Injury and illness recordkeeping: Take it step-by-step

Now, more than ever, employers must understand how and when to record employee injuries and illnesses, as well as what not to record. Taking a step-by-step approach through the maze of injury and illness recordkeeping requirements can help you determine if your company is covered; and if so, how to document and maintain accurate records of work-related injuries and illnesses.

**Step 1: Determine whether the recordkeeping rule applies**
In general, all employers covered by the Occupational Safety and Health Act are required to keep work-related injury and illness records. However, employers with 10 or fewer employees, and businesses in low-hazard industrial classifications are exempt from routinely recording injuries and illnesses.

**Step 2: Use the correct forms**
There are three forms that you must be aware of — OSHA 300 Log of Work-Related Injuries and Illnesses, OSHA 301 Injury and Illness Incident Report, and the OSHA 300A Summary of Work-Related Injuries and Illnesses.

**Step 3: Determine the employment status of your workers**
In addition to full-time, part-time, and seasonal workers, you have to record the injuries and illnesses of employees who are not on your payroll, such as temporary and leased workers — if you supervise them on a day-to-day basis.

**Step 4: Decide if an injury or illness is work-related**
Work-relatedness is presumed for an injury or illness resulting from an event or exposure occurring in the workplace.

**Step 5: Determine if a case is recordable**
An injury or illness is recordable if it is work-related, a new case, and results in any of the following outcomes:

- Death,
- Days away from work,
- Restricted work or job transfer,
- Medical treatment beyond first aid,
- Loss of consciousness, or
- A significant injury or illness.

**Step 6: Decide if a case is new or a continuation**
An injury or illness is considered a “new case” if the employee:

- Has not previously experienced a recorded injury or illness of the same type that affects the same part of the body, or
- Previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely (all signs and symptoms
had disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.

**Step 7: Determine if the injury/illness is a privacy case**
OSHA has identified certain types of workplace injuries or illnesses to be “privacy cases” where the employer must conceal the employee’s identity. If you have a privacy concern case, you cannot enter the employee’s name on the 300 Log. Instead, enter “privacy case” in the space normally used for the employee’s name.

**Step 8: Record specific types of cases**
These types of cases must be recorded, regardless of whether the cases meet the other recordkeeping requirements:

- Work-related needle stick injuries and cuts from sharp objects that are contaminated.
- Situations where employees are removed from hazardous situations because of over-exposure to hazards – called medical removal.
- Work-related hearing losses of 10 decibel shifts that result in a total 25 decibel shift above audiometric zero.
- Occupational exposure to Tuberculosis.
- Work-related injuries and illnesses related to musculoskeletal disorders.

**Step 9: Report fatalities and hospitalization incidents**
You must report each fatality or multiple hospitalization incident within 30 days of the incident to OSHA.

Verbally report to OSHA the death of an employee or the inpatient hospitalization of three or more employees as a result of a work-related incident.