

OSHA Recordkeeping — 29 CFR Part 1904

Subpart A V2 — Purpose (§1904.0)

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Subpart A — Purpose

§1904.0

Purpose of Part 1904

- Requires employers to record and report work-related injuries and illnesses.
- Data supports OSHA, BLS, and employer prevention programs; not a measure of fault or comp eligibility.

What Recording Means (and Doesn't)

- Recording indicates a work-related case met OSHA criteria.
- It does NOT: assign fault, indicate OSHA standard violation, or determine workers' compensation outcomes.

Who Must Comply

- All employers covered by the OSH Act.
- Some are partially exempt, but severe incidents must still be reported (§1904.39).

Case Example — Maria (Warehouse Associate)

Recordable — Medical Treatment Beyond First Aid

Incident: Maria cut her palm on a broken pallet board.

Treatment: Required sutures (medical treatment beyond first aid).

Outcome: 1 day away from work.

Case#	Employee	Date	Description	Outcome
1	Maria R.	02/03	Palm laceration — sutures	Days away (1)

Case Example — Jamal (Forklift Operator)



Incident: Maria cut her palm on a broken pallet board.

Treatment: Required sutures (medical treatment beyond first aid).

Outcome: 1 day away from work.

Recordable — Medical Treatment Beyond First Aid 

Case#	Employee	Date	Description	Outcome
1	Maria R.	02/03	Palm laceration — sutures	Days away (1)

Case Example — Elena (Picker/Packer)

Incident: Jamal strained his shoulder adjusting a pallet.

Treatment: Clinician restricted overhead lifts for 5 days.

Outcome: Job transfer to non-lifting tasks.

Recordable — Job Transfer / Restriction 

Case#	Employee	Date	Description	Outcome
2	Jamal K.	03/15	Shoulder strain — restriction	Job transfer (5)

Subpart A — Closing Summary

Incident: Elena slipped on wet floor and fractured her wrist.

Treatment: Hospital admission, casting applied.

Outcome: Hospitalization triggers reporting duty.

Reportable — Inpatient Hospitalization (§1904.39) 

Case#	Employee	Date	Description	Outcome
3	Elena V.	05/11	Wrist fracture — inpatient admit	Days away

Subpart A Quiz — A-1

Incident: Elena slipped on wet floor and fractured her wrist.

Treatment: Hospital admission, casting applied.

Outcome: Hospitalization triggers reporting duty.

Reportable — Inpatient Hospitalization (§1904.39) 

Case#	Employee	Date	Description	Outcome
3	Elena V.	05/11	Wrist fracture — inpatient admit	Days away

Subpart A Quiz — A-2

- Ava fainted at workstation, brief LOC, returned to work.
- A) Recordable — LOC
- B) Not recordable — personal
- C) Recordable only if hospitalized
- D) Not recordable — no days away

Subpart A Quiz — A-3

- Diego developed rash; OTC hydrocortisone (non-Rx) used; no restrictions.
- A) Recordable — significant diagnosis
- B) Not recordable — first aid
- C) Recordable — med treatment
- D) Recordable — days away

Instructor Appendix — Subpart A

Answer — Subpart A QA-1 (Slide 11)

- **Question:**
- Liam cut finger opening a crate; clinic sutured; light use 2 days.
- **Answer: B**
- Explanation: Sutures are medical treatment beyond first aid.
- CFR Reference: §1904.7(b)(5)

Answer — Subpart A QA-2 (Slide 12)

- **Question:**
- Ava fainted at workstation, brief LOC, returned to work.
- **Answer: A**
- Explanation: Any work-related loss of consciousness is recordable.
- CFR Reference: §1904.7(b)(6)

Answer — Subpart A QA-3 (Slide 13)

- **Question:**
- Diego developed rash; OTC hydrocortisone (non-Rx) used; no restrictions.
- **Answer: B**
- Explanation: Non-prescription meds are first aid only.
- CFR Reference: §1904.7(b)(5)(i)(A)

End of Subpart A — Continue to Subpart B

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Subpart B — Scope & Exemptions

§1904.1 (≤10 Employees Exemption)

Table of Contents — §1904.1

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§1904.1 — Scope

- Employers with 10 or fewer employees are partially exempt from OSHA injury and illness recordkeeping.
- They do not need to routinely keep OSHA 300, 300A, or 301 logs.

§1904.1 — Reporting Still Required

- Even if exempt from recordkeeping, employers must report certain severe events:
 - • Fatalities (within 8 hours)
 - • In-patient hospitalizations (within 24 hours)
 - • Amputations (within 24 hours)
 - • Loss of an eye (within 24 hours)

§1904.1 — If Requested

- Exempt employers must still provide records if OSHA or the Bureau of Labor Statistics requests them.
- Equivalent forms are acceptable as long as the required information is available.

§1904.1 — Counting Employees

- Count the highest number of employees employed at any time during the year.
- This includes all employees in the company (all establishments).
- Do not average or use year-end count only.

§1904.1 — Small Employer Scenario (Example)

- A family-owned storefront employs 8 workers.
- They are exempt from maintaining OSHA 300 logs.
- However, if one worker is hospitalized overnight after a forklift incident, the employer must report it within 24 hours.

§1904.1 — Pitfalls and Clarifications

- Exemption is from routine logs, not from reporting obligations.
- Employers often mistakenly believe exemption covers both.
- Always clarify exemption status with managers each year.

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Subpart B — Scope & Exemptions

§1904.2 (Appendix A Industries) & §1904.3 (Other Federal Agency
Records)

Table of Contents — §1904.2 & §1904.3

- §1904.2 — Appendix A Industry Exemption
 - • Definition
 - • Establishment-based exemption
 - • Industry changes mid-year
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 - • Multi-industry employers
 - • Contractors
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 - • Communication practices
- §1904.3 — Records from Other Federal Agencies
 - • Equivalent forms
 - • Accessibility
 - • Consistency
 - • Privacy safeguards

§1904.2 — Definition

- Establishments in industries listed in Appendix A are partially exempt from maintaining OSHA 300 logs.
- Exemption is based on the industry's NAICS code.

§1904.2 — Establishment-Based Exemption

- Exemption applies to establishments, not to entire companies.
- A company with both exempt and non-exempt establishments must keep logs for the non-exempt locations.

§1904.2 — Industry Changes Mid-Year

- If an establishment changes industry classification mid-year, apply the NAICS code in effect for the majority of the year.

§1904.2 — Exemption ≠ Reporting Exemption

- Exemption from recordkeeping does not remove obligation to report severe cases under §1904.39.
- Fatalities, hospitalizations, amputations, and eye losses must still be reported.

§1904.2 — Multi-Industry Employers

- Companies with multiple establishments may have both exempt and non-exempt sites.
- Each establishment must be evaluated separately for recordkeeping requirements.

§1904.2 — Contractors

- Host employer's NAICS code does not automatically exempt contractors.
- Contractors must be evaluated by their own establishment's NAICS classification.

§1904.2 — Requests from OSHA/BLS

- OSHA and BLS may request injury and illness data even from exempt establishments.
- Employers must be prepared to provide equivalent information.

§1904.2 — Communication Practices

- Managers should be informed annually of their exemption status.
- Ensure communication clarifies the difference between reporting and recordkeeping.

