

OSHA Recordkeeping: Employee Version **Leader's Guide**

Structure and Organization

Information in this program is presented in a definite order so that employees will see the relationships between the various groups of information and can retain them more easily. The sections included in the program are:

- The OSHA Recordkeeping Rule.
- Work-related injuries and illnesses.
- Recordable work-related injuries and illnesses.
- OSHA recordkeeping forms.
- Reporting injuries and illnesses.

Each of the sections covers important information in one topic area, providing employees with the basis for understanding the basic concepts of OSHA recordkeeping.

Background

OSHA's Part 1904 Recordkeeping Rule requires companies to keep track of injuries, illnesses and fatalities that occur in their facilities, so they have the information they need to correct problems and help their employees to work more safely. The information gathered by those companies also enables OSHA to identify injury and illness hazards that exist in multiple industries and pass laws to control or eliminate them.

For this process to work, and for employers to be able to comply with the OSHA recordkeeping requirements, employees need to understand the goals of OSHA's Recordkeeping Rule and how it affects the company they work for. They should also understand how employee injuries and illnesses are recorded, how they should report them when they occur, and how the Rule protects them from any retaliation for making these reports.

For this recordkeeping to be effective, everyone's cooperation is needed. Employees need to inform management of incidents in a timely manner. And management needs to record injuries and illnesses in a way that OSHA has determined to be readable and usable. By understanding what's involved in the recordkeeping process and the roles they should be playing in it, employees can not only support the health and safety of their coworkers, they can also contribute to the safety of every workplace in the country.

Objectives

This education and training program discusses how the OSHA Recordkeeping Rule helps to keep employees safe on the job, and the important part they play in making the process work. Upon completion of the program, employees should:

- Understand the purpose of the OSHA recordkeeping system.
- Know what types of illness and injury information OSHA requires from companies it regulates.
- Understand how injury and illness records help protect their health and safety on the job.
- Know what types of workplace injuries and illnesses are tracked by OSHA.
- Know how to report a workplace injury or illness.
- Understand how the OSHA Recordkeeping Rule protects employees who report workplace illnesses and injuries.
- Know how they can help to make the reporting and recordkeeping process run smoothly.

Reviewing the Program

As with any educational program, the "presenter" should go through the entire program at least once to become familiar with the content and make sure that it is consistent with company policy and directives.

As part of this review process, you should determine how you will conduct your session. The use of materials such as handouts, charts, etc., that may be available to you needs to be well thought out and integrated into the overall program presentation.

PREPARING FOR THE PRESENTATION

Structuring the Presentation

In conducting this education session, you should proceed with a friendly and helpful attitude. Remember that the "trainees" are looking to your experience and knowledge to help them relate to the situations shown in the program. It is important to let the trainees interact with you and each other during the training session.

Stimulating conversation within the group is one of the best things you, as the presenter of the program, can do to help everyone get as much as possible from the session. Be alert for comments that could help in this area in future sessions and make note of them.

As the presenter, you also should:

- Keep the session related to the topic of OSHA recordkeeping.
- Focus discussions on how the recordkeeping process relates to the work of class participants and how they can participate in it.
- Keep any one person or small group of employees in the session from doing all the talking.
- Get everyone involved. Ask questions of those who don't participate voluntarily.
- Clarify comments by relating them to the key points in the program.

Use the "Outline of Major Program Points" section of this guide, as well as the information included in the quiz, as the basis for answering any questions. If you don't know the answer, say so. Remember, this is a positive program on OSHA recordkeeping. Make sure that your attitude and words reflect this, and that the emphasis is always on providing the information needed by the attendees to improve their understanding of OSHA's recordkeeping requirements.

