

**Lake County Safety Council**  
**Thursday, January 13 Meeting**



**LAKE COUNTY**  
**SAFETY COUNCIL**  
Working Towards A Safer Workplace

***OSHA Record Keeping – Preparing for 2022***

***presented by:***

***Scott Cole, CSP, SMS, CHST***

***EHS Director, Turner Construction***

# Event Sponsor

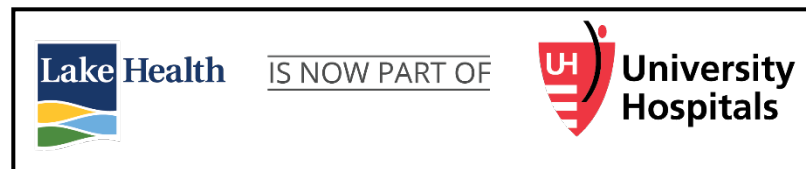


***HZW Environmental  
Consultants***

# Event Sponsor



*Lake Health  
Occupational Services*



# Event Sponsor

## Lake Health Occupational Services



### Occupational Health Clinic Locations

Your employees will never be far from a University Hospitals Occupational Health Clinic. With multiple locations, our clinics provide a comprehensive menu of services, including drug and alcohol screenings, physicals, injury and follow-up care, vaccinations and more to meet the unique needs of your organization.

In addition to our full-service Occupational Health Clinics, our UH Urgent Care locations offer acute illness and non-trauma injury care during after-hours and on weekends.

[UHhospitals.org/EmployerSolutions](http://UHhospitals.org/EmployerSolutions)



- 1. UH OCCUPATIONAL HEALTH – ASHLAND**  
2212 Mifflin Avenue, Suite 215, Ashland  
419-281-4440  
*8 a.m. – 4:30 p.m., Monday through Friday*
- 2. UH OCCUPATIONAL HEALTH – BEACHWOOD**  
3619 Park East Drive, Suite 205, Beachwood  
216-464-6211  
*7:30 a.m. – 4 p.m., Monday through Friday*
- 3. UH OCCUPATIONAL HEALTH – CHARDON**  
510 Fifth Avenue, Chardon  
855-525-3622  
*8 a.m. – 4 p.m., Monday through Friday*  
*Pre-employment physicals: Wednesday and Friday*
- 4. UH OCCUPATIONAL HEALTH – MEDWORKS**  
39000 Center Ridge Road, North Ridgeville  
440-329-7490  
*7:30 a.m. – 4 p.m., Monday through Thursday*  
*7:30 a.m. – 3 p.m., Fridays*  
*Appointment only. Pricing may vary.*
- 5. UH OCCUPATIONAL HEALTH – MENTOR**  
UH Brunner Sanden Deitrick Wellness Center  
8655 Market Street, Mentor  
855-525-3622  
*8 a.m. – 8 p.m., Monday through Friday*  
*9 a.m. – 5 p.m., Saturday and Sunday*
- 6. UH OCCUPATIONAL HEALTH – PARMA**  
6115 Powers Boulevard, Suite 200, Parma  
440-743-7373  
*7:30 a.m. – 4 p.m., Monday through Friday*
- 7. UH OCCUPATIONAL HEALTH – PORTAGE**  
3957 Loomis Parkway, Ravenna  
330-297-2385  
*7:30 a.m. – 4 p.m., Monday through Friday*
- 8. UH OCCUPATIONAL HEALTH – WILLOWICK**  
29804 Lakeshore Boulevard, Willowick  
855-525-3622  
*8 a.m. to 8 p.m., Monday through Friday*  
*9 a.m. to 5 p.m., Saturday*



# OSHA Recordkeeping

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216-318-3878

# Agenda

- Review of Recordkeeping Forms
- Presentation and Review
- Questions and Feedback

# 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
- **PERRP Forms**
  - 300P, 301P, 300AP

# OSHA Form 300 Recordkeeping

- OSHA requires facilities to maintain records of all work-related recordable injuries and illnesses.
- Applies to 10 or more employees
  - Exception: BLS
- The employer has the ultimate responsibility for making a good faith determination about recordability.





