





# RECORDKEEPING GUIDE

## Forward

There are several important reasons for mechanical construction and service firms to keep track of work-related injuries and illnesses. Proper recordkeeping will help your company:

- Identify injury and/or illness incident trends so that actions can be taken to prevent recurrence;
- Establish pertinent safety and health training topics and materials such as those contained in MCAA's *Toolbox Safety Talks* series and MSCA's *Tailgate Safety Talks* series;
- Comply with the Occupational Safety and Health Administration's (OSHA) recordkeeping requirements; and
- Remain competitive in the marketplace.

The final bullet requires some explanation. MCAA has discovered that many of its members are over-recording work-related injuries and illnesses. By recording injuries and illnesses that are not required to be recorded, a company may be inadvertently damaging its opportunity for future business.

Owners, general contractors, construction managers and construction employers have become very sophisticated about safety and health pre-qualification for contractors. Many of them require information from contractor candidates' injury and illness recordkeeping logs, first report of injury forms, etc. This information helps them determine whether a company is a good or bad risk, and therefore whether the company is eligible to bid and work on their projects.

This guide will assist you in accurately determining whether an injury or illness must be recorded, and will help you record it properly when recording is required.

The bottom line is this: When a work-related injury or illness must be recorded, be absolutely certain that you record it properly. When a work-related injury or illness does not require recording, be absolutely certain that you do not record it. If you are an MCAA member and you need assistance in determining whether an injury or illness is considered recordable, call MCAA at 800-556-3653.



## Introduction

This is not a technical guide. You won't learn the specifics of safe confined space entry or fall prevention here. The purpose of this guide is to help you learn the most effective methods of teaching safety subjects to workers who may or may not want to learn them.

The Occupational Safety and Health Administration (OSHA) requires employers with more than 10 employees to record—*not report*—work-related injuries and illness. In most cases the agency never sees the records, but employers must have them readily accessible and provide them to OSHA inspectors when asked to do so as part of a jobsite inspection. It is not necessary to *report* a work-related injury or illness unless:

- There is a fatality, or
- A single incident results in the hospitalization of three or more workers.

It is important to accurately *record* the work-related injuries or illness that are required to be recorded on an OSHA 300 Log, or an equivalent document that provides, at a minimum, the same information found in an OSHA 300 Log. If you fail to record a recordable injury or illness, or if you record it improperly, your company will be subject to OSHA citations and fines. What may be difficult is determining whether the injury or illness is work related, and whether it has to be recorded.

Many companies make the mistake of recording every incident regardless of how minor and regardless of how it is treated. If you inadvertently record injuries or illnesses that should not be recorded, your logs may give the inaccurate impression that it is unsafe to work for your company. Two things could result from this scenario, and neither is favorable. First, owners, GCs, CMs, and other construction employers may decide not to let you bid or work on their projects because of this misperception of your safety record. Second, OSHA may feel compelled to pay special attention to your company's projects. With these scenarios in mind:

1. Use this publication to determine what injuries/illnesses are *not* recordable, and make sure you don't record them on your OSHA 300 Log or equivalent form.
2. Track your company's non-recordable incidents and near misses elsewhere. Use the information to make appropriate changes to your company's safety program, project-specific safety and health plan, pre-project/pre-task safety and health planning initiatives, and to develop hazard-specific safety and health training programs and materials.



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## Employers' Recordkeeping Obligations

### Companies with More than 10 Full-Time Employees in a Calendar Year

As an employer with more than 10 full-time employees at any time in a calendar year, you have recordkeeping obligations dictated either by the United States *Code of Federal Regulations* at 29 CFR 1904, or by your state's occupational safety and health regulations if your company is located in a "state plan state." The following listing of employer obligations may vary in state plan states; please consult your state's regulations. Under 29 CFR 1904, employers are obligated to:

- Record work-related injuries/illnesses that meet OSHA's recordability criteria;
- Call OSHA (800-321-6742) within eight (8) hours of any work-related fatality;
- Call OSHA (800-321-6742) within eight (8) hours of any incident resulting in the hospitalization of three (3) or more workers;
- Record the occurrence of individual injuries/illnesses on OSHA Form 301 (Incident Report) or its equivalent;
- Record injuries/illnesses collectively on OSHA Form 300 (Log of Injuries/Illnesses) or its equivalent;
- Maintain a summary of Each OSHA 300 Log on an OSHA 300A Form or its equivalent;
- Keep all forms for the current year and the preceding four years readily accessible;
- Post the preceding year's OSHA 300A Summary or its equivalent from February 1–April 30 in a conspicuous location where workers are likely to see it; and
- Keep completed 301, 300, 300A or their equivalents for at least five (5) years.

### Companies with 10 or Fewer Full-Time Employees in a Calendar Year

If your company had 10 or fewer employees at all times during the preceding calendar year, you do not need to record work-related injuries/illnesses for that year unless the Occupational Safety and Health Administration (OSHA) or the Bureau of Labor Statistics (BLS) requires you to do so in writing.

### Some Things Must Be Reported Regardless of Company Size

All employers must verbally report all work-related incidents that result in a fatality or the hospitalization of three or more workers within eight (8) hours. To report a work related fatality or incident with multiple hospitalizations, call OSHA at 800-321-6742.





## Exercise—Test Your Knowledge of Injury/Illness Recordability

**Instructions:** Read through the following list of occurrences that OSHA considers to be recordable, then answer the questions on the next page. Check your answers on page 13.