Setting Up the Class and Classroom

Remember, there are a number of things that must be done to "set up" the class as well as the classroom. These fall into several groups of activities, and include:

- **Scheduling and Notification**
 - You can use and copy the "Scheduling and Attendance Form" in this Leader's Guide to schedule employees into the session.
 - Make sure that the session is scheduled so that it fits into your attendees' work day.
 - Send out notification of the session well in advance, to give people enough time to incorporate it into their schedule.
 - If possible, post a notification on bulletin boards in the affected employees' areas.
- **The Classroom**
 - Schedule the room well in advance.
 - Make sure the room can accommodate the expected number of attendees.
 - Check it again on the day of the program to make sure there is no conflict.
 - Make sure the room can be darkened, and won't create a glare on the television screen.

- Locate the light controls and test them.
- Make sure the power for the DVD player you are using operates separately from the room light.
- See if you can control the room temperature.
- Know where the closest restrooms are located.
- Assure that the room is free from distracting noises.
- Make sure emergency exits are marked and known to the attendees.

- **Seating**

- Make sure everyone can see the screen from their seat.
- Make sure everyone can hear the DVD and you.
- Check to see that seating is such that writing can be done easily.
- Make sure the seating arrangement allows eye contact between attendees, and between you and attendees.

- **Equipment and Materials**

- Make sure the DVD player, monitor, and all appropriate cables and extension cords are available.
- Make sure a stand or table is available and is of appropriate height for all attendees to easily see the monitor.
- If you plan on using a chart pad, blackboard or other writing board...make sure it is available, easy to see, and you have the proper writing implements.
- Make sure you have 6" x 8" index cards or other materials to be used as "name tents" for attendees.
- Make sure you have made up a sufficient number of copies of the "Quiz", as well as any other handouts you are using.

- **"Final Check"**

- Make sure equipment is in the room prior to the scheduled session.
- Check to see that the room is set up properly.
- Check equipment prior to the presentation to assure that it works.
- If need be, make sure extension cords, etc. are "taped down" to avoid tripping.

CONDUCTING THE SESSION

The Initial Steps

In conducting the session remember the positive nature of this presentation. Everyone is attending in order to learn more about OSHA recordkeeping. Initially, you need to:

- Introduce yourself as the session leader.
- State the title of the program, "OSHA Recordkeeping: Employee Version" and the purpose of the session...to learn about the OSHA Recordkeeping Rule and the role employees play in the process.
- Inform the attendees when there will be breaks (if you plan for them) the location of exits and restrooms and if water, coffee, or other refreshments will be available.
- Make sure all of the attendees have "signed in" on your "Scheduling and Attendance Form". Remember, it is very important to document people's attendance at the session.

Once this housekeeping is done, it is time to move to the "meat" of the session. First, the attendees need to be informed about the objectives of the session...this is where you can use a flip chart or board to list the objectives, which should be done prior to the class starting. This listing should be preceded with some introductory remarks. Your own words are always best, but the remarks should follow along the lines of the following:

- "Today we are going to talk about OSHA recordkeeping. While it may not be the most exciting subject, it is a critical component of any successful safety program. Not only can it help to make our facility a safer place to work, but it can help companies throughout the country to operate more safely as well... because OSHA uses the information that we provide, along with data from many other facilities to identify common hazard situations that may need to be addressed through a new or revised regulation."
- "Keep in mind that the goal of OSHA's Recordkeeping Rule is not to penalize employees or their companies. It's to identify problems, so that steps can be taken to eliminate them."
- "The information that is created through the recordkeeping process can also help us to focus on the hazards that are common in our facilities. By looking closely at what went wrong we can learn from our mistakes, and prevent the same problem from happening again. But for this process to work, you need to understand the goals of OSHA's Recordkeeping Rule and how it affects this company."
- "You also need to understand how you should report work-related injuries and illnesses when they occur, how they are recorded and how OSHA's Recordkeeping Rule protects you from any retaliation for making a report."

- "The program we are going to watch today will give us some good information about OSHA recordkeeping. To make this the most productive session possible we need to look at what we want to accomplish here today." (Verbally reference the 'Objectives' list from the first section in this guide, or point to a white-board or chart where you have written them down).

