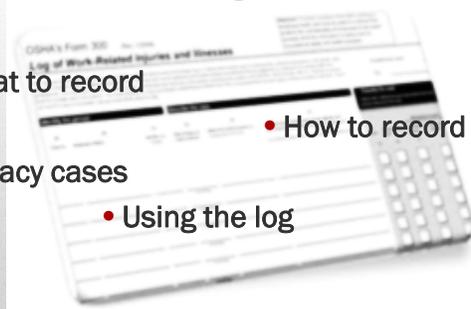


# OSHA LOG Recordkeeping

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## Recordkeeping Topics

- What to record
- Privacy cases
- Using the log
- How to record



The not so Secret Key to  
recordkeeping success



Another Secret Key to  
recordkeeping success



## Who is a covered employee?

- On a company's payroll as
  - labor
  - executive
  - hourly
  - salary
  - part-time
  - seasonal or migrant workers

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## Who is a covered employee?

- Not on the payroll, but is supervised on a day-to-day basis
  - Labor from a temporary help service, employee leasing firm or other personnel supply service
- Does not include independent contractors

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## Establishments

- A log is needed for each location that will exist for at least one year
- Regardless of number of workers, if the company has more than 10 workers
- Log can be kept at a central location, but should note location for each case

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## Is an injury or illness recordable?

- "recordable" means countable as an injury or illness case of sufficient severity to merit inclusion in the log



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### Recordable if:

- A **work-related** injury or illness

and



- Time away from work, job restriction or transfer, or **medical treatment beyond first aid**

### Recordable if:

- Loss of consciousness
- An instance of a special set of “significant” diagnosed injuries or illnesses
- and not a recurrence of an ongoing chronic condition

### Re-injury and recurring cases

Complete recovery



Re-injury



New case

Chronic illness



Were symptoms due to workplace exposure?

### Work-relatedness of an injury or illness

- Presumed for events or exposures in the work environment that either
  - caused or contributed to the resulting condition, or
  - significantly aggravated a pre-existing injury or illness

## Recordable does not mean compensable

OSHA log recordkeeping



is completely separate from workers' compensation

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## Compensable does not mean recordable

- Even if your workers' comp insurer pays the claim, it might *not* be a recordable case



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## Begin filling out the form

- Case number
- Name (except if privacy case)
- Occupation
- Date of event

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## Identify the person

(A)	(B)	(C)	(D)
Case No.	Employee's Name	Job Title (e.g., Welder)	Date of injury or onset of illness (mo./day)

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### Privacy concern cases (1)

- ONLY use “Privacy concern case” for
  - Injuries to intimate body parts or reproductive systems
  - Injury or illness resulting from sexual assault
  - Mental illness



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### Privacy concern cases (2)

- ONLY use “Privacy concern case” for
  - HIV infection, hepatitis or TB
  - Contaminated needlesticks and cuts from sharp objects
  - Other diseases, if worker independently and voluntarily asks
- These are the ONLY allowable uses

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### Privacy concern cases (3)

- Can also be vague about description to help protect worker’s identify
  - Gender and job title
- Keep a separate list that matches name to each case
  - Used for updating information
  - May be needed by OSHA

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### Injury/illness description

- Location of event
- Event and injury description
- Can use multiple lines in form
  - Eliminate tiny script

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## Describing an injury or illness

(E)	(F)
Where the event occurred (e.g. Loading dock north end)	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 forearm from acetylene torch)

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## Injury and illness characteristics

- Nature of injury (what?)
- Part of body injured (where?)
- Source(s) of injury (object or substance)(with/by/from what?)
- Event or exposure (how?)

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## Case classification

- Fatality
- Day away from work
- Job transfer or restriction
- Other recordable
- Not recordable

**Most serious**  
  
**Least serious**

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## Classifying the cases

CHECK ONLY ONE box for each case based on the most serious outcome for that case:

Death	Days away from work	Remained at work	
		Job transfer or restriction	Other record-able cases
(G)	(H)	(I)	(J)

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## Counting days



## Counting days

- Use calendar days
- Count excludes day of incident
- No partial days, only whole numbers
- A DAFW case needs at least one day away

## Counting the days

Enter the number of days the injured or ill worker was:

Away From Work (days)	On job transfer or restriction (days)
(K)	(L)

## Stop counting days

- Can stop count at 180 days per case
- This is the employer's option, be consistent
- Show information to make the case understandable
  - Don't hide days away from work



## Needlesticks and Sharps injuries

- Must be a contaminated object
  - Blood or potentially infectious material
- Record as an injury
- Do **not** enter worker's name
  - Use "Privacy concern case"
- If no time away from work or restrictions, code as an "other recordable" case

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## Exposure to blood and potentially infectious material

- If splashed or exposed without being cut
  - Record only if other recording criteria are met
- If the worker later is diagnosed with an infectious bloodborne disease...

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## Needlesticks, sharps and exposures

- If the worker later is diagnosed with an infectious bloodborne disease
  - Update log to indicate illness
  - Change description to include type of illness
  - Change case classification, if needed
  - Privacy case, do not enter worker's name

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## Immunizations and inoculations

- Not recordable unless a work-related injury or illness has occurred
- If in response to a needlestick or exposure to bloodborne pathogen, then case is already recordable
- Worker must first test positive for exposure or infection for a non-needlestick/sharps incident to be recordable

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## Tuberculosis cases

- Must record where
  - 1) A worker has been exposed in the workplace to anyone with an active TB case **and**
  - 2) the worker subsequently develops a TB infection
- Classified as a respiratory infection
- Date of illness is the date of diagnosis

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## Posting the log summary

- The summary must be certified
- Post in each establishment the log summary for that establishment
- Posted Feb. 1 to April 30
  - Must not be altered, defaced or covered by other material



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## OSHA's Online Recordkeeping Expert

### OSHA Recordkeeping Advisor

<http://www.dol.gov/elaws/OSHARecordkeeping.htm>

This interactive tool simulates the interaction you might have with an expert on the Recordkeeping rules. It asks questions and provides answers based on your responses. In some cases, you may need additional expert help.

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## Some recordkeeping examples

Classify the case					
CHECK ONLY ONE box for each case based on the most serious outcome for that case:				Enter the number of days the injured or ill worker was:	
Death	Days away from work	Remained at work		Away from work (days)	On job transfer or restriction (days)
		Job transfer or restriction	Other recordable cases		
(G)	(H)	(I)	(J)	(K)	(L)
	X			3	
	X			2	32
		X			14
			X		

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## Recordkeeping: Final thoughts

- Recordkeeping *can be* complicated
- Needs to be consistent, comparable and correct to be useful
- Review your site's log information regularly, keep it accurate
- Use available resources to maintain and improve recordkeeping quality

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- Phone: 651-284-5568
- Or show up in person (by appointment)
  
- DLI Research and Statistics Web site:  
<http://www.dli.mn.gov/Research.asp>
  
- Available to present to groups throughout Minnesota

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