§1904.3 — Equivalent Forms

- Employers may use records kept for other federal agencies (e.g., MSHA, DOT) if they are substantially similar to OSHA forms.

§1904.3 — Accessibility

- Records must be readily accessible to OSHA upon request.
- Equivalent forms must allow OSHA to review required data quickly.

§1904.3 — Consistency

- Ensure definitions and case outcomes on other agency forms align with OSHA's criteria for recordable cases.

§1904.3 — Privacy Safeguards

- Employers must protect personally identifiable information when providing records.
- Follow OSHA's privacy case rules where applicable.

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Subpart B — Case Examples of §1904-1, §1904-2, §1904-3
(OSHA-Style Mini-Log Snapshots)

Table of Contents — Case Examples

- Maria — Laceration, Days Away
- Jamal — Restriction/Transfer
- Elena — Fracture, Hospitalization
- Diego — Hearing Loss
- Company Case — Horizon Logistics (Multiple Establishments)
- Practice/Follow-Up Slides

Case — Maria (Warehouse Associate)

- Incident: Palm laceration from broken pallet; two sutures placed.
- Outcome: 1 day away (recordable — medical treatment beyond first aid).
- Action: Log as days-away case; estimate days; update when known.

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away	Transfer	Other
1	Maria R.	Warehouse Assoc.	02/03	Loading Dock	Hand laceration, sutures		<input checked="" type="checkbox"/>		

Case — Jamal (Forklift Operator)

- Incident: Shoulder strain while adjusting pallet; clinician restricts overhead lifting 5 days.
- Outcome: Job transfer (5 days) — recordable restriction/transfer.
- Action: Document restriction dates; verify count method.

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away	Transfer	Other
2	Jamal K.	Forklift Operator	03/15	Warehouse	Shoulder strain, restricted lifting			<input checked="" type="checkbox"/>	

Case — Elena (Picker/Packer)

- Incident: Slip on wet floor; wrist fracture; admitted overnight as inpatient.
- Outcome: Recordable; also reportable under §1904.39 (inpatient hospitalization).
- Action: Report within 24 hours; log with days-away if applicable.

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away	Transfer	Other
3	Elena V.	Picker/Packer	05/11	Packing Line	Wrist fracture, hospitalized		<input checked="" type="checkbox"/>		

Case — Diego (Maintenance)

- Incident: Audiogram shows material threshold shift confirmed against baseline.
- Outcome: Recordable occupational hearing loss under §1904.10.
- Action: Maintain audiometric records; update 300 log.

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away	Transfer	Other
4	Diego R.	Maintenance Tech	06/20	Maintenance Shop	Hearing loss (threshold shift)				<input checked="" type="checkbox"/>

Case — Horizon Logistics, Inc.

- Company with three locations:
 - Location A — Warehouse (NAICS 4931, non-exempt).
 - Location B — Corporate Office (NAICS 5511, exempt).
 - Location C — Retail Storefront (NAICS 4481, exempt).
- Outcome: Must keep logs only for Location A.
- Still required to report severe cases at all locations.

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away	Transfer	Other
5	N/A	Forklift operator	07/14	Warehouse Dock	Forklift collision, days away injury		<input checked="" type="checkbox"/>		

Practice — Maria Follow-Up

- Track days away until return; convert estimate to actual; certify 300A.

Practice — Jamal Clarification

- Differentiate restriction vs job transfer; document task list; count partial days properly.

Practice — Elena Reporting

- Confirm inpatient admission qualifies for report; ensure 24-hour reporting timeline met.

Practice — Diego QA

- Verify baseline audiogram; ensure standard threshold shift documentation exists.

Practice — Horizon Logistics

- Clarify why logs are required for warehouse but not office or retail site.
- Ensure managers at all establishments understand reporting obligations.

Subpart B — Quiz Bank (20 Questions)

All Questions on 2 Slides

Quiz — Part A (Q1–Q10)

- Q1. If a company had 10 or fewer employees last calendar year, what is their recordkeeping requirement under §1904.1?
 - A. Must keep OSHA 300 logs always
 - B. Exempt from routine logs unless OSHA/BLS requests
 - C. Only report serious injuries
 - D. Exempt from all OSHA recordkeeping including reports
- Q2. A facility in a NAICS industry listed in Appendix A with 15 employees should do which of the following?
 - A. Keep OSHA logs for that establishment
 - B. Exempt from logs
 - C. Exempt from everything including reporting
 - D. Only keep logs if requested by OSHA
- Q3. Which incident must be reported even if an establishment is exempt under size or industry?
 - A. Minor first aid
 - B. An inpatient hospitalization
 - C. Bruise or sprain not treated by medical professional
 - D. Employee working lighter duty
- Q4. When does the exemption for Appendix A industries apply?
 - A. To the whole company if any site is in Appendix A
 - B. Only to establishments whose primary NAICS code is in Appendix A
 - C. Only if all employees are part-time
 - D. If OSHA has approved
- Q5. Horizon Corp has 3 locations: Office (NAICS in Appendix A), Manufacturing Plant (non-exempt), Warehouse (non-exempt). Which locations must keep OSHA 300 logs?
 - A. Only Manufacturing Plant
 - B. Manufacturing + Warehouse
 - C. Office too
 - D. None if corporate is exempt
- Q6. An employee slips, gets stitches, but returns next shift, with no days away. How should this be recorded?
 - A. Not recordable
 - B. Recordable medical treatment beyond first aid
 - C. Days away case
 - D. Only if requested by employer
- Q7. A small retail shop has 12 employees. Its NAICS code is in Appendix A. Does it need to maintain OSHA 300 logs?
 - A. Yes
 - B. No
 - C. Only for certain injuries
 - D. Only if OSHA asks
- Q8. Contractors working at an exempt establishment: whose log must include their injuries?
 - A. Contractor's employer's log
 - B. Establishment's log if host supervises daily
 - C. No logging needed
 - D. Log everything anyway
- Q9. What's required if an establishment changes its NAICS code midyear?
 - A. Exemption status changes immediately
 - B. Use code that applied for majority of year
 - C. Log both codes
 - D. Keep logs if any code is non-exempt
- Q10. Which of the following is NOT correct about the "10 or fewer employees" size exemption?
 - A. It's based on the company-wide total
 - B. If at any time during year you exceed 10, you lose exemption
 - C. Applies per establishment, not company
 - D. Reporting still required even if exempt

Quiz — Part B (Q11–Q20)

