

Thank you for your interest in OSHA Recordkeeping information – we hope the following slides assist you when maintaining your OSHA records.

If you have any questions, please do not hesitate to reach out to your Injury Prevention and Worksite Wellness Consultant.



Overview

- Requirements
- Forms
 - OSHA 300 Log
 - OSHA 300A
 - OSHA 301



- Recordkeeping Basics
- Workers' Compensation Claims vs OSHA Records
- Quiz
- Key Points



WHO Must Complete The Forms?

- · MOST but not all employers:
 - Employers with <u>10 or more</u> employees at any time during a calendar year must complete OSHA injury and illness recordkeeping forms
 - Full-time, part-time, temporary and seasonal employees must be included in the total number
- · Exceptions include:
 - Small employers with 10 or fewer employees at all times during the year
 - Employers in industries OSHA has determined to be low-risk
 - Please go to <u>https://www.osha.gov/recordkeeping2014/OSHA3746.pdf</u> for a list of Partially Exempt Industries



WHO Must Complete The Forms?

- All employers, regardless of size or industry, MUST report to OSHA:
 - All work-related fatalities within 8 hours
 - Any work-related amputations, in-patient hospitalizations or loss of an eye within 24 hours of learning of the incident
- · Report these types of events by:
 - Phoning your local OSHA Area Office
 - Please see how to contact your Area Office at: https://www.osha.gov/html/RAmap.html
 - By using the OSHA 800 number (#1-800-321-6742) or
 - By using the reporting application on OSHA's public website
 - Please go to: https://www.osha.gov/pls/ser/serform.html



HOW To Submit The Forms

Certain establishments meeting the following criteria must also *electronically submit* their OSHA injury and illness records

- Organizations with <u>250 or more employees</u> that are currently required to keep OSHA injury and illness records
 - Must electronically submit information from OSHA Forms 300 (Log of Work-Related Injuries and Illnesses), 300A (Summary of Work-Related Injuries and Illnesses), and 301 (Injury and Illness Incident Report)
- Establishments with <u>20-249 employees</u> that are classified in <u>certain high-risk industries</u> with historically high rates of occupational injuries and illnesses
 - Must electronically submit information from OSHA Form 300A
- High Risk industries: https://www.osha.gov/recordkeeping/NAICScodesforelectronicsubmission.html



HOW To Submit The Forms

- Go to OSHA's Injury Tracking Application (ITA Launch Page): https://www.osha.gov/injuryreporting/ita/
- You will be required to create an account for electronic submission, or if already created, you can also access your account here
- Provide your required information
- Use one of the following three methods for data submission:
 - Manually enter data into a web form
 - Upload a CSV file to process single or multiple establishments at the same time
 - Users of automated recordkeeping systems may transmit data electronically via an API (application programming interface)



WHEN To Submit The Forms

Organizations with 250+ employees:

- By December 15, 2017, must submit information from completed 2016 300, 300A and 301
- By July 1, 2018, must submit information from completed 2017 forms 300, 300A, and 301

Establishments with <u>20-249 employees</u> in industries classified as high-risk:

- By December 15, 2017, must submit completed 2016 Form 300A
- By July 1, 2018, must submit completed 2017 Form 300A

Beginning in **2019** and every year thereafter, covered establishments must submit the information *by March* 2^{nd}





Which Forms Must Be Completed?

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

NOTICE

REPORT ALL
INJURIES
IMMEDIATELY

There are three forms you--the employer--must complete. OSHA forms 300 (OSHA 300 Log) and 301 are maintained on an ongoing basis. Recordable injuries and illnesses must be entered on these forms as they occur throughout the year.

The OSHA Form 300A/Annual Summary is completed after the end of the calendar year, and summarizes the number of recordable cases that occurred.

Employers may use equivalent forms as long as the equivalent forms contain all of the same data elements.