Once the objectives have been provided, you are ready to show the program. However, you do need to let the attendees know that they will be taking a Quiz...if you are using it. It should be emphasized that they are not being "graded", but that the quiz is being used to determine if the session is effectively transmitting information to them in a way they will remember.

Conducting the Discussion

After the program has been shown, it is time for the group discussion on the information that it contained. Care must be taken to make sure that the discussion is kept to the general topic of OSHA recordkeeping. There are several ways to conduct this discussion...

- Calling for questions from the attendees and using these questions as the basis for the discussion.
- "Leading" the discussion through the points covered in the program using statements such as...
 - "One of the segments of the program discussed the differences between work-related and non-work-related injuries and illnesses. Who can give us examples of injuries or illnesses that fall into one or the other of these categories?"
 - "We saw an interesting sequence about posting the OSHA Form 300A in a workplace. Who can describe when, where and how the form should be posted?"

You should use the discussion format that you are most comfortable with. The "Outline of Major Program Points" section and the "Presenter's Copy of Quiz with Answers" in this guide should be used as a basis for this discussion, as well as any supplemental information that you have presented in this session.

Remember, you have allocated a limited amount of time in which this discussion can take place. It is important to blend the attendees' questions and areas of interest with the objective of trying to touch on each major area within the program in the discussion. By touching on each area, the attendees are much more likely to retain the information presented in the session.

An alternative to this approach is to give the quiz immediately after showing the program, then using a review of the questions as a basis for your group discussion.

Concluding the Presentation

Once discussion has concluded (whether naturally or you have had to bring the discussion to a close in order to complete the session within the time allowed) it is time to give the quiz if you are using it. Copies of the Quiz contained in this Leader's Guide can be made.

Again, remind the attendees that the quiz is only meant to help determine how effective the presentation of the information is, and that they will not be graded. Let them know that they have approximately five minutes to complete the quiz.

At the end of the five minute period, remind the attendees to date and sign their quizzes and then collect them. The attendees should be thanked for attending the session and reminded of any other sessions in the educational program that they may be attending. They can then be dismissed to return to their normal activities.

"Wrapping Up" the Paperwork

Before much time has passed and the subject matter is fresh in your mind, several types of "paperwork" must be completed. First, check to make sure that all attendees signed the "Scheduling and Attendance Form". Next, make sure that you have a quiz from every attendee, dated and signed.

Depending upon what you have decided to do, a copy of the attendance form and the quiz for each attendee should be either filed in your files, or turned over to the attendee's department manager (or the personnel office) so that this paperwork can be included in their personnel file.

Remember it is always a good idea to document information about an employee's attendance at these sessions, as well as the fact that the employee has come away from the session with an increased knowledge of OSHA's Recordkeeping Rule and the recordkeeping process.

Scheduling and Attendance Form

This form is provided so you can easily schedule your attendees into each session of the program. It's important that you have each attendee "sign-in" on the appropriate form, documenting their attendance at the session. Typically, a copy of this attendance/"sign-in" form is filed in the employee's personnel file.

Quiz

There are two copies of the quiz...one for the trainees and the "Presenter's copy with Answers". The quiz is normally given after viewing the program. However, if you would like an indication of the "increase" in the attendees' knowledge of OSHA recordkeeping, you can give the quiz both before and after the program is shown. It is often interesting to have the attendees compare their "before and after" answers as part of the session.

OUTLINE OF MAJOR PROGRAM POINTS

The following outline summarizes the major points of information presented in the program. The outline can be used to review the program before conducting a classroom session, as well as in preparing to lead a class discussion about the program.