- Q11. An inpatient hospitalization occurs at an establishment that is exempt due to Appendix A. What must be done?
 - A. Nothing
 - B. Report to OSHA
 - C. Log only, no report
 - D. Wait until end of year
- Q12. Employee works at two locations of same company, one exempt, one not. Injury occurs while doing work at non-exempt site. Which log entry is required?
 - A. Exempt site's log
 - B. Non-exempt site's log
 - C. Both logs
 - D. Neither log
- Q13. Which of the following is a characteristic of an establishment eligible for Appendix A exemption?
 - A. High-hazard manufacturing
 - B. Retail clothing store
 - C. Chemical processing
 - D. Electric power generation
- Q14. If OSHA or BLS asks in writing for logs from an exempt establishment, what is the obligation?
 - A. They can refuse
 - B. Must provide equivalent records
 - C. Only provide summary
 - D. Provide logs only if serious injury
- Q15. A maintenance worker at an office in an Appendix A NAICS code suffers hearing loss (standard threshold shift). Is it recordable?
 - A. No because office is exempt
 - B. Yes, hearing loss is recordable
 - C. Only if OSHA inspects
 - D. No unless days away
- Q16. Which of the following is acceptable for OSHA purposes under §1904.3?
 - A. IRS tax logs
 - B. MSHA injury logs (if definitions are consistent)
 - C. EPA incident reports
 - D. Worker's compensation insurance claims
- Q17. When using equivalent records, what must be true?
 - A. Records must capture all cases OSHA would require
 - B. Records can omit days away cases
 - C. Records may exclude employee names
 - D. Records only need annual summaries
- Q18. Privacy cases may be logged how?
 - A. Exclude them from the log
 - B. Use "privacy case" in place of the employee's name
 - C. Log only if employee consents
 - D. Use initials only
- Q19. Which is NOT a valid reason to mark a case as a privacy case?
 - A. Injury to intimate body part
 - B. HIV infection
 - C. Needlestick injury
 - D. Sprained ankle
- Q20. Who may request access to the full 300 log including employee names?
 - A. Only OSHA and BLS
 - B. Only corporate managers
 - C. Employees, former employees, and authorized representatives
 - D. No one

Instructor Appendix — Subpart B Quiz Explanations

Correct answers, explanations, CFR references, and slide
references

Instructor Notes: Q1

- If a company had 10 or fewer employees last calendar year, what is their recordkeeping requirement under §1904.1?
- ✓ Correct Answer: B
- Explanation: Exemption applies unless OSHA/BLS requests records.
- CFR Reference: 29 CFR 1904.1
- Slide Reference: Quiz Slide A

Instructor Notes: Q2

- A facility in a NAICS industry listed in Appendix A with 15 employees should do which of the following?
- ✓ Correct Answer: A
- Explanation: Establishments in Appendix A NAICS codes may be exempt, but 15 employees trigger requirements.
- CFR Reference: 29 CFR 1904.2
- Slide Reference: Quiz Slide A

Instructor Notes: Q3

- Which incident must be reported even if an establishment is exempt under size or industry?
- ✓ Correct Answer: B
- Explanation: Serious incidents (fatalities, hospitalizations, amputations, eye loss) must always be reported.
- CFR Reference: 29 CFR 1904.39
- Slide Reference: Quiz Slide A

Instructor Notes: Q4

- When does the exemption for Appendix A industries apply?
- ✓ Correct Answer: B
- Explanation: Exemptions apply at the establishment level, not the entire company.
- CFR Reference: 29 CFR 1904.2
- Slide Reference: Quiz Slide A

Instructor Notes: Q5

- Horizon Corp has 3 locations: Office (Appendix A), Manufacturing Plant (non-exempt), Warehouse (non-exempt). Which must keep OSHA 300 logs?
- ✓ Correct Answer: B
- Explanation: Non-exempt establishments (Manufacturing + Warehouse) must keep logs.
- CFR Reference: 29 CFR 1904.2
- Slide Reference: Quiz Slide A

Instructor Notes: Q6

- An employee slips, gets stitches, but returns next shift, with no days away. How should this be recorded?
- ✓ Correct Answer: B
- Explanation: Stitches are medical treatment beyond first aid, so recordable.
- CFR Reference: 29 CFR 1904.7
- Slide Reference: Quiz Slide A

Instructor Notes: Q7

- A small retail shop has 12 employees. Its NAICS code is in Appendix A. Does it need to maintain OSHA 300 logs?
- ✓ Correct Answer: A
- Explanation: With more than 10 employees, logs are required, even in Appendix A industries.
- CFR Reference: 29 CFR 1904.1 & 1904.2
- Slide Reference: Quiz Slide A

Instructor Notes: Q8

- Contractors working at an exempt establishment: whose log must include their injuries?
- ✓ Correct Answer: B
- Explanation: If host supervises day-to-day work, the host establishment must record.
- CFR Reference: 29 CFR 1904.31
- Slide Reference: Quiz Slide A

Instructor Notes: Q9

- What's required if an establishment changes its NAICS code midyear?
- ✓ Correct Answer: B
- Explanation: Use the code that applied for the majority of the year.
- CFR Reference: 29 CFR 1904.2
- Slide Reference: Quiz Slide A

Instructor Notes: Q10

- Which is NOT correct about the “10 or fewer employees” size exemption?
- ✓ Correct Answer: C
- Explanation: Exemption applies at the company level, not per establishment.
- CFR Reference: 29 CFR 1904.1
- Slide Reference: Quiz Slide A

Instructor Notes: Q11

- An inpatient hospitalization occurs at an exempt Appendix A establishment. What must be done?
- ✓ Correct Answer: B
- Explanation: Report to OSHA; serious cases must always be reported.
- CFR Reference: 29 CFR 1904.39
- Slide Reference: Quiz Slide B

Instructor Notes: Q12

- Employee works at two locations, one exempt, one not. Injury occurs at the non-exempt site. Which log entry is required?
- ✓ Correct Answer: B
- Explanation: Log the case at the non-exempt site where it occurred.
- CFR Reference: 29 CFR 1904.2
- Slide Reference: Quiz Slide B

Instructor Notes: Q13

- Which is a characteristic of an establishment eligible for Appendix A exemption?
- ✓ Correct Answer: B
- Explanation: Retail clothing stores are listed in Appendix A.
- CFR Reference: 29 CFR 1904.2 Appendix A
- Slide Reference: Quiz Slide B

Instructor Notes: Q14

- If OSHA or BLS requests logs from an exempt establishment, what is the obligation?
- ✓ Correct Answer: B
- Explanation: The establishment must provide equivalent records.
- CFR Reference: 29 CFR 1904.2
- Slide Reference: Quiz Slide B

Instructor Notes: Q15

- A maintenance worker at an office in Appendix A suffers hearing loss. Is it recordable?
- ✓ Correct Answer: B
- Explanation: Hearing loss is always recordable regardless of exemption.
- CFR Reference: 29 CFR 1904.10
- Slide Reference: Quiz Slide B

Instructor Notes: Q16

- Which of the following is acceptable for OSHA purposes under §1904.3?
- ✓ Correct Answer: B
- Explanation: MSHA injury logs are acceptable if consistent with OSHA.
- CFR Reference: 29 CFR 1904.3
- Slide Reference: Quiz Slide B

Instructor Notes: Q17

- When using equivalent records, what must be true?
- ✓ Correct Answer: A
- Explanation: They must capture all OSHA recordable cases completely and consistently.
- CFR Reference: 29 CFR 1904.3
- Slide Reference: Quiz Slide B

Instructor Notes: Q18

- How should privacy cases be logged?
- ✓ Correct Answer: B
- Explanation: Record as 'privacy case' instead of the employee's name.
- CFR Reference: 29 CFR 1904.29(b)(10)
- Slide Reference: Quiz Slide B

Instructor Notes: Q19

- Which is NOT a valid reason to mark a case as privacy case?
- ✓ Correct Answer: D
- Explanation: Sprained ankle is not a privacy case.
- CFR Reference: 29 CFR 1904.29(b)(10)
- Slide Reference: Quiz Slide B

Instructor Notes: Q20

- Who may request access to the full OSHA 300 log with names?
- ✓ Correct Answer: C
- Explanation: Employees, former employees, and reps may request access.
- CFR Reference: 29 CFR 1904.35
- Slide Reference: Quiz Slide B

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Subpart C — §1904.4 Recording Criteria

(Quoted CFR • Expansion • Decision Flow • Cases • Quiz •
Instructor Appendix)

§1904.4 — Section Outline

- Quoted CFR language (verbatim)
- What §1904.4 means — plain language expansion
- Three-part test (work-related • new case • meets criteria)
- Decision flow (step-by-step)
- Case examples with OSHA-style mini-log
- Recap 
- Quizzes (A–D) and Instructor Appendix

§1904.4 — Recording Criteria (Quoted)

- “Each employer required by this part to keep records of occupational injuries and illnesses must record each fatality, injury, or illness that:
 - (1) is work-related;
 - (2) is a new case; and
 - (3) meets one or more of the general recording criteria of §1904.7 or the application to specific cases of §§1904.8–1904.12.”