### What is Recordable?

OSHA requires you to record all work-related injuries or illnesses involving one or more of the following:

- Death;
- Days away from work;
- Restricted work;
- Transfer to another job;
- Medical treatment beyond first aid;
- Loss of consciousness;
- Diagnosis by a licensed health care professional as “significant.”



## Exercise Questions

1. A worker suffers a work-related injury. He leaves work for the rest of the day, but no medical treatment beyond first aid is required. He returns to work the following day and is able to perform his normal job tasks. Is the case recordable?  
 Yes       No
2. After examining a worker who suffered a work-related injury, the doctor tells the worker to take 600 milligrams of Ibuprofen every six hours to relieve the pain. No other medical care is administered. The worker does not miss any work and is able to perform his normal job tasks. Is the case recordable?  
 Yes       No
3. A worker gets an object in his eye while working on the jobsite. He is rushed to an emergency room for treatment. The ER doctor removes the object using irrigation. The worker returns to his normal job tasks without any lost time. Is the case recordable?  
 Yes       No
4. A worker suffers a laceration while working on the jobsite and is taken to the ER for treatment. The ER doctor cleans the wound and closes it with butterfly bandages. The worker returns to work the next day and is able to perform his normal job tasks. Is the case recordable?  
 Yes       No
5. A worker falls at the jobsite and is transported to the hospital by ambulance, strapped to a backboard. The doctor X-rays the worker, but the X-rays are negative. The worker returns to work the next day and is able to perform his normal job tasks. Is the case recordable?  
 Yes       No
6. A worker is taken to the ER for treatment after being gouged by a rusty nail while working on the jobsite. The ER doctor cleans the wound and administers a tetanus shot. The worker returns to work that day and is able to perform his normal job tasks. Is the case recordable?  
 Yes       No
7. A worker suffers a heart attack and dies while hanging pipe on the jobsite. Is the case recordable?  
 Yes       No



