



FOREST RESOURCES ASSOCIATION INC. **LOSS CONTROL**

600 JEFFERSON PLAZA, SUITE 350
ROCKVILLE, MARYLAND 20852

PHONE: 301/838-9385

FAX: 301/838-9481

OVERVIEW

LCO-5A

OSHA 300 RECORDKEEPING REQUIREMENTS

revised December 3, 2004

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**.

Injuries and illnesses are required to be logged on an OSHA 300 form and reported on an OSHA 301 form or equivalent. 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. Discussions of the use of these forms may be found on FRA Loss Control Overview LCO 5, “OSHA 300 Recording and Recordkeeping Overview.”

In determining the recordability of an incident, first determine the work-relatedness of the incident. An injury or illness is considered work-related if an event or exposure in the work environment caused or contributed to the condition *or* significantly aggravated a preexisting condition. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures in the workplace, unless an exception to the standard specifically applies. (Refer to the standard at www.osha.gov/recordkeeping/index.html. The exceptions are too specific to be included here.)

Record those work-related injuries and illnesses that result in death; loss of consciousness; days away from work; restricted work activity or job transfer; or medical treatment beyond first aid. Also record any significant work-related injury or illness that is diagnosed by a physician or other licensed health care professional.

Medical treatments (which must be logged) includes managing and caring for a patient for the purpose of combating a disease or disorder. Medical treatment typically includes injections, treating fractures, sutures, administering prescription medication, over-the-counter medication in prescription strength, giving prescription medication samples, second-degree burns (blisters) requiring medical treatment, restricted work, etc.

First aid treatments (which are *not* logged) include visits to a doctor or health care professional solely for observation or counseling; diagnostic procedures, including administering prescription medications used *solely* for diagnostic purposes; (i.e. eye drops to dilate pupils) and any procedure that can be labeled “first aid.” First aid treatment also includes using non-prescription medications at non-prescription strength; tetanus immunizations; cleaning, flushing or soaking wounds on the skin surface; using wound coverings, such as bandages, BandAids™, gauze pads, SteriStrips™ or butterfly bandages; using hot or cold therapy; using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc.; using temporary immobilization devices while transporting an accident victim (splints, slings, neck collars, or back boards); drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters; using eye patches; using simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye; using irrigation, tweezers, cotton swab or other simple means to remove

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

splinters or foreign materials from areas other than the eye; using finger guards; using massages; drinking fluids to relieve heat stress.

Restricted work activity occurs when, as the result of a work-related injury or illness, an employer or health care professional keeps, or recommends keeping, an employee from doing the routine functions of his or her job or from working the full workday that the employee would have been scheduled to work before the injury or illness occurred.

If an employee is restricted by a health care professional from performing *any* work beyond the day of injury, (including Saturday and Sunday) *it would be considered a lost time injury*. Count the number of calendar days the employee was on restricted work activity or was away from work as a result of injury or illness (including holidays and weekends.) Do not count the day of the injury or illness. Stop counting if the days of restricted work activity or days away from work total 180 days.

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; or go to www.osha.gov for additional information.

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