

OSHA Recordkeeping in the Healthcare Setting

Objectives



- 1. Outline OSHA's Recordkeeping Requirements for Hospital and Healthcare Organizations
- 2. Outline OSHA's recordkeeping rule change and describe how it will impact your recordkeeping program
- 3. Discuss how to use OSHA recordkeeping and injury data in safety and health management programs

Brief History of the BLS & OSHA





Brief History of the BLS & OSHA

(continued)



- BLS (Bureau of Labor Statistics) begins collecting work injury data
- Limited in scope and voluntary for employers



Brief History of the BLS & OSHA

(continued)

- December 29, 1970 Occupational Safety and Health Act (OSH Act) is signed into law by President Richard Nixon
- April 28, 1971 OSHA is formed



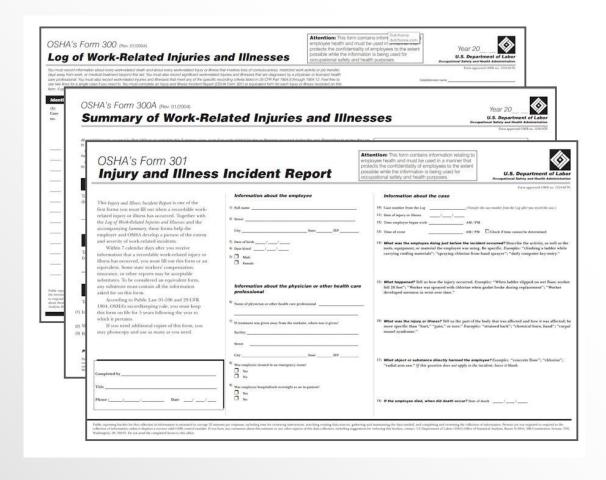
OSHA's Mission Statement



"....to assure safe and healthful working conditions for working men and women by....."

- 1. Developing job safety and health standards
- 2. Enforcing them through worksite inspections
- 3. Providing training programs to increase knowledge

OSHA Injury & Illness Recordkeeping Rule 29 CFR Part 1904



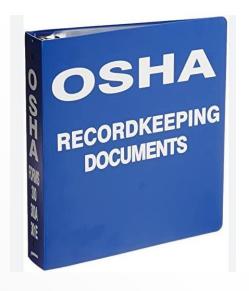
Sections of OSHA's Recordkeeping Rule

Standard Number – 29 CFR 1904

- Subpart A Purpose
- Subpart B Scope
- Subpart C Recordkeeping Forms and Recording Criteria
- Subpart D Other OSHA Injury and Illness Recordkeeping Requirements
- Subpart E Reporting Fatality, Injury and Illness Information to the Government
- Subpart F Transition From the Former Rule
- Subpart G Definitions

Purpose of the OSHA Recordkeeping Rule 29 CFR Part 1904 – Subpart A

"The purpose of this rule (part 1904) is to require employers to <u>record</u> and <u>report</u> work-related fatalities, injuries, and illnesses."



https://www.ecfr.gov/current/title-29/section-1904.0

29 CFR Part 1904 - Subpart B - Scope

1904.1 – Small employer partial exemptions

If 10 or fewer employees at all times during the last calendar year

1904.2 – Partially exempt industries

If establishment classified in specific industry groups, you do not need to keep OSHA injury and illness records

https://www.ecfr.gov/current/title-29/part-1904/section-1904.1#p-1904.1(a) https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.2 https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904SubpartBAppA

Partially Exempt Healthcare related Industries

Some examples of partially exempt healthcare related industries

- 1. Offices of Physicians (NAICS 6211)
- DENTIST

 CONTROL OF THE PROPERTY OF THE PROPER



- 2. Offices of Dentists (NAICS 6212)
- 3. Offices of Other Health Practitioners (NAICS 6213)
- 4. Outpatient Care Centers (NAICS 6214)
- 5. Medical and Diagnostic Laboratories (NAICS 6215)



https://www.osha.gov/recordkeeping/presentations/exempttable

Covered Healthcare Industries That Must Record Injuries and Illnesses

- 1. General Medical & Surgical Hospitals (NAICS 622100)
- 2. Psychiatric and Substance Abuse Hospitals (NAICS 622200)
- 3. Specialty (except Psychiatric and Abuse) Hospitals (NAICS 622310)
- 4. Nursing Care Facilities (Skilled Nursing Facilities) (NAICS 623000)
- 5. Home Health Care Services (NAICS 621600)





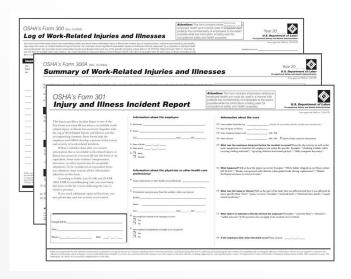




https://www.osha.gov/recordkeeping/presentations/covered

Subpart C – Recordkeeping Forms and Recording Criteria 1904.4 - 1904.29

- 1904.4 Recording Criteria
- 1904.5 Determination of work-relatedness
- 1904.6 Determination of new cases
- 1904.7 General recording criteria
- 1904.8 Recording criteria for needlestick and sharps injuries
- 1904.9 Recording criteria for cases involving medical removal under OSHA standards
- 1904.10 Recording criteria for cases involving occupational hearing loss
- 1904.11 Recording criteria for work-related tuberculosis cases
- 1904.29 Forms



Recording Criteria

1904.4

Basic requirement

Each employer required by this part to keep records of fatalities, injuries, and illnesses must record each fatality, injury and illness that:

- 1. Is work-related; and
- 2. Is a **new case**; and
- 3. Meets one or more of the <u>criteria</u> contained in section 1904.7 or the application to specific cases in 1904.8 through 1904.12.

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904/subpart-C/section-1904.4

Recording Criteria - (continued)

1. Work-related

"event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness."

Recording Criteria – (continued)

2. New case

A new work related injury or illness

or

 A work related injury or illness to the same part of the body as a prior injury or illness. But the employee has recovered completely of signs and symptoms from that prior work related injury or illness

Recording Criteria - (continued)

Must record all <u>new cases</u> of <u>work related</u> fatalities, injuries, and illnesses that meet one or more of the <u>criteria</u> contained in sections 1904.7 through 1904.11.

General Recording Criteria

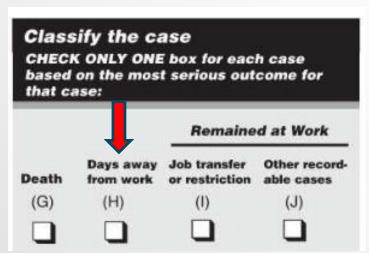
- 1. Death
- 2. Days away from work
- 3. Restricted work or job transfer
- 4. Medical treatment beyond first aid
- 5. Loss of consciousness
- 6. Other significant injuries or illnesses

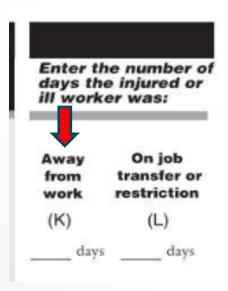
https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904/subpart-C/section-1904.7

Days Away Cases 1904.7(b)(3)

Record case if it involves one or more calendar days away from work (excluding day of injury or illness)

Check the box for days away cases and count the number of calendar days

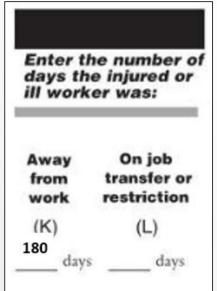


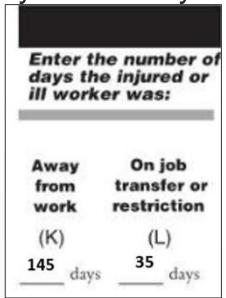


Days Away Cases

1904.7(b)(3) (continued)

Cap day count at 180 days away and/or days restricted



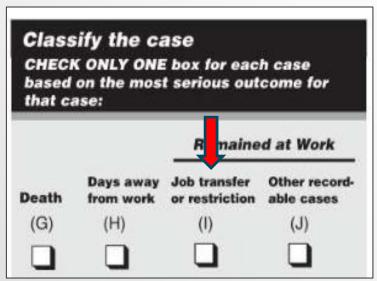


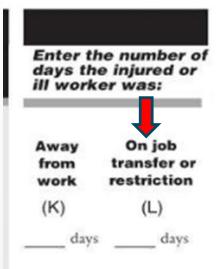
May stop day count if employee leaves company for a reason unrelated to the injury or illness

Job Transfer or Restricted Work Cases 1904.7(b)(4)

Record case involves one or more calendar days of restricted work or job transfer (excluding day of injury or illness)

Check the box for restricted/transfer cases and count the number of days of restricted work





Restricted Work Case - Definitions

1904.7(b)(4) (continued)

Restricted work means the employee is:

- Unable to work the full workday he or she would otherwise have been scheduled to work; or
- Unable to perform one or more <u>routine job functions</u>

Routine Job Functions: those activities the employee regularly performs at least once per week



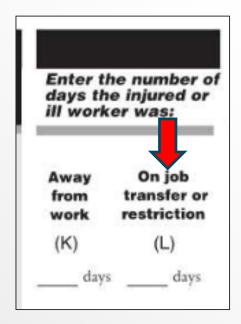


Job Transfer

1904.7(b)(4)

Definition of Job Transfer

An injured or ill employee is assigned to a job other than his or her regular job for all or part of the day



Medical Treatment

1904.7(b)(5)(i)

Definition of Medical Treatment

"The management and care of a patient to combat disease or disorder."



