reveals a standard threshold shift (STS) in either or both ears: and
 - ✓ The hearing level in the same ear is 25 dB above audiometric zero.
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What is a Standard threshold shift (STS) ? A change in hearing threshold relative to the baseline audiogram of an average of 10 dB (decibel - a logarithmic unit of sound intensity) or more at 2000, 3000, and 4000 Hz (Hertz -unit of frequency, equal to one cycle per second) in either ear. OAR 437-002-0095, (g)(10)(i)

- In determining whether an STS has occurred, you may correct for the age of the employee.
 - ✓ Use the appropriate table in Appendix A of the rule to determine the age adjustment.
 - ✓ If the STS is 10 dB or more after the age correction, it still meets the criteria for recordability.
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- If you retest the employee's hearing within 30 days of the first test, and the retest does not confirm the STS, you are not required to record the hearing loss case on the OSHA 300 log.
 - If the retest confirms the recordable STS, you must record the hearing loss illness within seven (7) calendar days of the retest.
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- If subsequent audiometric testing performed under the testing requirements of the noise standard (OAR 437-002-1910.95) indicates that an STS is not persistent, you may erase, delete, or line-out the recorded entry.
 - If a physician or other licensed health care professional determines that the hearing loss is not work-related or has not been significantly aggravated by occupational noise exposure, the case is not work-related. Do not record it on the OSHA 300 Log.
 - Note: Non-Mandatory Appendix A shows how to age correct when determining if a recordable STS has occurred.
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Tuberculosis Recording Criteria

- If any of your employees has an occupational exposure to anyone with a known case of active tuberculosis (TB), and that employee subsequently develops a tuberculosis infection, as evidenced by a positive skin test or diagnosis by a physician or other licensed health care professional, record the case on the OSHA 300 Log by checking the “respiratory condition” column.

- Do not record a pre-employment positive skin test because the exposure was not in your workplace.
- Line out or erase a recorded case if you prove that:
 - ✓ The worker lives in a household with a person diagnosed with active TB;
 - ✓ The Public Health Department identifies the worker as a contact of an individual with a case of active TB unrelated to the workplace; or
 - ✓ A medical investigation shows that the employee’s infection was caused by exposure to TB away from work, or proves that the case was not related to the workplace TB exposure.



Musculoskeletal Disorder Recording Criteria

If any of your employees has a recordable work-related musculoskeletal disorder (MSD), record it on the OSHA 300 Log.

- There are no special criteria for determining which musculoskeletal disorders to record. An MSD case is recorded using the same process you would use for any other injury or illness.
- If the musculoskeletal disorder is work related and is a new case, and meets one or more of the general recording criteria you must record the musculoskeletal disorder.
- Note: A MSD must be diagnosed by a health care professional.



Exercise: Needlestick and carpal tunnel

Instructions: Record the following injuries on the OSHA 300 Log Worksheet.

On 10/4/04, while cleaning in the warehouse during the graveyard shift, Jill Smith, a custodian at XYZ, receives a needlestick from a used syringe someone had placed in a waste can. There is no time loss as a result of the incident.

Ellen Bass, typist in the office, reports pain and numbness in her fingers when she uses her computer for more than 30 minutes. On 11/5/04, her doctor diagnosed her symptoms as carpal tunnel syndrome as a result of ongoing computer work. He prescribes a rigid wrist brace for her to wear at night.



More information on forms:

- Page 1 of an OSHA 801 or equivalent form must be completed for each recordable injury or illness on the OSHA 300 log.
 - The OSHA 300 Log and 801, Page 1, Incident Report must be completed within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.
 - Computers can be used to keep records if it can produce equivalent forms when needed.
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Retaining and updating paperwork

- Information must be retained for five (5) years following the end of the calendar year that they cover.
 - During this storage period, you must update your stored OSHA 300 Logs to include newly discovered recordable injuries or illnesses and to show any changes that have occurred in the classification of previously recorded injuries and illnesses.
 - If the business changes ownership, the records must be turned over to the new owner, who must retain them for the remainder of the retention period.
 - Note: No updating required on stored OSHA 200 logs for prior years.
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Employee Involvement and Access to Paperwork:

