

RECORDKEEPING PLAN

The (TITLE), (NAME) is responsible for maintaining OSHA'S Injury, Illness, and Fatality records. This plan will provide employees and employers with a basic understanding of OSHA's Injury, Illness, and Fatality, recordkeeping requirements. It can also be used as a guidance document to help those responsible for keeping injury, illness, and fatality records.

Employers will learn about their responsibilities under OSHA's recordkeeping standard and employees will learn about their rights under the standard.

Employers will learn about the criteria for determining if an injury or illness must be recorded. They will also understand how to determine if an injury or illness is work-related, whether it is a new case, and whether it meets the general recording criteria.

There will also be instruction on how to complete the recordkeeping forms accurately, including classifying the case, entering the number of days away from work or days of restricted work, and marking the appropriate type of injury.

SUGGESTED MATERIALS TO HAVE ON HAND

- A copy of the OSHA regulations (29 CFR 1904)
- OSHA 300 Log of Work-Related Injuries and Illnesses
- OSHA 300-A Summary of Work-Related Injuries and Illnesses
- OSHA 301 Injury and Illness Incident Report

INTRODUCTION/OVERVIEW

OSHA's revised recordkeeping standard became effective January 1, 2002.

OSHA's goal was to make injury, illness, and fatality recordkeeping requirements easy to understand and the forms simple to complete. OSHA's previous recordkeeping standard had many "gray areas." Over time, OSHA had issued hundreds of interpretations, compliance letters, and guidebooks to help employers determine how to record injuries, illnesses, and fatalities accurately. This revised recordkeeping standard (29 CFR 1904) sweeps away and replaces the old standard as well as the hundreds of interpretive documents.

For those who are familiar with the previous standard, the following are some of the major changes we will discuss:

- Revised recordkeeping forms.
- Specific definitions of "work-related" and "pre-existing conditions" are given.
- A list of the procedures considered to be "first-aid".

- Calendar days, instead of working days, are counted when calculating days away from work and days of restricted work.
- The distinction between criteria for injuries and illnesses is eliminated.
- Privacy is provided for employees who suffer certain injuries or illnesses.
- Recording needlestick and sharps injuries.
- The annual summary is posted for three months instead of one month.

AFFECTED EMPLOYERS

All employers covered by OSHA regulations (e.g., general industry, construction) are also covered by these recordkeeping requirements unless the employer meets an exemption. Employers receive a partial exemption from recording injuries or illnesses if one of the following criteria is met:

- Peak employment for the calendar year is less than 10 employees
- Employer is classified as a specific low hazard retail, service, finance, insurance, or real estate industry. The specific list of exempt low hazard industries is contained in 29 CFR 1904, Subpart B, Appendix A. OSHA or the Bureau of Labor Statistics (BLS) may require a partially exempt employer to comply with injury, illness, and fatality recordkeeping requirements.

Alaska OSH (AKOSH) REQUIREMENTS

Report industrial deaths and accidents to the Division of Labor Standards and Safety. Alaska Statute 18.60.058 requires employers to report to Division of Labor Standards and Safety any employment accident which is fatal to one or more employee's, or which results in the overnight hospitalization of one or more employees. The report, which must be made immediately, but no later than 8 hours after receipt by the employer of information that the accident has occurred, must relate the circumstances of the accident, the number of fatalities, and the extent of the injuries.

Monday-Friday Alaska OSH (800) 770-4940 · 24-hour OSHA Hotline (800) 321-6742

“Injury” means accidental injury or death arising out of in the course of employment and an occupational disease, illness, or infection which arises naturally out of the employment or which naturally or unavoidably results from an accidental injury.

“Injury” does not include mental injury caused by stress unless it is established that (A) the work stress was extraordinary and unusual in comparison to pressures and tensions experienced by individuals in a comparable work

environment, and (B) the work stress was the predominant cause of the mental injury. A mental injury is not considered to arise out of and in the course of employment if it results from a disciplinary action, work evaluation, job transfer, layoff, demotion, termination, or similar action taken in good faith by the employer

PROVIDING DOCUMENTATION

Employers are required to provide any of the documentation required by the standard to OSHA representatives within four business hours after the request is made. Documents requested might include OSHA 300 Logs, Summary Forms, and OSHA 301 Forms.

RECORDKEEPING SURVEYS

- OSHA's Injury and Illness Survey form. The employer must complete it and return it within 30 calendar days, or the date stated on the survey.
- BLS Injury and Illness Survey. Each year surveys are sent randomly to employers. The information is used to compile national occupational injury and illness statistics. An employer who receives a survey must follow the instructions to complete the form and return it promptly as instructed.

NEW RECORDKEEPING FORMS

The **OSHA 300 Log of Work-Related Injuries and Illnesses** form, which replaces the previously used OSHA 200 Log, is used to enter a one or two line description of the injury or illness. The information must be recorded on the OSHA 300 Log within seven calendar days of the incident.

Information required on the OSHA 300 Log includes:

- Identity of the employee (unless a privacy case).
- Time and place the incident occurred.
- Type of injury or illness.
- Parts of body affected.
- Object or substance that directly caused the injury or illness.
- Classification of each case according to the most serious outcome associated with it (i.e., death, days away from work, restricted work, medical treatment only).
- Identification of the case as an injury or an illness.
- The appropriate category if an illness.