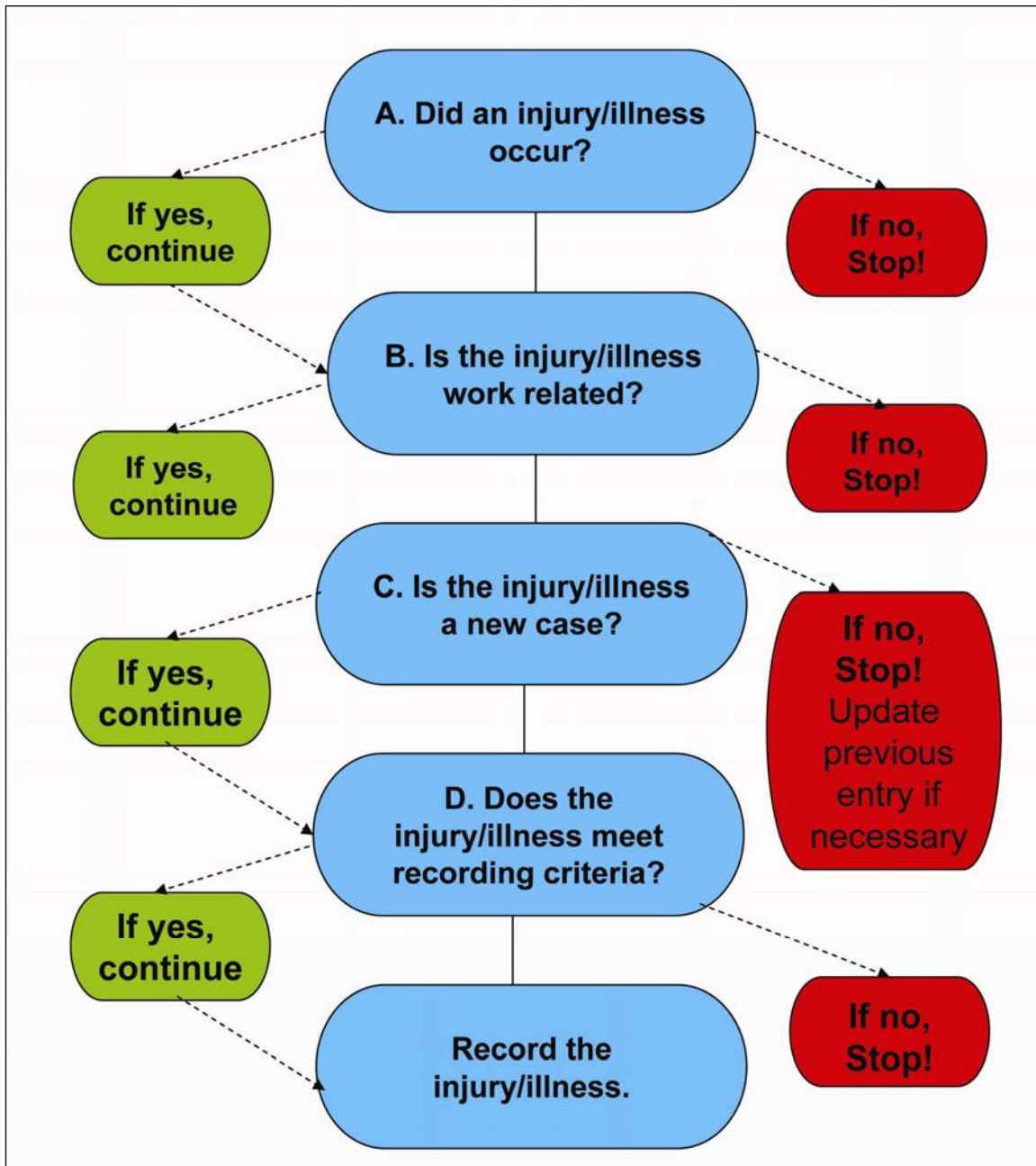
## Exercise Answers

1. No—Never count the actual day the injury occurred as a lost workday.
2. No—If the doctor had prescribed 800 milligram doses of Ibuprofen, the case would have been recordable. The 600 milligrams of ibuprofen is not a prescription dose.
3. No—Even though a doctor treated the worker at the hospital emergency room, removing an object from an eye by irrigation is considered by OSHA to be first aid treatment. And, the worker returned to work without lost time, restricted work activity, or having to transfer to another job.
4. No—Even though a doctor treated the worker at the hospital emergency room, cleaning a wound and closing it with butterfly bandages is considered by OSHA to be first aid treatment. And, the worker returned to work without lost time, restricted work activity, or having to transfer to another job.
5. No—Being transported by ambulance and/or receiving X-rays are not considered by OSHA to constitute medical treatment beyond first aid. Since the worker returned to work without lost time, restricted work activity, or having to transfer to another job, the case is not recordable.
6. No—Even though a tetanus vaccine would ordinarily be considered a prescription, OSHA considers tetanus shots to be first aid treatment.
7. No—Or at least...probably not. All fatalities have to be recorded and reported to OSHA within eight (8)-hours. The question becomes: Was the heart attack work related? While the fatality must be recorded initially, most heart attacks are not work related. If the autopsy findings indicate that the heart attack was caused by arterial scleroses or another non-work-related condition, the death would not be recordable. In this instance, you would red line through the initial recording on your OSHA 300 Log or equivalent form to indicate that the case was not work related.

The purpose of this exercise is to highlight a few of the many types of cases that are frequently—but inadvertently and unnecessarily—recorded. Now let's take a look at how to determine what constitutes a recordable occupational injury/illness.



## Occupational Injury/Illness Recordability Determination Flowchart



See the following page for detailed descriptions of what is meant in items A—D





## Occupational Injury/Illness Recordability Criteria

### A. Did an injury/illness occur?

First, you must decide whether an injury/illness occurred. An injury/illness is defined by OSHA as an abnormal condition or disorder. Following are some examples of injuries that might be incurred on a typical construction jobsite:

- Cuts;
- Fractures;
- Sprains; and
- Amputations.

Illnesses include, but are not necessarily limited to, acute and chronic conditions. Examples of an illness you may come across are:

- Skin diseases;
- Respiratory disorders; and
- Poisoning.

### B. Is the injury/illness work related?

Next, you must determine whether the injury/illness is work related. A case is considered to be work related only if an event or exposure in the *work environment* is a discernable:

- Cause of the injury/illness; or
- Significant aggravation to a pre-existing condition. Significant aggravation is when an event or exposure in the work environment, which would not have otherwise occurred, results in any of the following:
  - Death;
  - Days away from work;
  - Restricted work;
  - Transfer to another job; or
  - Medical treatment beyond first aid.

To make the correct call here, you need to know what constitutes a “work environment.” According to OSHA, a work environment is the establishment and other locations where one or more employees are:

- Working; or
- Present as a condition of employment.

The work environment includes:

- Physical locations; and
- Equipment and materials used by employees during the course of work.

## Exceptions

In the following scenarios the cases are *not* work-related and therefore should not be recorded.

- An employee incurs an injury/illness while present as a member of the general public;
- An employee incurs symptoms in a work environment that are solely due to non-work-related events or exposures;
- An employee incurs an injury/illness while participating in a voluntary wellness program, medical activity, fitness activity, or recreational activity.
- An employee incurs an injury/illness while eating, drinking, or preparing food or drink for personal consumption.
- An employee incurs an injury/illness while performing personal tasks outside of the assigned work hours.
- An employee incurs an injury/illness while performing personal grooming.
- An employee incurs an injury/illness while performing self medication for non-work-related conditions.
- An employee incurs an injury/illness that is self inflicted.
- An employee incurs an injury/illness due to a motor vehicle accident in the company parking lot or access road while commuting to or from work.
- An employee incurs the common cold or flu.
- An employee incurs mental illness, unless the illness is work related.

## C. Is the injury/illness a new case?

Your next task is to determine whether a case is new. OSHA considers a case to be new when:

- The employee has not previously experienced a recorded injury/illness of the same type that affects the same body part;
- The employee has experienced a recorded injury/illness that affected the same body part, but the employee had fully recovered and an event or exposure in the workplace caused the signs or symptoms to reappear; or
- There is a medical opinion regarding resolution of a case.

If signs and symptoms recur in the absence of exposure, a case is not considered to be new and should not be recorded. Some examples of this type of case are: silicosis, tuberculosis, and asbestosis.

## D. Does the injury/illness meet recording criteria?

Finally, you must determine whether an injury/illness meets OSHA's recording criteria. In order to do so, it must result in one or more of the following:

- **Death**—Any death that occurs in the work environment must be recorded, and must be reported to OSHA by telephone (800-321-6742) within eight (8) hours. If you later determine that the death was not work related, be sure to go back and “red line” through the recorded incident.
- **Days Away from Work**—Any injury/illness that results in the employee spending days away from work must be recorded. However, be sure not to count the day the injury/illness occurred when determining whether there were days away from work, or how many days away from work occurred.
- **Restricted Work**—Any injuries/illness that result in the employee spending days performing restricted work activities must be recorded. This includes cases where the employee is unable to work the full day on which he is scheduled or is unable to perform one or more routine job functions. When determining whether restricted work was performed, or how many restricted days occurred, be sure not to count the day the actual injury/illness occurred.

