

## **RECORD KEEPING**

OSHA has revised its Recordkeeping Standard **29 CFR 1904**. For three decades most all employers and employees have abided by the Occupational Safety and Health Act of 1970 record keeping system to track and record workplace injuries and illnesses. This new standard will affect almost all employers in each industry.

The final rule becomes effective on January 1, 2002 and will affect about 1.3 million establishments. This will allow organizations enough time to learn and implement the new standard. OSHA Administrator Charles N. Jeffress says, "The new rule combines previously regulatory requirements and interpretations into one clear and precise document that will aid an employer's ability to increase workplace safety."

### **Here are the changes that the new rule addresses:**

- OSHA 200 Log will be replaced by OSHA Form 300 (Log of Work-Related Injuries and Illnesses)
- OSHA 101 Log will be replaced by OSHA Form 301 (Injury and Illness Incident Report) → includes more data on how the injury/illness occurred
- OSHA Form 300A implemented (Summary of Work-Related Injuries and Illnesses) → a separate form updated to make it easier to calculate incident rates
- One criteria will be used for recording Work-Related Injury and Illness resulting in one of the following:
  1. Death
  2. Days away from work
  3. Restricted work
  4. Transfer to another job
  5. Medical treatment beyond first aid
  6. Loss of consciousness
  7. Diagnosis of a significant injury/illness by physician or HCP
- Requires a significant degree of aggravation before a preexisting injury or illness becomes recordable
- Additional exemptions issued to limit recording cases involving eating, drinking, common colds, flu, blood donations, exercise programs, mental illness, etc.
- Clarifies "light duty" or restricted work cases
- Requires all employees to record all needlestick and sharps injuries involving contamination by another person's blood or other bodily fluids
- Requires employers to record standard threshold shifts (STS) in employees' hearing (separate column on OSHA 300 dedicated to recording results)
- Musculoskeletal Disorders will have a column dedicated to recording cases
- Includes separate provisions describing the recording criteria for cases involving the work-related transmission of tuberculosis or medical removal under OSHA standards
- Eliminates "lost workdays" and focuses on days away or days restricted (uses calendar days instead of work days)
- Requires employers to establish a procedure to report injuries and illnesses

- Protects an employee's privacy by:
  1. Prohibits employers from entering an individual's name on Form 300 for certain injuries/illness (e.g. sexual assault, HIV infections, etc.
  2. Provides employees the right not to describe the nature of sensitive injuries where employees identity would be known
  3. Gives employees access only to the portion of Form 301 which contains no personal identifiers
  4. Requires employers to remove employees' names before providing the data to persons not provided access rights under the rule.
- Requires annual summary to be posted for three months instead of one. Requires certification of the summary by a company executive
- Changes the reporting for fatalities and catastrophes to exclude some motor carrier and motor vehicle accidents

For a copy of OSHA's Recordkeeping Guide, please visit

<http://www.osha.gov/recordkeeping/index.html>