- Inform each employee including temporary, seasonal, etc. of how they are to report injuries and illnesses to you.
- When an employee, former employee, personal representative, or authorized employee representative asks for a copy of a current or stored OSHA 300 Log or an OSHA 801 Incident Report for an injury to that employee, provide it by the end of the next business day. Leave the names on the 300 Log unless it is a “privacy concern case”.
- Page 1 of the 801 is the only part used for Recordkeeping purposes. It is important that workers NOT sign or complete Page 2 of the 801 form if it is only being used for Recordkeeping and the worker does not want to file a Workers’ Compensation claim.
- A decision to deny Workers’ Compensation benefits does not necessarily mean that the case should be removed from the 300 Log.
- Provide the 801 Incident Report section titled “Tell us about the case” to employee representatives within 7 calendar days of a request.
- Provide copies of your records to Government Representatives within four (4) business hours of the request.



All employers must:

- Report fatalities and multiple hospitalizations to OR-OSHA within 8 hours of occurrence. (Includes heart attacks that occur at work)
- Report accidents or injuries to OR-OSHA that result in overnight hospitalization for medical treatment other than first aid, within 24 hours after you become aware of the incident.
- Complete and return the Annual Injury and Illness Survey if you receive one.
- Respond to requests for information from the Bureau of Labor Statistics or DCBS.

Annual Summary

At the end of each calendar year, you must:

- review the OSHA 300 Log to verify that the entries are complete and accurate, and correct any problems;
 - use the OSHA 300A or equivalent form to create an annual summary of injuries and illnesses from the OSHA 300 Log;
 - certify that one of the following examined the OSHA 300 log and believe, based on knowledge of the process by which the information was recorded, that it is correct and complete.
 - ✓ The highest ranking manager at the location where the log is compiled.
 - ✓ If there is no management at the compiling location, any manager with jurisdiction over that location.
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- 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 ensure that the posted annual summary is not altered, defaced or covered by other material.
 - You must post the summary no later than **February 1** of the year following the year covered by the records and keep it posted until **April 30**.
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Calculating the DART Rate

As of January 1, 2002 the term “lost workday” was no longer used for recordkeeping purposes. The new language is **DART**.

DART = Days Away, Restricted, or Transferred.

The **DART** rate is calculated using the following formula:

$$\frac{N \times 200,000}{EH}$$

where:

N = number of injuries and/or illnesses with days away, restricted work, or job transfer

EH = total hours worked by all employees during calendar year

200,000 = base for 100 full-time equivalent workers (working 40 hours per week, 50 weeks per year).

The DART rate can be used to compare statistics with the earlier LWDI.

Exercise: What's the DART Rate?

Determine the DART Rate for an employer with 75 employees who worked a total of 150,000 hours and experienced 10 injuries and/or illnesses with days away, restricted work, or job transfer during the previous calendar year.

$$\text{DART} = \frac{\quad \times 200,000}{\quad} = \quad$$



The final exercise:

Instructions: Read and discuss the scenario your group has been assigned. Decide whether the employer made the right decision related to OSHA 300 Log recordkeeping.

Scenario 1:

- An employee must report to work by 8:00 a.m.
- The employee drove into the company parking lot at 7:30 a.m. and parked the car.
- The employee exited the car and proceeded to the office to report to work.
- The parking lot and sidewalks are privately owned by the facility and both are within the property line, but not the controlled access points (i.e., fence, guards).
- The employee stepped onto the sidewalk and slipped on the snow and ice.
- The employee suffered a back injury and missed multiple days of work.

The company believes that the employee was still in the process of the commute to work since the employee had not yet checked in at the office. Since a work task was not being performed, the site personnel deemed the incident not work-related and therefore not recordable.

Do you agree or disagree _____ Why?

