

PRESENTER'S GUIDE

"OSHA RECORDKEEPING FOR MANAGERS AND SUPERVISORS"

**Training for the
OSHA RECORDKEEPING STANDARD**

THE REGULATORY COMPLIANCE KIT

SERIES

This education program is part of a comprehensive series of programs on important regulatory topics. Many of these programs have been created to meet employee training requirements of specific OSHA, EPA and DOT regulations. The series includes programs on the following regulations and topics:

- Aerial Lifts in Industrial and Construction Environments.
- The Asbestos Standard.
- The Bloodborne Pathogens Standard.
- The Confined Space Entry Standard.
- DOT Hazardous Materials Regulations (HMR).
- Emergency Planning.
- Forklift Safety: Industrial Counterbalance Lift Trucks.
- Forklifts/Powered Industrial Trucks Standard.
- Introduction to GHS (The Globally Harmonized System).
- GHS Container Labeling.
- GHS Safety Data Sheets.
- The Hazard Communication Standard.
- Hearing Conservation and Safety.
- HIPAA Rules and Compliance.
- Indoor Air Quality.
- The OSHA Lead Standards.
- Introduction to OSHA.
- Lock-Out/Tag-Out.
- The Personal Protective Equipment Standards.
- The OSHA Recordkeeping Standard.
- The Respiratory Protection Standard.
- Scissor Lifts in Industrial and Construction Environments.
- Supported Scaffolding Safety in Industrial and Construction Environments.
- Suspended Scaffolding Safety.
- Tuberculosis in Healthcare Environments.

A number of these programs are available in multiple versions that have been created for specific types of companies and operations, including General Industry, Construction, Healthcare, Cleaning/Maintenance and more.

Other products in the "Regulatory Compliance Kit" line include compliance manuals, employee booklets and posters which have been designed specifically to be used with the programs. These products can be used to satisfy OSHA, EPA and DOT compliance requirements for creating written compliance programs, as well as employee training.

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"This program has been created to assist companies that are endeavoring to educate their employees regarding good safety and health practices. The information contained in this program is the information available to the producers of the program at the time of its production. All information in this program should be reviewed for accuracy and appropriateness by companies using the program to assure that it conforms to their situation and recommended procedures, as well as to any state, federal or other laws, standards and regulations governing their operations. There is no warranty, expressed or implied, that the information in this program is accurate or appropriate for any particular company's environment."

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TABLE OF CONTENTS

	<u>Section</u>
• INTRODUCTION TO THE PROGRAM	1
— Structure and organization	
— Background	
— Objectives	
— Reviewing the program	
• PREPARING FOR THE PRESENTATION	2
— Structuring the presentation	
— Setting up the class and classroom	
• CONDUCTING THE SESSION	3
— The initial steps	
— Showing the program	
— Conducting the discussion	
— Concluding the presentation	
— "Wrapping up" the paperwork	
• OUTLINE OF MAJOR POINTS IN THE PROGRAM	4
• ACCOMPANYING MATERIALS	5
— Scheduling and Attendance Form*	
— Quiz*	
— Training Certificate*	
— Employee Training Log*	
— Booklet	
* <i>In both a print version in the back pocket of this binder and as a PDF on the DVD</i>	

INTRODUCTION TO THE PROGRAM

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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.
- The importance of keeping injury and illness records.
- Exempt businesses.
- Defining "injuries and illnesses".
- What are "work-related" and "new" cases?
- The three key OSHA recordkeeping forms.
- Employee rights.
- Other recordkeeping issues.

Each of the sections covers important information in one topic area, providing managers and supervisors with a basis for understanding 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 requirement, managers and supervisors need to understand the goals of OSHA's Recordkeeping Rule and how it affects the company they work for. They should know what types of employee injuries and illnesses should be recorded, and how that information should be made available to employees, OSHA and other government agencies. They should also understand how the Recordkeeping Rule protects employees from retaliation for reporting injuries and illnesses in the workplace.

Objectives

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

- Understand the purpose of the OSHA Recordkeeping Rule.
- Know under what circumstances a business could be considered to be "partially exempt" from the Rule.
- Understand OSHA's requirements for recording employee injuries and illnesses.
- Understand under what circumstances an injury or illness would not be considered to be "work-related".
- Know when an injury or illness would be considered to be "new".
- Know what types of injuries must be reported to OSHA almost immediately, and how the reports can be made.
- Know the three key OSHA recordkeeping forms, how they are used and what information they contain.
- Know under what circumstances Form 300A must be submitted to OSHA electronically.
- Know the rights that employees have under the OSHA Recordkeeping Rule.

