



RECORDABLE VS. REPORTABLE: UNDERSTANDING THESE IMPORTANT COMPLIANCE TERMS

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As with most government-related topics, OSHA recording requirements can seem complicated and overwhelming. However, it is often these types of topics where it is even more important to get things right.

Understanding when to track incident records can help your company meet OSHA compliance and, ideally, [avoid costly fines](#). Keep reading to learn more about maintaining OSHA records and when you might need to report an incident to OSHA.

TERMS TO KNOW

With OSHA records, there are three main terms you will see commonly used, and that will be used throughout this article. You will learn more about each later on, but here are the basics.

Recording is simply the act of tracking an on-the-job injury or illness. There are multiple forms and logs that need to be filled out and maintained by each company, with different details required of each one.

Reporting means notifying OSHA of certain outcomes from occupational incidents, such as a death. These types of incidents must be reported within a certain timeframe, depending on the occurrence.

Submitting is similar to recording, in that this does not apply to all employers. However, for those that fall within the restrictions, there is a specific injury and illness form that needs to be electronically submitted to OSHA each year.

WHO NEEDS TO RECORD INJURIES?

[Under 29 CFR 1904](#), any employer covered by the Occupational Safety and Health Act with 11 or more employees must maintain OSHA injury and illness records. Employers with 10 or fewer employees and organizations in certain [low-hazard industries](#) are partially exempt from keeping such records.

Within many smaller organizations, employee numbers may fluctuate throughout the year. In these instances, employers should review their maximum employment numbers. If at any time during the year, you have more than 10 employees, you are required to record safety incidents, unless you are in an exempt industry.



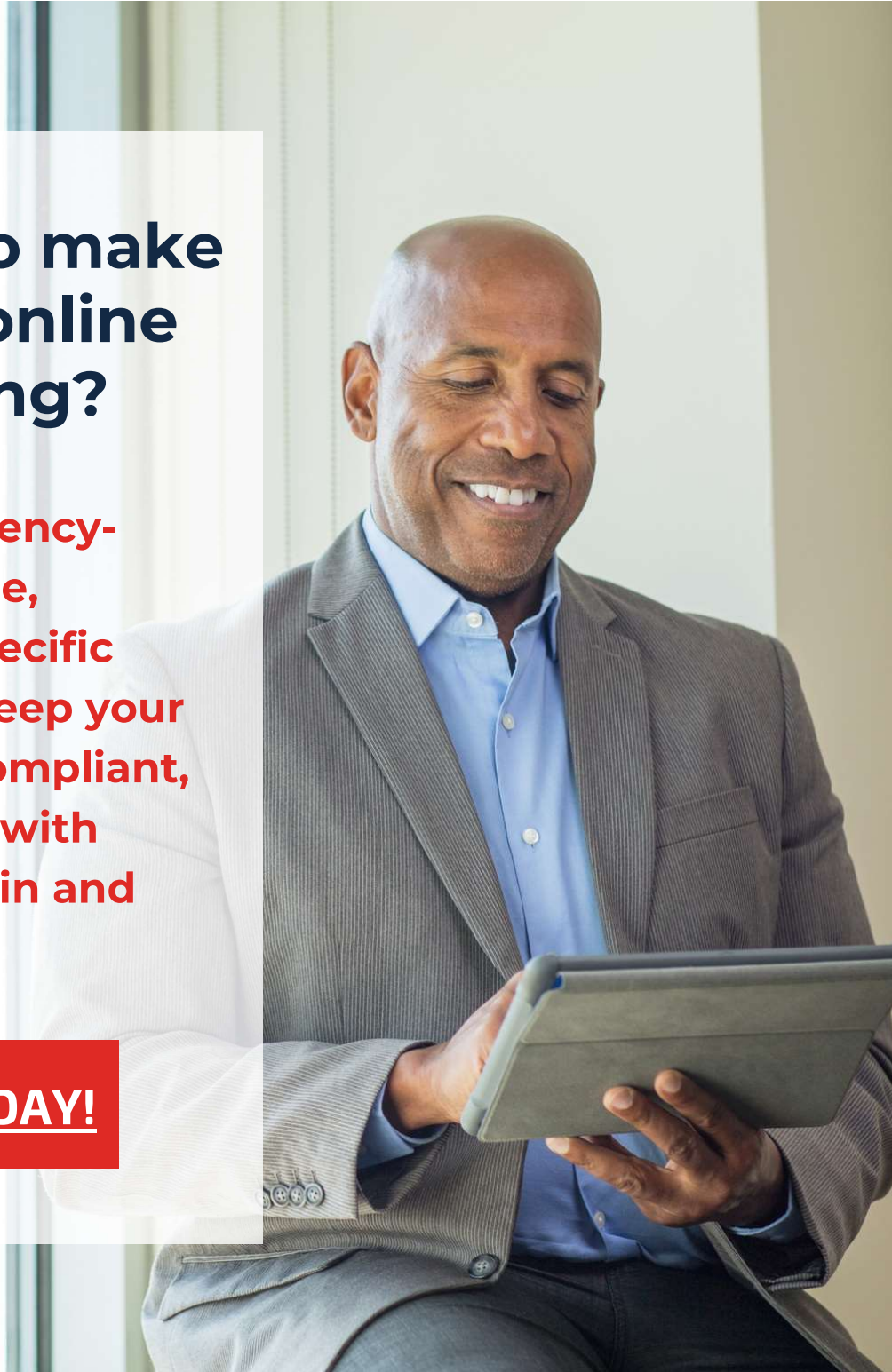
Additionally, not all employers are covered by federal OSHA regulations. There are currently 26 states and 2 U.S. territories operating under an OSHA-approved [State Plan](#).

