

TerranearPMC Safety Share

Week of January 12, 2015 – The OSHA 300A Log

One of the requirements for American businesses this time of the year is getting the OSHA *Summary of Work-related Injuries and Illnesses* ready for posting in an area that is designated for employees to freely congregate, such as a break area. Often times, this document is simply referred to as the 300A form. This document must be posted from February 1 through April 30 of the following year. This means that the 2014 OSHA 300A log needs to be posted from 2/1 – 4/30 2015. As its name implies, this log is a summary of workplace incidents. However, the privacy of those individuals that were involved in a workplace incident must be maintained and therefore, their names cannot be included on the form. The OSHA 300A log is a tally sheet that presents the various types of OSHA recordable events that occurred within a business establishment, categorizing them as:

Physical injuries	Skin disorders
Respiratory conditions	Poisonings
Hearing loss	All other illnesses

An incident is considered a recordable event when an employee gets hurt or sick from performing an assigned job task within the work environment and requires more than standard first aid treatment. Specific conditions that would NOT be considered a work-related incident are: choking on personal food during lunch breaks, a vehicular accident when coming to/from the work establishment (this includes parking lots!) and exhibiting symptoms of the common cold or flu. A complete list of injury/illness exemptions can be found under the regulation: 29 CFR 1904.5(b)(2).

In an attempt to alleviate confusion regarding interpretation of first aid treatment, 29 CFR 1904.7(b)(5)(ii) lists the specific items that fall into this category. These are:

- Cleaning, flushing or soaking wounds on the surface of the skin
- Using wound coverings such as bandages, Band-Aids™, gauze pads, etc. or using butterfly bandages or Steri-Strips™
- Using hot or cold therapy;
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister
- Drinking fluids for relief of heat stress
- Using eye patches;
- Using temporary immobilization devices while transporting an accident victim (*e.g.*, splints, slings, neck collars, back boards, etc.).
- Administering tetanus immunizations (although other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment)
- Cleaning, flushing or soaking wounds on the surface of the skin
- Using finger guards
- Removing foreign bodies from the eye using only irrigation or a cotton swab;
- Using massages (however, physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes)



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- Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes, such as ibuprofen at 800 mg doses).

The OSHA 300A form includes a summary of the various workplace incidents, tallying each category such as, deaths, days away from work, cases requiring job transfers (performing a task other than the normal assigned work activity), and other recordable events (events requiring more than first aid). This is followed by tallying the total number of days off and number of restricted or transferred days.

The purpose of the OSHA 300A log is to inform employees of the workplace incidents that have occurred in their place of employment without passing on information that would be considered personal and confidential.

While the OSHA 300A Log is a summary sheet, the main document used to record workplace injuries and illnesses is the OSHA 300 log. This is a document that details each occurrence, identifying the employee, date of incident as well as a description of the event.

All workplace injuries and illnesses must be individually documented with an injury/illness report. This is the OSHA form 301. However, OSHA does allow each employer to use their own reporting form, but must have all the information required on the 301 form. Information that needs to be provided is: employee information (name, age, date of hire), date and time of incident, a description of the incident as well as what was the cause of the occurrence and the equipment/materials used. However, the OSHA 301 log does not ask for a root cause or contributing factors. This is probably the reason why many organizations prefer using their own accident investigation form as opposed to the 301 form. The OSHA logs (300, 300A and 301) must be maintained for at least five years following the year for which they pertain.

Not every employer is required to have these OSHA forms. For instance, employers with ten or fewer employees at all times during the previous calendar year are exempt from routinely keeping OSHA injury and illness records. In addition, establishments in certain low-hazard industries are also exempt from routinely keeping OSHA injury and illness records. Since 1982, this list has been comprised of establishments pertaining to retail trade, finance, insurance and real estate; and the service industry if their respective three year average lost workday case rate equal to or less than 75 percent of the overall three year average within their respective private industry. Specific examples are: Motor Vehicle Dealers, Legal Services, Clothing Stores, Florists, and Colleges, Universities, and Professional Schools.

Making a living shouldn't have to cost you your life. Workplace fatalities, injuries, and illnesses are preventable. Safe jobs happen because employers make the choice to fulfill their responsibilities and protect their workers.

Dr. David Michaels Assistant Secretary of Labor for Occupational Safety and Health