Medical Treatment

1904.7(b)(5)(i)(A) & (B)

Medical Treatment DOES NOT include:

Visits to a Medical Provider solely for observation or counseling

Diagnostic procedures



What is "First Aid" 1904.7(b)(5)(ii)



- Using nonprescription medication at nonprescription strength
- Tetanus immunizations
- Cleaning, flushing, or soaking surface wounds
- Wound coverings, butterfly bandages, Steri-Strips
- Hot or cold therapy
- Non-rigid means of support
- Temporary immobilization device used to transport accident victims



First Aid (continued) 1904.7(b)(5)



- Drilling of fingernail or toenail, draining fluid from blister
- Eye patches
- Removing foreign bodies from eye using irrigation or cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Finger guards
- Massages
- Drinking fluids for relief of heat stress



Loss of Consciousness

1904.7(b)(6)

All work-related cases involving loss of consciousness must be recorded



Significant Diagnosed Injury or Illness 1904.7(b)(7)

Always record the following work related conditions: (even if no treatment rendered)

- Cancer
- Chronic irreversible disease
- Punctured eardrum
- Fractured or cracked bone or tooth

Recording Criteria for Needlesticks and sharps injuries - 1904.8

All work-related "contaminated sharps" i.e. needlesticks and cuts from sharp objects that are contaminated with another person's blood or OPIM must be recorded on the OSHA 300 Log







OPIM = Other Potentially Infectious Material

Non-Sharps Recording Criteria - 1904.8(b)(4)

Only record work-related splashes or "**non-sharp**" related exposures to blood or OPIM if it results in a diagnosis of a bloodborne disease or meets the general recording criteria





Medical Removal

 Work Exposures in which an employee is medically removed under the medical surveillance requirements of an OSHA standard, must be recorded on the OSHA 300 Log.

Examples: Lead, cadmium, methylene chloride, formaldehyde, benzene etc.



Hearing Loss

1904.10

Must record all work-related hearing loss cases:

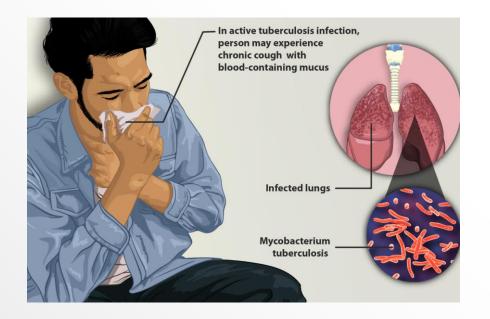
If an employee's hearing test (audiogram) reveals that the employee has experienced a work-related Standard Threshold Shift (STS) in hearing in one or both ears, and the employee's total hearing level is 25 decibels (dB) or more above audiometric zero (averaged at 2000, 3000, and 4000 Hz) in the same ear(s) as the STS.

See OSHA Standard Number 1904.10 for complete details

Tuberculosis

1904.11

Work related exposures to someone with a known case of active TB that develops into a TB infection must be recorded on the OSHA Log.

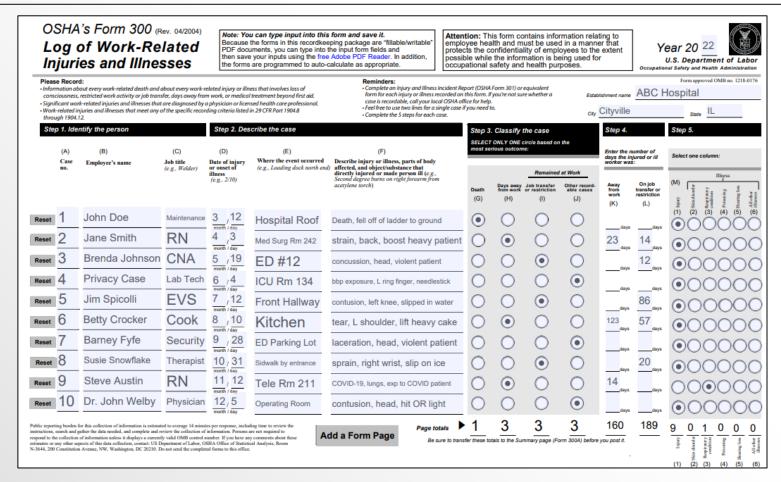


OSHA Recordkeeping Forms - 1904.29

	orm 300 (Pec 01/2004) Work-Related Injuries a	protects the confident	10 Realth purposes. Occupational Safety as	ertment of Labor Wealth Administration
eys awey from work, or are professional: Your se two lines for a sing arm. If you (A)	utter about nevery work-indeed related and about every verdin-indeed the tays of selection medical indeed recognition that all to raise and an accord segrificant eviden-indeed in medical indeed recognition that and according recognition evidentials in the case of procuremed to. You must consider on higher and direct incodered frequent (c) SSHA'S Form 300A (their, 0.1/2004) SUMMARY OF WORK-Rei	d injuries and Whesees that are diagnosed by a physician or licensed health recording critinia listed in 29 CFR Part 1904.8 through 1904.12. Field fee to	(dalatomer.nme	Year 20 U.s. Department of Labor qualitation before year the second of the control of the contro
Af to	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 confideration of employees to the extent possible while the information is being used for cocupational safely and health pumposes.	U.S. Department of Lai Occupational Safety and Health Administra
To de vege de la constante de	This Injury and Illians Insident Report is one of the first forms you must fill out when a recordable work-related injury or illines has occurred. Ingefore with the leg of Illines Inside coursed. Ingefore with the leg of Illines Illians occurred. Ingefore such the comployer and OSHA develop a jointure of the extent and severity of work-related incidents. Within 7 calendar davs after you receive information that a recordable work-related injury or illiness has occurred, you must fill out this forms or an equivalent. Some state workers' compensation, immarance, or other reports may be acceptable submittees. To be considered an equivalent form, any submittee must contain all the information asked for on this form. According to Public Law 91-596 and 29 CFR. 1994, CSHA's recordskepping rule, you must keep this form on the first years following the year to which it pertains. If you need additional copies of this form, you may photocopy and time as many as you need.	Information about the employee 11. Full name	10 based hipery or illnes 31 Time employee began work 33 Time of event 44 UP 14 What was the amployee doing but before the fact node, equipment, or material the employee was usin carrying reaffing materials? "Spraysing chinine from the complex of the control of the contro	In Check if time cannot be determined these accurates Planck the the strikey, as will as a fine a comment Planck the the strikey, as will as the strikey as will be a hand aprayer," "daily computer key-entry." hand aprayer," "daily computer key-entry." unapple: "When ladder alipped on wet floor, work on gasket hooke during replacement," "Worker as when the body that was affected and how it was affected to the out was affected to the out was affected to the out was affected and how it was affected and how it was affected to the output of the ou
P Pri co co w	Completed by	State State EEF	17) What object or substance directly harmed the owner of relating the sense of th	invident, leave it blank.

