



OSHA Recordkeeping

Who is required to keep records?

Employers with more than 10 employees and whose locations are not classified as a partially exempt industry are required to keep OSHA records.

Effective Jan. 1, 2015, employers are not required to keep OSHA injury and illness records if their location is classified as a partially exempt industry based on their North American Industry Classification System (NAICS) code, unless they are asked in writing to do so by OSHA, the Bureau of Labor Statistics (BLS), or a state agency operating under the authority of OSHA or the BLS.

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What forms should I use?

- OSHA 300 – Log of Work-Related Injuries and Illnesses
- OSHA 300A – Summary of Work-Related Injuries and Illnesses
 - A company executive is required to certify the Summary by signing it.
 - Must be posted from Feb. 1 through April 30, in a visible location so that employees are aware of the injuries and illnesses occurring in their workplace.
- OSHA 301 – Injury and Illness Incident Report

Employers are required to keep a Log for each location or worksite. If you have more than one location, keep a separate Log and Summary for each physical location that is expected to be in operation for one year or longer.

What is recordable?

Any work-related injury or illness resulting in any of the following:

- Death
- Days away from work
- Restricted work or transfer to another job
- Loss of consciousness
- Medical treatment beyond first aid
- Diagnosis of a significant injury or illnesses by a physician or other licensed health care professional (even if it does not result in any of the above recordables)

What do employees need to know?

- How to report injuries and illnesses
- The circumstances under which injury and illness records can be accessed
- The location where the OSHA 300A Summary is posted each year
- A description and explanation of the OSHA forms used for OSHA recordkeeping
- A description of the requirements for record location, retention and maintenance
- What is and is not an OSHA recordable injury

Employee privacy protection rules

- Employers are prohibited from entering an individual's name on the 300 Log for certain types of injuries/illnesses (sexual assaults, HIV infections, mental illnesses, etc.).
- Employers have the option to not describe the nature of sensitive injuries where the employee's identity would be known.
- Employee representatives should only be allowed access to the portion of 301 Incident Report which contains no personal identifiers.
- Employers are required to remove employees' names before providing data to persons that do not have access rights under the rule.

Refer to the complete text of the OSHA Recordkeeping compliance requirements, 29 CFR 1904, if more information is needed.