What §1904.4 Means — Plain Language

- You only record a case when ALL THREE are true: work-related + new case + meets a listed criterion.
- If any one is NOT met, you do not record it on the OSHA 300 log.
- General criteria in §1904.7 include: death, days away, restricted work/transfer, medical treatment beyond first aid, loss of consciousness, significant diagnoses.
- Specific case rules (§§1904.8–1904.12) include: needlesticks, medical removal, hearing loss, tuberculosis, and more.

Three-Part Test (Check All Three)

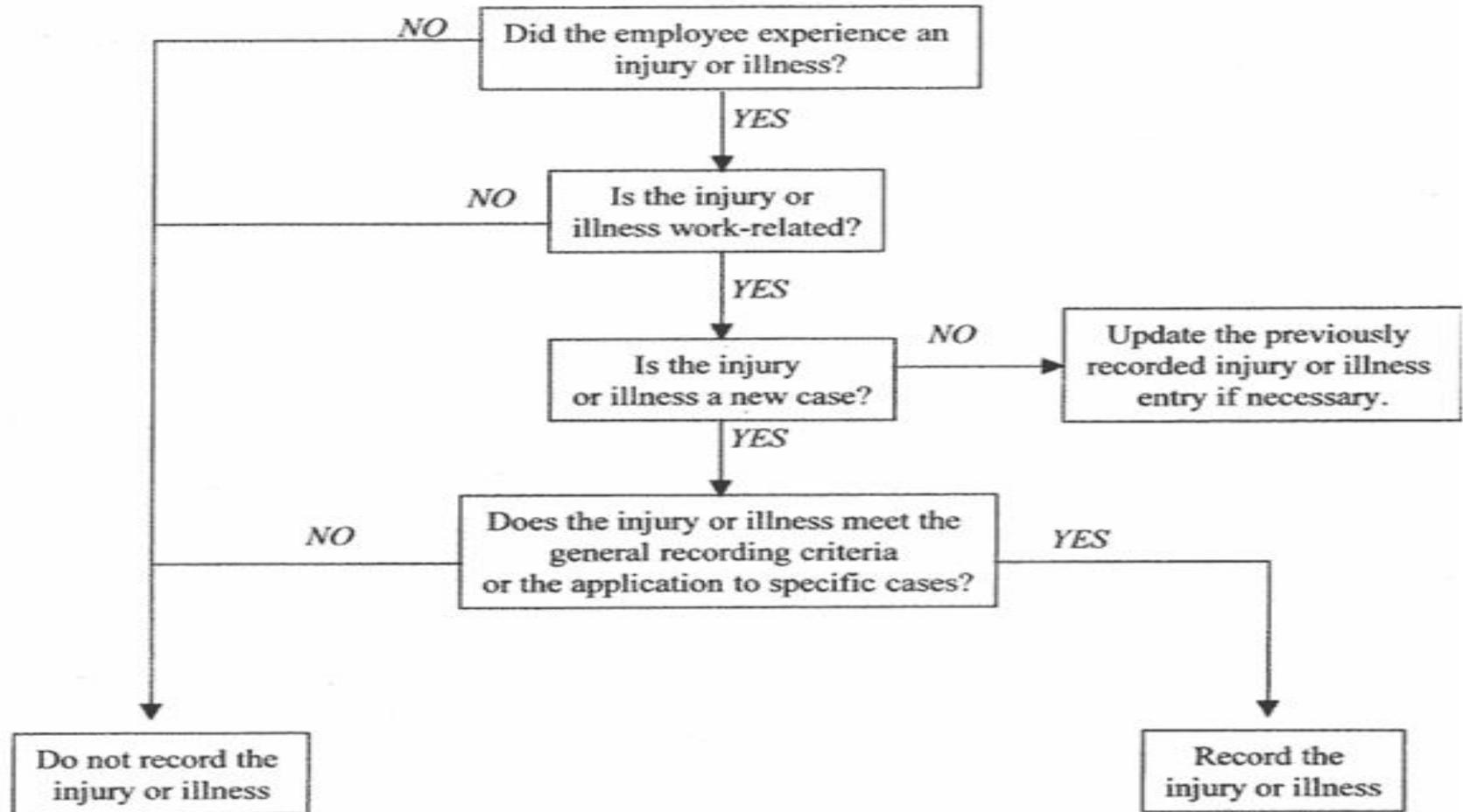
- 1) Work-related? (§1904.5) — event/exposure in the work environment caused or contributed to the case.
- 2) New case? (§1904.6) — not a continuation of a previous unresolved recordable case.
- 3) Meets a criterion? (§1904.7 or §§1904.8–1904.12).

Decision Flow — §1904.4

- Start → Did an injury/illness occur? → If no, stop.
- If yes → Was it work-related? (§1904.5) → If no, stop.
- If yes → Is it a new case? (§1904.6) → If no, update prior case (do not re-record).
- If yes → Does it meet any criterion (§1904.7) or special case rule (§§1904.8–1904.12)? → If yes, record on 300 log.

OSHA Decision Tree — 1904.4 Recording Criteria

(2) How do I decide whether a particular injury or illness is recordable? The decision tree for recording work-related injuries and illnesses below shows the steps involved in making this determination.



[66 FR 6122, Jan. 19, 2001, as amended at 81 FR 91809, Dec. 19, 2016; 82 FR 20548, May 3, 2017]

Case — Maria

- Hand laceration requiring sutures after contact with broken pallet.
- Work-related? Yes. New case? Yes. Meets criteria? Yes — medical treatment beyond first aid (§1904.7).

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away
1	Maria R.	Warehouse Assoc.	02/03	Loading Dock	Hand laceration; sutures		<input checked="" type="checkbox"/>

Case — Jamal

- Shoulder strain; clinician restricts overhead lifting for 5 days.
- Work-related? Yes. New case? Yes. Meets criteria? Yes — job restriction/transfer (§1904.7).

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away
2	Jamal K.	Forklift Operator	03/15	Warehouse	Shoulder strain; restriction		

Case — Elena

- Slip; wrist fracture; admitted overnight as inpatient (reportable).
- Work-related? Yes. New case? Yes. Meets criteria? Yes — significant injury + days away; also reportable (\$1904.39).