OSHA's Form 301 Injury and Illness		Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.	U.S. Department of Labo Occupational Safety and Health Administration
his layary and Illinos Incident Report is one of the rest forms you must fill out when a recordable work- lated injury or illness has occurred. Together with see lage of Work-Related Injuries and Illinoses and the companying Summery, these forms help the inployer and OSHA develop a picture of the extent do severity of work-related incidents. Within 7 calendar days after you receive formation that a recordable work-related injury or mess has occurred, you must fill out this form or an quivalent. Some state workers' compensation, surrance, or other reports may be acceptable bubstitues. To be considered an equivalent form, you substitute must contain all the information keel for on this form. According to Public Law 91-596 and 29 CFR 194, OSHA's recordikeeping rule, you must keep is form on file for 5 years following the vear to hach it spectains. If you need additional copies of this form, you asy photocopy and use as many as you need.	Information about the employee 11 hall name 23) Serest Cop	16 What was the employee doing just before the incide tools, equipment, or material the employee was using, carrying roofing materials"; "speaying chlorine from I start happened? Tell on how the injury occurred. Emiliant fell? If fer?", "Worker was sprayed with chlorine when developed sourness in wrist over time."	Form approved OMB on. 123-bil to some number from the last after you round the same.) Check if time cannot be determined and occurred? Describe the activity, as well as the the specific. Examples: "climbing a hadder while hand sprayere"; "duily computer key-entry." aptic: "When ladder slipped on wet floor, work graket broke during replacement"; "Worker- body that was affected and how it was affected; body that was affected and how it was affected;
Completed by	CityStateZIP	17) What object or substance directly harmed the employers are save." If this question does not apply to the in	
Title	Was coupleyee hospitalized oversight as an in-patient! Was	(8) If the employee died, when did death occur? Date of	teath//

You must fill out an Injury and Illness Incident Report for every recordable work-related injury or illness. You may use your own form as long as the information presented in the form includes all information on the OSHA Form 301. Together with the Log of Work-Related Injuries and Illnesses (aka OSHA 300 Log) and the accompanying Annual Summary (Form 300A), you and OSHA will be able to develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form <u>or an equivalent</u>. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

	A's Form 300 g of Work	l Ilinesses	Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.							Year 20 U.S. Department of Occupational Safety and Health Admin								
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Ident	ify the person		Describe t	the case		- i	Class	ify the c	ase									
(A) Case	(B) Employee's name	(C) Job title	(0) Date of injury	(E) Where the event occurred		CHECK ONLY ONE box for each case based on the most serious outcome for					Enter the number of days the injured or ill worker was: Choose			ck tile "Injury" column ose one type of illness:				
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				right forearm from metylene torch)		Death	Days away from work	Job transfer or restriction	Other record-	from work	transfer or restriction	Legar	Shinde	Ropera	Page 1	AB of the		
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NOTE: OSHA eliminated a separate category for musculoskeletal disorders (MSDs) from the 300 Log. MSDs include back injuries, tendinitis, carpal tunnel syndrome and other problems due to repetitive strain.

MSDs are the most common type of serious injuries in the workplace and should now be classified on your Form 300/OSHA 300 Log under "All Other Illnesses.

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(G)	(H)	(0)	(J)	OR
Number of D	ays			North American Industrial Classification (NAICS), if known (e.g., 336212)
Total number of da from work		otal number of days of job ansfer or restriction		Employment information (if you don't have these figures, see the Worksheet on the back of this page to estimate.)
				Annual average number of employees
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Injury and II	lness Types			Sign here
Total number of				Knowingly falsifying this document may result in a fine.
Injuries	_	(4) Poisonings (5) Hearing loss	三	I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.
Skin disorders		(6) All other illnesse	_	
Respiratory conditi	oin			Company recordine Table

All establishments required to complete OSHA records must complete the Summary of Work-Related Injuries and Illnesses, even if no injuries or illnesses occurred during the year.

Remember to review your OSHA 300 Log/Form 300 to verify that the entries are complete and accurate before completing this summary. Using the OSHA 300 Log, count the individual entries you made for each category. Then, write the totals on the left side of the Annual Summary/Form 300A, making sure you've added the entries from every page of the Log. If you had no cases, write in a zero.

On the right side of the Annual Summary/Form 300A, fill in your establishment information.



