

SGIA's Abbreviated OSHA Recordkeeping Checklist (Aug 2016)

This checklist is an abbreviated guide to help you comply with OSHA's injury and illness recordkeeping rule. While additional and more detailed information may be necessary with individual cases, this checklist is designed to give you the basic foundation addressing the applicability, forms, and general requirements.

First, it's important to understand if you are subject to OSHA's recordkeeping rule. The following explains which employers must follow the rule requirements and those that would be exempt.

Applicability

Under the OSHA Injury and Illness Recordkeeping rule (29 CFR 1904), any employer who had more than ten (10) employees at any time during the last calendar year is subject to the rule and must keep and maintain injury and illness records for all work-related injuries and illnesses in the current year.

Partial Exemption

An employer who had ten (10) employees or less at all times during the last calendar does not need to keep injury and illness records, unless OSHA notifies the employer in writing that they must keep such records.

Injury and Illness Forms

Ensure you have and understand the necessary forms. OSHA Injury and Illness Recordkeeping forms include:

- Form 300 - the Injury and Illness Log
- Form 301- the Incident Report
- Form 300A - the Summary of Work-Related Injuries and Illnesses

OSHA Injury and Illness Recordkeeping forms are available free from the OSHA website at: www.osha.gov/recordkeeping/RKforms.html

Recording and Maintaining Requirements

The following are the basic steps when recording a work-related injury or illness incident and the requirements for maintaining such records:

- Determine if a fatality, injury or illness case is recordable.
Within 7 days after you receive information about a fatality, injury or illness case, decide if it is recordable by determining if it is work-related as well as if it is a new case or a recurrence of a previous case.
- For each recordable case, record it onto Form 300, the Injury and Illness Log.
- For each recordable case logged onto Form 300, complete Form 301, the Incident Report.
Record the details of the specific case. You can sometimes use an equivalent form to Form 301. Some state workers compensation, insurance, or other reports may be acceptable substitutes, as long as they provide the same information as OSHA Form 301.
- Review all injury and illness cases logged on Form 300 before the end of the current year.
Ensure the accuracy of each case and the information recorded.
- Summarize the information from Form 300 using Form 300A at the end of each year.

Recording and Maintaining Requirements (continued)

- Post Form 300A of the previous year within the facility from February 1st through April 30th of the following year.
This form will show the previous years cases and must be posted in a conspicuous location for all employees to have access and review. The summary form must be posted regardless if there were no injuries or illnesses recorded.

- Archive past recordkeeping forms.
Retain of each Form 300, 300A and 301 (or equivalent form) maintained for five years following the end of the calendar year that those records cover.

Electronic Submittal Requirements

As of January 1, 2017, certain employer groups (according to size) must electronically submit specific injury and illness records to OSHA. This requirement is being phased in over 2 years.

The following describes the applicable employer groups and the specific records to submit:

Establishments with 250 or more employees must submit:

- Form 300A by July 1, 2017
- Forms (300A, 300, and 301) by July 1, 2018
- Beginning in 2019 and every year thereafter, Forms (300, 300A, and 301) by March 2

Establishments with 20-249 employees must submit:

- Form 300A by July 1, 2017
- Form 300A by July 1, 2018
- Beginning in 2019 and every year thereafter, Form 300A by March 2

Self Reporting Requirement

As of January 1, 2015, all employers (regardless of size) must report any work-related fatality within 8 hours, and any work-related inpatient hospitalizations, amputations, and losses of an eye within 24 hours to OSHA.

Anti-Discrimination Requirements

As of August 10, 2016, all employers must implement the following:

- Inform employees of their right to report work-related injuries and illnesses without retaliation
- Procedures for reporting work-related injuries and illnesses that are reasonable and which do not deter or discourage employees from reporting
- Ensure that actions by employers do not discourage employees from reporting an injury or illness

If you have any questions on how to use the injury and illness recordkeeping forms or have other regulatory questions, contact govtaffairs@sgia.org.