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away
3	Elena V.	Picker/Packer	05/11	Packing Line	Fracture; hospitalized		<input checked="" type="checkbox"/>

Case — Diego

- Audiogram shows standard threshold shift confirmed vs baseline.
- Work-related? Yes (exposure). New case? Yes. Meets criteria? Yes — specific rule (§1904.10 hearing loss).

Case No.	Employee Name	Job Title	Date	Where Event Occurred	Description	Death	Days Away
4	Diego R.	Maintenance Tech	06/20	Maintenance Shop	Hearing loss (STS)		

Recap — §1904.4

- Record only when the case is: work-related + new case + meets a criterion.
- Use the decision flow to avoid over- or under-recording.
- Check special case sections (§§1904.8–1904.12) for needles, hearing, TB, etc.

Quiz — Part A (Q1–Q5)

- Q1. Which combination correctly satisfies §1904.4?
 - A. Work-related + New Case + Meets a criterion
 - B. Work-related only
 - C. New case only
 - D. Meets a criterion only
- Q2. If a case is NOT work-related under §1904.5, you should:
 - A. Record it
 - B. Report it
 - C. Do not record it
 - D. Transfer it
- Q3. A recurrence of a prior recordable case that has not fully resolved is:
 - A. A new case
 - B. Continuation of prior case
 - C. Not recordable
 - D. Always reportable
- Q4. Sutures for a laceration are:
 - A. First aid
 - B. Medical treatment beyond first aid
 - C. Not recordable
 - D. Restricted duty
- Q5. Overnight inpatient admission triggers:
 - A. No action
 - B. Log only
 - C. Report to OSHA
 - D. Transfer only

Quiz — Part B (Q6–Q10)

- Q6. If none of the §1904.7 criteria are met, you should:
 - A. Record anyway
 - B. Record as ‘other’
 - C. Do not record
 - D. Report to OSHA
- Q7. Hearing loss cases are addressed in:
 - A. §1904.7
 - B. §1904.10
 - C. §1904.39
 - D. §1904.2
- Q8. If a case is not a new case under §1904.6, you should:
 - A. Record as new
 - B. Update prior case information
 - C. Report as new
 - D. Ignore it
- Q9. Which set belongs to the three-part test?
 - A. Work-related, New case, Meets a criterion
 - B. New case, Days away, Reportable
 - C. Work-related, Reportable, Restricted
 - D. Days away, Restricted, Transfer
- Q10. Job restriction for 5 days under clinician’s order is:
 - A. Not recordable
 - B. Recordable restriction/transfer
 - C. Death case
 - D. First aid

Instructor Notes — Q1

- Which combination correctly satisfies §1904.4?
- ✓ Correct Answer: A
- CFR Reference: §1904.4
- Slide Reference: Quiz Slide A
- Explanation: All three elements must be satisfied to record a case.

Instructor Notes — Q2

- If a case is NOT work-related under §1904.5, you should:
- ✓ Correct Answer: C
- CFR Reference: §1904.5
- Slide Reference: Quiz Slide A
- Explanation: Not work-related → do not record under §1904.5 exceptions.

Instructor Notes — Q3

- A recurrence of a prior recordable case that has not fully resolved is:
- ✓ Correct Answer: B
- CFR Reference: §1904.6
- Slide Reference: Quiz Slide A
- Explanation: If not a new case, update prior entry rather than recording new.

Instructor Notes — Q4

- Sutures for a laceration are:
- ✓ Correct Answer: B
- CFR Reference: §1904.7
- Slide Reference: Quiz Slide A
- Explanation: Sutures are beyond first aid → recordable medical treatment.

Instructor Notes — Q5

- Overnight inpatient admission triggers:
- ✓ Correct Answer: C
- CFR Reference: §1904.39
- Slide Reference: Quiz Slide A
- Explanation: Inpatient admission within 24 hours → report to OSHA.

Instructor Notes — Q6

- If none of the §1904.7 criteria are met, you should:
- ✓ Correct Answer: C
- CFR Reference: §1904.7
- Slide Reference: Quiz Slide B
- Explanation: No criteria met → do not record.

Instructor Notes — Q7

- Hearing loss cases are addressed in:
- ✓ Correct Answer: B
- CFR Reference: §1904.10
- Slide Reference: Quiz Slide B
- Explanation: Hearing loss has its own section (§1904.10).

Instructor Notes — Q8

- If a case is not a new case under §1904.6, you should:
- ✓ Correct Answer: B
- CFR Reference: §1904.6
- Slide Reference: Quiz Slide B
- Explanation: Continuation of prior recordable case → update, not new.

Instructor Notes — Q9

- Which set belongs to the three-part test?
- ✓ Correct Answer: A
- CFR Reference: §1904.4
- Slide Reference: Quiz Slide B
- Explanation: The three-part test is the gatekeeper for recording.

Instructor Notes — Q10

- Job restriction for 5 days under clinician's order is:
- ✓ Correct Answer: B
- CFR Reference: §1904.7
- Slide Reference: Quiz Slide B
- Explanation: Clinician-ordered restriction/transfer is recordable.

OSHA Recordkeeping — 29 CFR Part 1904

Subpart B — Appendix A (Partially Exempt Industries)

Appendix A — Introduction

- Appendix A lists industries that are partially exempt from keeping OSHA injury and illness logs.
- Exemptions are based on the industry's NAICS code and its classification as low-hazard.
- Exemptions apply at the establishment level, not across an entire company.
- Employers in exempt industries must still report serious cases under §1904.39.

Appendix A — OSHA NAICS Table

-  Embedded graphic of OSHA's Appendix A NAICS list table

NAICS Code	Industry
4412	Other Motor Vehicle Dealers.
4431	Electronics and Appliance Stores.
4461	Health and Personal Care Stores.
4471	Gasoline Stations.
4481	Clothing Stores.
4482	Shoe Stores.
4483	Jewelry, Luggage, and Leather Goods Stores.
4511	Sporting Goods, Hobby, and Musical Instrument Stores.
4512	Book, Periodical, and Music Stores.
4531	Florists.
4532	Office Supplies, Stationery, and Gift Stores.
4812	Nonscheduled Air Transportation.
4861	Pipeline Transportation of Crude Oil.
4862	Pipeline Transportation of Natural Gas.
4869	Other Pipeline Transportation.
4879	Scenic and Sightseeing Transportation, Other.
4885	Freight Transportation Arrangement.
5111	Newspaper, Periodical, Book, and Directory Publishers.
5112	Software Publishers.
5121	Motion Picture and Video Industries.
5122	Sound Recording Industries.
5151	Radio and Television Broadcasting.
5172	Wireless Telecommunications Carriers (except Satellite).
5173	Telecommunications Resellers.
5179	Other Telecommunications.
5181	Internet Service Providers and Web Search Portals.
5182	Data Processing, Hosting, and Related Services.
5191	Other Information Services.
5211	Monetary Authorities—Central Bank.
5221	Depository Credit Intermediation.
5222	Nondepository Credit Intermediation.
5223	Activities Related to Credit Intermediation.