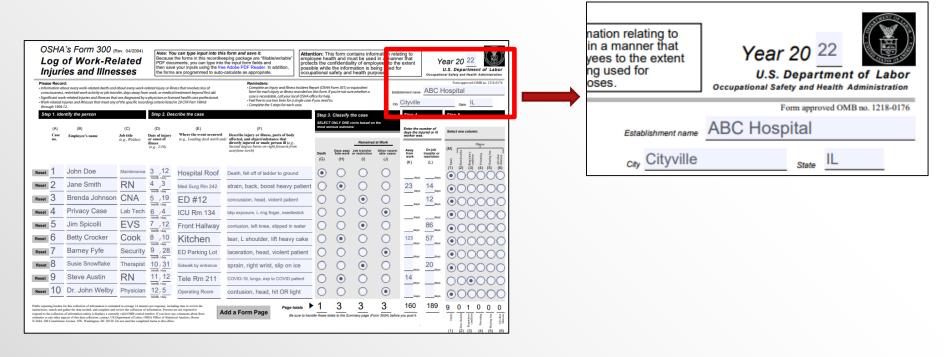
https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904/subpart-C/section-1904.29

OSHA Form 300 Log of Work-Related Injuries and Illnesses



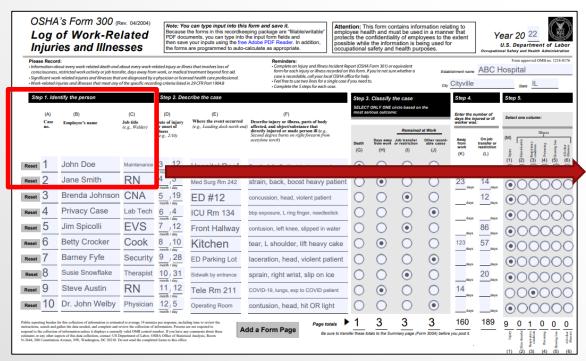
OSHA 300 Log - Establishment Name

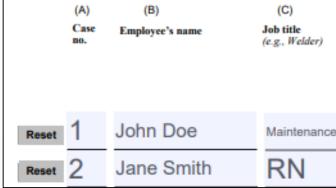
Establishment: "a single physical location where business is conducted or where services or industrial operations are performed"



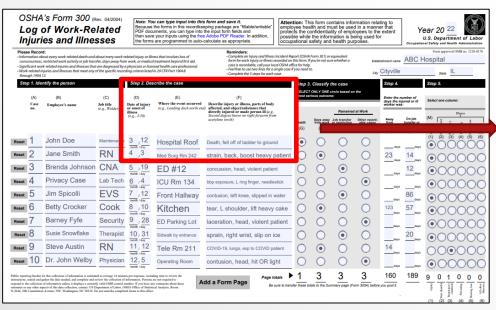
https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.46

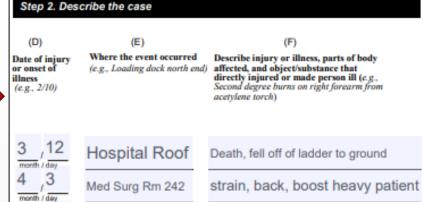
OSHA 300 Log - Step One: Identify the person



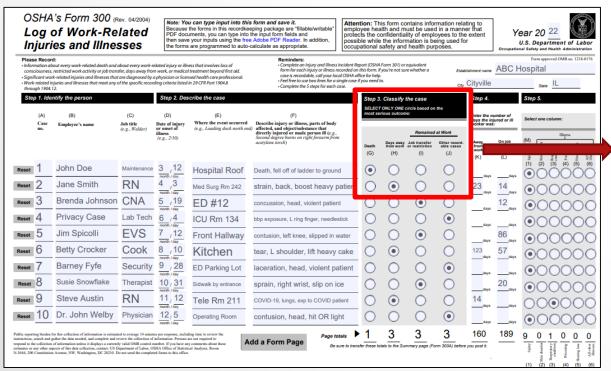


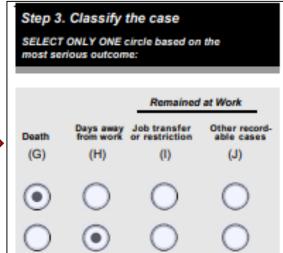
OSHA 300 Log: Step 2: Describe the case





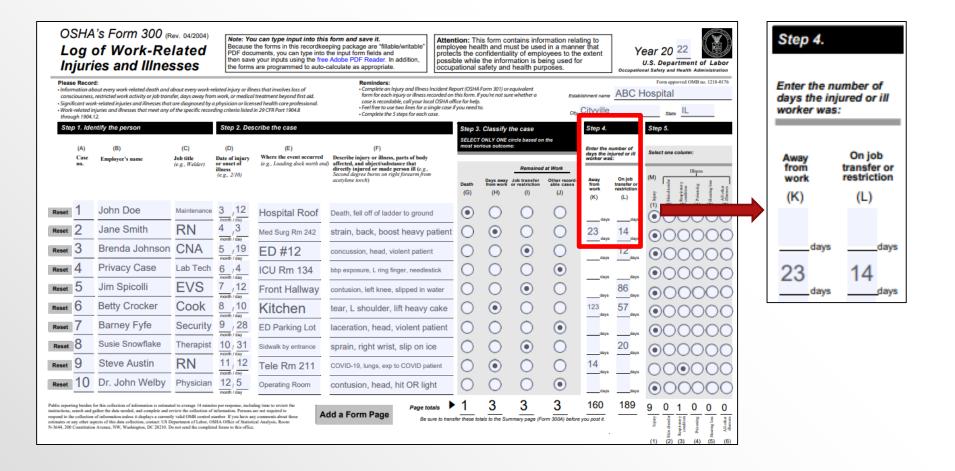
OSHA 300 Log: Step3: Classify the case



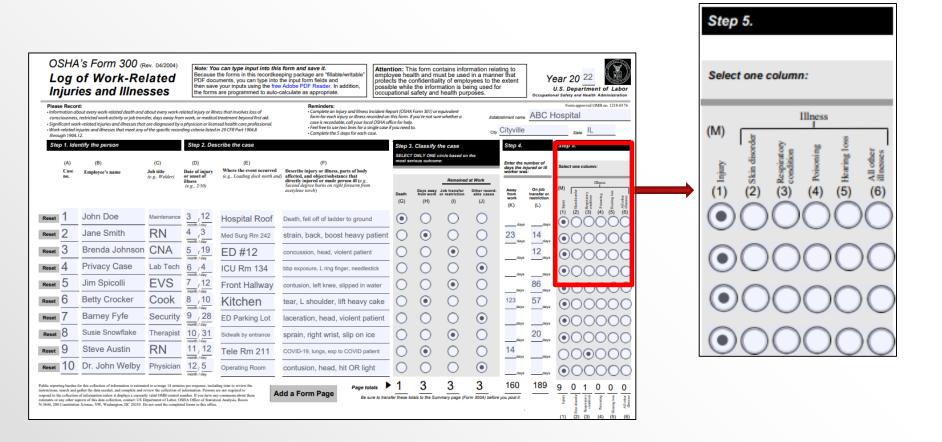


OSHA 300 Log - Step 4:

Counting days away & job transfer or restriction



OSHA 300 Log - Step 5: Select Injury or Illness

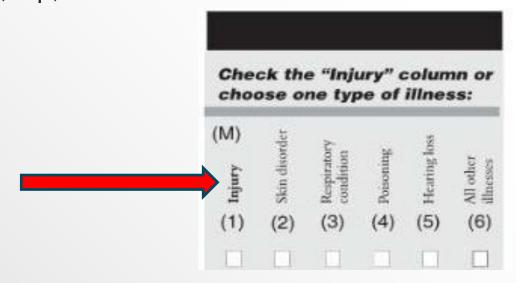


Classifying the Injury and Type of Illness

Column (M) - OSHA 300 Log

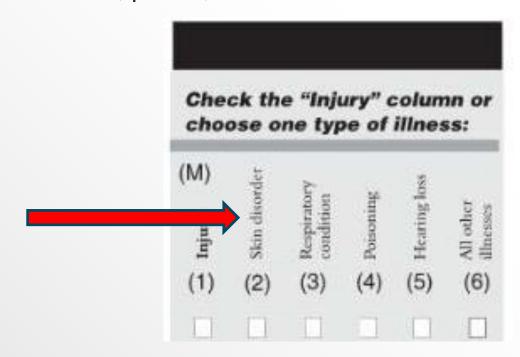
Definition of "Injury"

Any wound or damage to the body resulting from an event in the work environment. Cut, puncture, laceration, abrasion, fracture, bruise, amputation, insect bite, electrocution, or a thermal, chemical, electrical, or radiation burn. Sprain and strain injuries to muscles, joints, and connective tissues are classified as injuries when they result from a slip, trip, fall or other similar accidents.



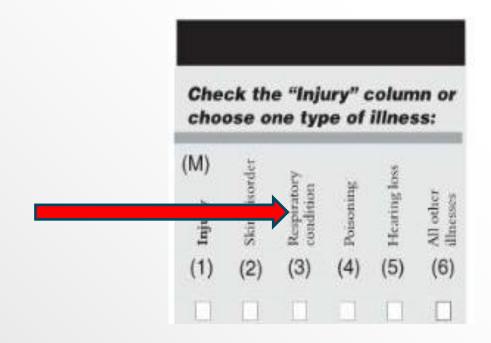
Skin disorders

illnesses involving the worker's skin that are caused by work exposure to chemicals, plants, or other substances.



