

LIVE WEBINAR

OSHA Compliance and Recordkeeping: Fine Tuning Your OSHA 300 Logs to Make a Good First Impression

WEDNESDAY

DECEMBER 17

1-2PM CST



TJ Greenwood

Safety Services Manager, SMSC

Before We Begin

All attendees are in “LISTEN ONLY” mode.

You can type in questions by clicking on the question box on the top right of your GoToWebinar panel.

Q&A at the end of the webinar.

Additional questions can be emailed to: TGreenwood@smscsafety.com

A recorded copy of the webinar and slides will be made available to all attendees.



TODAY'S PRESENTER



TJ GREENWOOD

Manager, Risk Safety Services- SMSC

tgreenwood@smscsafety.com

M: 608.408.8353



AGENDA



CAUTION

**IF YOU THINK OSHA
IS A SMALL TOWN
IN WISCONSIN,
YOU'RE IN TROUBLE.**

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OSHA: Recordability

PURPOSE OF THE RULE



To require employers to record and report work-related fatalities, injuries and illnesses

Recording does not mean the employer or employee was at fault, an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits.

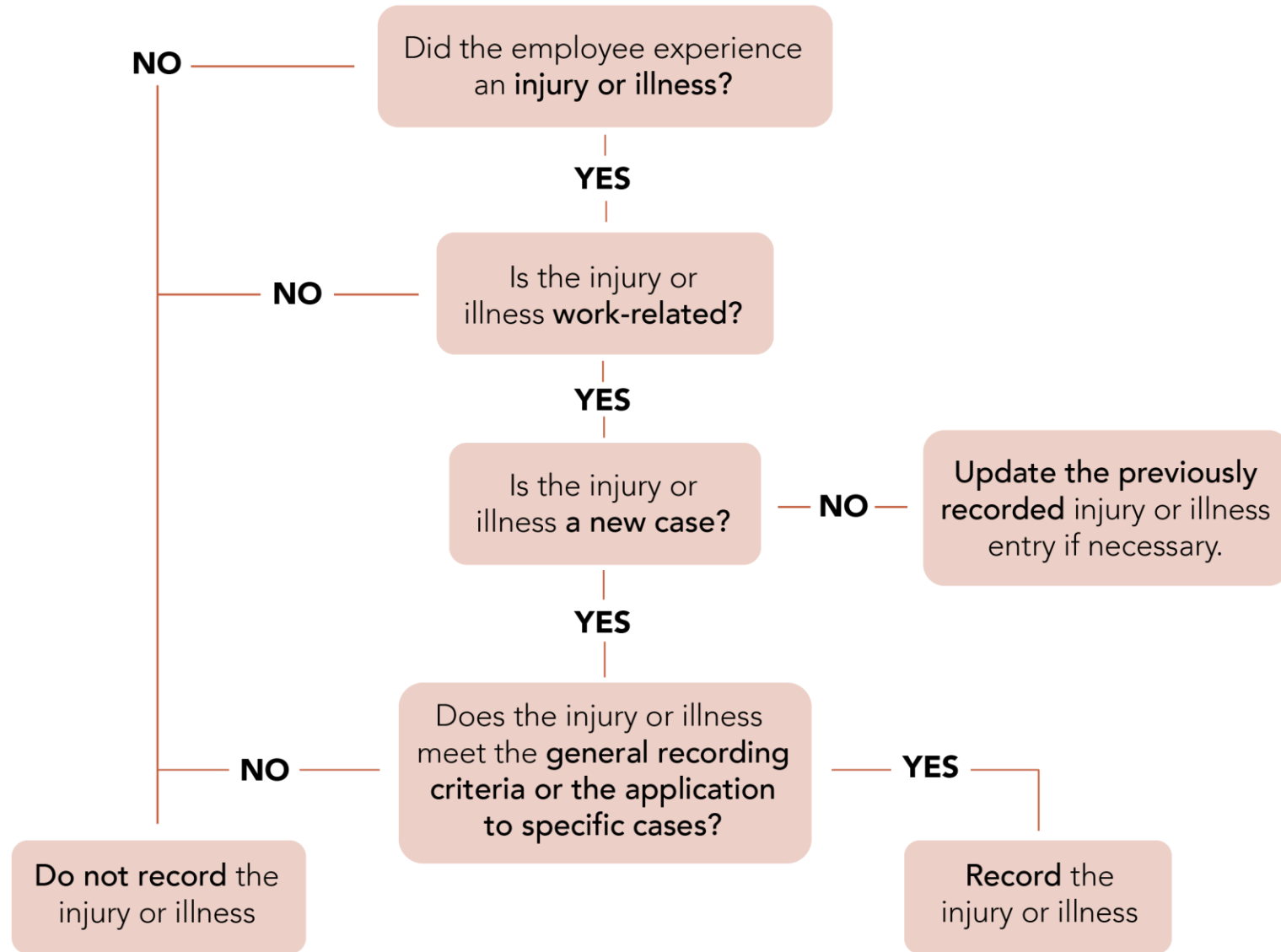


1904.4 – RECORDING CRITERIA

Covered employers must record each fatality, injury or illness that:

- is **work-related**, and
- is a **new** case, and
- meets one or more of the general recordkeeping **criteria**





1904.5 – EXCEPTIONS

Present as a member of the **general public**

Symptoms arising in work environment that are solely due to **non-work-related** event or exposure

Voluntary participation in **wellness program**, medical, fitness or recreational activity

Eating, drinking or preparing food or drink for personal consumption



1904.5 - EXCEPTIONS

Personal tasks outside assigned working hours

Personal **grooming**, self medication for non-work-related condition, or intentionally **self-inflicted**

Motor vehicle accident in parking lot/access road during commute

Common **cold** or **flu**

Mental illness, unless employee voluntarily provides a medical opinion from a physician or licensed health care professional (PLHCP) having appropriate qualifications and experience that affirms work-relatedness