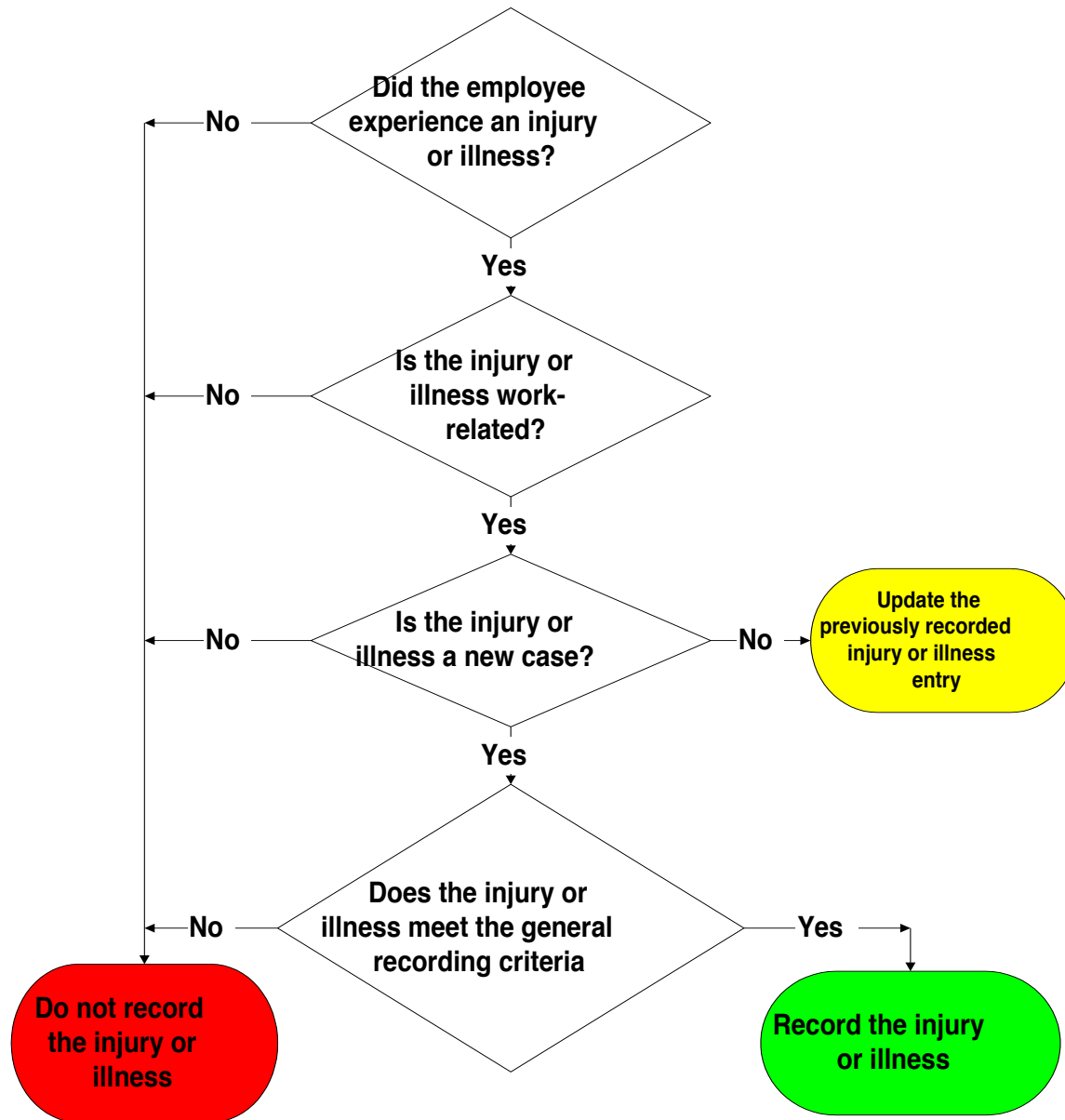
# OSHA 300 Recordability vs. Workers' Compensation Compensability

- The requirements for recordability should not be confused with compensability.
- Decisions regarding recordability must be made without regard to compensability.

# Recording Criteria

- Employers must record each fatality, injury, or illness that is:
  - work-related; and
  - a new case; and
  - meets one or more of the general recording criteria contained in sections 1904.7-1904.12

# Recordkeeping Decision Tree



# Establishing Work Relationship

- If an event results in an injury/illness in the work environment, it is presumed work-related.
  - A case is considered work-related if an event or exposure in the work environment either caused or contributed to the resulting condition.
  - A pre-existing injury or illness is considered work-related if an event or exposure in the work environment **SIGNIFICANTLY** aggravated the condition.