Respiratory condition

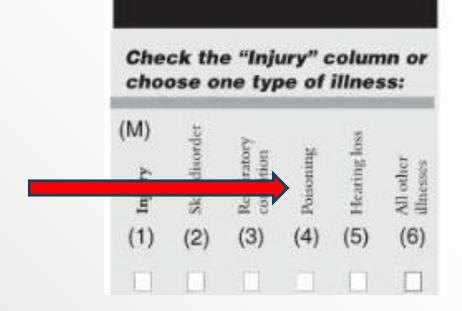
illnesses associated with breathing hazardous biological agents, chemicals, dust, gases, vapors, or fumes at work.



Poisoning

includes disorders evidenced by abnormal concentrations of toxic substances in blood, other tissues, other bodily fluids, or the breath that are caused by the ingestion or absorption of toxic substances

into the body.

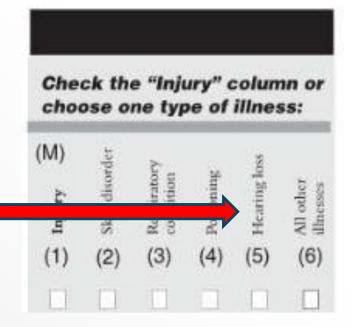




Hearing Loss

is defined for recordkeeping purposes as a change in hearing threshold relative to the baseline audiogram of an average of 10dB or more in either ear at 2000, 3000, and 4000 hertz,

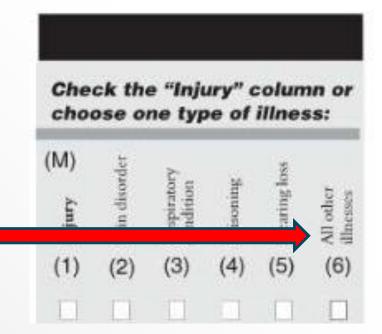
and the employee's total hearing level is 25 decibels (dB) or more above audiometric zero (also averaged at 2000, 3000, and 4000 hertz) in the same ear(s).



All other illnesses

include heatstroke, sunstroke, heat exhaustion, heat stress and other effects of environmental heat; effects of ionizing radiation (isotopes, x-rays, radium); effects of nonionizing radiation (welding flash, ultra-violet rays, lasers); anthrax;

blood borne pathogenic diseases, such as AIDS, HIV, Hepatitis B or Hepatitis C; brucellosis; malignant or benign tumors; histoplasmosis; coccidioidomycosis.



OSHA Form 301 "Injury and Illness Incident Report"

OSHA's Form 301 (Rev. 04/2004)

Injury and Illness Incident Report

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the free Adobe PDF Reader. In addition, the forms are programmed to auto-calculate as appropriate.

Information about the employee

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. 1218-0176

This Injury and Illness Incident Report is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the Log of Work-Related Injuries and Illnesses and the accompanying Summary, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains.

If you need additional copies of this form, you may photocopy the printout or insert additional form pages in the PDF, and then use as many as you need.

Completed by	
Title	
Phone	Date
	Month Day Year

Street								
City					State	ZII		
Date	of birth							
Date l	hired	Month	Day	Year				
		Month	Day	Year				
QM:	ıle OF	emale						
Name	of phys		other hea	alth care	professiona	ı		
	of phys	ician or o			professiona		given?	
If trea	of phys	ician or o					given?	
If trea	of phys	ician or o					given?	
If trea	of phys	ician or o					given?	
If trea	atment v	ician or o	away fr	om the v	worksite, wh			

Information about the	case		Tom approved out Disc. 1210-0170
(0) Case number from the Log_		(Transfer the case number	from the Log after you record the case
1) Date of injury or illness			
	Month Day Year		
2) Time employee began work (H	H:MM)	O AM OPM	
3) Time of event (HH:MM)	OA:	M OPM OCheck it	f time cannot be determined
* Re fields 14 to 17: Please d worker(s) involved in the incide	o not include any perso nt (e.g., no names, pho	nally identifiable information numbers, or Social S	ation (PII) pertaining to Security numbers).
(4)* What was the employee do tools, equipment, or material t carrying roofing materials": "	the employee was using. I	Be specific. Examples: "cl	imbing a ladder while
carrying rooming materials ,	spraying emornic from its	and sprayer , dainy comp	anci acy cincy.
15)* What Happened? Tell us he 20 feet"; "Worker was spraye			
soreness in wrist over time."	d with emornic when gasi	ket broke during replacen	ient , worker developed
L6)* What was the injury or illne	0 T-II d	- b - d - d - t 00 - t - d -	- I been been a Control
Examples: "strained back"; "c			ind now it was affected.
17)* What object or substance of			rete floor"; "chlorine";
"radial arm saw." If this quest	ion does not apply to the	incident, leave it blank.	
to. Make employee died when	did dooth occurs. D		
If the employee died, when	ala aeath occur? Di	ate of death Month	Day Year
		Month	
		1	

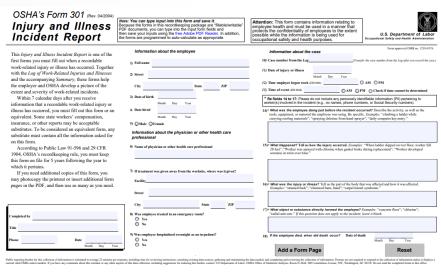
Public reporting burden for this collection of information is estimated to average 22 minutes per respon and completing and reviewing the collection of information. Persons are not required to respond to the collection of information unless it displays a current valid OMB control number. If you have any comments about this estimate or any other aspects Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

OSHA 301 Form (alternative form options) 1904.29(b)(4) continued

Forms that have all of the same information that is on the OSHA 301 Form may be used

Example: work accident or incident reports





https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.29(b)(4)

OSHA 300 Log & 301 Form (electronic records) 1904.29(b)(5) continued

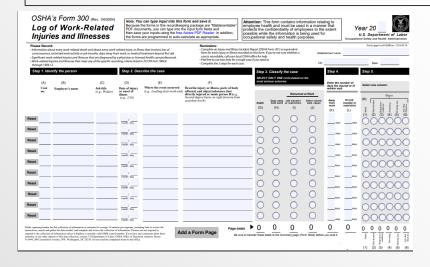
- Computer records are permitted
- if they can be produced when needed

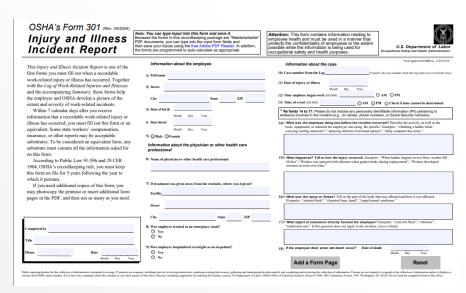


https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.29(b)(5)

How quickly must each Injury or illness be recorded?

Record case in OSHA 300 log and complete OSHA 301 form within 7 calendar days of receiving information.





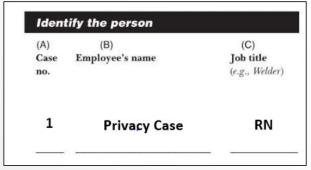
https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.29(b)(3)

OSHA Log - Privacy Concern Cases

1904.29(b)(6)

Do not enter the name of an employee on the OSHA 300 Log for "privacy concern cases"

Enter "privacy case" in the name column



Keep a separate confidential list of the case numbers and employee names

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.29(b)(6)

Privacy Case Determination

1904.29(b)(7)

Privacy concern cases are:

- Injuries or illnesses to an intimate body part or reproductive system
- Injury or illness from a sexual assault
- Mental illness
- HIV infection, hepatitis, tuberculosis
- Needlestick or sharps injuries contaminated with another person's blood or OPIM
- Employee requests to keep their name off

Sharps Injury Log

1910.1030(h)(5)

Establis	hment/Facility N	ame: <u>ABC Hospital</u>			
Samp	ample Sharps Injury Log		Year 2022		
Date	Case/ Report No.	Type of Device (e.g., syringe, suture needle)	Brand Name of Device		Brief description of how the incident occurred [i.e., procedure being done, action being performed (disposal, injection, etc.), body part injured]
6/4/2022	4	butterfly needle	XYZ Company	ICU Rm 134	Drawing blood on patient when patient moved causing contaminated needle to come in contact with left middle finger.
					_

29 CFR 1910.1030, OSHA's Bloodborne Pathogens Standard, in paragraph (h)(5), requires an employer to establish and maintain a Sharps Injury Log for recording all percutaneous injuries in a facility occurring from contaminated sharps. The purpose of the Log is to aid in the evaluation of devices being used in healthcare and other facilities and to identify problem devices or procedures requiring additional attention or review. This log must be kept in addition to the injury and illness log required by 29 CFR 1904. The Sharps Injury Log should include all sharps injuries occurring in a calendar year. The log must be retained for five years following the end of the year to which it relates. The Log must be kept in a manner that preserves the confidentiality of the affected employee.