A case should **not** be recorded if the employee:

- Experiences only minor musculoskeletal discomfort;
  - Has been determined by a health care professional to be fully able to perform all routine job functions; or
  - Has been assigned a work restriction for the purpose of preventing a more serious condition from developing.
- **Job Transfer**—Any injuries/illnesses that result in the employee being assigned to a job other than his regular job for any part of a day must be recorded.
  - **Medical Treatment Beyond First Aid**—Any injury/illness that results in an employee receiving medical treatment that goes beyond what OSHA defines as first aid treatment must be recorded. Cases that result in first aid treatment only should **not** be recorded. **Do not record the following types of cases:**
    - Visits to a professional licensed health care provider for observation or counseling;
    - Diagnostic procedures;
    - Using non-prescription medication at non-prescription strength;

- Tetanus immunizations;
  - Cleaning, flushing, or soaking surface wounds;
  - Application of wound coverings such as butterfly bandages or sterile strips;
  - Hot/cold therapy;
  - Non-rigid means of support;
  - Temporary immobilization devices used to transport victims;
  - Drilling of fingernails or toenails;
  - Draining fluid from blisters;
  - Use of eye patches;
  - Removing foreign bodies from eyes using irrigation or cotton swabs;
  - Removing splinters or foreign material from areas other than eyes by irrigation, use of tweezers, cotton swabs or other simple means;
  - Use of finger guards;
  - Massages; or
  - Drinking fluids for relief of heat stress.
- ***Loss of Consciousness***—Any injury/illness that results in an employee losing consciousness must be recorded.
  - ***Injury/Illness Diagnosed as “Significant”***—Any injury/illness diagnosed by a licensed health care professional as “significant” must be recorded. Examples include, but are not necessarily limited to:
    - Cancer;
    - Chronic irreversible disease;
    - Punctured eardrum;
    - Fractured or cracked bone or tooth.
  - ***Bloodborne Pathogens Exposures***—All sticks and cuts from sharp objects that are contaminated with another person’s blood or other potentially infectious material such as human body fluids, tissues and organs, or other materials infected with HIV or HBV must be recorded. Splashes or other exposures to blood or potentially infectious materials also must be recorded if they result in the diagnosis of a bloodborne disease.
  - ***Medical Removal***—Several of OSHA’s health standards have medical removal provisions that require employers to remove workers from potentially hazardous

work areas under specified conditions. If you are required to implement the medical removal provision in an applicable OSHA standard, the case must be recorded. In this instance, the case would be recorded as a lost workday case or a restricted work day case.

- **Hearing Loss**—Any injury/illness that results in an employee’s hearing loss where the employee has experienced a Standard Threshold Shift (STS); and the employee’s hearing level is 25 decibels (dB) or more above audiometric zero averaged at 2,000; 3,000; and 4,000 hertz (Hz) in the same ear as the STS. A change in hearing threshold, STS is measured relative to a baseline audiogram of an average of 10 dB or more at 2,000; 3,000; and 4,000 Hz in one or both ears.
- **Tuberculosis**—Any time an employee is exposed to someone with a known case of active tuberculosis (TB), and subsequently develops a TB infection, the case must be recorded unless:
  - The employee is living in a household with another person who has been diagnosed with active TB;
  - The public health department has identified the employee as a contact of an individual with active TB; or
  - A medical investigation shows that the employee’s infection was caused by exposure away from work.



## Properly Recording Injuries/Illnesses

Once it is determined that a worker has experienced a work related, recordable injury/illness, you must record it on the recordkeeping forms provided by OSHA or equivalent forms. The three OSHA recordkeeping forms are:

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

The following information will help you to properly complete each of these forms. All three forms are available from OSHA at no charge. To obtain copies of these forms in either Adobe Acrobat or Microsoft Excel format, visit OSHA's [recordkeeping forms](#) page. If you choose to use non-OSHA forms, you must be certain that you provide, at a minimum, all the information that you would have provided on the OSHA forms.

### OSHA Form 301

- Complete this form or an equivalent form within seven (7) calendar days after learning about a work-related recordable injury/illness.
- The form is simple and mostly self explanatory.
- Be sure to apply a case number on the form (at number 10), which will correspond to the case you record on the OSHA 300 log or equivalent form.
- Include details and be specific when responding to the following questions in order to accurately reflect the extent and severity of the incident:
  - 15) What Happened?;
  - 16) What was the Injury or Illness?;
  - 17) What Object or Substance Directly Harmed the Employee?; and
  - 18) If the Employee Died, When Did Death Occur?
- Keep each completed form for at least five years following the year in which the injury/illness occurred.

*See OSHA Form 301 on next page*



## OSHA's Form 301 Injury and Illness Incident Report

**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 Labor  
 Occupational Safety and Health Administration

Form approved OMB no. 1218-0175

### Information about the employee

- 1) Full name \_\_\_\_\_
- 2) Street \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_
- 3) Date of birth \_\_\_\_/\_\_\_\_/\_\_\_\_
- 4) Date hired \_\_\_\_/\_\_\_\_/\_\_\_\_
- 5)  Male  Female

### Information about the physician or other health care professional

- 6) Name of physician or other health care professional \_\_\_\_\_  
 \_\_\_\_\_
- 7) If treatment was given away from the workplace, where was it given?  
 Facility \_\_\_\_\_  
 Street \_\_\_\_\_  
 City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

Completed by \_\_\_\_\_ Date \_\_\_\_/\_\_\_\_/\_\_\_\_

Title \_\_\_\_\_

Phone (\_\_\_\_) \_\_\_\_\_

- 8) Was employee treated in an emergency room?  
 Yes  No
- 9) Was employee hospitalized overnight as an in-patient?  
 Yes  No

### Information about the case

- 10) Case number from this Log \_\_\_\_\_ (Transfer the case number from the Log after you read the case)
- 11) Date of injury or illness \_\_\_\_/\_\_\_\_/\_\_\_\_ AM / PM
- 12) Time employee began work \_\_\_\_ AM / PM  Check if time cannot be determined
- 13) Time of event \_\_\_\_ AM / PM
- 14) What was the employee doing just before the incident occurred? Describe the activity, as well as the tools, equipment, or material the employee was using. Be specific. *Examples:* "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key-entry."

