Agenda

- Emphasis programs
- OSHA top ten most frequently cited
- Overview of OSHA recordkeeping
MNOSHA Strategic Plan

Inspection Emphasis

- Construction
- Manufacturing
- Public Sector
  - State government
  - Local government
  - Schools
National Emphasis Programs

- Amputations
- Combustible dust
- Lead
- PSM
- Silica
- Trenching Hazards

Local Emphasis Programs

- Foundries
- Grain Facilities
- Healthcare
- Hexavalent Chromium
- Meat Packing
- Noise & Respiratory Hazards
- Window Washing
Pilot Emphasis

- Temp Employee & Employment Agencies

WSC

- Ergonomics
- Workplace Violence
- Safe Patient Handling
Workplace Safety Consultation

- Workplace Violence Prevention
- MNSTAR
- Ergonomic Outreach
- Safe Patient Handling
- MNSHARP

- Labor Management Safety Committee
- Safety Hazard Abatement Grant
- Construction Outreach
- Alliances

Alliance – Silica sampling

- MMUA
- Goal of creating a data set of measured exposures
- Contact Mark Hottle with MMUA
Most Frequently Cited

MNOSHA Construction

- 1926.501 Fall protection
- 1926.652 Protective systems for excavations
- §MN Stat. 182.653 subd. 8 AWAIR
- 1926.451 General requirements for scaffolds
- 1926.651 Specific requirements for excavations
- 1910.1200 Hazard communication
- 1926.1053 Ladders
- 1926.405 Electrical wiring, components and equipment
- 1926.503 Fall protection training requirements
- MN Rules 5207.1000 Mobile earth moving equipment
### WSC Construction

- 1926.404(f)(6) Path to ground
- 1926.416(e)(1) Worn or frayed electric cords and cables
- 1926.501(b)(1) Fall protection unprotected sides and edges
- 5207.250(3) Tripping and impaling hazards
- 1926.405(a)(2) (ii)(I) Flexible cord and cable protection
- 1926.416(e)(2) Extension cord suspension
- 1926.405(g)(2)(iv) Flexible cord strain relief
- 1926.501(b)(14) Wall openings
- 1926.1052(c)(1) Stair rails and handrails
- 1926.451(g)(1)(vii) Scaffold fall protection
- 1926.502(b)(3) Guardrail systems

### MNOSHA General Industry

- 1910.1200 Hazard communication
- 1910.212 Machine guarding
- 1910.147 Lockout/Tagout
- 1910.134 Respiratory protection
- 1910.178 Powered industrial trucks
- §MN Stat. 182.653 subd. 8 AWAIR
- 1910.305 Electrical wiring methods, components and equipment for general use
- MN Rules 5205.0116 Carbon monoxide monitoring
- 1910.242 Hand and portable powered tools and equipment, general
- MN Rules 5206.0700 Employee right-to-know
• 1910.212(a)(1) Machine guarding
• 1910.151(c) Eyewash
• 1910.132(d)(1) PPE assessment
• 1910.304(g)(5) Path to ground
• 1910.147(c)(6)(i) LOTO annual inspections

• 1910.1200(e)(1) Hazard communication written program
• 1910.305(b)(1)(ii) Electrical unused openings not closed
• 1910.157(c)(1) Fire extinguisher accessibility
• 1910.1200(f)(6) Hazardous substance container labeling
• 1910.303(g)(1)(ii) Electrical panel working space
Walking-Working Surfaces Update

- Falls are among the leading cause of serious injury and deaths.
- On average, over 202,000 serious injuries and 345 deaths occur annually.
- The update clarifies the previous standard and brings it more in line with the construction standard.
- The update adds training and inspection requirements.
# Walking-Working Surfaces Update

- **1910.21** Scope and Definitions
- **1910.22** General Requirements
- **1910.23** Ladders
- **1910.24** Step Bolt and Manhole Steps
- **1910.25** Stairways
- **1910.26** Dockboards

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- **1910.27** Scaffolds and Rope Descent Systems
- **1910.28** Duty to Have Fall Protection and Falling Object Protection
- **1910.29** Fall Protection Systems and Falling Object Protection – Criteria and Practices
- **1910.30** Training Requirements
1910.21 Scope and Definitions

- Applies to all General Industry workplaces unless specifically excluded within the standard.
- Contains multiple definitions that are used within the standard.