1904.5 – TRAVEL STATUS

An injury or illness that occurs while an employee is on travel status is work-related if it occurred while the employee was **engaged in work activities** in the interest of the employer

Home away from home

Detour for personal reasons is not work-related



1904.7 – GENERAL RECORDING CRITERIA

An injury or illness is recordable if it results in one or more of the following:

- Death
- Days away from work
- Restricted work activity
- Transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- Significant injury or illness diagnosed by a PLHCP

WORK COMP DOES NOT MEAN OSHA RECORDABLE



1904.7(B)(3) - DAYS AWAY CASES

- Record if the case involves one or more days away from work
- Check the box for days away cases and count the number of days
- Do not include the day of injury/illness
- Count the number of calendar days the employee was unable to work (include weekend days, holidays, vacation days, etc.)
- Cap day count at 180 days away and/or days restricted
- May stop day count if employee leaves company for a reason unrelated to the injury or illness
- If a medical opinion exists, employer must follow that opinion

◀ ▶ July 2018

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY
Jul 1 Jeff falls	2	3	4	5 Jeff returns



1904.7(B)(4) - RESTRICTED WORK CASES

Restricted work activity exists if the employee is:

- Unable to work the full workday he or she would otherwise have been scheduled to work; or
- Unable to perform one or more routine job functions

An employee's routine job functions are those activities the employee regularly performs at least once per week



1904.7(B)(5) – MEDICAL TREATMENT

Medical treatment is the management and care of a patient to combat disease or disorder.

It does not include:

- Visits to a PLHCP solely for observation or counseling
- Diagnostic procedures
- First aid



1904.7(B)(5) – FIRST AID

- Using nonprescription medication at nonprescription strength
- Tetanus immunizations
- Cleaning, flushing, or soaking surface wounds
- Hot or cold therapy
- Wound coverings, butterfly-bandages
- Ace bandages