# Establishing Work Relationship

*(continued)*

- A pre-existing injury or illness is significantly aggravated when an event or exposure in the work environment results in any of the following:
  - death
  - loss of consciousness
  - one or more days away from work, or restricted days, or a job transfer
  - medical treatment

# Work Relationship Exceptions

- Employee present as a member of the general public (rather than employee).
- Symptoms surface at work solely due to non-work related event.
- Voluntary participation in wellness programs, medical, fitness, or recreational activity.
- Eating, drinking, or preparing food or drink for personal consumption.

# Work Relationship Exceptions

*(continued)*

- Personal tasks outside assigned working hours.
- Personal grooming, self-medication for a non-work related condition, or intentionally self-inflicted.
- Motor vehicle accident in company parking lot / access road during commutes.

# Work Relationship Exceptions

*(continued)*

- 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)



# COVID

- COVID-19 can be a recordable illness if a worker is infected as a result of performing their work-related duties. However, employers are only responsible for recording cases of COVID-19 if all of the following are true:
  - The case is a confirmed case of COVID-19;
  - The case is work-related; and
  - The case involves one or more of the general recording criteria set forth in [29 CFR 1904.7](#) (e.g., medical treatment beyond first aid, days away from work).

# Work From Home

- Work-related if the injury or illness occurs while the employee is performing work for pay or compensation in the home, and the injury or illness is directly related to the performance of work rather than to the general home environment or setting.

# Key Definitions

**New Case** - the employee has not had a 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 body part, but:
  - had recovered completely, **and**
  - an event caused the symptoms to reappear

# Key Definitions *(continued)*

First Aid - is defined as anything contained in a comprehensive, specific list within the standard. This is a complete list of all treatments considered first aid.

- First aid can be administered by a physician, nurse, or other licensed health care professional.
- First Aid cases are not recordable.

# Key Definitions *(continued)*

**Medical Treatment** - the management and care of a patient to combat disease or disorder.

- Does not include:
  - visits to physician solely for observation or counseling
  - diagnostic procedures, e.g., X-rays (negative), blood tests, prescriptions used solely for diagnostic purposes, e.g. eye drops to dilate pupils
  - first aid cases

# Key Definitions *(continued)*

Recordable injury - a case is recordable if the injury or illness results in:

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

# Key Definitions *(continued)*

- Record a case if it involves a **significant** injury or illness, diagnosed by a 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. Examples include:
  - punctured eardrum
  - fracture
  - chronic irreversible disease

# General Recording Criteria – First Aid

- Non prescription medication at non-prescription strength
- Tetanus immunizations
- Cleaning, flushing, soaking surface wounds
- Wound coverings, butterfly bandages, steri-strips
- Hot or cold therapy (regardless of number of applications)



# General Recording Criteria - First Aid *(continued)*

- Non-rigid means of support, e.g., ace bandage
- Temporary immobilization devices used to transport accident victims
- Drilling, toe or finger nails, draining fluid from blister
- Eye patches

# General Recording Criteria - First Aid *(continued)*

- Removing foreign bodies from eye with only irrigation or cotton swab
- Removing splinters/foreign material from areas other than eye by irrigation, tweezers, cotton swabs or other simple means
- Finger guards
- Massages (not physical therapy)
- Drinking fluids to relieve heat stress

# General Recording Criteria - First Aid *(continued)*

- If not included on the first aid list, the treatment is **RECORDABLE**

# Warning

The following slides contain pictures of an actual injury

# General Recording Criteria

## Prescription Medication

- Issuance of any prescription medication (including single dose) is recordable. Even if:
  - the employee does not take the prescription, or
  - the employee does not fill it
- Over the counter medication, e.g., ibuprofen, given in prescription strength is recordable.
- Samples of prescription medicine are recordable.

# General Recording Criteria - Burns

- Only burns that receive medical treatment are recordable. Therefore:
  - the vast majority of 1st degree burns and minor second degree burns will not be recordable
  - more serious 1st and 2nd degree burns that receive medical treatment will be recordable
  - 3rd degree burns are recordable

# General Recording Criteria - Hearing Loss Cases

Hearing loss cases are recordable if there is a work-related shift in hearing of an average of 10 dB or more at 2,000, 3,000, and 4,000 Hz in one or both ears

# Medical Removal

If an employee is medically removed (except voluntary removals below required removal levels) from the work environment under the medical surveillance requirements of an OSHA standard, record the case as:

- involving days away from work or restricted work activity
- standards include lead, cadmium, methylene chloride, formaldehyde and benzene



# Distinguishing Between Employees and Other Workers

- Employers are required to maintain injury and illness records for their own employees.
- Employers are not responsible for maintaining records for employees of other firms or for independent contractors.
- Key factor in determining who should record a worker's injury or illness is "supervision." The employer who generally supervises the day-to-day activities is responsible for recording injuries/illnesses.