- 15) What happened? Tell us how the injury occurred. *Examples:* "When ladder slipped on wet floor, worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist over time."
- 16) What was the injury or illness? Tell us the part of the body that was affected and how it was affected; be more specific than "hurt," "pain," or "sore." *Examples:* "strained back"; "chemical burn, hand"; "carpal tunnel syndrome."

- 17) What object or substance directly harmed the employee? *Examples:* "concrete floor"; "chlorine"; "radial arm saw." If this question does not apply to the incident, leave it blank.

- 18) If the employee died, when did death occur? Date of death \_\_\_\_/\_\_\_\_/\_\_\_\_

Public reporting burden for this collection of information is estimated to average 32 minutes per response, including the time for reviewing instructions, gathering existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington, DC 20543-0180. Do not send the completed forms to this office.

# OSHA Form 301

## OSHA Form 300

- Complete this form or an equivalent form within seven (7) calendar days after learning about a work-related recordable injury/illness.
- Maintain separate records for each physical location (i.e., jobsite) that will be in operation for a year or more.
- If necessary, use two rows to record a single case.
- Match the case numbers in the rows under (A) *Case no.* with the corresponding case numbers you record on the OSHA Form 301 at number 10.
- Be as specific as possible when filling out Section F, which asks for a description of the injury/illness.
- Revise the case classification section of the log if the injury/illness progresses and becomes worse than originally recorded.
- Choose only one category in the case classification section i.e. death, days away from work, job transfer, or other recordable cases.
- Note whether the case is an injury or an illness in the last column.
- At the end of the calendar year, add up the page totals in each vertical column and record them at the bottom of the log.
- Transfer the page totals to OSHA Form 300A.
- Keep each completed log for at least five years following the year in which the injury/illness occurred.
- Keep the completed logs where they can be quickly and easily accessed during an inspection.

*See OSHA Form 300 on the next page*



## OSHA Form 300A

- Complete this or an equivalent form before February 1 each year by transferring the page totals from the bottom of the OSHA Form 300 to the corresponding space on the OSHA Form 300A.
- Determine the average number of employees who worked for your company during the year by taking the total number of employees paid in all pay periods and dividing by the total number of pay periods during that year. Round the number up to the next highest whole number and record it in the Employment Information section of the form.
- Determine the total number of hours worked by all employees by taking the total number of full-time employees in your company for the year and multiplying that number by the number of hours a full-time employee works in a year. Be sure to add in any overtime hours and hours worked by other employees such as part-time workers, temporary workers, and/or seasonal workers. Round the number up to the next highest whole number and record it in the Employment Information section of the form.
- Post the completed OSHA Form 300A from the previous calendar year from February 1 to April 30 in a conspicuous location where employee information is usually posted.
- Before posting the OSHA Form 300A in a new calendar year, a company executive must examine the previous year's corresponding, completed OSHA Form 300 and certify that he believes it to be complete and accurate. The executive must then sign the completed, corresponding OSHA Form 300A.
- Keep each completed OSHA Form 300A for at least five years following the year in which the injury/illness occurred.
- File completed forms where they can be quickly and easily accessed in the event of an inspection.

*See OSHA Form 300A on next page*

OSHA's Form 300A (Rev. 01/2004)

## Summary of Work-Related Injuries and Illnesses

Year 20\_\_\_\_  
**U.S. Department of Labor**  
Occupational Safety and Health Administration  
Item approved OMB no. 1215-0174

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.  
Using the Log, count the individual entries you make for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."  
Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.36, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

### Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
(G) _____	(H) _____	(I) _____	(J) _____

### Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
(K) _____	(L) _____

### Injury and Illness Types

Total number of . . .	(4) Poisonings	_____
(1) Injuries	(5) Hearing loss	_____
(2) Skin disorders	(6) All other illnesses	_____
(3) Respiratory conditions		_____

**Post this Summary page from February 1 to April 30 of the year following the year covered by the form.**

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time for reviewing the instructions, searching existing data sources, gathering the data needed, and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments on this burden estimate or any other aspect of this data collection, including suggestions for reducing the burden, contact: US Department of Labor, OSHA, Office of Statistical Analysis, Room N-3634, 200 Constitution Avenue, NE, Washington, DC 20046. Do not send this information to the office.