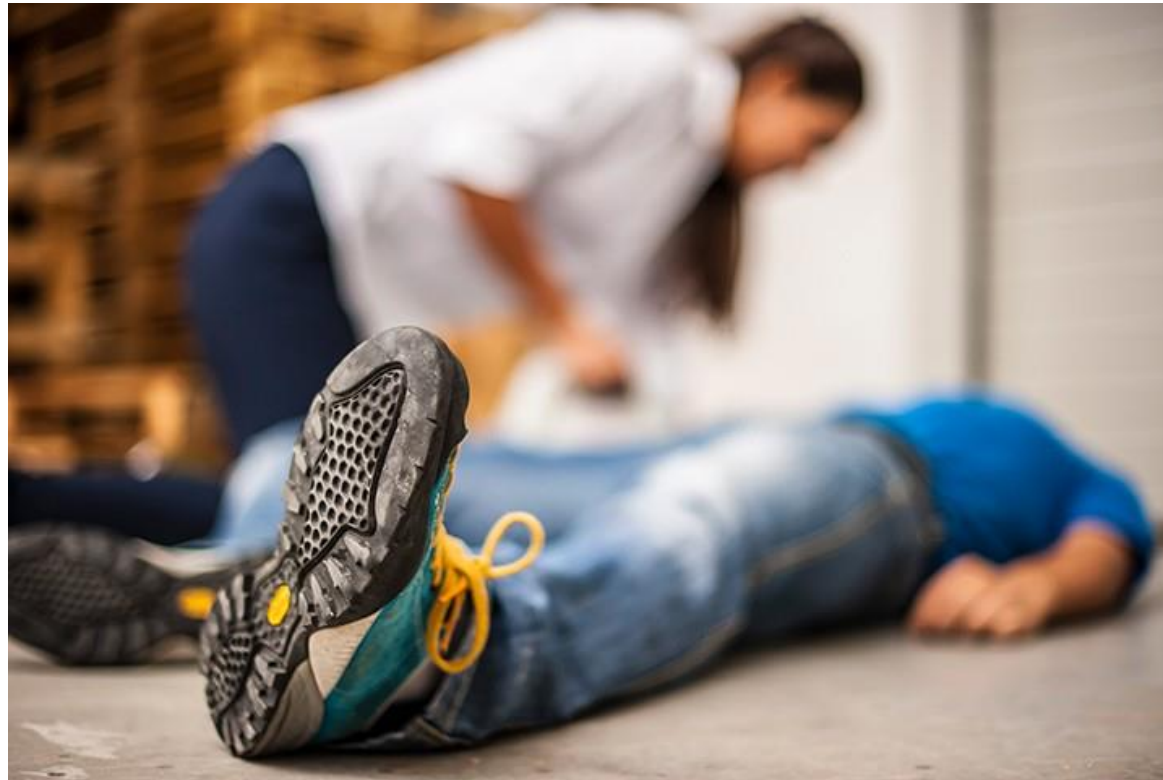
1904.7(B)(5) – FIRST AID

- Drilling of fingernail or toenail, draining fluid from blister
- Eye patches
- Removing foreign bodies from eye using irrigation or cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means
- Finger guards
- Massages
- Drinking fluids for relief of heat stress



1904.7(B)(6) – LOSS OF CONSCIOUSNESS

All work-related cases involving loss of consciousness must be recorded



1904.7(B)(7) – SIGNIFICANT DIAGNOSED INJURY OR ILLNESS

The following work-related conditions must always be recorded at the time of diagnosis by a Licensed Healthcare Provider:

- Cancer
- Chronic irreversible disease
- Punctured eardrum
- Fractured or cracked bone or tooth



OSHA: Logs and Forms

OSHA FORM 300A

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 20____


U.S. Department of Labor
Occupational Safety and Health Administration
Form approved OHS no. 12 D-4174

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."

Employers, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
_____	_____	_____	_____
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
_____	_____
(K)	(L)

Injury and Illness Types

Total number of: ...	
(M)	
(1) Injuries	(4) Poisonings
(2) Skin disorders	(5) Hearing loss
(3) Respiratory conditions	(6) All other illnesses

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 20 minutes per response, including time to review the instructions, search existing data sources, gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments on this estimate or any other aspect of this data collection, contact: U.S. Department of Labor, OSHA Office of Statistical Analysis, Room N-3634, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed form to this office.