- **You and your employer have a powerful tool for making your facility a safer place to work.**
 - It's OSHA's injury and illness recordkeeping system, often referred to as "Part 1904," after its Federal Regulation part number.
- **In addition to establishing a standard method for recording work-related injuries and illnesses, Part 1904 allows your employer to easily create statistics on any incidents that occur at your facility.**
 - These statistics help them to identify problem areas within your facility... and to correct any hazardous conditions that exist.
- **Part 1904 also gets you involved in the recordkeeping process.**
 - First, by requiring that the annual summary of workplace injuries and illnesses must be posted so that you may examine it.
 - Second, it protects the privacy of injured and sick workers by requiring that highly personal information, such as the identities of individuals, or detailed information on sensitive conditions such as genital infections, be kept confidential.
- **There's a "bigger picture" here, too. On a national level, OSHA relies on the data that companies like yours collect.**
 - Without this data, OSHA would have a much more difficult time determining when a new regulation was necessary, or if existing regulations needed to be modified.
 - And without appropriate regulations, workers might not be protected from serious injuries, or even death.
- **But in order for this recordkeeping system to be successful, you have to be involved.**
 - You and your representatives play a crucial role in complying with Part 1904, because you are the "eyes and ears" of the recordkeeping system.
 - That's why you need to know how to report injuries or illnesses to management, as well as what information to give them.

- **To encourage your participation, OSHA prohibits employers from discriminating against anyone who:**
 - Reports a work-related fatality, injury or illness.
 - Files safety and health complaints.
 - Asks for appropriate access to health records.
 - Exercises any other rights afforded by Part 1904.
- **How do you know if you're affected by these regulations? Employees protected by the OSHA recordkeeping rule include everyone on your company's payroll, whether they are classified as:**
 - Labor
 - Executive
 - Hourly
 - Salary
 - Part-time
 - Seasonal
 - Contract
 - Freelance
 - Migrant
- **Certain types of businesses are exempt, but if you are watching this program, it's a good bet that your business is covered.**
- **You play an important role in OSHA's recordkeeping system, and there are some important things that you need to remember as you do your part.**
 - For example, recording a work-related injury, illness, or fatality does not mean that an OSHA rule has been violated or that a particular person was at fault.
 - Neither does this rule determine who is... or isn't... eligible
- **The sole intent of the OSHA Recordkeeping Rule is to make your workplace safer, by providing a way to efficiently report and record work-related injuries or illnesses.**
- **But what does this term "work-related" really mean?**
 - Simply put, an injury or illness may be work-related if an event in the workplace caused it or made it worse.
 - That definition covers a lot of ground, so much so, in fact, that it will take less time to discuss when a condition is not work-related.

- **Medical problems are not work-related if they occurred in the workplace during off-hours, or took place when employees were doing tasks unrelated to their jobs.**
 - Let's say that a wood-worker in a small furniture-making company is building a chair for use in his own home. One evening, outside of normal business hours, he is working on this personal project when he hurts his hand while using a lathe.
 - Since this injury didn't occur during the employee's normal work day, and did not involve a normal work activity, under Part 1904 this is not considered to be a work-related injury.
- **Also, conditions that result from voluntary participation in medical, fitness or recreational activities, like giving blood, getting a flu shot or playing on the company softball team, are not work-related.**
 - If a medical condition develops as a result of your eating, drinking, or preparing food or drink for personal consumption, it is not considered to be work-related, either.
- **If, however, you or a coworker get sick from eating food that is contaminated by materials in your workplace such as lead, or the food was supplied by your employer, the resulting illness would be work-related.**
- **Neither the common cold nor the flu is classified as work-related.**
 - But contagious diseases such as tuberculosis or hepatitis are classified as work-related...if you were infected at work.
- **These are some of the most common categories of non-work-related medical conditions, there are a number of others.**
 - As you can imagine, with all this to consider your managers can sometimes have a difficult time determining if an incident is actually work-related.
- **Complicating the issue is whether or not the medical problem is recordable.**
 - This is one of the places that you can help, by gathering as much information as possible about an incident you see or are involved in.
- **Not all work-related injuries or illnesses are recordable.**
 - "Recordable" means that your employer is required by law to report the injury or illness to OSHA and must keep a record of the injury or illness on official OSHA recordkeeping forms.