Sharps Injury Log – (continued) 1910.1030(h)(5)

Sharps Injury Log Requirements

- The employer shall establish and maintain a sharps injury log recording of percutaneous injuries from contaminated sharps
- Information in sharps injury log shall be recorded in such manner as to protect the confidentiality of the injured employee

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-Z/section-1910.1030#p-1910.1030(h)(5)

Sharps Injury Log – (continued) 29 CFR 1910.1030(h)(5)

Minimum information required on sharps injury log

- (A) The type and brand of device involved in the incident,
- (B) The department or work area where the exposure incident occurred, and
- (C) An explanation of how the incident occurred.

		Sample Sharps Injury Log Year 2						
Date	Case/ Report No.	Type of Device (e.g., syringe, suture needle)	Brand Name of Device	Work Area where injury occurred [e.g., Geriatrics, Lab]	Brief description of how the incident occurred [i.e., procedure being done, action being performed (disposal, injection, etc. body part injured]			

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1910/subpart-Z/section-1910.1030#p-1910.1030(h)(5)

Subpart D – Other OSHA Injury and Illness Recordkeeping Requirements

- 1904.30 Multiple business establishments
- 1904.31 Covered employees
- 1904.32 Annual summary
- 1904.33 Retention and updating
- 1904.35 Employee involvement
- 1904.36 Prohibition against discrimination

Multiple Business Establishments

1904.30 & 1904.46

Employers must keep OSHA Recordkeeping Records for each covered "Establishment":

"An establishment is a single physical location where business is conducted or where services or industrial operations are performed. For activities where employees do not work at a single physical location, such as construction; transportation; communications, electric, gas and sanitary services; and similar operations, the establishment is represented by main or branch offices, terminals, stations, etc. that either supervise such activities or are the base from which personnel carry out these activities."

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.30(a) https://www.ecfr.gov/current/title-29/part-1904#p-1904.46(Establishment)

Multiple Business Establishments (continued) 1904.30

Example of health system with multiple establishments:

ABC Health System

Establishments:

- 1. ABC Hospital NAICS 622110
- 2. ABC Nursing Home NAICS 623110
- 3. ABC Laundry Service NAICS 812320
- 4. ABC Medical Group NAICS 621111

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.30(a)

Covered Employees

1904.31

Who is a "Covered Employee" that must recorded on the OSHA 300 Log?

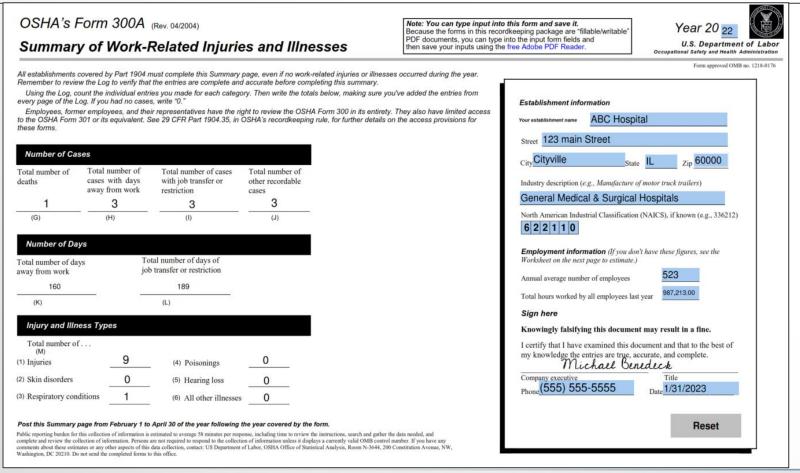
Covered Employees:

- All employees on your payroll
- Temporary employees you supervise on a day-to-day basis i.e. Agency RN, CNA, etc.
- Contractor employees you supervise on a day-to-day basis

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.31(a)

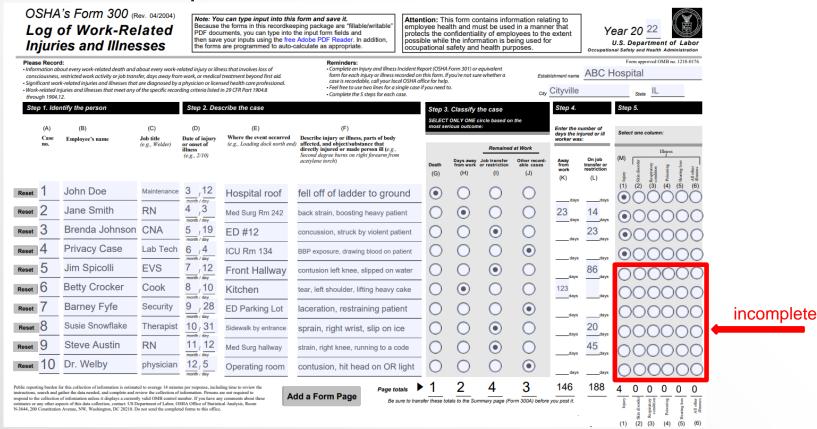
Annual Summary of Work-Related Injuries and Illnesses - OSHA Form 300A - 1904.32

At the end of each calendar year you must prepare and post form OSHA 300A.



Preparing the Annual Summary of Work-Related Injuries and Illnesses - OSHA 300A (continued)

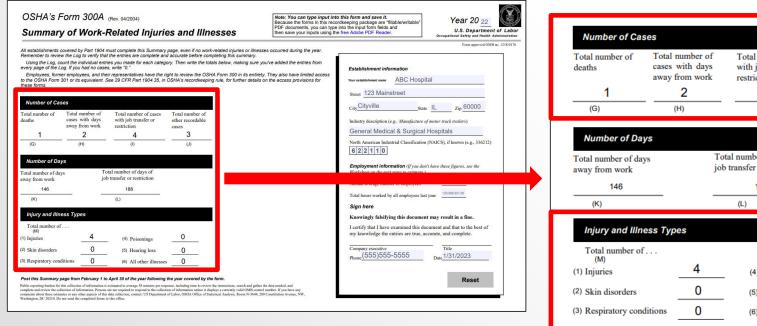
Review & Update OSHA 300 Log to verify that the entries are complete and accurate

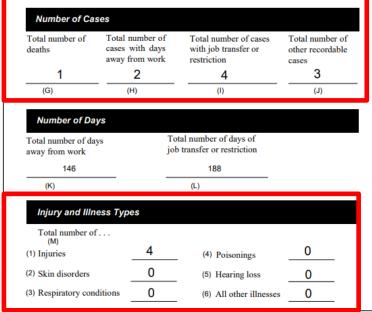


https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.32(a)(1)

Annual Summary of Work-Related Injuries and Illnesses - OSHA Form 300A (continued)

Create annual summary of injuries and illnesses using the OSHA 300A form and data from the OSHA 300 Log



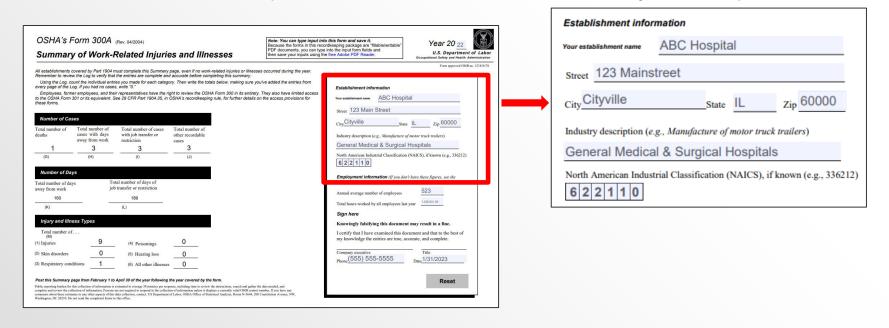


Do you notice any errors on this form?

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.32(a)(2)

Annual Summary of Work-Related Injuries and Illnesses - OSHA 300A (continued)

- Establishment Name
- **Industry Description**
- NAICS number (located on the BLS Survey Form)



Annual Summary of Work-Related Injuries and Illnesses - OSHA 300A (continued)

- Annual average number of employees
- Total hours worked by all employees



https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.32(b)(2)(ii)

Annual Average Number of employees calculation - OSHA 300A (continued)

How to figure the average number of employees who worked for your establishment during the year:

- **Add up** and then enter the number of employees your establishment paid **IN EACH PAY PERIOD** during the year. Be sure to include all employees: full-time, part-time, temporary, seasonal, salaried, and hourly.
- The total number of employees paid in all pay periods throughout the year =
- **Count** and then enter the number of pay periods your establishment had during the year. Be sure to include any pay periods when you had no employees. For example, enter 26 if you have biweekly pay periods or 52 if you have weekly pay periods.
- The number of pay periods during the year =

3 Divide the number of employees by the number of pay periods. (See auto-calc.)

 $\frac{0}{2} \frac{0}{0} = 30.00$

Round the answer to the next highest whole number (See auto-calc.). Write the rounded number in the blank on the Summary page marked *Annual average number of employees*.