# Location of OSHA Form 300

Each case must be linked with one establishment

- an injury or illness experienced by an employee is normally recorded on the log at the employee's home site
- if an injury or illness occurs to an employee who is at another company site, record the case at that site
- If an injury or illness occurs away from the employees home site, i.e., not within the company, record on the log where the employee normally reports.

# Travel Status

To be on travel status, employees must either be:

- outside their normal geographic area of operation, or
- working off premises for more than a normal workday (such as staying overnight).

An employee's "normal geographic area of operation" includes the town or city where the employee normally works and directly adjoining municipalities.

## Travel Status *(continued)*

When a traveling employee checks into a hotel or motel, they establish a "home away from home".

An injury/illness would not be recordable if it occurred during normal living activities, e.g., eating, sleeping, recreation, etc., or if the employee deviates from a reasonably direct route of travel.

## Travel Status *(continued)*

- Employees who travel on company business shall be considered to be engaged in work-related activities all the time they spend in the interest of the company, including, but not limited to, travel to and from customer contacts and, entertaining for the purpose of transacting, discussing, or promoting business.

# General Recording Criteria - Lost Workday Cases

- Lost workday cases are those cases resulting in days lost from work of injury or illness.
- The number of days away from work does not include the day of injury, or the onset of illness.
- Count the number of calendar days the employee was unable to work, regardless of whether the employee was scheduled to work.
- Weekend days, holidays, and vacation days, or other days off, e.g., temporary plant closing, are included in the total number of lost workdays recorded if the employee was not able to work.

# General Recording Criteria - Lost Workday Cases *(continued)*

The total days away from work are “capped” at 180 calendar days.


Stop counting days away from work if the employee leaves the company for some reason unrelated to the injury or illness, such as retirement, permanent plant closing, or to take another job.



## General Recording Criteria - Restricted Work Activity

The emphasis on determining restricted activity is the employee's ability to perform all of his or her routine functions during all of his or her normal workday or shift.





## General Recording Criteria - Restricted Work Activity *(continued)*


An employee's routine functions are those work activities the employee regularly performs at least once per week.

# General Recording Criteria -

## Restricted Work Activity *(continued)*

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

- the employer, physician or other LHCP, keeps the employee from performing one or more of the routine functions of his or her job, or from working the full workday that he or she would otherwise have been scheduled to work; or
- you assign an employee to a job other than his or her regular job



# General Recording Criteria - Restricted Work Activity *(continued)*

Days of restricted work are counted in the same way as lost workdays.



# Log Entry Time Requirements

Employers must enter each recordable case on the appropriate forms within 7 calendar days of receiving information that a recordable case occurred.

# Retention and Updating

- Keep forms for the current year plus 5 previous years.
- Must update the OSHA Form 300 during the retention period.
- DO NOT need to update the OSHA Form 300A or 301.

# Privacy Concern Cases

## Finite list:

- HIV infection, hepatitis, tuberculosis
- recordable needlestick and sharps injuries
- mental illness
- injury or illness involving sexual assault
- injury or illness to the reproductive system
- employee requests to keep name off

Employer may use discretion in “description”  
portion of log if employee can still be identified

# Privacy Issues

Do not enter the employee's name on the OSHA Form 300 for "privacy concern cases".

Write "privacy concern" in the name column.

Keep a separate confidential list of the case numbers and employee names.

# Annual Summary

Review OSHA Form 300 for accuracy.  
Complete OSHA Form 300A.

Certify Summary (signed by company executive).

Post the Form 300A summary February 1 through April 30 in a conspicuous place(s) where notices to employees are customarily posted.



# Annual Summary *(continued)*

A company executive must certify that:

- they have examined the log
- they reasonably believe, based on personal knowledge of the recordkeeping process, that the summary is accurate and complete

# Annual Summary *(continued)*

A company executive certifying the summary must be one of the following:

- an officer of the corporation
- the highest ranking company official working at the establishment
- The immediate supervisor of the highest ranking official on site

# Record Access to Government Employees

- Provide copies of records kept under 1904 within 4 business hours to:
  - a representative of OSHA conducting the inspection
  - a representative of a State agency administering portions of a State plan
  - a representative of NIOSH conducting an investigation

# Questions and Feedback

<https://plusdelta.app/join/HBV04D>

or



Thank you!