Scenario 2:

- An employee reports to work.
- Several hours later, the employee goes outside for a "smoke break."
- The employee slips on the ice and injures his back.

Since the employee was not performing a task related to the employee's work, the company has deemed this incident non-work related and therefore not recordable.

Do you agree or disagree with the decision? _____ Why?

Scenario 3:

- An employee drives into the company parking lot at 7:30 a.m., exits his car, and proceeds to cross the parking lot to clock-in to work.
- A second employee, also on the way to work, approaches the first employee, and the two individuals get into a physical altercation in the parking lot. The first employee breaks an arm during the altercation.
- The employee goes to the doctor and receives medical treatment for his injury.

The company deems this non-work related, and therefore non-recordable, since the employees had not yet reported to work and a work task was not being performed at the time of the altercation.

Do you agree or disagree with the decision? _____ Why?

Scenario 4:

- A site hired numerous temporary workers at its plant.
- Three temporary workers were injured.
- They each received injuries that were recordable on the OSHA 300 Log.
- The employees were under the direct supervision of the site.

Is it correct that these injuries were recordable on the site log or should they have been recordable on the temp agency log? What are the criteria related to temporary workers that need to be reviewed to determine which OSHA log is appropriate for recording the injury/illness?

Do you agree or disagree with the decision? _____ Why?

For more information on Workers' Compensation call the Workers' Compensation Infoline (toll free in Oregon) at 1-800-452-0288

Workers' Compensation Division Website:

<http://www.cbs.state.or.us/external/wcd/index.html>

Reference Materials

Question & Answers for Recordkeeping Participants:

Q: Does closure of a wound using super glue constitute Medical Treatment or First Aid?

A: It is Medical Treatment. If the item is not specifically listed as First Aid, it is Treatment.

Q: In the case of someone having an epileptic seizure at work, is it recordable? What if they hit their head, break a bone, etc. when the seizure occurs?

A: Epileptic seizures are not work related unless the seizures occur as a result of a work injury.

In most instances, it is not work related. You also would not record any additional injuries that happen solely as a result of the seizure occurring in the work environment.

Q: Are injuries occurring during breaks work related since the person is paid for this time?

A: It depends on where the employee is when the injury occurs. If they are at the workplace, it would be work related. If they have left the workplace, such as going to a local restaurant, or off the premises for the break, the injury would not be work related and would not be recorded on the 300 log.

Q: Since you do not record injuries which occur while the individual is commuting, do you consider an injury to be work related if it is in a company owned/maintained parking lot?

A: A commuter must have parked their car and started walking into the building. For

example: If an individual slams their finger in their car door, it would not be work related. If they trip after they start walking across the parking lot, it would be. Injury to an employee who walks to work would not be recordable unless it happens on company property. An injury is recordable if they were walking somewhere as a work activity regardless of where it happened.

Q: How do you decide when an employee enters the workplace when coming to work in the morning?

A: The question you need to ask yourself is--At what point does the employer have control over removing or fixing hazardous conditions? If they are responsible for repairs to the parking lot, it starts there. If they own and maintain the sidewalks, it starts there. It may be that the employer's control over hazards does not start until the employee enters the front door of their business.

Q: When would a heart attack be work related?

A: When there is a medical diagnosis that mental or physical stress from work activities contributed to the heart attack.

Q: Is there any time when an injury of a student would be recordable on the 300 log?

A: Yes. If the student is receiving remuneration and/or is covered by Workers Compensation.

Q: Is the administration of oxygen medical treatment?

A: Usually. OSHA considers most uses of oxygen medical treatment because oxygen administration is a treatment that can only be provided by trained medical personnel, uses relatively complex technology, and is used to treat serious injuries and illnesses. However, if oxygen is administered as a purely precautionary measure to an employee who does not exhibit any symptoms of an injury or illness, the case is not recordable

Q: Can any employee at a workplace ask to see all the 801 forms as well as the 300 log?