1910.22 General Requirements

- Maintain clean, orderly and sanitary conditions.
- Floors in the facility must be kept clean and to every extent possible dry.
- Walking-working surfaces (WWS) are kept free of hazards.
- Loads can be supported by WWSs.
- Safe access and egress to and from WWSs.
1910.22 General Requirements

- Inspections, Maintenance and Repair
  - WWSs must be inspected regularly and maintained.
  - Hazardous conditions must be corrected or repaired.
  - Qualified person must be involved in correction or repair that involved structural integrity.

1910.23 Ladders

- All Ladders
  - Must be free from hazards.
  - Used for the purpose they are designed.
  - Be inspected and if defaults are found then they must be tagged.
1910.23 Ladders

- Portable Ladders
  - Rungs need to be corrugated knurled, dimpled or coated to minimize slipping.
  - Ladders must not be overloaded.

- Fixed Ladders
  - Capable of supporting their maximum load
  - Specific measurements

- Mobile Ladders
  - Support at least 4X their intended load
  - Wheels must lock.

Changes

- Ladders over 24 feet will require a ladder safety system or personal fall protection system
- Within 20 years, all existing ladders extending more than 24 feet must have a ladder safety system or personal fall arrest system
1910.23 Ladders

• Does not apply to ladders used in emergency operations or ladders that are an integral part of or designed into a machine or piece of equipment.

1910.24 Step Bolts & Manhole Steps

• Step Bolts
  • Corrosion proof is necessary
  • Prevent slipping
  • Spacing specifics outlined
  • If installed after January 17, 2017 then they must support 4X their intended load
  • Inspections must be conducted
1910.24 Step Bolts & Manhole Steps

- Manhole steps
  - Must be able to support maximum intended load
  - Surface needs to be corrugated, knurled, dimpled or slip resistant
  - Corrosion resistant
  - Spacing requirements are outlined
  - Steps must be uniformly spaced
  - Inspected at the start of the work shift and maintained

1910.25 Stairways

- Handrail and guardrail requirements
- Vertical clearance above stair treads
- Must be uniform
- Landing and door swing requirements
- Each stair must support at least five times the anticipated load
- Measurement specifics
1910.26 Dockboards

- Capable of supporting the maximum intended load
- Run-off protection
- Portable and permanent dockboards are secured
- Portable dockboards equipped with handholds

1910.27 Scaffold and Rope Descent Systems

- Scaffolds used in General Industry must meet the requirements in 29 CFR 1926, subpart L (Scaffolds)
- Rope Descent Systems
  - Anchorages
  - Use
  - Training
  - Weather
  - Tools
1910.28 Duty to Have Fall Protection and Falling Object Protection

• This section does not apply to:
  • Portable Ladders
  • Inspection, investigating or assessing workplace conditions or work to be performed prior to start of work or after all work has been completed
  • To fall hazards presented by exposed perimeters of stages or RR station platforms
  • To powered platforms, aerial lefts, telecommunications work, or electric power generation, transmission and distribution work

1910.28 Duty to Have Fall Protection and Falling Object Protection

• The employer must ensure that each employee on a walking-working surface with an unprotected side or edge that is 4 feet (1.2 m) or more above a lower level
Fall Protection Options

- Safety Net
- Fall Restraint
- Guardrail System
- Ladder Safety Device
- Positioning System
- Personal Fall Arrest System

1910.28 Duty to Have Fall Protection and Falling Object Protection

- The sections covers the specifics when guarding;

<table>
<thead>
<tr>
<th>Hoist Areas</th>
<th>Holes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Runways / Walkways</td>
<td>Dangerous Equipment</td>
</tr>
<tr>
<td>Openings</td>
<td>Pits</td>
</tr>
<tr>
<td>Outdoor Advertising</td>
<td>Low-Slope Roofs</td>
</tr>
</tbody>
</table>
1910.28 Duty to Have Fall Protection and Falling Object Protection

• Low Slope Roof
  • Less than 6 feet from the edge must have fall protection system (Safety Monitor for roofing activities only)
  • 6 feet – 15 feet from the edge employer must provide a fall protection system or a designated area. The employer is not required to provide any fall protection if the work is infrequent and temporary