The number rounded = $\mathbf{400}$

https://www.osha.gov/sites/default/files/OSHA-RK-Forms-Package.pdf

Annual Summary of Work-Related Injuries and Illnesses - OSHA 300A (continued)

Annual average number of employees calculation

Example:

H	Hospital A - cal	culating average number of employees
Pay Period	Number of EE's Paid	
Pay Period 1	345	
Pay Period 2	328	
Pay Period 3	316	
Pay Period 4	388	
Pay Period 5	344	
Pay Period 6	299	
Pay Period 7	326	
Pay Period 8	347	
Pay Period 9	333	
Pay Period 10	308	
Pay Period 11	311	
Pay Period 12	319	
Pay Period 13	325	
Pay Period 14	366	
Pay Period 15	351	
Pay Period 16	347	
Pay Period 17	336	
Pay Period 18	327	
Pay Period 19	316	
Pay Period 20	319	
Pay Period 21	328	Number of employees paid = 8,754
Pay Period 22	336	
Pay Period 23	346	Number of pay periods = 26
Pay Period 24	358	
Pay Period 25	367	8,754/26 = 336.69
Pay Period 26	368	336.69 round to 337
Total	8,754	337 is the annual average number of employees

https://www.osha.gov/sites/default/files/OSHA-RK-Forms-Package.pdf

Certifying the Annual Summary of Work-Related Injuries and Illnesses Form OSHA 300A

29 CFR 1904.32(b)(3) - A company executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.



https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.32(b)(3)

Who is considered a company executive? 29 CFR 1904.32(b)(4)

Company Executive who certifies the OSHA Form 300A:

Company Executive can be:

- An Officer of the hospital or health system i.e. CEO, Compliance Officer
- The highest ranking company official of the hospital or health system
- The highest ranking company official working at the establishment

Posting the Annual Summary (OSHA Form 300A) 1904.32

Where should it be posted?

"...in each establishment in a conspicuous place or places where notices to employees are customarily posted."



https://www.ecfr.gov/current/title-29/part-1904#p-1904.32(b)(5)

Mandatory Posting Period

OSHA 300A - 1904.32

When do I have to post the annual summary?

You must post the summary no later than February 1st of the year following the year covered by the records and keep the posting in place until April 30th.



https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.32(b)(6)

Retention & Updating

1904.33

5 Year Retention Requirement

You MUST save the OSHA 300 Log, the privacy case list (if one exists), the annual summary, and the OSHA 301 incident report forms for five (5) years following the end of the calendar year that these records cover.



Retention & Updating (continued) 1904.33

Which OSHA Recordkeeping documents must employers update during five-year retention period?

- OSHA 300 Log YES!
- OSHA 301 Incident Reports NO!
- Annual Summary of Injuries & Illnesses NO!

During storage period you <u>MUST UPDATE</u> your stored OSHA 300 Logs to include newly discovered recordable cases and to show any changes that have occurred in the classification of previously recorded cases.

https://www.ecfr.gov/current/title-29/section-1904.33

Subpart E - Reporting Information to the Government

1904.39 Fatality and catastrophe reporting

1904.40 Access for Government representatives

1904.41 OSHA Survey

1904.42 BLS Survey

Reporting fatalities, hospitalizations, amputations, and losses of an eye

Report a Fatality or Severe Injury

- All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.
- A fatality must be reported within 8 hours.
- An in-patient hospitalization, amputation, or eye loss must be reported within 24 hours.



Important Note: OSHA's definition of amputation includes fingertip amputations with or without bone loss. 29 CFR 1904.39(b)(11)

https://www.osha.gov/report#:~:text=To%20Make%20a%20Report&text=Call%20the%20OSHA%2024%2Dhour,321%2D6742%20(OSHA)

Reporting fatalities, hospitalizations, amputations, and losses of an eye

29 CFR 1904.39 - continued

How to make a Report to OSHA



To Make a Report

- Call the nearest OSHA office.
- Call the OSHA 24-hour hotline at 1-800-321-6742 (OSHA).
- Report online

Be prepared to supply: Business name; names of employees affected; location and time of the incident, brief description of the incident; contact person and phone number.

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.39(a)(3)

Fatalities, hospitalizations, amputations, and losses of an eye - 1904.39 - continued

Important OSHA Fatality & Serious Injury Reporting Condition Must Report Incident to OSHA only if:

<u>Fatality</u>

Must have occurred within (30) days of work related incident

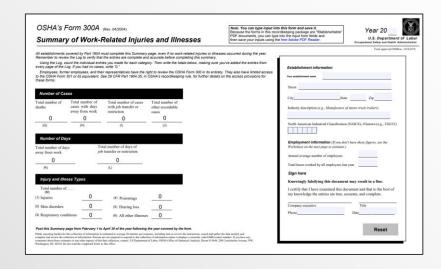
<u>In-patient hospitalization, amputation, or loss of an eye</u>

Must have occurred within (24) hours of the work related incident."

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.39(b)(6)

Electronic Submission of Injury and Illness Summary to OSHA - 1904.41

Submission of OSHA 300A Summary of Injury & Illness data must be made by March 2 of each year



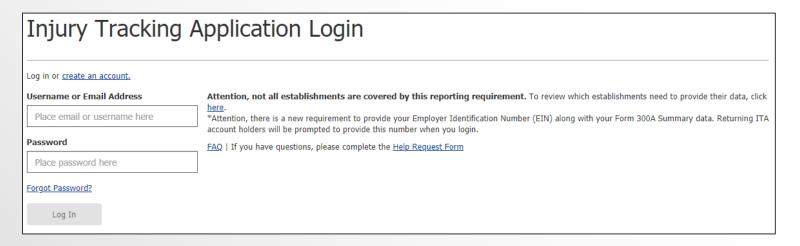


https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.41(a)

Electronic Submission of Injury and Illness Summary to OSHA - (continued)

Data submission process

OSHA provides a secure website where employers create an account, enter, and submit their data.



https://www.osha.gov/injuryreporting/ita/

Electronic Submission of Injury and Illness Summary to OSHA – (continued)

Which healthcare organizations must submit records?

- Establishments with 250 or more employees that are required to keep OSHA Injury & Illness Records
- Establishments with 20-249 employees that are classified in certain industries

Determine if your establishment is required to electronically submit OSHA Recordkeeping documents to OSHA:

ITA Coverage Application site - https://www.osha.gov/itareportapp

OSHA ITA - (Injury Tracking Application) **New Secure Website**

- The new website to submit 300A injury data to OSHA is (Login.gov)
- Current & new account holders must connect their ITA account to a Login.gov account using the same email address to access ITA
- Due date to submit Form 300A data to OSHA is still March 2nd, 2024

https://www.osha.gov/injuryreporting/ita/

OSHA Revised Recordkeeping Rule for 2024

On March 30, 2022 OSHA published its intent to amend the recordkeeping regulation to require certain employers to electronically submit injury and illness information to OSHA that employers are already required to keep under the recordkeeping regulation.

On July 21, 2023 published the final rule that will go into effect on January 1, 2024.

https://www.federalregister.gov/documents/2022/03/30/2022-06546/improve-tracking-of-workplace-injuries-and-illnesses https://www.federalregister.gov/documents/2023/07/21/2023-15091/improve-tracking-of-workplace-injuries-and-illnesses

Requirements of the new rule

OSHA will require certain employers to submit the following information annually:

- OSHA Form 300 Log of Work-Related Injuries and Illnesses
- 2. OSHA Form 301 Injury and Illness Incident Report Data

The following are the employers who will be required to submit their previous calendar year data to OSHA annually:

 Establishments with a peak employment of 100 or more employees in designated high-hazard industries listed in (<u>Appendix B to Subpart E of 29 CFR Part 1904</u>)

Appendix B to Subpart E to Part 1904 - [Effective 1/1/2024]Designated Industries for § 1904.41(a)(2) Annual Electronic Submission of Information From OSHA Form 300 Log of Work-Related Injuries and Illnesses and OSHA Form 301 Injury and Illness Incident Report by Establishments With 100 or More Employees in Designated Industries, 29 C.F.R. § 1904 app B to Subpart E to Part 1904 | Casetext Search + Citator

Establishments with 100 or more employees in the highest hazard industries must:

- Electronically submit to OSHA detailed information about each recordable injury and illness entered on their previous calendar year's OSHA Form 300 Log and Form 301 Incident Report
- Continue to electronically submit Form 300A Annual Summary once a year to OSHA

OSHA intends to post the data from the proposed annual electronic submission requirement on a public website after identifying and removing information that reasonably identifies individuals directly, such as individuals' names and contact information.