NAICS Code	Industry
5231	Securities and Commodity Contracts Intermediation and Brokerage.
5232	Securities and Commodity Exchanges.
5239	Other Financial Investment Activities.
5241	Insurance Carriers.
5242	Agencies, Brokerages, and Other Insurance Related Activities.
5251	Insurance and Employee Benefit Funds.
5259	Other Investment Pools and Funds.
5312	Offices of Real Estate Agents and Brokers.
5331	
5411	
5412	
5413	
5414	
5415	
5416	
5417	
5418	
5511	
5611	
5614	
5615	
5616	
6111	
6112	
6113	
6114	
6115	
6116	
6117	
6211	Educational Support Services.
6211	Offices of Physicians.
6212	Offices of Dentists.
6213	Offices of Other Health Practitioners.
6214	Outpatient Care Centers.
6215	Medical and Diagnostic Laboratories.
6244	Child Day Care Services.
7114	Agents and Managers for Artists, Athletes, Entertainers, and Other Public Figures.
7115	Independent Artists, Writers, and Performers.
7213	Rooming and Boarding Houses.
7221	Full-Service Restaurants.

NAICS Code	Industry
7222	Limited-Service Eating Places.
7224	Drinking Places (Alcoholic Beverages).
8112	Electronic and Precision Equipment Repair and Maintenance.
8114	Personal and Household Goods Repair and Maintenance.
8121	Personal Care Services.
8122	Death Care Services.
8131	Religious Organizations.
8132	Grantmaking and Giving Services.
8133	Social Advocacy Organizations.
8134	Civic and Social Organizations.
8139	Business, Professional, Labor, Political, and Similar Organizations.

Appendix A — OSHA NAICS Table cont.

NAICS Code	Industry
7222	Limited-Service Eating Places.
7224	Drinking Places (Alcoholic Beverages).
8112	Electronic and Precision Equipment Repair and Maintenance.
8114	Personal and Household Goods Repair and Maintenance.
8121	Personal Care Services.
8122	Death Care Services.
8131	Religious Organizations.
8132	Grantmaking and Giving Services.
8133	Social Advocacy Organizations.
8134	Civic and Social Organizations.
8139	Business, Professional, Labor, Political, and Similar Organizations.

Appendix A — Recap

- Appendix A industries are exempt from routine OSHA 300, 300A, and 301 logs.
- Exemptions apply at the establishment level, not the employer as a whole.
- Employers in these industries must still report fatalities, hospitalizations, amputations, and loss of an eye.
- OSHA or BLS may request equivalent data even from exempt establishments.

OSHA Recordkeeping — 29 CFR §1904.5

Determination of Work-Relatedness

(CFR Text • §1904.5(b)(2) Exceptions • §1904.5(b)(6) Home-Office
Rule)

§1904.5 — Part 1 (CFR & Tables)

- Quoted CFR language (verbatim excerpts)
- Plain-language expansion of the presumption rule
- §1904.5(b)(2) — Nine exceptions (full table)
- §1904.5(b)(6) — Working at home (table with scenarios)

§1904.5 — CFR (Excerpt 1)

- §1904.5(a) Basic requirement — You must consider an injury or illness to be work-related if an event or exposure in the work environment caused or contributed to the condition or significantly aggravated a pre-existing injury or illness.

§1904.5 — CFR (Excerpt 2)

- §1904.5(b)(1) Work environment — The work environment is the establishment and other locations where one or more employees are working or are present as a condition of their employment.

§1904.5 — CFR (Excerpt 3)

- §1904.5(b)(2) Exceptions — You are not required to record injuries and illnesses if they meet one of the specific exceptions (see table in this deck).

§1904.5 — CFR (Excerpt 4)

- §1904.5(b)(6) Working at home — A case that occurs while an employee is working at home is recordable only when it is directly related to the performance of work rather than the general home environment.

§1904.5 — Plain-Language Expansion

- Presumption: If it happens in the work environment, it is work-related unless a specific exception applies.

§1904.5 — Plain-Language Expansion

- Causation: ‘Caused or contributed to’ includes triggering, worsening, or significant aggravation due to work exposure.

§1904.5 — Plain-Language Expansion

- Boundary: Use §1904.5(b)(2) exceptions and §1904.5(b)(6) to separate work causes from general/non-work circumstances.

§1904.5(b)(2) — Exceptions (1/2)

Item	§1904.5(b)(2) Exception	Recordability
(i)	Present in the work environment as a member of the general public.	Not work-related
(ii)	Symptoms arise at work solely from a non-work-related event or exposure off premises.	Not work-related
(iii)	Voluntary participation in a wellness, medical, fitness or recreational activity (e.g., blood donation, physical exam, flu shot, exercise class, sports).	Not work-related
(iv)	Eating, drinking or preparing food or drink for personal consumption.	Not work-related*
(v)	Personal tasks (unrelated to employment) performed at the establishment outside assigned working hours.	Not work-related

* If food/drink is contaminated by workplace substances, the case may be work-related.

§1904.5(b)(2) — Exceptions (2/2)

Item	§1904.5(b)(2) Exception	Recordability
(vi)	Personal grooming, self-medication for a non-work condition, or intentionally self-inflicted injury.	Not work-related
(vii)	Motor-vehicle accident in company parking lot or access road while commuting.	Not work-related
(viii)	Common cold or flu.	Not work-related
(ix)	Mental illness, unless the employee voluntarily provides a medical opinion from a licensed health care professional that it is work-related.	Not work-related unless certified

Applying §1904.5(b)(2) Exceptions

- Identify and document which exception applies.
- If both work and non-work causes exist, record if the work exposure caused or contributed to the outcome.
- Cold/flu exception does not extend to other work-acquired infectious diseases (e.g., TB).

§1904.5(b)(6) — Working at Home (Rule)

- An injury or illness that occurs while an employee is working at home is work-related if it occurs while performing work for pay/compensation and is directly related to the performance of work rather than the general home environment.

§1904.5(b)(6) — Home-Office Scenarios

Scenario	Work-Related?	Notes
Trips over employer-provided power cord while typing reports.	Yes	Directly related to work equipment/task.
Trips over child's toy walking to kitchen for lunch.	No	General home environment.
Back strain lifting boxes of company records at home.	Yes	Direct performance of work.
Burns cooking personal lunch at home.	No	Personal consumption.
Shock from faulty employer-provided laptop power supply.	Yes	Employer equipment for work.
Slip on icy driveway leaving for personal errand mid-day.	No	Personal activity; not work duty.

Applying §1904.5(b)(6) — Notes

- Ask: Did the event arise from performing work, or from the general home setting?
- Employer need not inspect homes to determine recordability; assess facts and document.
- Update the log promptly if facts change (e.g., days away develop).

Subpart C — §1904.5

Work-Relatedness (Part 2)

Application & Training (b)(3) Mental Illness • (b)(4) Travel • (b)(5)
Home • (b)(6) Special Cases

Outline — §1904.5 (Part 2)

- §1904.5(b)(3) — Mental Illness (CFR + plain-language)
- §1904.5(b)(4) — Travel Status (CFR + plain-language)
- §1904.5(b)(5) — Working at Home (CFR + plain-language)
- §1904.5(b)(6) — Special Cases (transition + application)

§1904.5(b)(3) — Mental Illness (CFR excerpt — abridged)

- “Mental illness is not considered work-related unless the employee voluntarily provides a medical opinion from a licensed health care professional with appropriate training and experience stating the illness is work-related.”
- Note: Employer may record if it has objective evidence that a case is work-related and is work-relatedness clearly established.