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

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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.
- 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 and how to comply with them.

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 the scheduling and attendance form to schedule employees into the session (copies can be made using the printed "master" in the back of this binder or from the PDF version on the DVD).
 - 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 for that day.
 - 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 (when you speak).

- 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.
 - Make sure you have the right program, (look inside the three-ring binder).
 - Check to see that the room is set up properly.
 - Check equipment prior to the presentation to assure that it works.
 - Make sure extension cords, etc. are "taped down", if need be, to avoid tripping.

CONDUCTING THE SESSION

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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 for Managers and Supervisors" and the purpose of the session (to learn about OSHA recordkeeping and the role that they 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, which is a critical component of any successful safety program. Not only does 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 purpose of OSHA's Recordkeeping Standard is not to penalize individuals or companies. It is to identify problems, and take steps to eliminate them. By looking closely at what went wrong we can learn from our mistakes, and prevent the same problem from happening again."

"The information that is created through the recordkeeping process can also help employees focus on the hazards that are common in our facilities. But for this process to work you need to understand the goals of OSHA's Recordkeeping Rule and how it affects this company. You should also know what types of employee injuries and illnesses should be recorded, and how that information should be maintained and made available to employees, OSHA and other government agencies."

"The program we're going to watch today will give us some good information on 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, or indicate to the blackboard 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 at the end of the session (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 that they will remember.

Showing the Program

At this point, you need to introduce the title of the program once again, "OSHA Recordkeeping for Managers and Supervisors", darken the lights if necessary, and begin the showing of the program.

You have several options as to how you can move through the program and what employees see. The DVD menu has three "selection bars":

- "Play".
- "Scene Index".

- "Contact Info".

To just play the program from beginning to end, select "Play".

To view (or review) a specific section of the program, select "Scene Index". You will be presented with a group of buttons, each of which corresponds to a section of the program. You can then select the specific section that you want to view.

If you would like information on other programs and products that are available from MARCOM you can select "Contact Info" for information about how to contact us.

All of our DVDs, both English and Spanish, are subtitled (similar to closed captioning). If there are hearing impaired employees participating in your training session, or you want people to be able to read the program narration as well as hear it, push the "subtitle" button on your DVD player's remote control or the player's control panel. A print version of the narration will then appear on the screen as the program plays.

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. These include:

- 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 in this guide, and the questions and answers in the master copy of the quiz should be used as a basis for this discussion, as well as the 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 can be made using the printed "master" in the back of this binder or from the PDF version on the DVD. 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. The attendees' training logs should also be updated, and every attendee should be given a filled out and signed training certificate, which signifies that they have successfully completed the course. Copies of the employee training log and the training certificate can be made using the printed "master" in the back of this binder or from the PDF version on the DVD.

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 recordkeeping and how they need to participate in the process.

OUTLINE OF MAJOR PROGRAM POINTS

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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.

- **Employers and managers like you have a powerful tool for making their facilities safer.**
 - It's OSHA's recordkeeping system... often referred to as "Part 1904," after its Federal Regulation part number.
- **The information, forms and procedures required by Part 1904 make it easy for you to:**
 - Document workplace injuries and illnesses.
 - Determine how they happen.
 - Make good decisions for the long-term improvement of your workplace safety program.
- **But Part 1904 does even more.**
 - It gets employees involved in the recordkeeping process as well, and protects their right to a safe workplace.
- **You play an important role in making this all happen. In this program we will explore how your contribution helps improve workplace safety for everyone, and...**
 - Why recordkeeping is so important.
 - How a few more records or some statistics can actually make your facility a safer place to work.
 - What part you play in the process.
- **By gathering and organizing more information on work-related injuries and illnesses, you can help determine whether they form patterns.**
 - This enables you to identify problems and then take steps to eliminate them.

