

TerranearPMC Safety Share

Week of October 3, 2011 – What is an OSHA Recordable Incident?!%\$@&?

Maintaining a strong occupational safety and health incident record is not only an indication of how well an organization advocates safety and health, but also helps provide an organization for continued success, as safety and health statistics have become a main acceptance criterion for proposal biddings. Companies with substandard S&H records are frequently not even invited to bid on projects; especially when the customer is the US government. As such, having a strong corporate S&H program, not only ensures the well-being of company employees, but allows an organization to grow in a healthy fashion.

One of the principle indicators for an organization's S&H efforts toward "corporate wellness" is the information found on the OSHA 300-log. This log is an OSHA requirement that documents and categorizes the number of recordable incidents your organization had over the past year. A summary of the log (referred to the OSHA Log 300A form) needs to be displayed in the workplace (where employees typically congregate, such as a lunch or break area) during the time period of February 1 through April 30 of the following year. As this form's name implies, the OSHA Log 300A simply summarizes the workplace injuries and illnesses of an establishment of a particular calendar year without revealing employee names. This allows employees to see the number and types of work-related occupational events that occurred during the previous year without breaching personal information or confidentiality.

While this practice has been required of US employers for many years, most persons do not fully understand what a recordable incident is. OSHA has defined a recordable incident as a work-related occurrence that has resulted in one of the following: 1) Death, 2) Days away from work, 3) Restricted work or transfer to another job, 4) Medical treatment beyond first aid, 5) Loss of consciousness, and 6) a significant injury or illness diagnosed by a physician or other licensed health care professional.

While a number of these categories are self-explanatory, "Days away from work" and "Restricted work or transferred to another job" may need further clarification. The terminology for the categories of "days away from work," "restricted work or transfer to another job" are commonly referred to as DART cases. These cases refer to persons that may have been hurt or suffered a work-related illness, and while the incident may involve one specific occurrence, the number of days absent from work indicates a level of severity of the injury/illness. Thus an incident resulting an employee out for two weeks indicates a level of severity far greater than being absent for one day. The OSHA log takes into account both categories: one as a single DART case while also tabulating the number of DART days. The same holds true for "restricted days," as persons that, while do not need to be hospitalized or bed-ridden, they are still in a recuperative process. Thus, depending on the number of days an employee performs "light duty" (being restricted work), as opposed to their normal field activities, is an indication of the severity of a particular incident.

Another "recordable" category is "medical treatment beyond first aid. According to the OSHA regulation "Recording and Reporting Occupational Injuries and Illnesses," 29 CFR 1904, First Aid is defined as the following:

- a) Using a nonprescription medication at nonprescription strength - if an employee is provided prescription medication or non-prescription medication at prescription strength, it is considered medical treatment.
- b) Administering tetanus immunizations
- c) Cleaning, flushing or soaking wounds on the surface of the skin;
- d) Using wound coverings, butterfly bandages, Steri-Strips
- e) Using hot or cold therapy;
- f) Using any non-rigid means of support
- g) Using temporary immobilization devices while transporting an accident victim
- h) Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister.
- i) Using eye patches.
- j) Removing foreign bodies from the eye using irrigation or a cotton swab.
- k) Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- l) Using finger guards.
- m) Using massages (physical therapy or chiropractic treatment is considered medical treatment for recordkeeping purposes).
- n) Drinking fluids for relief of heat stress.

Thus, instances when the above treatments are employed, would be considered as first aid treatment only and NOT constitute an OSHA recordable case and therefore, would not be included in the OSHA 300 log.

Many times medical centers that are not familiar with occupational medicine (such as hospital emergency rooms) will prescribe more expensive prescription medications which typically do not provide any additional benefit beyond what an over-the-counter medicine can do. The following medications are examples of what is considered non-prescription in accordance with First Aid guidelines:

Tylenol Extra Strength	Motrin 200 mg
Naprosyn 375 mg	Neosporin Ointment
Bacitracin Ointment	Visine
Hydrocortisone 1%	Antihistamines

It is an interesting note that the use of antibiotics, even for preventative purposes, does not fall under the First Aid guidelines. Therefore, antibiotics should only be prescribed when medically indicated for the current treatment of infection.

The fact that work status is modified or restricted on a simple case should not prevent declaring these as First Aid. For example, a case with a mild ankle sprain which is treated with over-the-counter Advil and no prolonged standing or walking for a week could be considered First Aid under the current definition, particularly if it is not an essential job function. Seem a little confusing? Don't worry. The most important thing is to ensure the safety and health of the employee-in-question...and always get your S&H professional involved. This is the key person that can offer assistance by ensuring that the action we take will lead to a success resolution.

No problem can be solved from the same level of consciousness that created it.
Albert Einstein