§1904.5(b)(3) — What this means

- Recording mental illness requires a voluntary clinician certification tying the condition to work; otherwise, do not presume work-relatedness.
- Employers should avoid forcing disclosures; handle privacy per §1904.29.
- Keep documentation of any clinician opinion and your determination rationale.

§1904.5(b)(3) — Practical applications

- Stress claim without clinician certification → generally not recordable.
- PTSD diagnosed by clinician as work-related → recordable if it meets §1904.7 criteria (e.g., days away).
- Use privacy case notation when applicable.

§1904.5(b)(3) — Boundaries

- Voluntary certification must come from a qualified/licensed HCP with appropriate training.
- If multiple opinions conflict, base determination on the most authoritative, well-documented opinion.

§1904.5(b)(4) — Travel Status (CFR excerpt — abridged)

- “Injuries/illnesses that occur while an employee is on travel status are work-related if they occur while the employee is engaged in work activities in the interest of the employer.”
- “Injuries/illnesses are not work-related if they occur during a normal living activity away from the establishment after the employee has checked into a temporary residence (‘home away from home’), or during a personal detour.”

§1904.5(b)(4) — What this means

- Travel cases are presumed work-related only when the employee is performing tasks for the employer's benefit.
- The 'home away from home' concept limits the work environment during off-duty time at a hotel or temporary lodging.

§1904.5(b)(4) — Examples

- Injury walking between client meetings → work-related.
- Food poisoning at client dinner hosted for business → work-related (if clearly linked).
- Sprain at hotel gym after hours → generally not work-related (personal activity).

§1904.5(b)(4) — Boundaries

- Personal detours during travel (sightseeing, visiting friends) break work-relatedness until duties resume.
- Commuting to the airport from home before trip → not work-related (commuting).

§1904.5(b)(5) — Working at Home (CFR excerpt — abridged)

- “An injury or illness that occurs while an employee is working at home is work-related if it occurs while performing work for pay or compensation and is directly related to the performance of work rather than the general home environment.”

§1904.5(b)(5) — What this means

- Record only if the injury/illness results from a task or exposure directly tied to the work being performed at home.
- General home hazards (e.g., tripping over a pet, preparing personal lunch) are not work-related.

§1904.5(b)(5) — Examples

- Shock from employer-provided laptop power supply → work-related.
- Trip over child's toy en route to kitchen → not work-related.
- Back strain lifting boxes of company files → work-related.

§1904.5(b)(6) — Special cases (CFR excerpt — abridged)

- Special conditions clarify borderline situations and reinforce that evidence of a direct work connection is required to record.
- Examples may include clarification around heart attacks, layover activities, or circumstances requiring further investigation.

§1904.5(b)(6) — What this means

- Evaluate facts case-by-case; document the work connection clearly.
- When in doubt, assess against §1904.4 (work-related + new case + meets criteria).

§1904.5(b)(6) — Examples

- Employee collapses at work (possible cardiac event) → investigate; record only if work event/exposure caused or contributed.
- Symptoms with clear non-work cause (e.g., allergic reaction to off-duty exposure) → not work-related.

Case Example — Maria (Warehouse Associate)

Incident: Maria cut her palm on a broken pallet board.

Treatment: Required sutures (medical treatment beyond first aid).

Outcome: 1 day away from work.

Case#	Employee	Date	Description	Outcome
1	Maria R.	02/03	Palm laceration — sutures	Days away (1)

Case Example — Jamal (Forklift Operator)

Incident: Jamal strained his shoulder adjusting a pallet.

Treatment: Clinician restricted overhead lifts for 5 days.

Outcome: Job transfer to non-lifting tasks.

Case#	Employee	Date	Description	Outcome
2	Jamal K.	03/15	Shoulder strain — restriction	Job transfer (5)

Case Example — Elena (Picker/Packer)

Incident: Elena slipped on wet floor and fractured her wrist.

Treatment: Hospital admission, casting applied.

Outcome: Hospitalization triggers reporting duty.

Case#	Employee	Date	Description	Outcome
3	Elena V.	05/11	Wrist fracture — inpatient admit	Days away

Case Example — Luis (Office Staff)

Incident: Luis reports anxiety due to workload.

Treatment: No clinician opinion provided initially. Later, psychologist certifies condition as work-related.

Outcome: Recordable if criteria met (days away, restricted work).

Case#	Employee	Date	Description	Outcome
4	Luis M.	07/21	Work-related anxiety — clinician certified	Restricted work

Case Example — Horizon Logistics (Multiple Locations)

Incident: Horizon Logistics operates multiple branches. Determining recordkeeping by establishment.

Treatment: Centralized tracking not permitted under OSHA for separated locations.

Outcome: Each site must maintain its own OSHA 300 log.

Quiz — §1904.5 Work-Relatedness (Q1–Q5)

- Q1. Injuries are presumed work-related unless:
 - A) The employee denies it
 - B) An exception in §1904.5(b)(2) applies
 - C) Employer decides otherwise
 - D) The log is full
- Q2. An employee is injured while commuting from home to work. Is it recordable?
 - A) Yes
 - B) No
 - C) Only if in company vehicle
 - D) Only if supervisor reports
- Q3. Mental illness is recordable only if:
 - A) Employee says it is
 - B) A clinician certifies it
 - C) Manager believes so
 - D) It results in time off work
- Q4. Maria breaks her ankle at hotel gym during travel. Recordable?
 - A) Yes
 - B) No
 - C) Only if hospitalized
 - D) Only if company policy requires
- Q5. Jamal shocked by employer laptop cord at home. Recordable?
 - A) Yes
 - B) No
 - C) Only if hospitalized
 - D) Only if more than one day lost

Quiz — §1904.5 Work-Relatedness (Q6–Q10)

- Q6. Luis reports anxiety with no clinician certification. Recordable?
 - A) Yes
 - B) No
 - C) Only if time off work
 - D) Only if manager agrees
- Q7. Horizon Logistics employee injured at another location. Where is it recorded?
 - A) Home office
 - B) Nearest log
 - C) Assigned location
 - D) Corporate HQ
- Q8. A cold contracted at work is:
 - A) Recordable
 - B) Not recordable
 - C) Only if hospitalized
 - D) Only if spread to coworkers
- Q9. A clinician diagnoses PTSD as work-related. Recordable?
 - A) Yes, if criteria in §1904.7 met
 - B) No
 - C) Only if hospitalized
 - D) Only if supervisor agrees
- Q10. Employee trips over personal bag at workplace. Recordable?
 - A) Yes
 - B) No (personal task)
 - C) Only if hospitalized
 - D) Only if supervisor files report

Quiz — §1904.5 Work-Relatedness (Q11–Q15)

- Q11. Employee injured while sightseeing on personal detour during travel. Recordable?
 - A) Yes
 - B) No
 - C) Only if hospitalized
 - D) Only if employer approves
- Q12. Burns while cooking personal lunch at home. Recordable?
 - A) Yes
 - B) No
 - C) Only if hospitalized
 - D) Only if equipment provided by employer
- Q13. Back strain lifting company files at home. Recordable?
 - A) Yes
 - B) No
 - C) Only if hospitalized
 - D) Only if no witnesses
- Q14. Which is always excluded from recordability?
 - A) Flu
 - B) Tuberculosis
 - C) Hepatitis A
 - D) Plague
- Q15. Heart attack at work is recordable:
 - A) Always
 - B) Never
 - C) Only if work event/exposure contributed
 - D) Only if fatal

Answer Key & Discussion

- Q1. Injuries are presumed work-related unless:
- Answer → B) An exception in §1904.5(b)(2) applies
- CFR Reference → §1904.5(a)
- Justification → ‘You must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed... unless an exception in paragraph (b)(2) specifically applies.’