Establishment information

Your establishment name _____

Street _____

City _____ State _____ ZIP _____

Industry description (e.g., Manufacturer of motor vehicles)

Standard Industrial Classification (SIC), if known (e.g., 3711)

OR

North American Industrial Classification (NAICS), if known (e.g., 336212)

Employment information (If you don't have these figures, see the definition on the back of this page to estimate.)

Total average number of employees _____

Total hours worked by all employees last year _____

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company signature _____ Title _____

Date _____

These 2 sections should equal the same number



1904.29 - FORMS

Employers must enter each recordable case on the forms within 7 calendar days of receiving information that a recordable case occurred



1904.30 – MULTIPLE BUSINESS ESTABLISHMENTS

- Keep a separate OSHA Form 300 for each establishment that is expected to be in operation for more than a year
- Each employee must be linked with one establishment
- Employers do not have to have an OSHA 300 Log if the employment was **less than 10** throughout the entire calendar year for the entire firm.
 - However, if one terminal has 7 employees and another terminal has 5 employees that would be 12 and both locations would need an OSHA 300 Log.



1904.31 – COVERED EMPLOYEES

- Employees on payroll
- Employees not on payroll who are supervised on a day-to-day basis
- Exclude self-employed and partners
- Temporary help agencies should not record the cases experienced by temp workers who are supervised by the using firm.
 - Only 1 location should account for the employee
- Owner-operators (gray area) – Normally you would not record these injuries, however if you are directing the owner/operator (meaning dispatching; scheduling loads; basically, treating like your company drivers, then you would record these injuries).



1904.32 – ANNUAL SUMMARY (OSHA 300A OR EQUIV.)

A company executive must certify the summary:

- An owner of the company
- An officer of the corporation
- The highest ranking company official working at the establishment, or
- His or her supervisor

Must post for 3-month period from **February 1 to April 30** of the year following the year covered by the summary



1904.33 – RETENTION AND UPDATING

Retain forms for 5 years following the year that they cover

Update the OSHA Form 300 during that period

Need not update the OSHA Form 300A or OSHA Form 301

Forms can be found at:

[Recordkeeping - Recordkeeping Forms | Occupational Safety and Health Administration \(osha.gov\)](#)



OSHA: Reporting of Serious Events

UPDATED 1904.39 – FATALITY/CATASTROPHE REPORTING

Employers have to report the following events to OSHA:

- All work-related fatalities
- All work-related in-patient hospitalizations of one or more employees
- All work-related amputations
- All work-related losses of an eye



UPDATED 1904.39 – FATALITY/CATASTROPHE REPORTING

Employers must report work-related fatalities within 8 hours of finding out about it.

For any in-patient hospitalization, amputation, or eye loss employers must report the incident within 24 hours of learning about it.

- Do not need to report highway or public street motor vehicle accidents involving the above (outside of a construction work zone)
- Still must record within OSHA records




1904.36 PROHIBITION AGAINST DISCRIMINATION



In addition to § 1904.35, section 11(c) of the OSH Act also prohibits you from discriminating against an employee for reporting a work-related fatality, injury, or illness.



OSHA: Injury Tracking Application



The screenshot shows the OSHA.gov website. At the top is a red header with the OSHA logo, "UNITED STATES DEPARTMENT OF LABOR", social media icons, a search bar with "Find it in OSHA", and a "A TO Z INDEX" link. Below the header is a navigation bar with links: ABOUT OSHA, WORKERS, EMPLOYERS, REGULATIONS, ENFORCEMENT, TOPICS, NEWS & PUBLICATIONS, and DATA. The main content area displays the "Injury Tracking Application Home" page. It includes sections for "Get Started Here" (Manual Data Entry and Batch Data Transmission), an "Overview of Data Submission Process" (4 steps: Create an Establishment, Add 300A Summary Data, Submit Data to OSHA, Review Confirmation Email), and a "2016 Data Submission Status" table.

2016 Data Submission Status	
300A Summary Status	Establishments
Not Added	0
Not Submitted	16
Submitted	5
Total	21

OSHA now accepting electronic submissions of injury and illness reports

Employers can begin submitting Form 300A data using an electronic reporting system.

Learn more [here](#).