- official
 - e.g. owner, highest ranking official/supervisor on-site or that person's supervisor
- Must be posted

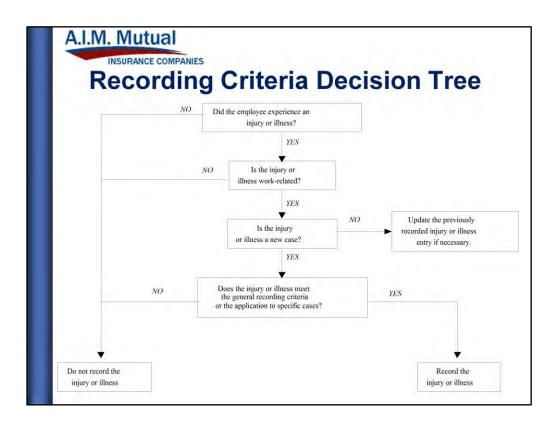
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- In a conspicuous place or places where notices to employees are typically posted
- No later than February 1 of the year following the year covered by the records and must remain posted for three months until April 30

Also on the right side of the form, a company official must certify that the entries on the summary are true, accurate, and complete. The certifying official must be the owner of the company, an officer of the corporation, the highest ranking company official at your establishment, or that person's supervisor.

You must post a copy of your Annual Summary/Form300A in a conspicuous place or places where notices to employees are customarily posted. You must post it no later than February 1 of the year following the year covered by the records and keep the posting in place for three months until April 30 (i.e. post your calendar year 2017 Annual Summary/OSHA Form 300A from February 1, 2018 through April 30, 2018.







Determining If Work-Related or Not?

Cases are considered work-related if they are:

- Caused by events or exposures in the work environment
- Contributed to by events or exposures in the work environment
- Significantly aggravated by events or exposures in the work environment

It may be difficult to determine whether a case is work-related or not in situations where an employee reports that prior symptoms or a pre-existing condition have been aggravated by their work environment. Please contact your claims representative to discuss the case if you have any questions regarding whether a case is work-related.



Recording Criteria

- Once determined to be work-related, cases resulting in any of the following MUST be recorded on your OSHA forms should they occur:
 - Death
 - Injury with days away from work, restricted work or transfer to another job
 - Medical treatment beyond first aid
 - Loss of consciousness
 - Diagnosis of a significant injury/illness by a licensed health care professional



What Is Considered Medical Treatment Beyond First Aid?

- Any treatment for an injury or illness except diagnostic procedures, observation and counseling, and First Aid
- For instance, the following are considered First Aid and are <u>NOT</u> recordable:
 - Visits to a doctor or health care professional solely for observation or counseling
 - Diagnostic procedures, such as x-rays as well as administering prescription medications that are used solely for diagnostic purposes and
 - Any procedure that can be labeled First Aid



How OSHA Defines First Aid

- If the incident required only the following types of treatment, consider it First Aid. Do <u>NOT</u> record. OSHA classifies 14 specific treatments as First Aid, including:
 - Using a non-prescription medication at non-prescription strength
 - Cleaning, flushing or soaking wounds on the surface of the skin
 - Using bandages such as Band-Aids, gauze pads
 - Using hot or cold therapy (i.e. ice)
 - Use non-rigid supports, such as wraps
 - Using eye patches
 - Removing a particle from an eye using only irrigation or a cotton swab
 - Removing splinters
 - Massages....and more
 - For a complete list of procedures considered First Aid by OSHA, go to: https://www.osha.gov/recordkeeping/firstaid_list.pdf



Classifying an Event as an Injury or Illness

- OSHA defines an injury or illness as an "abnormal condition or disorder"
- · Injuries and illnesses include:
 - Cuts, fractures, sprains, skin diseases, or respiratory conditions and
 - Only subjective symptoms such as aches or pain
- Exposures that do <u>not</u> result in signs or symptoms are <u>not</u> considered injuries or illnesses and should therefore not be recorded on the OSHA forms

For example, if an employee is exposed to chlorine and does not exhibit any signs or symptoms due to the exposure, the case would not be recorded on the OSHA 300 Log/Form 300, even if it involved prophylactic (i.e. preventative) medical treatment.