### Establishment information

Your establishment name \_\_\_\_\_  
Street \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_  
Industry description (e.g., Manufacturer of motor truck bodies) \_\_\_\_\_  
Standard Industrial Classification (SIC), if known (e.g., 3713) \_\_\_\_\_  
OR \_\_\_\_\_  
North American Industrial Classification (NAICS), if known (e.g., 336212) \_\_\_\_\_

### Employment information

If you don't know these figures, see the Handbook on the back of this page or online.  
Annual average number of employees \_\_\_\_\_  
Total hours worked by all employees last year \_\_\_\_\_

**Sign here**  
**Knowingly falsifying this document may result in a fine.**

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company executive \_\_\_\_\_ Title \_\_\_\_\_  
Date \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

## Appendix A—Calculating Incidence Rates

While you are not required to calculate incidence rates for the purpose of recording work-related injuries/illnesses, incidence rates can be useful for establishing benchmarks and comparing your company's safety performance with national averages. Many owners, GCs, and CMs also require contractor candidates to provide work-related injury/illness incidence rates. Typical incidence rate categories are:

- Fatality Cases Incidence Rate
- Recordable Cases Incidence Rate
- Lost Workday Cases Incidence Rate
- Lost Workdays Incidence Rate

### How to Calculate Incidence Rates: An Example

Following is an example of how to calculate an incidence rate. Here, we will calculate a Lost Workday Cases Incidence Rate (LWDCIR). For purposes of this example, imagine that a company had a total of three lost workday cases and worked a total of 750,000 hours the preceding calendar year. The 200,000 in the equation is a fixed variable that never changes. It represents 100 full-time workers (100 x 40 hours/week x 50 weeks/year).

$$\frac{N \times 200,000}{WH} = \frac{3 \times 200,000}{750,000} = \frac{600,000}{750,000} = \text{LWDCIR of } .8$$

#### Key:

N = 3 (the number of lost workday cases)

WH = 750,000 (the total number of work hours)

200,000 = a fixed variable representing 100 full-time workers

This same formula will apply regardless of the type of incidence rate you will be calculating.





## Appendix B—Summary of OSHA’s Recordkeeping Rule

### Scope

- Mechanical construction and service employers who employed 10 or more employees at any time during the previous calendar year must keep OSHA injury and illness records.
- All employers are required to report to OSHA any workplace fatalities or incidents that result in the hospitalization of three or more workers.
- Employers required to keep OSHA injury and illness records must record each fatality, injury and illness that:
  - is work related;
  - is a new case; and
  - meets at least one of the general recording criteria.
- All recordable injuries and illnesses must be recorded on OSHA Forms 300, 300A and 301 or equivalent forms that include at minimum the same information that would appear on the OSHA forms.

### Work-Relatedness

- Employers must consider injuries and illnesses to be work related if an event or exposure in the work environment either caused or contributed to the condition or significantly aggravated a pre-existing injury or illness regardless of whether it was work-related.
- Employers are not required to record injuries and illnesses that occur when the employee is present in the work environment as a member of the general public.
- Employers are not required to record injuries and illnesses that result solely from non-work-related events.
- Employers are not required to record injuries and illnesses that result from voluntary participation in a wellness program, or medical, fitness or recreational activity.
- Employers are not required to record injuries and illnesses that result from employees eating, drinking, or preparing food or drink for personal consumption.
- Employers *are* required to record illnesses resulting from ingested food contaminated by workplace contaminants.



- Employers are not required to record injuries or illnesses that are solely the result of an employee doing personal tasks outside of his or her established work hours.
- Employers are not required to record injuries or illnesses that result from an employee's personal grooming, self-medication for a non-work-related condition, or intentional self-infliction of an injury or illness.
- Employers are not required to record injuries that result from motor vehicle accidents while the employee is commuting to or from work (including accidents in company parking lots and access roads).
- Employers are not required to record the common cold or flu.
- Employers must treat an injury or illness as one that *significantly aggravated a pre-existing injury or illness* when:
  - The pre-existing injury or illnesses results in death, but would not have resulted in death but for the work environment event or exposure.
  - Loss of consciousness occurs, but would not have occurred but for the work environment event or exposure.
  - Medical treatment becomes necessary when no medical treatment was needed prior to the work environment event or exposure.
  - A change in medical treatment becomes necessary because of the work environment event or exposure.
- Employers must consider injuries or illnesses to be *pre-existing conditions* when they result from a non-work-related event or exposure that occurred outside the work environment.

## Determination of New Cases

- Employers must consider an injury or illness to be a *new case* if the employee has not previously experienced a recorded injury or illness of the same type that affected the same body part or has completely recovered from such an injury or illness, but subsequently experienced a new one.
- Chronic illnesses with recurring symptoms are not considered new cases.

## General Recording Criteria

- Injuries and illness are recordable if they result in *death, days away from work, restricted work, transfer to another job, medical treatment beyond first aid or loss of consciousness*.
- Injuries or illnesses are also recordable if a licensed health care professional diagnoses them as significant regardless of whether they result in *death, days*

*away from work, restricted work, transfer to another job, medical treatment beyond first aid or loss of consciousness.*

- All *recordable* injuries and illnesses must be recorded on an OSHA 300 Log.
- Any work-related fatalities must be reported to OSHA within eight hours.
- When an injury or illness involves days away from work, employers must estimate the number of days the worker will be away and record that number on the OSHA 300 Log. The log must later be updated if necessary when the actual number of days the worker was away is determined.
- When estimating days away from work, employers are not to count the day the injury occurred.
- If a licensed health care professional recommends that a worker stay at home for a given number of days, you must count them as *days away from work* even if the worker reports to work against the recommendation of the health care professional.
- If a licensed health care professional recommends that a worker report to work, but the worker refuses, the employer must end the count for *days away from work* based on the health care professional's recommendation.
- Employers must use **calendar days** when counting *days away from work*.
- Employers are not required to record cases where a worker who was not scheduled to work over a weekend becomes injured or ill on a Friday, but reports to work on Monday as usual, unless a licensed health care professional indicates that he would have recommended that the worker not work over the weekend or perform only restricted work.
- Employers are not required to record cases where a worker was injured or became ill the day before scheduled time off unless a licensed health care professional indicates that he would have recommended that the worker not work over the scheduled time off or perform only restricted work.
- Employers should not record more than 180 calendar days when an injury or illness results in more than 180 *days away from work*. Instead, write in (180) in the appropriate block of the OSHA 300 Log.
- Employers should stop counting *days away from work* if the injured or ill worker leaves the company for any reason unrelated to the injury or illness.
- If an injured or ill worker leaves the company because of the injury or illness, the employer must estimate and record the number of *days away from work, days of restricted work, or job task transfer*.