REPORTING REQUIREMENTS

Below is the press release from OSHA introducing the introduction of this rule in 2024

The final rule takes effect on Jan. 1, 2024, and now includes the following

submission requirements: Certain establishments must electronically submit to OSHA detailed information about each recordable injury and illness entered on their previous calendar year's OSHA 300 Log and 301 Incident Report forms (29 CFR 1904.41). This includes the date, physical location, and severity of the injury or illness; details about the worker who was injured; and details about how the injury or illness occurred.

- Only establishments with 100 or more employees in designated industries are required to submit case-specific information from the OSHA Form 300 Log and the OSHA Form 301 Incident Report.
 - **Food Manufacturing, Wood Product Manufacturing, Plastics Manufacturing, Machine Shops, Metal Working, Building Material Wholesalers, General Merchandise Stores, General Freight trucking and many more are included. Some members will be effected by this new law.**
- The due date to complete this submission is March 2, 2024. The submission requirement is annual, and the deadline for timely submission of the previous year's injury and illness data will be on March 2 of each year.



300 & 301 FORMS: WHO MUST SUBMIT?

- Establishments with 100 or more employees that are classified in certain industries with historically high rates of occupational injuries and illnesses will need to submit OSHA 300 & 301 forms electronically to OSHA.
 - Food Manufacturing
 - Wood Product Manufacturing
 - Plastics Manufacturing
 - Machine Shops
 - Metal Working
 - Building Material Wholesalers
 - General Merchandise Stores
 - General Freight Trucking
 - Specialized Freight Trucking
 - And More...
- **This will allow OSHA to see the specific details, location, accident causes, etc.** In doing so OSHA will be able to target specific injuries or businesses for enforcement action if they choose to do so. The intent from OSHA is to nudge employers to improve safety and health incident rates.



OSHA 300 LOG ELECTRONIC SUBMISSIONS ([HTTPS://WWW.OSHA.GOV/INJURYREPORTING/INDEX.HTML](https://www.osha.gov/injuryreporting/index.html))

What:

Covered establishments must electronically submit information from their OSHA Form 300 & 301 for each injury on the form 300.

[illegible]

300A FORMS: WHO MUST SUBMIT?

Who:

Establishments with 250 or more employees that are currently required to keep OSHA injury and illness records, and establishments with 20-249 employees that are classified in certain industries with historically high rates of occupational injuries and illnesses.

OSHA News Release

OSHA determined that Section 18(c)(7) of the Occupational Safety and Health Act, and relevant OSHA regulations pertaining to State Plans, require **all affected employers** to submit injury and illness data in the Injury Tracking Application (ITA) online portal, **even if the employer is covered by a State Plan that has not completed adoption of their own state rule.**

OSHA 300 LOG ELECTRONIC SUBMISSIONS ([HTTPS://WWW.OSHA.GOV/INJURYREPORTING/INDEX.HTML](https://www.osha.gov/injuryreporting/index.html))



OSHA 300 LOG ELECTRONIC SUBMISSIONS (HTTPS://WWW.OSHA.GOV/INJURYREPORTING/INDEX.HTML)


What:

Covered establishments must electronically submit information from their OSHA Form 300A.

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 20


U.S. Department of Labor
Occupational Safety and Health Administration
Form approved OMB no. 1218-0176

All establishments covered by Part 300A must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
(K)	(L)

Injury and Illness Types

Total number of . . . (M)			
(1) Injuries	_____	(4) Poisonings	_____
(2) Skin disorders	_____	(5) Hearing loss	_____
(3) Respiratory conditions	_____	(6) All other illnesses	_____

Establishment information

Your establishment name _____

Street _____

City _____ State _____ ZIP _____

Industry description (e.g., *Manufacturer of motor truck trailers*) _____

Standard Industrial Classification (SIC), if known (e.g., 3713) _____

OR

North American Industrial Classification (NAICS), if known (e.g., 336212) _____

Employment information (If you don't have these figures, see the Worksheet on the back of this page to estimate.)

