"Updates to OSHA’s Reporting and Recordkeeping Rule"

By: Pete Rice, CIH, CSP, REHS- VP of EH&S Programs at ClickSafety

An Overview: The Occupational Safety and Health Administration’s updated recordkeeping rule includes two key changes.

First, the rule updates the list of industries that are exempt from the requirement to routinely keep OSHA injury and illness records due to relatively low occupational injury and illness rates.

The previous list of industries was based on the old Standard Industrial Classification (SIC) system and injury and illness data from the Bureau of Labor Statistics (BLS) from 1996-1998. The new list of industries that are exempt from routinely keeping OSHA injury and illness records is based on the North American Industry Classification System (NAICS) and injury and illness data from the Bureau of Labor Statistics (BLS) from 2007- 2009.

Note: The new rule retains the exemption for any establishment with ten or fewer employees, regardless of their industry classification, from the requirement to routinely keep records.
The rule expands the list of severe work-related injuries and illnesses that all covered employers must report to OSHA. The revised rule retains the current requirement to report all fatalities within 8 hours and adds the requirement to report all inpatient hospitalizations, amputations and loss of an eye within 24 hours to OSHA.

Establishments located in states under Federal OSHA jurisdiction must begin to comply with the new requirements as of **January 1, 2015**.

**OSHA’s Form 300 (Rev. 01/2004)**

**Log of Work-Related Injuries and Illnesses**

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or other licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12 use two lines for a single case if you need to. You must complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded form. If you’re not sure whether a case is recordable, call your local OSHA office for help.

<table>
<thead>
<tr>
<th>Case no.</th>
<th>Employee’s name</th>
<th>Job title</th>
<th>Date of injury or onset of illness</th>
<th>Where the event occurred (e.g. Loading dock with forklift)</th>
<th>Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g. Second degree burns on right knee from open flame torch)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Mark Bogin</td>
<td>Welder</td>
<td>5/25</td>
<td>basement</td>
<td>fracture, left arm and left leg fell from ladder</td>
</tr>
<tr>
<td>2</td>
<td>Shana Alexander</td>
<td>Foundry man</td>
<td>7/2</td>
<td>pouring dock</td>
<td>poisoning from lead fumes</td>
</tr>
<tr>
<td>3</td>
<td>Sam Sanders</td>
<td>Electrician</td>
<td>8/15</td>
<td>2nd floor storeroom</td>
<td>broken left foot, fell over box</td>
</tr>
</tbody>
</table>

Establishments located in states that operate their own safety and health programs should check with their state plan for the implementation date of the new requirements. The final rule will allow OSHA to focus its efforts more effectively to prevent fatalities and severe work-related injuries and illnesses. The final rule will also improve access by employers, employees, researchers and the public to information about workplace safety and health and increase their ability to identify and abate serious hazards.