

OSHA News

Recording and Reporting Occupational Injuries and Illnesses

The following explanation and instruction on what needs to be done to be in compliance with OSHA's Recording and Reporting Occupational Injuries and Illnesses (29 CFR Part 1904) will replace the need of a formal written program. However, it is extremely important that all areas of the document are completed.

All mushroom companies must implement (unless you have fewer than 10 employees) this regulation. Not only is accurate recordkeeping a federal requirement, it can be a valuable tool for you to identify and prevent safety and health hazards in your company.

The following are the basic steps you must follow to be in compliance:

1. You must determine if the injury or illness is OSHA recordable. First aid injuries and illnesses are not recordable, see part V for more information explanation.
2. If it is, you must record it on your OSHA 300 Log (Log of Work-Related Injuries & Illnesses)
3. Fill out an OSHA 301 Form (Injury and illness Incident Report) or an equivalent form
4. Complete OSHA 300A Form annually (Summary of Work-Related Injuries & Illnesses)

I. What is a Recordable Injury or Illness?

Basic requirements: You must determine if an injury or illness meets the general recording criteria, and therefore is recordable if it results in any of the following:

- i Death
- i Days away from work
- i Restricted work or transfer to another job
- i Medical treatment beyond first aid
- i Loss of consciousness

You must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting conditions or significantly aggravated a pre-existing injury or illness resulting from events or exposures occurring in the work environment.

You must also report all work-related needle stick injuries and cuts from sharp objects that are contaminated with another person's blood or potentially infectious material (as defined by 29CFR 1910.1030). You must enter the case on the OSHA 300 Log as an injury. To protect the employee's privacy, you may not enter the employee's name on the OSHA 300 Log.

Within eight hours after the death of any employee from a work-related incident or the in-patient hospitalization of three or more employees as a result of a work-related incident, you must orally report the fatality/multiple hospitalizations by telephone or in person to the area office of the Occupational Safety and Health Administration (OSHA, U.S. Department of Labor) that is nearest to the site of the incident. You may also use the OSHA toll-free central telephone number, 800/321-OSHA (6742).

- II. What is an OSHA 300 Log? (Log of Work-Related Injuries and Illnesses)
 - i The Log starts each calendar year (January 1 through December 31)
 - i You must fill out information about your company at the top of the OSHA 300 Log Form
 - i You must fill out the initial information about the injury or illness within seven days of you receiving the information
 - i You must keep this form on file for at least five years following the year to which it pertains
 - i Form has further instructions

- III. What is an OSHA 301? (Injury and Illness Incident Report)
 - The OSHA 301 Form, or an equivalent form, is one of the first forms you must fill out when a recordable injury or illness occurs
 - You must fill out the initial information about the injury or illness within seven days of receiving the information
 - You must keep this form on file for at least five years following the year to which it pertains
 - Form has further instructions

- IV. What is an OSHA 300 A? (Summary of Work-Related Injuries and Illnesses that you have recorded during the year on the OSHA 300 Log.)
 - i You must complete this form by January 31 of the following year and post it between February 1 to April 30 for the following year
 - i It must be signed by a company officer or owner
 - i It must be posted and filled out no matter if there were no injuries or illnesses
 - i You must keep this form on file for at least five years following the year to which it pertains
 - i Form has further instructions

V. What other information is needed for compliance for OSHA 29 CFR Part 1904? If the injury or illness requires no treatment or just first aid treatment, it is not recordable.

1. What are First Aid Injuries?

- i Using hot or cold therapy
- i Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment)
- i Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes)
- i Using temporary immobilization devices while transporting an accident victim – such as splints, slings, neck collars, back boards
- i Drilling of fingernail or toenail to relieve pressure or draining of a blister
- i Using eye patches
- i Removing foreign object from the eye using irrigation or cotton swab
- i Using finger guards
- i Using a nonprescription medication at nonprescription strength – (using nonprescription medication at prescription strength is considered recordable)
- i Cleaning flushing or soaking wounds on the surface of the skin
- i Using only wound coverings such as – bandages, Band-Aids, gauze pads or butterfly bandages or Steri/strips (All other wounds closing devices such as sutures are recordable)
- i Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or simple means
- i Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes)
- i Drinking fluids for relief of heat stress

(Are there any other procedures included in First Aid? – No, this is a complete list from OSHA 29 CFR Part 1904)

VI. If any injury or illness occurs in one year but are not completed until the following year, you do not record this injury or illness in both years

- i At the end of the year that the injury or illness occurred, you total the information on the OSHA 300 Log and OSHA 300 A Forms until December 31.

- i When you know the number of days (final), which are in the following year – you go to the 300 Log for the year the injury or illness occurred and cross out the days on the 300 Log and put the correct days.
- i You do not correct the OSHA 300 A Form that is posted in your facility from February 1 to April 30

VII. Days off

- i You cap the number of days off plus days and/or restricted duty days to a total of 180 days
- i You never count the day of the injury or illness

VIII. What is the requirement for record retention and availability?

- i You must keep these forms on file for five years following the years following the year to which it pertains
- i You must make these records available to an authorized government representative within four business hours or to an employee by the next business day

The following are instructions on filling out the OSHA 300 Log, the OSHA 300 A Form and the OSHA 301 Injury and Illness Incident Report.