1910.28 Duty to Have Fall Protection and Falling Object Protection

• Low Slope Roof
  • When work is performed 15 feet or more from the roof edge:
    • Protect each employee from falling by use of a fall protection system or a designated area. The employer is not required to provide any fall protection provided the work is both infrequent and temporary; and
    • Implement and enforce a work rule prohibiting employees from going within 15 feet of the roof edge without using fall protection
1910.28 Duty to Have Fall Protection and Falling Object Protection

- Protections from falling objects
  - Erect toe boards, screens or railings
  - Erect a canopy structure
  - Barricade the area

1910.29 Fall Protection Systems and Falling Object Protection – Criteria and Practices

- Lays out specific for fall protection systems:
  - Guardrail Systems
  - Safety Net Systems
  - Designated Areas
  - Covers
  - Handrail / Stair Rail Systems
  - Cages, well and platforms used with fixed ladders
1910.29 Fall Protection Systems and Falling Object Protection – Criteria and Practices

• Lays out specific for fall protection systems:
  • Outdoor Advertising
  • Ladder Safety Systems
  • Personal Fall Protection Systems
• Also covers specifics for falling object protection and grab handles

1910.29 Fall Protection Systems and Falling Object Protection – Criteria and Practices

• Designated Area

When the employer uses a designated area, the employer must ensure:
  • Employees remain within the designated area while work operations are underway; and
  • The perimeter of the designated area is delineated with a warning line consisting of a rope, wire, tape, or chain that meets the requirement of the section
1910.30 Training Requirements

- Before exposed to fall hazards, the employee must be trained.
- The employee must be trained by a competent person.
- Training must include:
  - Nature of fall hazards and how to identify them.
  - Procedures that must be used to minimize these fall hazards.
  - The correct procedures for installing, inspecting, operating, maintaining and disassembling the personal fall protection systems the employee uses.
  - The correct use of the above systems, i.e., anchoring, proper hook up, inspecting, etc.

Steps to Take

- Evaluate your workplace for slip, trip and fall hazards.
Steps to Take

• Inspect walking/working surfaces on an ongoing basis.

Steps to Take

• Implement fall protection measures.
Steps to Take

• Train your employees on how to recognize hazards and how to correctly use fall protection systems and equipment.

Walking-Working Surfaces Update

These requirements went into effect in Minnesota on September 19, 2017.
Many business establishments have difficulty using their OSHA logs as OSHA intended.
What are the forms required for OSHA recordkeeping?

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

The log isn’t just an internal document:
Worker names may need to be removed

- Keep the name:
  - Current and former employees
  - Workers’ union and legal representatives
  - John Franklin

- Keep or remove names:
  - Safety consultants
  - Insurer
  - John Franklin or
  ___

- Remove name:
  - All others
  - John Franklin

John Franklin
Establishments

- You need to keep a log for each location that will exist for at least one year
- Your logs can be kept at a central location; note the work location for each case

Three preconditions for an OSHA log case

- Employer
- Employee
- Event
Who is an employer?

Any individual or entity having an employment relationship with even one worker is an employer.

Which employers need to keep an OSHA Log?

In Minnesota, it’s all industries!
Who is a covered employee?

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

Who is a covered employee?

• Not on the payroll, but is supervised on a day-to-day basis, such as
  labor from a temporary help service, employee leasing firm or other personnel supply service

• Does not include volunteers and independent contractors
Events need to be reported!

Employers must (1904.35):

1. Create a process for reporting injuries and illnesses
2. Tell workers how and when to report

Is an injury or illness recordable?

A work-related injury or illness case needs sufficient severity to merit inclusion in the log
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 separate from workers’ compensation

Compensable does not mean recordable
Recordable if:

A work-related injury or illness and (choose one or more):

(a) time away from work,

(b) job restriction or transfer, or

(c) medical treatment beyond first aid

First aid list

• (A) Using a non-prescription medication at nonprescription strength

• (B) Administering tetanus immunizations

• (C) Cleaning, flushing or soaking wounds on the surface of the skin;

• (D) Using wound coverings such as bandages,

• (E) Using hot or cold therapy;

• (F) Using any non-rigid means of support

• (G) Using temporary immobilization devices while transporting an accident victim
First aid list

• (H) Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
• (I) Using eye patches;
• (J) Removing foreign bodies from the eye using only irrigation or a cotton swab;
• (K) Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
• (L) Using finger guards;
• (M) Using massages; or
• (N) Drinking fluids for relief of heat stress.

