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OVERVIEW

LCO-5

OSHA 300 RECORDING AND RECORDKEEPING OVERVIEW

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On January 1, 2002, the Occupational Safety and Health Administration amended its rules for recordkeeping injuries and illnesses for employers. The law is referenced in **Part 1904 – Recording and Reporting Occupational Injuries and Illnesses**.

Formerly, injuries and illnesses were required to be logged on an OSHA 200 form and reported on an OSHA 101 form. These forms have been changed to OSHA 300 (Log of Work-Related Injuries) and OSHA 301 (Injury and Illness Incident Report), respectively. A third report, OSHA 300-A (Summary of Work-Related Injuries and Illnesses) is the summary to be filed and posted according to the posting requirements. Discussion regarding each of the forms follows.

Generally, businesses that employ more than ten persons during any part of the calendar year are subject to the recordkeeping requirements of the rule. Even if the business has ten or fewer employees, it is recommended to keep track of all recordable occupational injuries and illnesses. For expedience, all businesses are encouraged to maintain an OSHA 300 log. Regardless, any employer must report to OSHA any workplace incident that results in a fatality or hospitalization of three or more employees, regardless of the total number of employees.

Injuries and illnesses must be recorded for any employees who are on the payroll, whether they are executive, hourly, salaried, part-time, seasonal or migrant workers. Also, a temporary office worker hired from an employment agency such as Manpower who works at a location for extended periods of time would be logged on the hiring company's log. (A daily temporary worker, however, would not be recorded on the hiring company's log but would instead be logged by the agency.) The key to determining whether or not an injury or illness is logged is determined by the amount of supervision the person receives from the employer. If they are supervised on a day-to-day basis, even if they are not on the payroll, it is likely that the incident be logged.

If the business is organized as a partnership or sole proprietor, the owner or partners are not considered employees for recordkeeping purposes and thus would not be posted on the log.

Any fatality, injury or illness that is (1) work-related; (2) a new case, and (3) meets one or more of the general recording criteria (see LCO 5A) must be recorded.

Logs must be available at each establishment for inspection and copying by employee representatives or representatives of various state or federal agencies. Logs may be computerized if they can be provided to the requesting agency by the end of the next business day.

Each employer must post an annual summary of occupational injuries and illnesses for each establishment. The OSHA 300-A Summary form is used for this purpose. The copy must be posted no later than February 1 and must remain in place until April 30.

Please follow equipment manufacturers' recommendations for safe operation and maintenance procedures.

The person responsible for the annual summary total shall certify that the totals are true and complete by signing at the bottom of the form. Only a company executive can certify the totals. The company executive who certifies the log must be one of the following persons: (1) an owner of the company; (2) an officer of the corporation; (3) the highest ranking official working at the establishment; or (4) the immediate supervisor of the highest ranking company official working at the establishment.

Logs must be maintained and retained for five years following the end of the calendar year.

Important Note: You are advised to contact the appropriate state and federal regulatory agencies for details of the OSHA injury and illness recordkeeping requirements and maintenance of all OSHA documents.

Forms may be obtained at any OSHA office location or from www.osha.gov/recordkeeping/RKforms.html.

Prepared by the Southwide Safety Committee, Forest Resources Association Inc.