Privacy of Injured Worker Information

In order to protect the privacy of injured workers, OSHA <u>will not</u> collect the following information from the OSHA Forms 300 and 301:

- 1. Employee Names
- 2. Healthcare Provider Names and Addresses
- 3. Other personal identifiers

OSHA will continue to require the following employers submit their OSHA 300A Summary of Work Related Injury and Illness data annually:

- All establishments with 250 or more employees that are required to keep records under OSHA's injury and illness standard
- 2. Establishments with 20 to 249 employees in certain industries

Healthcare Industries Included in new rule

OSHA is updating appendix A which designates the industries required to submit their Form 300A data. OSHA is adding appendix B that designates industries required to submit Form 300 and Form 301 data.

The following are healthcare related NAICS industry codes that are included in OSHA's appendix A and appendix B:

NAICS	Healthcare Industry
6219	Other Ambulatory Health Care Services
6221	General Medical and Surgical Hospitals
6222	Psychiatric and Substance Abuse Hospitals
6223	Specialty (except Psychiatric and Substance Abuse) Hospitals
6231	Nursing Care Facilities (Skilled Nursing Facilities)
6232	Residential Intellectual and Developmental Disability, Mental Health, and Substance Abuse Facilities
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly
6239	Other Residential Care Facilities

Submission deadline

The submission deadline will be March 2, 2024 which is the same date that the OSHA 300A has been due each year.

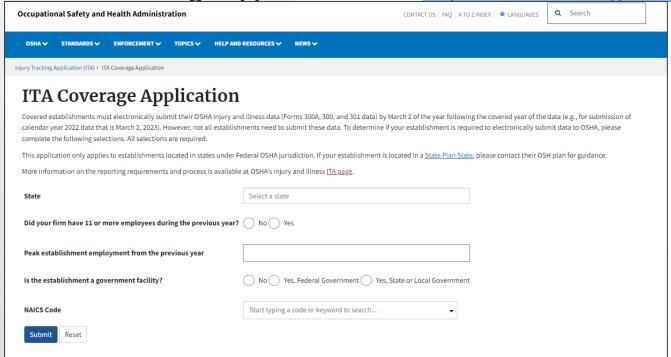
The method of submitting the data will continue to be the OSHA ITA.

OSHA will begin accepting 2023 injury and illness data on January 2, 2024.

ITA Coverage Application Site

Determine if your establishment is required to electronically submit Form 300A data to OSHA:

ITA Coverage Application site - https://www.osha.gov/itareportapp



Electronic Submission of Injury and Illness Summary to OSHA - (continued)

Examples #1 using the ITA Coverage Application Site:

ITA Coverage Application Covered establishments must electronically submit their OSHA injury and illness data (Forms 300A, 300, and 301 data) by March 2 of the year following the covered year of the data (e.g., for submission of calendar year 2022 data that is March 2, 2023). However, not all establishments need to submit these data. To determine if your establishment is required to electronically submit data to OSHA, please complete the following selections. All selections are required. This application only applies to establishments located in states under Federal OSHA jurisdiction. If your establishment is located in a State Plan State, please contact their OSH plan for guidance. More information on the reporting requirements and process is available at OSHA's injury and illness ITA page. State Illinois Did your firm have 11 or more employees during the previous year? No Peak establishment employment from the previous year 20 Yes, Federal Government Yes, State or Local Government Is the establishment a government facility? **NAICS Code** 622110: General Medical and Surgical Hospitals Submit Reset ITA Coverage Application • Reporting is required for this establishment. Based on your entries, you are required to report your Form 300A summary data to OSHA through the Injury Tracking Application. You are NOT required to report Forms 300 and 301 data State = Illinois Firm has 11 or more employees = Yes Peak establishment employment = 20 • Government = Non-government • NAICS code = 622110: General Medical and Surgical Hospitals

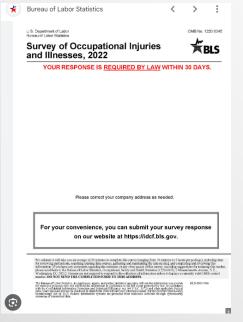
Electronic Submission of Injury and Illness Summary to OSHA - (continued)

Example #2 using the ITA Coverage Application Site:

Example 112 doing the 1111 doverage Application of						
ITA Coverage Application						
	d illness data (Forms 300A, 300, and 301 data) by March 2 of the year following the covered year of the data (e.g., for submission of ments need to submit these data. To determine if your establishment is required to electronically submit data to OSHA, please					
This application only applies to establishments located in states under F	ederal OSHA jurisdiction. If your establishment is located in a <u>State Plan State</u> , please contact their OSH plan for guidance.					
More information on the reporting requirements and process is available	e at OSHA's injury and illness <u>ITA page</u> .					
State	Illinois					
Did your firm have 11 or more employees during the previous year?	○ No ● Yes					
Peak establishment employment from the previous year	100					
Is the establishment a government facility?	No Yes, Federal Government Yes, State or Local Government					
NAICS Code	622110: General Medical and Surgical Hospitals					
Submit Reset						
ITA Coverage Applicati	on					
 Based on your entries, you are required to report your OSHA State = Illinois Firm has 11 or more employees = Yes Peak establishment employment = 100 Government = Non-government 	Forms 300, 301 and 300A data to OSHA through the <u>Injury Tracking Application</u> .					
NAICS code = 622110: General Medical and Surgical Hosp	itals					

BLS Survey of Occupational Injuries and Illnesses - 1904.42

Basic requirement. If you receive a Survey of Occupational Injuries and Illnesses Form from the Bureau of Labor Statistics (BLS), or a BLS designee, you must promptly complete the form and return it following the instructions contained on the survey form.





https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.42(a)

BLS Survey of Occupational Injuries and Illnesses - 1904.42

- Step 1: Complete survey only for establishment(s) noted on the front cover of survey ex. ABC Hospital
- Step 2: Check "Your Company Name" printed on the front cover and make any necessary corrections.
- Step 3: Have OSHA Forms 300, 301, & 300A ready to use when completing online survey

https://www.ecfr.gov/current/title-29/subtitle-B/chapter-XVII/part-1904#p-1904.42(a)

COVID-19 Cases OSHA Recordkeeping Directives

Criteria to Record COVID-19 Cases on OSHA 300 Log

- Confirmed case of COVID-19 as defined by the CDC
- Case is work related as defined by 29 CFR § 1904.5
- Case involves one or more general recording criteria set

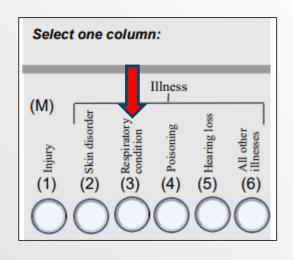
for in 29 CFR § 1904.7

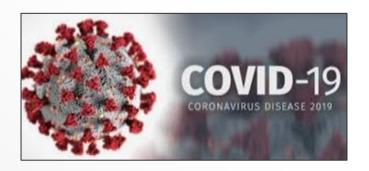


https://www.osha.gov/laws-regs/standardinterpretations/2020-05-19

COVID-19 Type of Injury or Illness

"COVID-19 is a respiratory illness and should be coded as such on the OSHA Form 300."





https://www.osha.gov/memos/2020-04-10/enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19

COVID-19 Cases OSHA Reporting Directives

OSHA's COVID-19 Emergency Temporary Standard (ETS) has ended.

Employers are required to follow the reporting requirements in 29 CFR 1904.39(b)(6) in regards to work related COVID-19 fatalities and in-patient hospitalizations.

- Fatality (report within 8hrs of notice)
- Inpatient Hospitalizations (report within 24hrs of notice)



https://www.osha.gov/coronavirus/faqs#reporting

COVID-19 Log - 1910.502

COVID-19 Log

The OSHA COVID-19 Healthcare Emergency Temporary Standard (ETS) requires employers to keep a COVID-19 Log if they have more than 10 employees on June 21, 2021 (the effective date of the ETS) (See 29 CFR 1910.502(q)). Employers are required to record on the COVID-19 Log each instance of an employee being confirmed COVID-19 positive (i.e., case that tested positive or was diagnosed by a licensed healthcare provider), whether it was contracted at work or elsewhere.