- **Workplace injury and illness records can also help your employees to focus on the specific hazards that they may encounter in your facilities.**
 - Once they have this information, they'll be more likely to follow proper procedures and report dangerous conditions.
 - That's something that will make your workplace safer for everyone.
- **Comprehensive recordkeeping has another advantage, as well.**
 - The data that you collect helps OSHA get a sense of the hazards that are common to many work environments.
 - So OSHA can help other employers and employees avoid them.
- **By keeping good injury and illness records, you can participate in protecting millions of workers across the country, not just those in your own facility.**
- **But there are some misconceptions about injury and illness recordkeeping that you should be aware of.**
 - For example, recording a work-related injury or illness does not necessarily mean that an OSHA rule was violated.
 - Also, these records are not meant to "point a finger" at any particular person... or to determine who is eligible for workers' compensation or other benefits.
 - The records exist for one reason only, to make all companies safer.
- **Regardless of what industry you are in, it is your responsibility to know which, if any, of the OSHA recordkeeping requirements apply to you.**

- **Whether you have to keep injury and illness records, and if so what kind, can depend on a number of things.**
 - For example, if your organization had 10 or fewer employees during all of the last calendar year, it could be considered "partially exempt".
 - If your business falls into one of OSHA's "low-hazard" classifications, such as the retail, service, finance, insurance or real estate industries, it may also be partially exempt from recordkeeping.
- **What does "partially exempt" mean?**
 - It means your organization is not required to keep injury and illness records for OSHA unless you are asked in writing to do so by OSHA, by the Bureau of Labor Statistics (the BLS) or by a state agency operating under the authority of OSHA or the BLS.
- **OSHA categorizes businesses based on the North American Industrial Classification System (NAICS for short), which is used by federal agencies to organize information about the U.S. economy.**
- **Industries that are partially exempt from the OSHA recordkeeping requirements are listed by NAICS code in an appendix to Part 1904.**
 - You can find this information on OSHA's website at www.osha.gov.
- **You can also get information on the NAICS codes and recordkeeping exemptions by contacting your nearest regional OSHA office.**
- **If your company is not exempt from the OSHA recordkeeping requirements, you must:**
 - Record work-related employee injuries and illnesses.
 - Maintain these records, and make them available to OSHA and your company's employees.

- **What is OSHA's definition of "injuries and illnesses" under Part 1904?**
 - First of all, you don't have to worry about recording minor medical problems.
 - If a cut requires only an adhesive bandage, or a burn doesn't blister and needs just a bit of first-aid cream, then they aren't recordable injuries.
- **But if someone loses workdays, or is restricted from doing certain tasks, or if a worker requires special medical treatment or hospitalization, their injuries or illnesses may well be recordable.**
- **This is true no matter what position the person has with the company, so employees have equal protection under Part 1904 regardless of whether they are classified as:**
 - Labor or executive.
 - Hourly or salaried.
 - Part-time, seasonal, or migrant.
- **Recordable injuries and illnesses must also be recorded for employees who are not on your payroll if you supervise these employees on a day-to-day basis, such as some "contractors".**
- **Once you've determined that an injury or illness is serious, and that the affected worker is covered by the recordkeeping guidelines, you must make sure that the problem is work-related and a "new" case.**
 - Only these injuries and illnesses are recordable.
- **The definition of "work-related" covers so much ground that it's easier to explain when a condition is not work-related.**
 - Obviously, a medical problem is not work-related if it results from events that take place outside of work.

- **But a health issue is also not work-related if it occurs in the workplace during off-hours... or is unrelated to the injured employee's job.**
 - For example, 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 accidentally hurts his hand using a lathe.
 - Since this injury didn't occur during the employee's normal work day, and has nothing to do with his job, this is not considered a work-related injury under Part 1904.
- **If an injury or illness is due to voluntary participation in a recreational activity, such as playing softball on the company team, it is also not considered to be work-related.**
- **If, however, an employee gets sick from eating food that is contaminated by materials in a workplace such as lead, or if the food was supplied by their employer, the resulting illness would be work-related.**
- **Health problems and injuries are not work-related if they are due to:**
 - Personal grooming.
 - Self-medication for a non-work-related condition.
 - Intentionally self-inflicted injuries.
- **Neither are injuries caused by motor vehicle accidents on company parking lots or access roads while an employee is commuting to or from work.**
- **Common cold or flu infections aren't considered work-related either.**
 - But contagious diseases such as tuberculosis or hepatitis can be considered work-related if the employee is infected while performing their job.