- When *days away from work* result from an injury or illness that occurred in the previous calendar year, employers should not record the injury twice, but should estimate the total number of *days away from work* and record them on the OSHA 300 Log that was in use when the injury occurred. When the true total is determined, employers should go back to the original OSHA 300 Log and change the estimated number of *days away from work* to the correct number.
- Employers are also required to record *restricted work*. Restricted work is work that occurs when a worker can't perform one or more of his routine functions as a result of the injury or illness.
- Employers should not record *restricted work* or *job transfers* that apply only to the day on which the injury or illness occurred.
- When a licensed health care professional recommends *work restriction*, employers should not consider the case to be recordable unless it affects one or more of the worker's routine job functions.
- Employers should record a partial day of work as a day of *job transfer* or *work restriction* except for the day on which the injury or illness occurred.
- When a licensed health care professional recommends a job restriction, but the worker continues to perform all routine job functions, employers must record the case as *restricted work*.
- Employers must consider cases to be *job transfer cases* whenever an injured or ill worker is assigned to a job other than his regular job for part of the day.
- Employers must record *job transfers* and *restricted work* in the same box of the OSHA 300 Log.
- Employers must count days of *job transfer* and *days of work restriction* in the same manner that *days away from work* must be counted.
- When an injury or illness involves *medical treatment beyond first aid*, it must be recorded.
- *Medical treatment beyond first aid* does not include a visit to a licensed health care professional for the sole purpose of observation, counseling, or the conduct of diagnostic procedures such as X-rays, blood tests, etc.
- A recommendation by a licensed health care professional to use a non-prescription drug at prescription strength is considered *medical treatment beyond first aid*.
- Regardless of whether a physician or any other licensed health care provider administers treatment, the comprehensive list of treatments that follow are considered to be first aid cases.

- Use of non-prescription drugs at non-prescription doses.
- Tetanus immunizations.
- Cleaning, flushing, or soaking wounds on the surface of the skin.
- Use of wound coverings i.e. band-aids, gauze pads, butterfly bandages, etc.
- Use of hot or cold therapy.
- Use of non-rigid means of support such as elastic bandages and wraps.
- Use of temporary immobilization devices (i.e. backboards and neck collars) while transporting a victim.
- Drilling of fingernails or toenails to relieve pressure or draining a blister.
- Use of eye patches.
- Removing foreign bodies from the eye using only irrigation or cotton swabs.
- Removing splinters or foreign material from areas other than the eye by irrigation, cotton swabs, or other simple means.
- Use of finger guards.
- Use of massages other than physical therapy or chiropractic treatment.
- Drinking fluids for relief of heat stress.
- If a licensed health care professional recommends *medical treatment beyond first aid*, it must be recorded even if the worker chooses not to seek the recommended treatment.
- Every work-related injury or illness involving the *loss of consciousness* must be recorded.
- Work-related cases involving cancer, chronic irreversible disease, a fractured or cracked bone, or a punctured eardrum must always be recorded.

## Medical Removal

- If a worker is medically removed under the requirements of other OSHA standards, the case must be recorded on the OSHA 300 Log as a case involving *days away from work* or *restricted work*.
- Employers are not required to record cases where they voluntarily medically remove a worker from the work environment.

## Occupational Hearing Loss

- If a worker's audiogram shows that a Standard Threshold Shift has occurred, the case must be recorded.
- Employers may adjust the audiogram results to reflect the effects of age on hearing (see applicable [OSHA regulations](#) on noise exposure).
- Hearing loss cases are automatically considered to be work related when the worker is exposed to noise in the workplace of 85 decibels over an 8-hour time-weighted average or a total noise dose of 50 percent.
- Employers are not required to record cases when a licensed health care professional determines that the hearing loss is not work related.

## Tuberculosis

- Employers must record the case when a worker develops a tuberculosis (TB) infection after being occupationally exposed to anyone with a known case of tuberculosis.
- Employers are not required to record a positive TB skin test obtained at a pre-employment physical.
- Employers may line out or erase a case if it is discovered that the worker is living with someone who has been diagnosed with tuberculosis, the public health department has identified the worker as a contact of an individual with a case of active tuberculosis, or a medical investigation shows that the worker's infection was caused by exposure away from work or proves the case was not related to the workplace.

## Forms

- Employers must use the OSHA forms (OSHA 300, *Log of Work-Related Injuries and Illnesses*; OSHA 300A, *Summary of Work-Related Injuries and Illnesses*; and OSHA 301, *Injury and Illness Incident Report*) or equivalent forms to record all recordable occupational injuries and illnesses.
- To complete the OSHA 300 Log, employers must enter information about their business, enter a brief description of the injury or illness, and summarize the information on OSHA 300A at the end of the year.
- To complete the OSHA 301 Form, employers must fill out a 301 Form or equivalent for each recordable injury or illness entered on the 300 Log.
- Employers must ensure that each recordable injury or illness is recorded within seven calendar days of receiving the information that the injury or illness occurred.