Special recordable cases

• 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

Chronic illness

Were symptoms due to workplace exposure?

New case

A question of measurement

<table>
<thead>
<tr>
<th>Not recorded on log</th>
<th>Recorded on log</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not a recordable injury or illness</td>
<td>Error — recordable event left off log</td>
</tr>
<tr>
<td>Correct non-entry of an event</td>
<td>Error in how case recorded in log</td>
</tr>
<tr>
<td>Error — nonrecordable event entered on log</td>
<td>Correct inclusion of an event on log</td>
</tr>
</tbody>
</table>
Begin filling out the log

Enter case identification information

<table>
<thead>
<tr>
<th>(A)</th>
<th>(B)</th>
<th>(C)</th>
<th>(D)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case No.</td>
<td>Employee’s Name</td>
<td>Job Title (e.g., Welder)</td>
<td>Date of injury or onset of illness</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>(mo./day)</td>
</tr>
</tbody>
</table>
Identify the case

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

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
Privacy concern cases (2)

• ONLY use “Privacy concern case” for (continued)
  • HIV infection, hepatitis or TB
  • Contaminated needlesticks and cuts from sharp objects
  • Other diseases, if the
    worker independently
    and voluntarily asks

• These are the ONLY allowable uses

Privacy concern cases (3)

• Can be vague about description to help protect the worker’s identity
  • Gender and job title

• Keep a separate list
  that matches name to each case
  • Used for updating information
  • May be needed by OSHA
Date of event

- Only include cases that occurred during that year
- A case is only recordable once, in the year that it occurred
  - Updates for cases from an earlier year are recorded on the log of the injury year for that case

Describe the injury or illness

<table>
<thead>
<tr>
<th>(E)</th>
<th>(F)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where the event occurred (e.g. Loading dock north end)</td>
<td>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)</td>
</tr>
</tbody>
</table>
Injury/illness description

• Location of event

• Event and injury description

• Can use multiple lines in form
  • Eliminate tiny script

Classify the cases

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

<table>
<thead>
<tr>
<th>Death</th>
<th>Days away from work</th>
<th>Remaining at work</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Job transfer or restriction</td>
</tr>
<tr>
<td>(G)</td>
<td>(H)</td>
<td>(I)</td>
</tr>
</tbody>
</table>
Case classification system

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

Record the day count

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

<table>
<thead>
<tr>
<th>Away From Work (days)</th>
<th>On job transfer or restriction (days)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(K)</td>
<td>(L)</td>
</tr>
</tbody>
</table>


How OSHA counts days

• Use calendar days
• Count excludes day of incident
• No partial days, only whole numbers

A day-away-from-work case needs at least one day away marked on the log

You can stop counting days at 180

• This is the employer’s option, be consistent
• Show information to make the case understandable
• Don’t hide days away from work
### Code as an injury or an illness

<table>
<thead>
<tr>
<th></th>
<th>Skin Disorder</th>
<th>Respiratory Condition</th>
<th>Poisoning</th>
<th>Hearing Loss</th>
<th>All other illnesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Injury</td>
<td>(1)</td>
<td>(2)</td>
<td>(3)</td>
<td>(4)</td>
<td>(5)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(6)</td>
</tr>
</tbody>
</table>

Check the "injury" column or choose one type of illness:

**Injury?**

- **Injury**: any wound or damage to the body resulting from an event in the work environment
- Some common injury types are: cut, abrasion, fracture and burn
**Illness?**

- Illness: Anything that is not an injury
- Optional: You may consider gradual onset injuries to be illnesses (all other)

**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
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...

Needlesticks, Sharps and exposures

If the worker is diagnosed with an infectious bloodborne disease:

• Update the log to indicate illness
• Change description to include type of illness
• Change case classification, if needed
• Privacy case, do not enter worker’s name
### OSHA’s Form 300A (Rev. 01/2004)

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

OSHA’s Form 300A is used to summarize work-related injuries and illnesses that occurred during the previous year. The summary must be posted on February 1 and updated monthly through April 30. The summary is used to calculate the injury and illness rates for the industry.