- **As you can see, determining whether or not a condition is work-related can be complicated.**
 - Figuring out whether it's "new" or not can be tricky, too.
- **An injury or illness is considered "new" if:**
 - The employee hasn't had an injury or illness like it before.
 - The employee did have a health problem like it before, and recovered from it, only to have something in the workplace cause it to reoccur.
- **Sometimes finding these things out can require a bit of detective work on your part. For each case, you'll want to talk to several people, including...**
 - The sick or injured employee, to get the basic facts.
 - Your company's designated physician, for an expert medical opinion.
 - Coworkers who may have seen something that others missed.
- **It's crucial for the information to be accurate when you are investigating an injury or illness.**
 - So stick to the facts, and be careful of people "speculating" about an incident, even if they're trying to be helpful.
 - Be sure you don't do any speculating yourself, as well.
- **Once you've established that an injury or illness is both work-related and "new", it's time to fill out OSHA Form 300, the Log of Work-Related Injuries and Illnesses.**
 - This is the ongoing record of the injuries and illnesses that occur in a facility.
- **The form asks for information like who was involved, where and when the incident happened, and how it injured the employee or made them sick.**
- **Be sure to note the estimated number of days that any injured or sick employee will be on medical leave, or restricted from performing their normal work.**

- **Next comes Form 301, the Injury and Illness Incident Report, which asks you for more details about each incident.**
 - 301 forms must be filled out within seven days after the incident has occurred.
- **You don't need to complete Form 300A, the Summary of Work-Related Injuries and Illnesses, until near the end of the calendar year.**
- **Form 300A helps you to create an overview of employee injury patterns over the preceding year. That way you can make informed decisions on how to improve worker safety at your facility.**
- **The form divides all recordable medical problems into six categories:**
 - Injuries.
 - Skin disorders.
 - Respiratory conditions.
 - Poisonings.
 - Hearing loss.
 - A miscellaneous category called "All Other Illnesses".
- **You assign each recordable incident to the category that describes it best, then add up the totals for each category.**
- **The OSHA recordkeeping forms are written in plain language, and use a convenient question-and-answer format that makes information-gathering easier.**
- **OSHA can also provide additional materials with instructions, flowcharts and checklists to help you complete the forms.**

- **OSHA would like to use the injury and illness records that companies are collecting to create a database of this information that would be available to everyone.**
 - This would provide consolidated data about injury and illness trends across the county, by location, industry and other criteria.
 - It would also allow people to see how individual companies are doing at preventing recordable workplace incidents.

- **To accomplish these goals, OSHA's "Improve Tracking of Workplace Injuries and Illnesses" regulation requires some companies to submit electronic copies of their completed Form 300A to the agency.**
 - This requirement applies to companies with 250 or more employees, as well as those that have between 20 and 249 employees and are in industries with historically high occupational injury and illness rates.
 - For these organizations, each year's Form 300A must be forwarded to OSHA along with their Employer Identification Number by March 2 of the following year.
 - If you're not sure whether this applies to your company, contact OSHA for more information.

- **There are several important "employee rights" under OSHA's recordkeeping rules.**
 - First, information about workplace injuries and illnesses must be made available to all employees.
 - That's why Part 1904 requires you to post a year's Form 300A in a conspicuous place where notices to employees are normally displayed, from February 1 to April 30 of the following year.
 - The form must be visible at all times, never altered, defaced or covered by other material.

- **If they want more detailed information, employees must also be given access to specific injury and illness records (but not to materials that are considered "confidential").**

- **Remember though, reading reports isn't the only, or even the most important, way that employees get involved in the recordkeeping process.**
 - Employees are your "eyes and ears" as far as injury and illness situations are concerned.
 - So you need to be sure that they know how to report these incidents when they occur.
- **To help encourage employee participation in the recordkeeping process, Part 1904 prevents companies from discriminating against anyone who reports a work-related fatality, injury or illness.**
- **The Standard also protects workers who:**
 - File safety and health complaints.
 - Ask for access to Part 1904 records.
 - Exercise any rights afforded by OSHA.
- **As with any other system, OSHA recordkeeping has its share of "special situations" you may have to deal with.**
- **For example, OSHA wants to find out about some types of injuries and incidents almost as soon as they happen, so they can identify and reduce hazards in the workplace more effectively.**
 - That's why Part 1904 requires you to report any work-related fatalities to OSHA within 8 hours of their occurrence.
- **You must also report certain work-related injuries and illnesses within 24 hours, including...**
 - In-patient hospitalizations.
 - Amputations.
 - Loss of an eye.
- **These reports can be made by telephone or in person to your local OSHA office, or you can call OSHA's central telephone number.**

