

01-06 OSHA Recordkeeping Regulations



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OSHA Recordkeeping Regulations

INFORMATION

On January 19, 2001, OSHA published its Final Rule on Occupational Injury and Illness Recording and Reporting. The new regulations will go into effect in January 2002. The new regulations change several things about injury and illness recordkeeping in some subtle yet fundamental ways.

The OSHA 200 log is now the OSHA Form 300 Log of Work Related Injuries and Illnesses. The new rules generally require separate logs for separate work sites. Although the new log does not have to be posted, it does have to be maintained and updated with each newly reported case within 7 calendar days and for 5 years. The new log has several blocks to note and tally different injuries including musculoskeletal disorders, skin disorder, respiratory condition, poisoning, hearing loss and all others. The major difference here is the disorders associated with repeated trauma have been separated into MSDs and hearing losses. The new log is set up to be serially numbered for each injury and has spaces to note the location where the event occurred.

The OSHA Form 300A is the new Summary of Work Related Injuries and Illnesses. This is a separate form which OSHA requires to be posted from February 1st to April 30th of each year. (In the transition year 2002, the OSHA Form 300 A for the year 2001 must be displayed from February 1st to March 1st.) This form summarizes the information on the OSHA 300 log and adds additional information on total hours employees have worked and the annual average number of employees. A company executive must sign this Annual Summary report prior to posting.

The OSHA Form 301 Injury and Illness Incident Report is similar to the old OSHA Form 101 and records the Who What When Where and Why of the injury or illness. However it is simpler to fill out.

The new rules try to simplify the definition of medical treatment versus first aid. They also simplify the number of days off or in restricted status. Now days off will be counted from the second day, and include a count of every calendar day where the employee cannot work due to the injury or illness regardless of whether the employee was scheduled to work, or go on vacation. The count stops at 180 days.

The rules clarify when the case needs to be considered and "new" case. The rules give a fair definition of musculoskeletal disorder, and advise that MSD will not be listed as the cause in cases caused by slips trips and falls. New privacy act considerations prohibit using the employees name on the OSHA 300 log in several instances. A separate "key" must be formulated.

OSHA has a detailed website "the OSHA subject page for recordkeeping" for the new recordkeeping rules. It is: <http://www.osha-slc.gov/recordkeeping/index.html>

OSHA also has a good website which contains the new forms for recording work related injuries and illnesses. It is <http://www.osha-slc.gov/recordkeeping/OSHArecordkeepingforms.pdf>

Finally, the OSHA subject page has both the detailed and short versions of the new rules. The rules themselves have a number of questions and answers included in the text. The short versions of the rules are located at: <http://www.osha-slc.gov/recordkeeping/rkeepregtext.html>

ACTION

Employers should study and start to implement the final rules. PMA will be checking the implementation of these rules with the states to ensure consistency. PMA will be modifying the accident forms to ensure that they comply with the new OSHA mandates, and will check data to ensure that it properly feeds into the modified forms. PMA training and accident prevention supervisors have a power point presentation that they can give on the new Federal Regulations.

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