#### Number of Cases

<table>
<thead>
<tr>
<th>Category</th>
<th>Total Number of Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of deaths</td>
<td></td>
</tr>
<tr>
<td>Total number of cases with days away from work</td>
<td></td>
</tr>
<tr>
<td>Total number of cases with job transfer or restriction</td>
<td></td>
</tr>
</tbody>
</table>

#### Number of Days

<table>
<thead>
<tr>
<th>Category</th>
<th>Total Number of Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of days away from work</td>
<td></td>
</tr>
<tr>
<td>Total number of days of job transfer or restriction</td>
<td></td>
</tr>
</tbody>
</table>

#### Injury and Illness Types

<table>
<thead>
<tr>
<th>Type</th>
<th>Total Number of Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of cases</td>
<td></td>
</tr>
<tr>
<td>Injuries</td>
<td></td>
</tr>
<tr>
<td>Skin disorders</td>
<td></td>
</tr>
<tr>
<td>Respiratory conditions</td>
<td></td>
</tr>
<tr>
<td>Poisonings</td>
<td></td>
</tr>
<tr>
<td>Hearing loss</td>
<td></td>
</tr>
<tr>
<td>All other illnesses</td>
<td></td>
</tr>
</tbody>
</table>

#### Preparing the Log Summary

- **Before Feb. 1 of following year**
- **Sum the case counts and day counts on each page and compute the grand total for the year**
- **If some workers are still away from work or on job restrictions**
  - Use doctor’s estimate of days still to count
  - Estimate on your own
Count workers and hours

- **Annual average** number of employees
  - Can use payroll or attendance counts by week, paycheck, month, compute average
  - Not the number of full-time equivalent workers
- **Total** hours worked by all employees
  - Can estimate
  - Not the average
Examples of proper case classification

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

<table>
<thead>
<tr>
<th>Death (G)</th>
<th>Days away from work (H)</th>
<th>Remained at work (I)</th>
<th>Job transfer or restriction (J)</th>
<th>Other recordable cases (K)</th>
<th>Away from work (days) (L)</th>
</tr>
</thead>
<tbody>
<tr>
<td>X</td>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>X</td>
<td>2</td>
<td>32</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>X</td>
<td>14</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

OSHA's Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20

Number of Cases
Real number of deaths
Real number of cases without days away from work
Real number of cases with job transfer or restriction
Real number of other recordable cases

Number of Days
Total number of days away from work
Total number of days of job transfer or restriction

Injury and Illness Types

<table>
<thead>
<tr>
<th>Injuries</th>
<th>(A)</th>
<th>(B)</th>
<th>(C)</th>
<th>(D)</th>
<th>(E)</th>
</tr>
</thead>
<tbody>
<tr>
<td>(A) Injuries</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(B) Skin disorders</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(C) Other illnesses</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>(E) All other illnesses</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Employee Information
Year of establishment
Name
Address
City
State
ZIP Code
Owner/Manager
Phone Number

Employer Information
If you have hired (or terminated) any employees during the year, please fill out the appropriate form. For the purposes of this form, an employee is any individual who worked for the company for at least one week during the year. If you have any questions, please contact OSHA at 1-800-321-OSHA. For more information, visit the OSHA website at www.osha.gov.
• The United States Census Bureau maintains a NAICS webpage https://www.census.gov/eos/www/naics/

Hours worked

• Hours worked can be the total hours worked by all employees as tallied by the company
• Hours worked can also be estimated
### Number of employees

- *Add* the total number of employees your establishment paid in all pay periods during the year. Include all employees: full-time, part-time, temporary, seasonal, salaried, and hourly.
- *Count* the number of pay periods your establishment had during the year. Be sure to include any pay periods when you had no employees.
- *Divide* the number of employees by the number of pay periods.
- *Round the answer* to the next highest whole number. Write the rounded number in the blank marked *Annual average number of employees*.

### Certifying the summary

- A company executive must sign the OSHA 300-A.
What if I have no injuries for the year?

• You are still required to complete an OSHA 300-A Summary of Workplace Injuries and Illnesses and post the form from February 1 to April 30th.

Do I need to post my OSHA 300 Log as well?