A: Employees are only given a copy of their own 801 form assuming they have a recordable injury. All employees also have a right to receive a copy of the entire 300 log for their workplace.

Q: Are employers ever required to post any part of the 300 log?

A: No. The only posting requirement in the 300 rules is the requirement to post the 300A (Summary Sheet) from Feb. 1 through April 30.

Q: When you have a large employer with multiple establishments doing the same type of work, or an entity like a county that has distinctly different divisions performing different work, do you keep one 300 log or one for each establishment?

A: You would keep one for each separate establishment, or Standard Industrial Classification. For example, a county might have a fire department, water department, roads, etc. You would need to be able to pull out information regarding each department's 300 entries. The summary sheets posted from February 1 through April 30 each year would reflect the injuries for the worksite where it is posted, not the entire company.

Q: We have multiple establishments that rarely, if ever, have recordable incidents, and those incidents are reported to our main office. Do we have to keep separate OSHA 300 logs for each establishment?

A: If those locations operate for one year or longer, the rule requires separate 300 logs for each location. However, you can keep all of the incidents on one central master log as long as each incident is recorded within seven days of notification. Also, you must prepare 300A summary forms for each separate location, so you must be able to extract information from the master 300 form to reflect where each incident occurred. You must also be able to extract all of the information for a specific location from that master 300 log within four hours when that data is requested by Oregon OSHA.

Q: If there is an establishment like a hospital with distinctly different functions which all fall under one Standard Industrial Classification, is it O.K. to have separate 300 logs for distinctly different functions and just roll all the information into one 300 log and 300A summary sheet when it comes time to do the annual posting for the establishment?

A: That would be acceptable.

NOTE #1: In Oregon if an employer is required to have an Exposure Control Plan, they must maintain a sharps log regardless of whether or not they must maintain a 300 log.

NOTE #2: Whenever the federal question and answer sheet references the 301, think 801.

Q. Is if a "one-time" dosage of a prescription drug considered medical treatment.

A. Yes.

The final rule, 29 CFR Part 1904 Occupational Injury and Illness Recording and Reporting Requirements, Section 1904.7(b)(5)(ii)(A) defines first aid as: Using a nonprescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes). OSHA has not included prescription medications, whether given once or over a longer period of time, in the list of first aid treatments. The Agency believes that the use of prescription medications is not first aid because prescription medications are powerful substances that can only be prescribed by a physician or licensed health care professional.

Key to final exercise: OSHA's response to scenarios

Scenario 1 Response: Company parking lots and sidewalks are part of the employer's establishment for recordkeeping purposes. Here, the employee slipped on an icy sidewalk while walking to the office to report for work. In addition, the event or exposure that occurred does not meet any of the work-related exceptions contained in the rule. The employee was on the sidewalk because of work; therefore, the case is work-related regardless of the fact that he had not actually checked in.

Scenario 2 Response: An injury or illness is not work-related if it is (1) solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment (2) outside of the employee's assigned working hours. In order for this exception to apply, the case must meet both of the stated conditions. The exception does not apply here because the injury or illness occurred within normal working hours. Therefore, your case in question is work-related, and if it meets the general recording criteria, the case must be recorded.

Scenario 3 Response: The recordkeeping regulation contains no general exception for purposes of determining work-relationship for cases involving acts of violence in the work environment. Company parking lots/access roads are part of the employer's premises and therefore part of the employer's establishment. Whether the employee had not clocked in to work does not affect the outcome for determining work-relatedness. The case is recordable on the OSHA log, because the injury meets the general recording criteria.

Scenario 4 Response: The employer must record the injuries and illnesses that occur to employees not on its payroll if it supervises them on a day-to-day basis. Day-to-day supervision generally exists when the employer "supervises not only the output, product, or result to be accomplished by the person's work, but also the details, means, methods, and processes by which the work objective is accomplished

Ref: OSHA Letter of Interpretation dated 01/15/2004 - Evaluation of seven scenarios for work-relatedness and recordkeeping requirements.



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