

SAFETY ALERT

Modifications to Occupational Injury and Illness Reporting and Reporting Requirements (OSHA 300)

The Occupational Safety and Health Administration (OSHA) is modifying the Occupational Injury and Illness Recording and Reporting Requirements published on January 19, 2001. Many of the changes concern the manner in which the records are kept. The modifications began January 2002. The following is a summary of some of those modifications:

Recording Criteria:

- **Required Recordings:** death, days away from work, restricted work, medical treatment beyond first aid (defined on a finite list), diagnosis of injury by a physician. Employers must record open wound injuries involving contamination from another person's blood or an infectious material.
- **Hearing:** Employers must record work shifts with hearing at a greater average than 25dB at 2,000, 3,000, and 4,000 hertz in either ear for 2002 and 10 dB in 2003.
- **Aggravation:** Before a preexisting injury becomes work-related, there must be a significant amount of aggravation.
- **Exemptions:** Cases evolving from eating, drinking, blood donations, or exercise programs are not required to be recorded.
- **Employee involvement:** Employees may report injuries to be recorded without discrimination. Employees have access to the 301 forms for review of self-records. And a third party representative has access to information relevant to workplace safety and health.
- **Privacy:** Employers must withhold personal information for sensitive injuries/illnesses (HIV infection, mental illness, or other such cases) as to not disclose the employee's identity.
- **Sign Off:** The highest level company executive (on site manager or owner) must certify by signature the annual summary.
- **Posting:** The OSHA 300 log must be posted in a visible location from February 1 through April 30th each year.

Delayed Provisions:

- **“Recording criteria for cases involving occupational hearing loss”** (January 1, 2003) (Section 1904.10 a, b). Employers must also conduct audiometric testing if employees are exposed to 8 time weighted hours of greater than 85dB, and take preventive measures if hearing loss is discovered.
- **“Recording criteria for cases involving work-related musculoskeletal disorders (MSD),”** (Date Pending) (Section 1904.12) which requires employers to check the MSD column on the OSHA 300 log if an employee encounters a work related MSD. MSD is defined as disorders of the muscles, nerves, tendons, ligament, joints, cartilage, and spinal discs not caused by slips, vehicle accidents, or other similar accidents.

Because of the stated decisions, OSHA will have modified forms, which do not include hearing loss or MSD columns on the OSHA 300 log, along with modified instructions on these forms for the 2002 calendar year. **NOTE: Definitions of what is considered an OSHA recordable injury have changed! It is recommended that you obtain a copy of the regulation.** In an effort to help employers understand the changes and for more information visit the OSHA website at OSHA.gov.