While these plans may differ from federal regulations in some aspects, OSHA has been very clear in noting that “State plans must have occupational injury and illness recording and [reporting requirements](#) that are substantially identical to the requirements in this part.”

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WHAT MAKES SOMETHING RECORDABLE

Simply put, a recordable incident is a work-related injury or illness that results in any of the following:

- Fatality
- Loss of consciousness
- Day(s) away from work
- Restricted work activity or job transfer
- Diagnosis of cancer or chronic irreversible diseases
- Punctured eardrum
- Fractured or cracked bones
- Medical treatment beyond first aid

With regards to the last item, OSHA provides a [detailed list](#) of treatments they consider to be basic first aid. Because this list covers such a wide variety of treatments, such as nonprescription medications, simple wound coverings, and even hot or cold therapy, this will likely be enough to treat many less severe incidents.

If basic first aid is all that is needed to treat an injury, that incident does not need to be noted in your recordkeeping logs.

On the other hand, if anyone – no matter if that person is a medical professional or not – has to administer a “medical treatment” for an injury or illness, the incident is required to be recorded.

The list of things OSHA considers to be medical treatment in these instances includes:

- Nonprescription medication used at prescription strength
- Stitches and staples to close wounds
- Rigid devices for support
- Physical therapy or chiropractic treatment
- Certain vaccines, such as rabies or Hepatitis B



Additionally, if a healthcare professional recommends one of these treatments and the affected employee does not follow-up on that recommendation, the incident still must be recorded.

There are also specific cases that must be recorded, regardless of the type of treatment applied and no matter what the physical result, such as death or days away from work, may be.

These four cases are:

- Hearing loss
- [Medical removal](#)
- Needlestick injuries
- Tuberculosis

One final thing to keep in mind is that each recorded incident must be a new case. According to OSHA, an injury or illness can be considered a new case if the employee:

- Has not previously experienced a recorded injury or illness of the same type that affects the same part of the body, or
- Previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely from the previous injury or illness.

WHAT MAKES SOMETHING REPORTABLE?