- **An injury or illness is recordable if it results in:**
 - Days away from work
 - Restricted work
 - Transfer to another job
 - Medical treatment beyond first aid
 - Loss of consciousness
 - Any significant injury or illness diagnosed by a physician or other licensed health care professional
 - Death
- **Now that you understand when an injury is both work-related and recordable, let's look at some of the most common types of work-related, recordable injuries.**
- **Musculoskeletal disorders (MSDs) are among the recordable illnesses that occur most frequently.**
 - MSDs tend to affect workers who are doing repetitive labor, such as some assembly-line jobs, or frequent heavy lifting.
- **MSDs include ailments of the:**
 - Muscles
 - Nerves
 - Tendons
 - Ligaments
 - Joints
 - Cartilage
 - Spinal discs
- **Examples of MSDs include:**
 - Carpal tunnel syndrome
 - Tendinitis
 - Low back pain
- **All MSD reports must indicate the number of days that the employee will be away from work or restricted from performing their normal jobs.**
- **Lacerations, puncture wounds, fractures and burns form another broad category of workplace injuries.**

- **What determines whether these types of injuries are recordable is their severity.**
 - For example, a mild scald from a hot water pipe would not be recordable.
 - But a third-degree burn from a high-pressure steam pipe would be.
 - Likewise, a tiny puncture wound from an office stapler would not be recordable.
 - But a deeply-penetrating puncture wound from a drill press would be.
- **When it comes to "severity," the deciding factor is usually the degree of treatment that is necessary.**
 - So, an injury that needs nothing more than an adhesive bandage or some first aid cream would probably not be recordable.
 - While a wound requiring stitches or other treatment from a physician, hospitalization or time off from work would be.
- **Any accident in which an employee is exposed to someone else's blood falls into this category of work-related injuries or illnesses, as well. These types of incidents can lead to the transmission of deadly diseases, such as:**
 - HIV, the human immunodeficiency virus that causes AIDS.
 - Hepatitis C, a liver disease.
- **Work-related tuberculosis cases are also recordable.**
 - A highly-contagious respiratory disease, TB often strikes healthcare workers, firefighters and other "first responders".
 - It can also occur in industrial settings, especially where large groups of employees work in close proximity to one another.
- **Now that you are familiar with some of the most common recordable injuries and illnesses, let's look at how these incidents are recorded.**
 - Even though you probably won't be the person responsible for documenting recordable incidents, it is still absolutely necessary for you to know how it's done.
 - You can't effectively be the "eyes and ears" of the recordkeeping process without being able to tell the difference between facts that must be recorded... and superfluous information.
 - The best way to "get educated" is to look at the recordkeeping forms themselves.

- **There are three main forms that are used to keep illness and injury records.**
 - The "OSHA 300", the "Log of Work-Related Injuries and Illnesses", contains one- or two-line descriptions of each recordable injury or illness in your facility.
 - The "OSHA 301", the "Injury and Illness Incident Report", contains all of the details that are pertinent to a specific incident.
 - Form 300A is OSHA's official "summary" form, and shows the total number of incidents in specific injury and illness categories.
- **OSHA feels that it is so important to fill out the 301 form while the information is fresh in everyone's mind, it must be completed within seven calendar days after management has been notified that the recordable injury or illness has occurred.**
- **At the end of each year, your employer will use the information on the 300 and 301 forms to fill out the third OSHA recordkeeping form, the 300A.**
 - OSHA is currently considering modifications to the recordkeeping rules that would require many employers to submit electronic copies of these forms to the agency, but this is still in the "discussion" stage.
- **The Form 300A must be posted in your facility from February 1 to April 30 of the following year (so 2017's form would be posted in 2018).**
 - It must be in a conspicuous place, where notices to employees are customarily displayed, so you and your coworkers can easily see it. And by law, it must never be altered, defaced or covered by any other material.
 - Also, OSHA requires that all of the injury and illness records be kept for at least five years, so they can be updated and referenced whenever necessary.
- **We've discussed the essentials of what work-related injuries and illnesses are, and why reporting them is a crucial part of keeping your facility safe.**
 - What we haven't looked at yet is how to report these incidents.
- **While OSHA hasn't established an official method that should be used to report workplace injuries and illnesses, there are some common-sense guidelines to follow.**
 - The first criterion for reporting workplace injuries and illnesses is to be prompt. If you are hurt on the job, let your manager know about it as soon as you can (but make sure you get medical treatment first).
 - The faster your boss knows about a problem, the quicker they can move to fix it.