- **OSHA has also made it easy to submit these reports electronically.**
 - Just go to www.osha.gov, and click on the "Report a death or severe injury" icon.
 - Then click on the "Report Online" link in the "To Make a Report" section and follow the prompts.
- **If your company is already complying with another government agency's injury and illness recordkeeping requirements, OSHA will accept those records in place of its "300 series" reports as long as...**
 - OSHA officially recognizes the other agency's records.
 - The other agency's records contain all of the same information that OSHA requires.
- **OSHA is also flexible regarding the 300 series forms themselves.**
 - If official 300, 301 and 300A forms are unavailable, "equivalent" forms may be used.
- **"Equivalent" forms must:**
 - Contain the same information as an official form,
 - Be as readable and understandable as an official OSHA form,
 - Be completed by following the same instructions as are used with the OSHA forms.
- **Some states operate their own OSHA programs, under the authority of a "state plan" approved by OSHA.**
 - Records kept for these state programs are also acceptable to OSHA as long as the states have occupational injury and illness reporting requirements that are identical to the requirements of Part 1904.
- **Keeping records organized and available is also important to OSHA.**
 - Once the 300, 301 and 300A forms are completed they must be retained for five years following the end of the calendar year that they cover.

- **During this storage period, OSHA 300 forms must be updated to include new information about the ailments they record, such as recurring illnesses or other medical conditions.**
 - If the description or outcome of a case changes, the original entry must be removed and the new information entered.
 - Keep in mind that these rules apply to OSHA 300 forms only (OSHA 301 and 300A forms do not have to be updated).
- **OSHA also wants to make sure that it has access to all of the information that your company has recorded.**
 - When an authorized government representative asks for the records you've kept under Part 1904, your company must provide copies within four business hours.
- **And if you receive OSHA's annual Audit and Verification Program survey form, you must also fill it out and return it in a timely fashion. Your response must include:**
 - The number of people employed at your facility in the specified year.
 - The number of hours worked by these employees.
 - Any information that OSHA requests from the records that you have kept under Part 1904.

*** * * SUMMARY * * ***

- **OSHA recordkeeping enables you to help make your facility a safer place to work.**
- **To determine whether your company is "partially exempt" from OSHA recordkeeping, visit www.osha.gov or contact your nearest OSHA office.**
- **"Recordable" injuries and illnesses are generally severe enough that they require medical treatment or affect an employee's ability to do their job.**

- **Recordable incidents must also be "work-related" and "new."**
- **The "Log of Work-Related Injuries" and the "Injury and Illness Incident Report" are both critical forms in the day-to-day recordkeeping process.**
- **Form 300A, the year-end "Summary of Work-Related Injuries and Illnesses", must be posted for all employees to see.**
- **Some companies are required to submit electronic copies of Form 300A and their Employer Identification Number to OSHA.**
- **OSHA's recordkeeping regulations also protect an employee's rights when they report work-related injuries and illnesses.**
- **You must inform OSHA of work-related fatalities within 8 hours, and hospitalizations, amputations, and the loss of an eye within 24 hours.**
- **Your OSHA recordkeeping duties under Part 1904 aren't just "make-work" and "pushing paper". They are the core of how your company can learn from their experiences today, to become an even safer place to work tomorrow!**

ACCOMPANYING MATERIALS

ACCOMPANYING MATERIALS

In order to assist you in conducting your session on OSHA Recordkeeping, we have provided a number of specific materials that can be used with this program. These materials have been furnished in PDF format on the DVD as well as printed "masters" in the back pocket of this binder. This will enable you to make as many copies of these forms as you need. If you have colored paper available to you, it is often useful to put each form on a different color. This enables you to easily differentiate between the materials. The materials enclosed with this guide include:

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

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. You can also use the quiz as the basis for a class discussion. If you have decided to give the quiz both before and after the attendees view the program, it is often interesting to have the attendees compare their "before" and "after" answers as part of the session. Typically, the quiz is filed in the employee's personnel file.

Training Certificate

This form allows you to give each employee their very own "certificate of completion", showing that they have attended the course and taken the quiz. Space is provided to insert the employee's name, the course instructor and the date of completion.

Employee Training Log

This log helps you to keep track of when each employee has taken the course, as well as associated courses/training. Space is provided to list pertinent data about the employee, as well as information such as the date the course was taken and the instructor conducting the course. A copy of this form should be kept in each employee's training or personnel file.

Booklet*

A sample copy of the employee booklet that has been designed for use with this program has also been included. Using both illustrations and text to review important points, the booklet is designed to reinforce the message that employees receive in the training session. The material is presented in the same order as seen in the program and is organized into concise sections, making it easy to understand and remember.

**Additional booklets, as well as copies of the poster that has been created to get employees thinking about OSHA Recordkeeping, are available from your reseller.*