- Employers may keep and maintain these records on a computer provided that it is equipped to produce forms that are equivalent to the OSHA 300, 300A, and 301 forms.
- Employers may not enter the injured or ill worker's name on the OSHA 300 Log when there is a privacy concern. Instead the words "privacy case" should be entered on the log.
- A case is considered a *privacy concern case* if the injury or illness involves the reproductive system, a sexual assault, mental illness, HIV infection, hepatitis, tuberculosis, injuries from objects contaminated with another person's blood or other potentially infectious materials, and other illness if the worker requests that that his name not be entered on the log.
- Employers who believe that omission of the worker's name is not enough to protect that worker from being identified may use discretion in describing the injury or illness on the OSHA 300 Log.
- Employers who choose to voluntarily provide access to the OSHA 300 and 301 forms to persons other than government representatives, workers, former workers, or authorized representatives must remove or hide the workers' names and any other personally identifying information.

## Multiple Business Establishments

- Employers must keep **separate** OSHA 300 Logs at each establishment that is expected to be in operation for one year or more.
- Employers are permitted to keep all of their records at their headquarters location provided that they can transmit the information about the injuries or illnesses to the central location within seven calendar days of receiving information about the injury or illness and produce and send the records from the central location within the required time frames established by this standard (see the Employee Involvement section of this summary).
- For recordkeeping purposes, employers must link each worker to an establishment when he works at several different locations or at none of the employer's established locations.
- Injuries or illnesses that occur to workers who are working at another of their employers' establishments must be recorded on the OSHA 300 Log of the establishment at which the injury or illness occurred.
- Injuries or illnesses that occur to workers who are working outside their employers' establishments must be recorded on the OSHA 300 Log of the establishment where they normally work.

## Covered Workers

- Employers must record all recordable injuries and illnesses that occur to all workers on their payroll.
- Employers must record all recordable injuries and illness to all workers who are not on their payroll if the employer supervises them on a day-to-day basis.
- If the business is organized as a sole proprietorship or partnership, injuries or illness that occur to the owner or partners should not be recorded.
- Self-employed workers should not record injuries or illnesses to themselves.
- Injuries or illnesses that occur to temporary workers must be recorded if the employer supervises them on a day-to-day basis.
- Employers must record injuries or illnesses that occur to their contractors' workers if the employer supervises them on a day-to-day basis.

## Annual Summary

- At the end of each calendar year, employers must review the OSHA 300 Log to verify that the entries are complete and accurate, create an *annual summary* of the injuries and illnesses recorded on the OSHA 300 Log, certify the *annual summary*, and post the *annual summary*.
- To complete the *annual summary*, employers must total the columns on the OSHA 300 Log and enter the calendar year covered, the company's name, establishment name, establishment address, annual average number of workers covered by the OSHA 300 Log and the total hours worked by all workers covered by the OSHA 300 Log.
- To certify the *annual summary*, a company executive must certify that he examined the OSHA 300 Log and that he believes the information on the summary is correct and complete.
- The company executive is the owner of the company, an officer of the corporation, the highest ranking company official working at the establishment or the immediate supervisor of the highest ranking company official working at the establishment.
- The *annual summary* must be posted in a conspicuous place in each establishment where notices to workers are usually posted.
- The summary cannot be altered, defaced, or covered by other material.
- The summary must be posted no later than February 1 of the year following the year covered by the records and must remain in place until April 30 of the same year.



## Retention and Updating

- The completed OSHA 300 Logs, OSHA 300A Summaries, and OSHA 301 Report Forms must be kept by the employer for a minimum of five years following the end of the calendar year that the records cover.
- Employers must update these records over the five-year period whenever changes or additions become apparent.
- Employers are not required to update the annual summaries (OSHA 300A) or the Incident Report Forms (OSHA 301) over the five-year retention period.

## Change in Business Ownership

- If your business changes ownership, you must record and report work-related injuries and illnesses only for the period of the year during which you owned the establishment.
- All occupational injury and illness records must be transferred to the new owner, who must keep them for the full required five-year time period, but is not required to update them.

## Worker Involvement

- Workers must be informed of how they are to report injuries and illnesses.
- Workers and authorized worker representatives must be allowed limited access to injury and illness records.
- Employers must establish ways for recordable injuries and illnesses to be reported promptly.
- Employers have until the end of the following business day to provide the current and/or stored OSHA 300 Logs and OSHA 301 Forms to workers or authorized worker representatives who request them.
- Employers may not remove the names of the workers from the OSHA 300 Log before providing it to the worker or authorized worker representative except as described in the Forms section of this summary regarding privacy issues.
- If an *authorized employee representative* requests copies of the OSHA 301 Report Forms for an establishment where the agent represents workers under a collective bargaining agreement, employers must give copies of those forms to the *authorized employee representative* within seven calendar days.
- You must provide to the *authorized employee representative* **only** the information from the OSHA 301 Report Forms in the section titled “*Tell us About the Case.*”
- You may not charge for the initial copies of the OSHA 300 Log or 301 Report. However, you may charge a reasonable amount for additional copies.



## **Prohibition Against Discrimination**

- Employers may not discriminate against workers for reporting a work-related fatality, injury, or illness.
- Employers may not discriminate against workers for issuing workplace safety or health complaints.

## **Reporting Fatalities and Multiple Hospitalization Incidents to OSHA**

- Employers must call OSHA (800-321-6742) within eight (8) hours following the work-related death of a worker or a work-related incident that results in the hospitalization of three or more workers.

## **Providing Records to Government Representatives**

- Employers must provide injury and illness records to authorized government representatives within four business hours.
- Authorized government representatives include representatives of the Secretary of Labor, Secretary of Health and Human Services, and state agencies from state plan states.

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