Classifying an Event as an Injury or Illness

- An *injury* is any wound or damage to the body resulting from an *event* in the environment
 - Examples include cuts, abrasions, fractures, burns, sprain/strains as a result of a slip/trip/fall





Classifying an Event as an Injury or Illness

Illnesses include:

- Skin diseases or disorders
 - Contact dermatitis, eczema and rashes caused by irritants such as chemicals
- · Respiratory conditions
 - Associated with breathing hazardous biological agents such as chemicals, dust, gases or fumes
- Poisoning
 - Caused by ingestion of substances such as mercury, carbon monoxide, insecticides
- All other illnesses



 Heatstroke, frostbite, bloodborne pathogenic diseases such as AIDS, HIV and Hepatitis B or C, musculoskeletal disorders (i.e. sprain/strains as a result of repetitive motion, cumulative trauma vs an acute event)



Musculoskeletal Disorders (MSDs)

Classified as either an *Injury* or an *Illness* depending upon the nature of the Injury

- MSD conditions that are the result of a traumatic incident such as a fall or being struck by an object are classified as "Injuries"
 - Think: Instantaneous, acute event
- MSD conditions that are the result of repetitive work/motion are classified under "All Other Illnesses"
 - Think: Cumulative, repetitious in nature



Special Recording Criteria

- You must also record the following conditions when they are work-related:
 - Needle stick injuries
 - Work-related tuberculosis infection
 - Medical removal under OSHA Standards
 - Any Standard Threshold Shift (STS) in hearing
 - Cancer
 - Chronic irreversible disease
 - Fractured or cracked bones or teeth
 - Punctured eardrum

Work-related cases of cancer, chronic irreversible disease, fractured or cracked bones or teeth, or a punctured ear drum must be entered on the OSHA forms. These are considered significant injuries and illnesses.

The recordkeeping rule also contains special criteria for recording occupational hearing loss, tuberculosis, injuries from needlesticks and sharps potentially contaminated with bloodborne pathogens, and cases involving medical removal required by other OSHA standards.

The reason OSHA created "Special Recording Criteria" is because there are some significant injuries, such as a punctured eardrum or a fractured toe or rib, for which neither medical treatment nor work restrictions may be recommended. As a result, for situations like those just described, had OSHA not created "Special Recording Criteria", the cases would not have met the general recording criteria and would have been omitted from OSHA records. Important data would have been lost.

In addition, there are some significant progressive diseases, such as byssinosis, silicosis, and some types of cancer, for which medical treatment or work restrictions may not be recommended at the time of diagnosis but are likely to be recommended as the disease progresses. OSHA believes that cancer, chronic irreversible diseases, fractured or cracked bones, and punctured eardrums are generally considered significant injuries and illnesses, and must be recorded at the initial diagnosis even if medical treatment or work restrictions are not recommended, or are postponed, in a particular case.



You do not need to record all cuts and lacerations if they do not meet the general recording criteria BUT you do need to record cuts, lacerations, punctures, and scratches **if they are work-related and involve contamination with another person's blood or other potentially infectious material.** If the cut, laceration, or scratch involves a clean object, or a contaminant other than blood or other potentially infectious material, you need to record the case <u>only if it meets one or more of the recording criteria</u> such as medical treatment beyond first aid.

If you were not aware that contamination occurred at the time the case was reported, and learn later that transmission of an infection did occur, you must update your records.



Special Recording Criteria

Recording Needlesticks

- Report as *Injury* Unless Blood Borne Pathogen Transmission
- Report as *Illness* if Blood Borne Pathogen Transmission
 - May not know if transmission occurred immediately so must update records if determine transmission occurred
- Must NOT enter involved employee's name on OSHA 300 Log
 - Maintain employee privacy by using code (e.g. PRIVACY) vs employee name



Special Recording Criteria

Tuberculosis

- Exposure must be considered work-related
- Defined as infection as evidenced by a positive skin test or diagnosis by a physician or other licensed health care professional after exposure to a known case of active TB
- If testing comes back negative, do not record on OSHA 300 Log



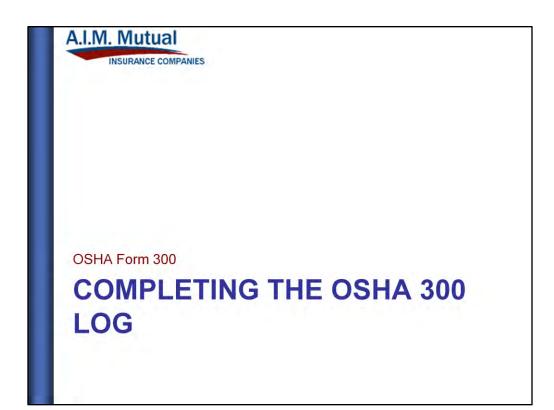
Additional Considerations

- Cases meeting OSHA recording criteria must be entered on the forms <u>within 7</u> <u>calendar days of learning about their</u> occurrence
- Must record qualifying injuries and illnesses of employees from temporary agencies, leasing companies, etc, <u>if they</u> <u>are under your direct supervision</u>
 - Applies to per diem and agency staff as well
 - Be certain to include the hours worked by these employees in your total productive hours when calculating incident and DART rates