Most work-related injuries and illnesses that occur may need to be recorded on the proper OSHA logs, but the majority will not be reported directly to OSHA, other than during an annual submission. However, there are certain situations that call for immediate action from the employer.

Any occupational incident that results in a fatality or a severe injury – in-patient hospitalization, amputations or the loss of an eye – must be directly reported, either to the nearest [OSHA Area Office](#), to the 24-hour OSHA hotline or via the [online reporting](#) form.

Work-related fatalities must be reported within 8 hours of learning about the death. All other severe injuries listed above must be reported within 24 hours. Unlike any of the recordkeeping restrictions, all



employers under OSHA jurisdiction must report these types of incidents.

However, it is important to remember that employers do not have to report an incident to OSHA if the injury or illness:

- Resulted from a motor vehicle accident on a public street or highway (except in a construction work zone)
- Occurred on a commercial or public transportation system
- Involved hospitalization for diagnostic testing or observation only

In such instances, the injury or illness should still be documented on the appropriate OSHA logs; they simply do not need to be reported directly to OSHA.

WHAT GETS SUBMITTED TO OSHA?

While the various OSHA forms – outlined in more detail below – include specific information about injuries and illnesses, and these forms must be maintained on-site and may be requested for an inspection, the good news is that the majority of organizations will not need to submit data to OSHA.

As of 2017, the only establishments that must electronically submit data from their 300A are those with 250 or more employees and those with 20 or more employees in certain [high-risk industries](#). In these cases, employers must use OSHA's [Injury Tracking Application portal](#) to submit OSHA 300A data by March 2 for the previous calendar year.

One thing to note is that, for organizations that fall under the requirements for submitting data to OSHA, an Injury Tracking Application must be completed even if there were no injuries or illnesses. In that case, zeroes would be reported, but this information must still be officially documented.

HOW TO DOCUMENT OCCUPATIONAL INCIDENTS

There are three different OSHA recordkeeping logs that need to be completed and maintained by all applicable organizations. The names of the logs are similar, so they can be easily confused, but here is a simple breakdown of the function of each.



OSHA Form 301

Also known as an Injury and Illness Incident Report form, this contains any injury deemed to be OSHA recordable. This form will list the extent and severity of an injury or illness and medical information.

Incidents must be documented within seven calendar days of learning about the injury or illness. This form does not get submitted to OSHA but it must be maintained at your worksite for 5 years.

OSHA 300 Log

The next form is the OSHA 300 Log, which must include incident information such as employee details and if the incident resulted in death, days away from work, a job transfer, or other outcomes.

Similar to Form 301, the 300 Log **does not** get submitted to OSHA but must also be maintained on the jobsite for 5 years. Employers may need to produce a copy of the 300 Log upon request during an OSHA inspection.

OSHA 300A

In 2019, OSHA updated the [recordkeeping regulation](#) to where applicable organizations now need only submit the OSHA 300A, which serves as an annual summary of all work-related incidents.

Much like the other OSHA forms, this must be kept at the worksite for 5 years. Additionally, the OSHA 300A also needs to be signed by a company executive and displayed in the office from February 1 to April 30 each year.

TRAINING TO AVOID RECORDABLE INCIDENTS

While it may go without saying, training your entire workforce not only helps to minimize safety risks, it also means you may be less likely to have an on-the-job incident that needs to be recorded.

Taking online safety training is convenient as each of your employees can receive training on a wide range of topics, from the uses of various PPE to understanding specific OSHA regulations and even learning proper [incident reporting](#) procedures.

Another benefit to taking training online is how easy it is to repeat training as often as is needed – or as often as you'd like. Some OSHA regulations require [training](#) to be conducted at least annually.

It's never a wrong time to evaluate your current safety program, or implement a new one, to protect your employees and ensure you are adhering to OSHA standards. Contact [SafetySkills](#) today to see how we can help you get a head start on improving your safety program.

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