• No. Only the OSHA 300-A is required to be posted.
Post your log summary

• Certify the summary
• 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

Electronic Posting

Am I in compliance if I electronically post my OSHA 300A?
• No. You must physically post the OSHA 300A.
Where to find the forms

• OSHA 300 the Log of Work-Related Injuries and Illnesses
• OSHA 300-A Summary of Work-Related Injuries and Illnesses
• Both forms are available on the OSHA.gov website under recordkeeping forms
• https://www.osha.gov/recordkeeping/RKforms.html

DLI recordkeeping assistance

MNOSHA Consultation
oshaconsultation@state.mn.us
651-284-5060 or 1-877-657-3776

MNOSHA Compliance
oshacompliance@state.mn.us
651-284-5050 or 1-877-470-6742
DLI recordkeeping assistance

• Injury and Illness survey recordkeeping
  • Research and Statistics unit: dli.research@state.mn.us
  • Assistance for survey participants
    • https://www.dli.mn.gov/our-areas-service/research-and-statistics/soii-contact-information

• Injury and Illness survey statistics
  • Incidence rates, numbers of cases, case characteristics

Recordkeeping articles online

Recordkeeping 101
• Part 1: Tracking injuries, illnesses puts you in control
• Part 2: Classifying recorded injuries
• Part 3: The days of our cases
• Part 4: Tell me what happened; describing the event
• Part 5: Injury or illness?
• Part 6: Summarizing the injury and illness log
• Part 7: Using your log results: 'How do we compare?' Rate chart (Excel)
• Part 8: A guide for keeping an accurate OSHA log

Recordkeeping 201
• Part 1: Privacy concerns -- when not to write a name
• Part 2: Records access, information disclosure
• Part 3: Job transfer and restricted work
• Part 4: New or deja vu? When to record injury recurrences and episodic illnesses
• Part 5: Needlesticks and sharps injuries, contact with bodily fluids
• Part 6: What are 'other recordable cases'?
• Part 7: A close look at first aid
• Part 8: 'And a one, and a two' -- Counting employees and hours
• Part 9: Matching workplaces and workers to OSHA logs
• Part 10: Recording cases and reporting claims -- A tale of two systems
OSHA recordkeeping online assistance

OSHA Recordkeeping Advisor
https://webapps.dol.gov/elaws/OSHARecordkeeping.htm

• Whether an injury or illness (or related event) is work-related
• Whether an event or exposure at home or on travel is work-related
• Whether an exception applies to the injury or illness
• Whether a work-related injury or illness needs to be recorded
• Which provisions of the regulations apply when recording a work-related case

Do I have to electronically file my information with OSHA?
Do you have employees at establishments in Minnesota?

Some of my employees work at several different locations or do not work at any of my establishments at all. How do I record cases for these employees?

You must link each of your employees with one of your establishments, for recordkeeping purposes.

You must record the injury and illness on the OSHA 300 Log of the injured or ill employee’s establishment, or on an OSHA 300 Log that covers that employee’s short-term establishment.

Page 113 OSHA Recordkeeping Handbook
Were you required to keep OSHA 300 Logs in Minnesota in 2017?

Firms with more than 10 employees must maintain OSHA 300 Logs. Minnesota did not adopt exemptions for low hazard industry NAICS.

1904.30 basic requirement – you must keep a separate OSHA 300 Log for each establishment that is expected to be in operation for one year or longer.

Do you have establishments that had 20 or more employees working there in 2017?

An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed.

To determine if you need to provide OSHA with the required data for an establishment, you need to determine the establishment's peak employment during the last calendar year.

Each individual employed in the establishment at any time during the calendar year counts as one employee, including full-time, part-time, seasonal, and temporary workers.
Retention and updating 1904.33

Do I have to update the OSHA 300 Log during the five-year storage period?

Yes, during the storage period, you must update your stored OSHA 300 Logs to include newly discovered recordable injuries or illnesses and to show any changes that have occurred in the classification of previously recorded injury or illnesses.

Do I have to update the annual summary?

No, you are not required to update the annual summary, but you may do so if you wish.

Recordkeeping Handbook page 134

Where do I enter my data?

OSHA calls it the ITA.

https://www.osha.gov/injuryreporting/OSHA
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Deadline for online submission of OSHA 300As.

What is going on at the federal level

• Proposed rulemaking for recordkeeping
Questions

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