Counting Days

- Count the number of calendar days the injured employee was on restricted work activity or away from work due to the recordable injury or illness
 - Weekend days, holidays, vacation days or other days off are included in the total number of days recorded if the employee would not have been able to work on those days because of a work-related injury or illness.
- · Begin counting from the day after the incident occurs
- If injury or illness involved both days away from work and days of restricted work activity, enter the total number of days for each in the respective columns on the OSHA 300 Log
- Stop counting days of restricted work activity or days away from work once the total of either or the combination of both reaches 180 days



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	that meet any of the specific recording criteria listed in 23 CFR 1304.8 through 1304.12. Feel free to Identify the person Describe the case							9									į
(A) Case No.	(B) Employee's Name	(C) Job Title (e.g., Welder)	Job Title Date of		(F) Describe injury or illness, parts of body affected,	CHECK ONLY ONE box for each case based on the most serious outcome for that case:					number of njured or ill is:	Check the "injury" column or chool type of illness:					
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-		Machine		production	dust in eqe				,			,					•
	Jarrod Daniels	operator	10/23	floor	uust m ege	-									_	_	

For cases that involve medical treatment beyond first aid where the employee remained at work, you must place a checkmark on the OSHA Form 300 in column J, which is for "other recordable cases." Then note in column M whether the case involves an injury or an illness.

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An employee is considered restricted if he or she is unable to work a full shift or is unable to perform all of the work activities he or she would be expected to do at least once during a week.

For cases that involve **restricted work activity or job transfer**, you must place a checkmark in column I on the OSHA Form 300 and enter the number of calendar days the employee was restricted in column L. You count the days in the same manner as counting days away from work. Then note in column M whether the case involves an injury or an illness.

If a case involves both days away from work AND days of restricted work activity, place a checkmark in column H, leave column I blank, and enter the correct day counts in both columns K and L. (For example, if an employee had 3 days away from work and 2 of restricted work activity, place a checkmark in column H and enter a 3 in column K and a 2 in column L.) Again, note in column M whether the case involves an injury or an illness.



Claims vs OSHA Records

- Report <u>ALL</u> incidents/cases to AIM as workers' compensation claims <u>BUT</u>
- Not all workers' compensation claims need to be included on OSHA 300 or 300A forms
 - Only claims that meet the OSHA recording criteria should be included on OSHA 300 and 300A forms
- Maintain separate records for OSHA cases and workers' compensation claims



Key Points

- All cases meeting OSHA recording criteria must be entered on the OSHA forms within 7 calendar days of learning about their occurrence
- For covered establishments/organizations, <u>electronic</u> submission is due December 15, 2017
- Your completed Annual Summary/OSHA Form 300A must be:
 - Signed by the highest ranking "official" within your organization
 - Posted in an area visible to employees and the public <u>from February</u>
 <u>1 April 30</u> of the year following the year the records cover even if
 there are no entries on the log
- Workers' compensation claims records should be kept separate from your OSHA 300 records
 - And...all claims should be reported to AIM BUT <u>not</u> all claims meet OSHA recording criteria
 - · Only cases meeting OSHA recording criteria are recorded on your OSHA forms

Thank you again for taking the time to review OSHA Recordkeeping information – please do not hesitate to contact your Injury Prevention and Worksite Wellness consultant with any questions you may have!



Additional Resources

- OSHA Recordkeeping web page
 - · https://www.osha.gov/recordkeeping/index.html
- OSHA Electronic Submission Information and Link to Create/Access Account
 - https://www.osha.gov/injuryreporting/index.html
 - https://www.osha.gov/injuryreporting/ita/
- · Occupational Safety and Health Definitions
 - https://www.bls.gov/iif/oshdef.htm
- · Local OSHA Offices
 - https://www.osha.gov/html/RAmap.html

These links provide additional information that you may find useful when reporting and/or recording OSHA cases.