(Employers may use this form or any other form containing similar information)

Name of Business/Employer:		
Address:		
Name and Contact information	of Employer's Contact Person:	

Employee Name and Occupation (Job Title)	Employee Contact Information (Address, Phone Number, or email address)	Employee Work Location (Address, Department, Floors, or Room Numbers)	Most Recent Day the Employee Was Present in the Workplace (Date)	Date of COVID-19 Diagnosis or Positive Test for COVID-19	Date of Onset of Symptoms (If Applicable)	Brief Description or Additional Information

https://www.osha.gov/sites/default/files/publications/OSHA4130.pdf https://www.ecfr.gov/current/title-29/part-1910/subpart-U#p-1910.502(q)(2)(ii)

COVID-19 Log (continued)

- Employers who were covered under the COVID-19 ETS still must establish and maintain a COVID-19 Log
- The log must record each instance identified by the employer in which an employee is COVID-19 positive regardless of whether it is from an exposure at work

https://www.osha.gov/sites/default/files/publications/OSHA4130.pdf

Important Updates with OSHA Recordkeeping

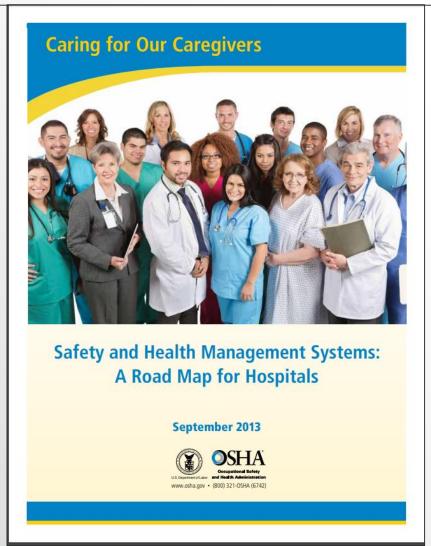
April 5, 2022 OSHA Trade Release Memo

"OSHA initiates enforcement program to identify employers failing to submit injury, illness data"

- OSHA Injury Tracking Application (ITA) enhanced enforcement procedure
- Citations for failure to submit OSHA Form 300A Data
- OSHA has posted ITA data to the public

https://www.osha.gov/news/newsreleases/trade/04052022

OSHA Recordkeeping & Hospital Safety and Health Management Systems

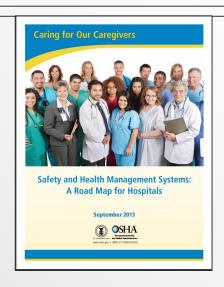


SIX MAJOR ELEMENTS OF AN EFFECTIVE INJURY & ILLNESS PREVENTION PROGRAM

- Management Leadership
- Worker Participation
- Hazard Identification and Assessment
- Hazard Prevention and Control
- Education and Training
- Program Evaluation and Improvement

IA FACT SHEET – INJURY & ILLNESS PREVENTION PROGRAMS http://www.mssc.org/wp-content/uploads/2013/06/OSHA3665.pdf

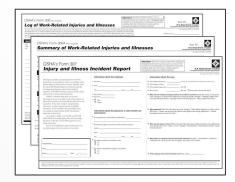
Hazard Identification and Assessment



SHMS Roadmap Table 2-1

Hazard Identification and Assessment **Example of Information Source**

"Data and reports on injuries, illnesses(OSHA Forms 300, 300A and 301)".



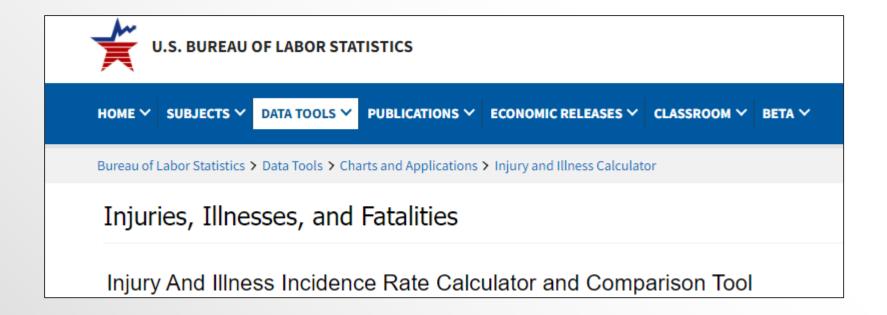
OSHA 300 Log Hazard Identification and Assessment

Provides the opportunity to identify:

- 1. Hazards identified that caused the incidents
- 2. Occupations with the most incidents
- 3. Work area or Departments with the most incidents
- Incidents and hazards resulting in the most severe outcomes

BLS Incident Rate Calculator & Comparison Tool

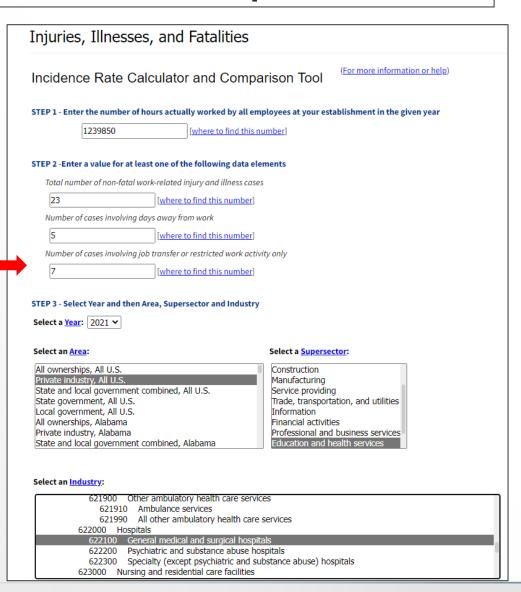
The information collected by the BLS is available to review for benchmarking purposes.



https://data.bls.gov/iirc/

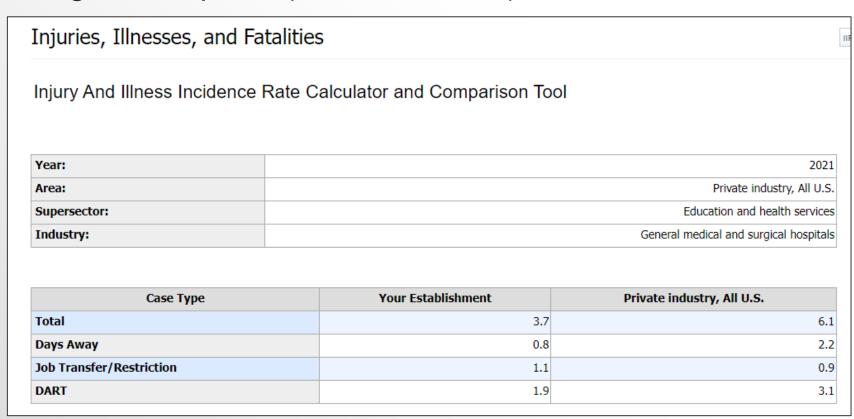
BLS Incident Rate Calculator & Comparison Tool

Example using Incident Rate Calculator & Comparison Tool



BLS Incident Rate Calculator & Comparison Tool

Sample result using the BLS Injury and Illness Rate Calculator and Comparison Tool for General Medical and Surgical Hospitals (NAICS 622100).



Incident Rate Definitions

Incidence Rate of Injuries and Illnesses

Total recordable injury & illness cases/Employee Hours x 200,000 work hours

Days Away Rate

Cases involving days away from work/Employee Hours x 200,000 work hours

Job Transfer/Restriction Rate

Cases involving job transfer or restricted work activity only/Employee Hours x 200,000 work hours

Days Away/Restricted or Transfer Rate (DART)

Total cases involving days away from work, days of restricted work activity, and/or job transfer x 200,000 work hours



HOSPITAL BENCHMARKING EXAMPLE

NAICS 622100 - General Medical and Surgical Hospitals

	TOTAL INCIDENT RATE	
Year	General Medical and Surgical Hospitals	Hospital A
2018	5.6	5.5
2019	5.5	6.1
2020	7.7	8.1
2021	6.1	5.8
2022	6.1	6.3
	DAYS AWAY RATE	
Year	General Medical and Surgical Hospitals	Hospital A
2018	1.3	1.1
2019	1.3	1.2
2020	3.7	2.9
2021	2.2	2.4
2022	2.3	2.4
	JOB TRANSFER/RESTRICTION	
Year	General Medical and Surgical Hospitals	Hospital A
2018	0.9	0.9
2019	0.9	1.2
2020	0.9	0.7
2021	0.9	0.6
2022	0.8	0.9
	5.457.5475	
V	DART RATE	II.a. a. ital A
Year 2018	General Medical and Surgical Hospitals	Hospital A
	2.2	2.0
2019	2.2	2.4
2020	4.6	3.6
2021	3.1	3.0
2022	3.2	3.3

QUESTIONS?

Please email all questions to Mike Benedeck at mbenedeck@team-iha.org

For More Help

For any OSHA Recordkeeping assistance needed Contact the IRMS/ICT Loss Control Department.

Mike Benedeck – Senior Director of Loss Control mbenedeck@team-iha.org (630) 276-5646

Deidre Harris – Senior Loss Control Specialist dharris@team-iha.org (630) 276-5414



Your trusted voice and resource

team-iha.org