

COMPLIANCE OVERVIEW

Identifying OSHA Recordable Incidents

The Occupational Safety and Health Act (OSH Act) generally requires covered employers to prepare and maintain records of occupational injuries and illnesses. The Occupational Safety and Health Administration (OSHA) is a part of the U.S. Department of Labor and is responsible for administering the recordkeeping system established by the OSH Act.

To comply with OSHA's recordkeeping rules, employers must first determine which incidents to record. In some cases, this can require a detailed analysis to assess whether an incident is work-related.

This Compliance Overview provides a sample workflow employers can use to determine whether an injury or illness is work-related and must be entered into the organization's OSHA records. Employers can also reference [published](#) OSHA guidance and frequently asked questions in their efforts to determine whether to record a specific incident.

LINKS AND RESOURCES

- OSHA Injury and Illness Recordkeeping and Reporting Requirements [website](#)
- OSHA Forms – [300](#), [300A](#) and [301](#)

Work-related injuries

An injury or illness is work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness.

Exempt Industries

- Employers in some industries are not required to keep OSHA injury and illness records.
- OSHA, the Bureau of Labor Statistics (BLS) or a state agency can overrule this exemption by notifying exempt establishments that they are required to create and maintain workplace injury and illness records.

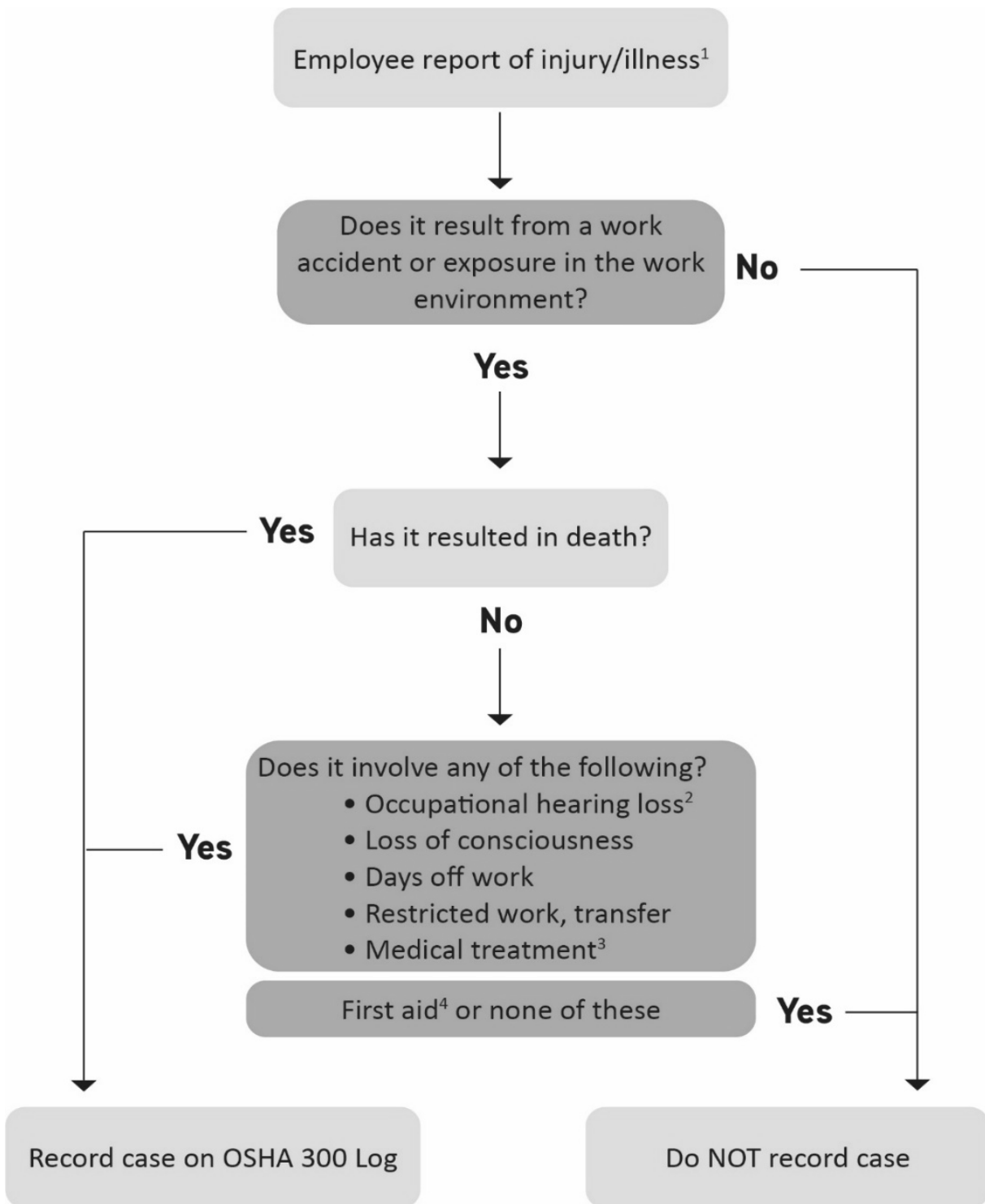
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OSHA 300 Recordability Flowchart



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Determining Work-Relatedness

Employers 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 condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception applies.