Annual average number of employees _____

Total hours worked by all employees last year _____

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company executive Title

Date Date

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 30 minutes per response, including time to review the instructions, search existing data sources, gather the data needed, and complete and review the collection of information. Send comments regarding this burden estimate or any other aspect of this data collection, including suggestions for reducing the burden, to Washington, DC 20503. Do not send the completed forms to this office.



OSHA 300 LOG ELECTRONIC SUBMISSIONS (HTTPS://WWW.OSHA.GOV/INJURYREPORTING/INDEX.HTML)

Establishments in the following industries with 20 to 249 employees must submit injury and illness summary (Form 300A) data to OSHA electronically

NAICS	Industry
11	Agriculture, forestry, fishing and hunting
22	Utilities
23	Construction
31-33	Manufacturing
42	Wholesale trade
4413	Automotive parts, accessories, and tire stores
4421	Furniture stores
4422	Home furnishings stores
4441	Building material and supplies dealers
4442	Lawn and garden equipment and supplies stores
4451	Grocery stores
4452	Specialty food stores
4521	Department stores
4529	Other general merchandise stores
4533	Used merchandise stores
4542	Vending machine operators
4543	Direct selling establishments
4811	Scheduled air transportation
4841	General freight trucking
4842	Specialized freight trucking

4841	General freight trucking
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When:

Covered establishments must submit year information by March 2 each year.



OSHA 300 LOG ELECTRONIC SUBMISSIONS ([HTTPS://WWW.OSHA.GOV/INJURYREPORTING/INDEX.HTML](https://www.osha.gov/injuryreporting/index.html))

How:

OSHA has a secure website that offers three options for data submission. First, users will be able to **manually enter** data into a web form. Second, users will be able to **upload a CSV file** to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to **transmit data electronically** via an API (application programming interface).



Are the electronic reporting requirements based on the size of the establishment or the size of the firm?

- The electronic reporting requirements are based on the size of the establishment, not the firm. The OSHA injury and illness records are maintained at the establishment level.
- An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed.
- A firm may be comprised of one or more establishments. To determine if you need to provide OSHA with the required data for an establishment, you need to determine the establishment's peak employment during the last calendar year.
- Each individual employed in the establishment at any time during the calendar year counts as one employee, including full-time, part-time, seasonal, and temporary workers.

OSHA confirmed less than 20 employees do not need to report electronically, but recommend keeping a log and:

All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.

A fatality must be reported within 8 hours.

An in-patient hospitalization, amputation, or eye loss must be reported within 24 hours.



May a firm with multiple establishments make a single submission of the data from the multiple establishments?

- Yes, a firm with more than one establishment may submit establishment-specific data for multiple establishments.
- To do this, the firm will create one registration and follow the directions provided to submit data for multiple establishments. It is important to note that the electronic reporting requirements are for data at the establishment level, not the firm level.
- The submitted data must be specific for each individual establishment.
- Note that establishments under state plan jurisdiction must comply with state plan regulations.





Questions



TODAY'S PRESENTER



TJ GREENWOOD
Senior Safety Consultant - SMSC

tgreenwood@smcsafety.com

M: 608.408.8353



Scan for more
upcoming events!