- **Don't give your manager too much information.**
 - Just include the basic facts.
 - If more information is needed, someone will ask for it.
- **Be patient.**
 - It might take a while, and a lot of questions, for people to determine exactly what happened.
 - You may be even be asked to help out by writing down a description of the incident.
- **Keep in mind that the aim of reporting workplace incidents is to keep you and your coworkers safe.**
 - By cooperating to the fullest, you are playing an important role in this process.

* * * **SUMMARY** * * *

- **OSHA's Recordkeeping Rule makes it possible for your employer to keep you and your coworkers safer on the job, and to keep employees safer in workplaces across the country as well.**
 - But your help is required to make this process work best for everyone.
- **OSHA's Recordkeeping Rule requires employers to keep track of work-related injuries and illnesses.**
- **Collecting this information helps companies to identify problem areas within their facilities, and correct any hazardous conditions that exist.**
- **It also helps OSHA to identify hazards that exist in businesses across the country, and update existing standards or create new ones, to control or eliminate them.**
- **Employees play a crucial role as the "eyes and ears" of the recordkeeping system, by reporting the injuries and illnesses that occur in their facility.**
- **Now that you understand OSHA's recordkeeping requirements, and know how you can participate in gathering important injury and illness information, you can help create a safer workplace for yourself and your coworkers... as well as other employees across America... every day!**

SCHEDULING AND ATTENDANCE FORM

TRAINING SESSION SCHEDULE

[illegible]

OSHA Recordkeeping: Employee Version QUIZ

Employee Name: _____ Training Date: _____

1. True or False?... The information that OSHA gathers through its recordkeeping system helps protect the health and safety of workers throughout the country.
_____ True _____ False
2. True or False?... Injuries that occur outside of an employee's working hours can be considered to be work-related.
_____ True _____ False
3. True or False?... Neither the common cold nor the flu are considered to be work-related illnesses.
_____ True _____ False
4. True or False?... Injuries that happen while employees are playing on a company softball team are not considered to be work-related.
_____ True _____ False
5. True or False?... If a worker becomes sick after eating food that has been contaminated by toxic materials in their workplace, the illness is considered to be work-related.
_____ True _____ False
6. True or False?... All injuries and illnesses that occur in the workplace are considered to be recordable.
_____ True _____ False
7. True or False?... OSHA currently requires some employers to submit electronic copies of Forms 300, 301 and 300A to the agency.
_____ True _____ False
8. True or False?... OSHA requires that all injury and illness records be kept by an employer for at least seven years.
_____ True _____ False
9. True or False?... To help others understand how a workplace injury occurred, you may be asked to prepare a written description of the incident.
_____ True _____ False
10. True or False?... You only need to give the basic facts when you first report a workplace injury or illness.
_____ True _____ False

OSHA Recordkeeping: Employee Version

Presenter's Copy of Quiz with Answers

1. True or False?... The information that OSHA gathers through its recordkeeping system helps protect the health and safety of workers throughout the country.
☒ **True** ☐ **False**
2. True or False?... Injuries that occur outside of an employee's working hours can be considered to be work-related.
☐ **True** ☒ **False**
3. True or False?... Neither the common cold nor the flu are considered to be work-related illnesses.
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