OSHA 300 Log Form (Figure 1): The log of Work-Related Injuries and Illnesses is used to classify work related injuries and illnesses and to note the extent and severity of each incident. When an incident occurs, use the log to record specific details about what happened and how it happened.

- i Fill in year and company name and address
- i "A" If and when a recordable injury or illness occurs – record it in Column A and start with the number "1"
- i "B" Record the employees name unless it is a needle stick injury and cut from sharp objects that was contaminated with another person's blood or potentially infectious material. In that case you record the incident on the 300 Log, but you do not record the employee's name
- i "C" Record the main job title of the employee
- i "D" Record the actual date of the injury
- i "E" Record where the incident occurred, for example; Plant 3, Double 10, upstairs or Cooler #3
- i "F" Record a brief description of what actually occurred, for example:
 - * Picking mushrooms – cut left thumb with knife
 - * Packing mushrooms – bruised right foot when mushroom skid fell

* Hurt lower back – dragging water hose in double #6

In Columns G – H – I – J you check only one for each incident. You always check the most severe. If employee had both Days-Off and Job Transfer or Restricted Duty, since Days-Off is the most severe, you would check Days-Off.

- i "G" Death - Check "X" if Occurred
- i "H" Days away from work - Check "X" if Occurred
- i "I" job transfer or restrictions - Check "X" if Occurred
- i "J" Other recordable cases - Check "X" if Occurred

If death did not occur, no days off, or no days with job transfer or restrictions, but it is still a recordable incident, you indicate it by checking Column J.

- i "K" Away from work – You enter the actual days employee is away from work. You do not count the day of the incident, but every day afterward until the employee returns to restricted duty or full time work. This means you count all days, which includes his normal days off.
- i "L" On job transfer or restrictions - You enter the actual days employee is on job transfer or restrictions. You do not count the day of the incident, but every day afterward until the employee returns to full time. This means you count all days including his normal days off.

Total days for each case (combined) of "days away from work" or "job transfer or restricted duty" (total of Column K and L) is capped at 180 days.

- i "M" You either check the injury Column (1) or choose one type of illness in either Column 2-3-4-5-6.

At the end of the year you total Columns G – H – I – J and that total should be the same as the number of cases you have in Column A. You then total Columns K and L. Part M is also totaled and the sum of Part M should be the same as the number of cases in Column A.

OSHA 300 A Form (Figure 2): Summary of Work-Related Injuries and Illnesses is used to summarize information from the 300 Log Form and inform all employees of number of injuries and illnesses by posting this 300 A Form from February 1 to April 30.

1. Number of Cases
 - i Total for (G), (H), (I), and (J) are same as the total for each column on the OSHA 300 Log Form
2. Number of Days
 - i Total for (K), and (L) are same as the total for each column on the OSHA 300 Log Form
3. Injury and Illness Types

- i Totals for (M) are the same numbers in (1), (2), (3), (4), (5) and (6) for each column on the OSHA 300 Log Form
4. Establishment Information
- i Fill in the company name and address where the OSHA 300 records are kept.
 - i Description of business – for example – Mushroom Farmer, Mushroom Packer, Composter, etc
 - i Fill in your SIC code (Standard Industrial Classification) and or your NAICS code (North American Industrial Classification)
5. Employment Information
- i You must fill-in your average annual number of employees
 - i You must fill-in the total hours worked for all employees during the year

On the OSHA 300 A Summary Form, examples are given on how to determine the average number of employees and the total hours worked. You can use their example. However, since most mushroom operations have a fairly consistence work force, take six different weeks throughout the year and add the number of employee pay checks for each week and divide by six to get the average number of employees. For hours worked, total the hours for each of those weeks, add in hours for contract work, divide by number of employees and then multiple that by 52 weeks. That should give you the total hours worked for the year.

6. Sign Here
- i A company owner or executive must sign the OSHA 300 A Summary Form.
7. Year
- i The year must be the same as the year on the OSHA Log.

OSHA 301 Form (Figure 3): Injury and Illness Report – Within seven calendar days, you must fill out this form or an equivalent form used by your company. If you use an equivalent form, it must include all information that OSHA 301 asks for. The information from the OSHA 301 Form or your equivalent form should contain the information on what actually happened, the extent and severity of the incident and what action the company should take so it does not happen again. To be able to fill this form out completely, a thorough investigation of the incident must be completed. This information is a vital tool to correct the problem and save the company money. The OSHA 301 Form or your equivalent goes into details of what occurred, while the information on the OSHA 300 Log is just a summary of what occurred. Even if the injury or illness is not OSHA recordable the OSHA 301 Form or your equivalent should be completed; again, this will help you correct the problem and help assure a minor incident does not turn into a more severe incident.

The form is divided into several areas:

1. Who completed the form – if more than one, list all
2. Numbers 1 through 11, will be filled out by a human resources person if your company is large or by someone who has access to employee information files
3. Numbers 12 through 18 should be filled out by someone who is familiar with what happened and is able to speak with witnesses

The OSHA 300 Log Form and the OSHA 301 Form must be updated and completed for each recordable OSHA injury and illness. The OSHA 300 A Form must be completed at the end of the year and posted from February 1 to April 30.