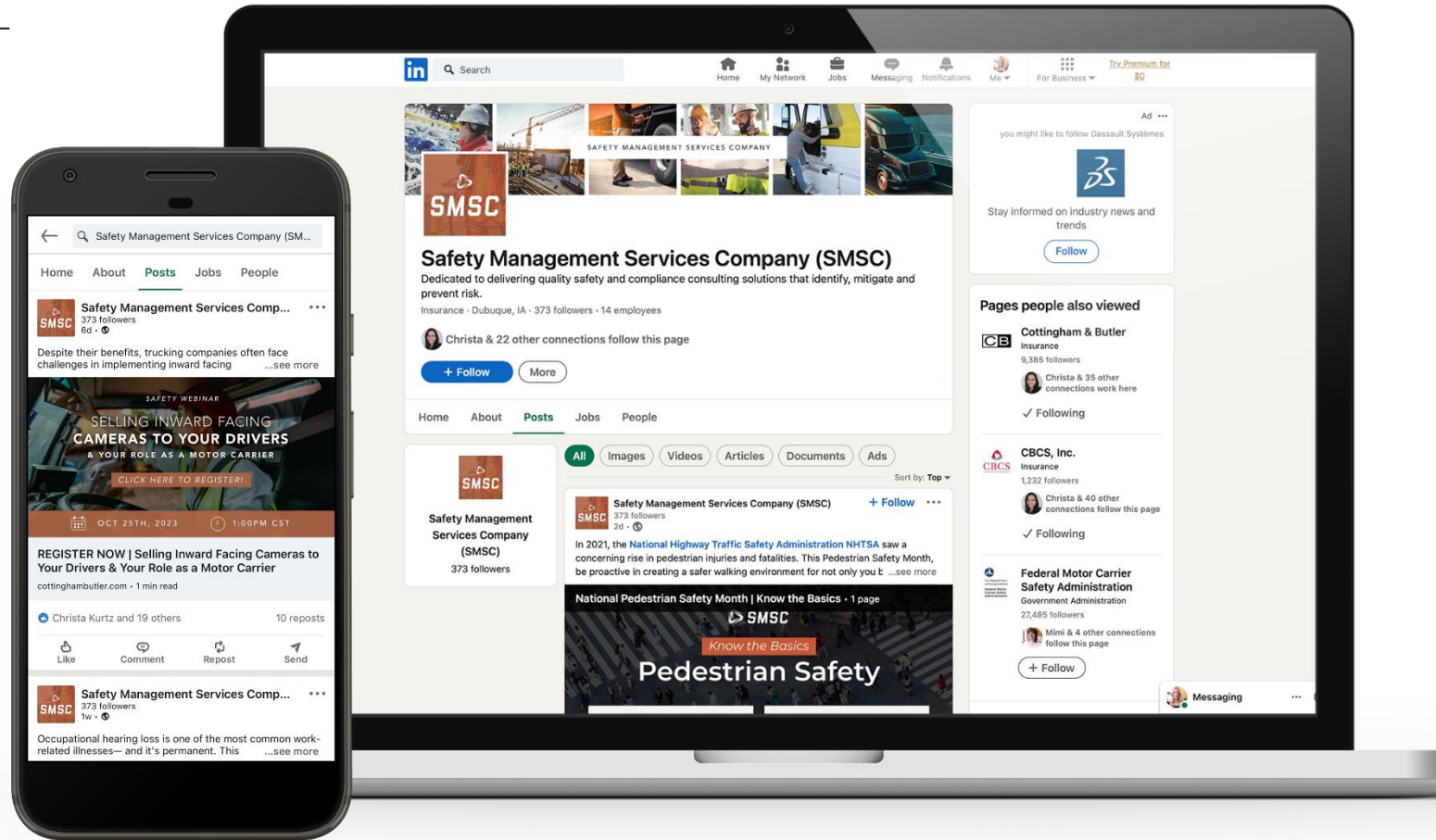


2026 Safety Webinar Series

Date	Webinar Title
January 21	TRUCKING / Cross-Border Safety: Strengthening ELP Standards and CDL Integrity
February 18	GENERAL INDUSTRY / Building a Safer Workplace: Reducing Workplace Injuries and Workers Compensation Claims for Drivers
March 17	TRUCKING / Navigating FMCSA Compliance Reviews
April 21	TRUCKING / Understanding CSA Scores and Their Impact
May 20	GENERAL INDUSTRY / Safety Leadership: Empowering Supervisors to Drive Change
June 17	TRUCKING / Crash Data Analysis: What Your Fleet's History is Telling You
July 14	TRUCKING / Mastering HOS & PC Rules: Split-Sleeper in Action
August 18	GENERAL INDUSTRY / Safety Training That Sticks: Learning Principles in Action
September 15	TRUCKING / Securing the Scene: Best Practices After a Collision
October 22	TRUCKING / The Impact of Drugs & Alcohol in Trucking
November 17	TRUCKING / FMCSA HOS Exceptions & Operational Flexibility
December 16	GENERAL INDUSTRY / OSHA Recordkeeping & ITA Compliance



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