Definitions

- 1. Employee Report of Injury/Illness:** Injury or illness reported assumes the individual reporting the injury or illness is an employee of OSHA. If the employee is a temporary employee from a temporary staffing agency, incidents are to be recorded in the 300 log; however, the temporary staffing agency would be responsible for reporting workers' compensation claims to the carrier.
- 2. Occupational Hearing Loss:** Defined as:
 - A change in hearing threshold relative to the baseline audiogram as an average of 10 decibels (dB) or more in either ear at 2,000, 3,000 and 4,000 hertz.
 - Employee's total hearing level of 25 dB or more above audiometric zero in both ears at the same hertz levels.
- 3. Medical Treatment:** The management and care of a patient to combat disease or disorder. It does not include:
 - Visits to practitioners for observation and/or evaluation only
 - Diagnostic procedures
 - First aid
- 4. First Aid:** Defined by OSHA regulations (section 1904.7 (b)(5)). Treatments that are considered first aid include:
 - The use of nonprescription medication at nonprescription strength
 - Tetanus immunizations
 - Cleaning, flushing or soaking surface wounds
 - Use of wound coverings, butterfly bandages, Steri-Strips
 - Use of non-rigid means of support
 - Temporary immobilization devices used to transport victims
 - Drilling of fingernails or toenails or draining fluid from a blister
 - Hot or cold therapy
 - Eye patches
 - Removal of foreign bodies from eye using irrigation or cotton swab
 - Removal of splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
 - Finger guards
 - Massage therapy
 - Drinking fluids for relief of heat stress

Exempt Industries

Employers are not required to keep OSHA injury and illness records for any establishment classified in the following North American Industry Classification System (NAICS) codes, 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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All employers, including those partially exempted by reason of company size or industry classification, must report to OSHA any workplace incident that results in a fatality within eight hours. They must also report to OSHA within 24 hours the in-hospitalization of at least one employee, an amputation or the loss of an eye (see § 1904.39). The partially exempt industry classifications are listed in the table below.

NAICS Code	Industry
4412	Other Motor Vehicle Dealers
4431	Electronics and Appliance Stores
4461	Health and Personal Care Stores
4471	Gasoline Stations
4481	Clothing Stores
4482	Shoe Stores
4483	Jewelry, Luggage and Leather Goods Stores
4511	Sporting Goods, Hobby and Musical Instrument Stores
4512	Book, Periodical and Music Stores
4531	Florists
4532	Office Supplies, Stationery and Gift Stores
4812	Nonscheduled Air Transportation
4861	Pipeline Transportation of Crude Oil
4862	Pipeline Transportation of Natural Gas
4869	Other Pipeline Transportation
4879	Scenic and Sightseeing Transportation, Other
4885	Freight Transportation Arrangement
5111	Newspaper, Periodical, Book and Directory Publishers
5112	Software Publishers
5121	Motion Picture and Video Industries

NAICS Code	Industry
5181	Internet Service Providers and Web Search Portals
5182	Data Processing, Hosting and Related Services
5191	Other Information Services
5211	Monetary Authorities - Central Bank
5221	Depository Credit Intermediation
5222	Nondepository Credit Intermediation
5223	Activities Related to Credit Intermediation
5231	Securities and Commodity Contracts Intermediation and Brokerage
5232	Securities and Commodity Exchanges
5239	Other Financial Investment Activities
5241	Insurance Carriers
5242	Agencies, Brokerages and Other Insurance-Related Activities
5251	Insurance and Employee Benefit Funds
5259	Other Investment Pools and Funds
5312	Offices of Real Estate Agents and Brokers
5331	Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)
5411	Legal Services
5412	Accounting, Tax Preparation, Bookkeeping and Payroll Services
5413	Architectural, Engineering and Related Services
5414	Specialized Design Services

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NAICS Code	Industry
5122	Sound Recording Industries
5151	Radio and Television Broadcasting
5172	Wireless Telecommunications Carriers (except Satellite)
5173	Telecommunications Resellers
5179	Other Telecommunications
5611	Office Administrative Services
5614	Business Support Services
5615	Travel Arrangement and Reservation Services
5616	Investigation and Security Services
6111	Elementary and Secondary Schools
6112	Junior Colleges
6113	Colleges, Universities and Professional Schools
6114	Business Schools and Computer and Management Training
6115	Technical and Trade Schools
6116	Other Schools and Instruction
6117	Educational Support Services
6211	Offices of Physicians
6212	Offices of Dentists
6213	Offices of Other Health Practitioners
6214	Outpatient Care Centers
6215	Medical and Diagnostic Laboratories

NAICS Code	Industry
5415	Computer Systems Design and Related Services
5416	Management, Scientific and Technical Consulting Services
5417	Scientific Research and Development Services
5418	Advertising and Related Services
5511	Management of Companies and Enterprises
6244	Child Day Care Services
7114	Agents and Managers for Artists, Athletes, Entertainers and Other Public Figures
7115	Independent Artists, Writers and Performers
7213	Rooming and Boarding Houses
7221	Full-Service Restaurants
7222	Limited-Service Eating Places
7224	Drinking Places (Alcoholic Beverages)
8112	Electronic and Precision Equipment Repair and Maintenance
8114	Personal and Household Goods Repair and Maintenance
8121	Personal Care Services
8122	Death Care Services
8131	Religious Organizations
8132	Grantmaking and Giving Services
8133	Social Advocacy Organizations
8134	Civic and Social Organizations
8139	Business, Professional, Labor, Political and Similar Organizations