Answer Key & Discussion

- Q2. An employee is injured while commuting from home to work. Is it recordable?
- Answer → B) No
- CFR Reference → §1904.5(b)(2)(vii)
- Justification → ‘You are not required to record injuries and illnesses if... the injury or illness is solely the result of an employee commuting to or from work.’

Answer Key & Discussion

- Q3. Mental illness is recordable only if:
- Answer → B) A clinician certifies it
- CFR Reference → §1904.5(b)(3)
- Justification → ‘You must record a mental illness only when a physician or other licensed health care professional has determined that the employee has a work-related mental illness.’

Answer Key & Discussion

- Q4. Maria breaks her ankle at hotel gym during travel. Recordable?
- Answer → B) No
- CFR Reference → §1904.5(b)(4)
- Justification → ‘Injuries and illnesses are not considered work-related if they occur while the employee is engaged in personal activities unrelated to work during travel status.’

Answer Key & Discussion

- Q5. Jamal shocked by employer laptop cord at home. Recordable?
- Answer → A) Yes
- CFR Reference → §1904.5(b)(5)
- Justification → ‘Injuries and illnesses that occur while an employee is working at home, and that are directly related to the performance of work, must be recorded.’

Answer Key & Discussion

- Q6. Luis reports anxiety with no clinician certification. Recordable?
- Answer → B) No
- CFR Reference → §1904.5(b)(3)
- Justification → ‘You must record a mental illness only when a physician or other licensed health care professional has determined that the employee has a work-related mental illness.’

Answer Key & Discussion

- Q7. Horizon Logistics employee injured at another location. Where is it recorded?
- Answer → C) Assigned location
- CFR Reference → §1904.30
- Justification → ‘Each establishment must keep a separate OSHA 300 Log.’ The case is recorded on the log of the establishment where the employee is normally assigned.

Answer Key & Discussion

- Q8. A cold contracted at work is:
- Answer → B) Not recordable
- CFR Reference → §1904.5(b)(2)(viii)
- Justification → ‘You are not required to record cases of the common cold or flu.’

Answer Key & Discussion

- Q9. A clinician diagnoses PTSD as work-related. Recordable?
- Answer → A) Yes, if criteria in §1904.7 met
- CFR Reference → §1904.5(b)(3)
- Justification → ‘You must record a mental illness only when a physician or other licensed health care professional has determined that the employee has a work-related mental illness.’

Answer Key & Discussion

- Q10. Employee trips over personal bag at workplace. Recordable?
- Answer → B) No (personal task)
- CFR Reference → §1904.5(b)(2)(v)
- Justification → ‘You are not required to record injuries and illnesses if... the injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment.’

Answer Key & Discussion

- Q11. Employee injured while sightseeing on personal detour during travel. Recordable?
- Answer → B) No
- CFR Reference → §1904.5(b)(4)
- Justification → ‘If the employee has established a home away from home, injuries that occur while engaged in personal activities unrelated to work are not considered work-related.’

Answer Key & Discussion

- Q12. Burns while cooking personal lunch at home. Recordable?
- Answer → B) No
- CFR Reference → §1904.5(b)(5)
- Justification → ‘Injuries and illnesses that occur at home and are not directly related to the performance of work are not recordable.’

Answer Key & Discussion

- Q13. Back strain lifting company files at home. Recordable?
- Answer → A) Yes
- CFR Reference → §1904.5(b)(5)
- Justification → ‘Injuries and illnesses that occur while an employee is working at home, and that are directly related to the performance of work, must be recorded.’

Answer Key & Discussion

- Q14. Which is always excluded from recordability?
- Answer → A) Flu
- CFR Reference → §1904.5(b)(2)(viii)
- Justification → ‘You are not required to record cases of the common cold or flu.’

Answer Key & Discussion

- Q15. Heart attack at work is recordable:
- Answer → C) Only if work event/exposure contributed
- CFR Reference → §1904.5(b)(2)
- Justification → ‘You are not required to record an injury or illness if... it is not work-related.’ Heart attacks are evaluated for work contribution.

Subpart C — §1904.6 New Case Criteria

Summaries of CFR text with practical case examples

Outline — §1904.6 New Case Criteria

- • Definition of a New Case
- • Role of recovery and new events
- • Chronic conditions
- • Aggravations of pre-existing cases
- • Clinician determinations

Definition of a New Case

- An injury or illness must be considered a new case if:
 - - The employee has recovered completely and a new event/exposure occurs.
 - - The employee has not previously experienced the same type of injury or illness.

Recurrence of Symptoms

- If the signs or symptoms reappear without a new event/exposure, it is NOT a new case.
- This is a continuation of the previous case.

Aggravation of Pre-existing Condition

- If a new event/exposure in the work environment significantly aggravates a pre-existing condition, it IS considered a new case.

Clinician Input

- Employers may rely on a physician or licensed healthcare professional to determine whether an injury/illness is a new case or a continuation.

Case Example — Back Injury

- An employee who previously recovered from a back strain suffers a new lifting injury. → Record as a new case.

Case Example — Asthma

- An employee with asthma experiences repeated attacks when exposed to workplace dust. → Considered continuation, not a new case.

Case Example — Dermatitis

- An employee with chronic dermatitis develops worsening symptoms after exposure to a new cleaning chemical. → Record as a new case (significant aggravation).

Case Example — Clinician Determination

- A physician certifies that current symptoms are unrelated to the prior case. → Record as a new case based on clinician determination.

§1904.7 — General Recording Criteria

Slides 1–23

Expanded CFR Summaries + Examples

§1904.7(a) Basic requirement — Summary

- An injury/illness is recordable if it results in:
 - - Death
 - - Days away from work
 - - Restricted work/transfer
 - - Medical treatment beyond first aid
 - - Loss of consciousness
 - - Significant diagnosis (cancer, chronic disease, fracture, punctured eardrum)
- OSHA's intent: Ensure all serious outcomes are captured consistently.

§1904.7(a) Example

- Example 1: A broken wrist treated with a cast = recordable.
- Example 2: Small cut cleaned and bandaged with Band-Aid only = not recordable.

- Key: Treatment level and severity drive recordability.

§1904.7(b)(1) How to decide — Overview

- Employers must evaluate each case against six possible outcomes.
- If any apply, the case is recordable.
 - (i) Death
 - (ii) Days away
 - (iii) Restricted/transfer
 - (iv) Medical treatment beyond first aid
 - (v) Loss of consciousness
 - (vi) Significant diagnosis

§1904.7(b)(1)(i–iii) Pathways

- (i) Death → All work-related fatalities are recordable.
 - (ii) Days away → If employee cannot work ≥ 1 day after incident.
 - (iii) Restricted/transfer → If employee can't perform routine job functions or full shift.
-
- Routine functions = activities done \geq once per week.

§1904.7(b)(1)(iv–vi) Pathways

- (iv) Medical treatment → Includes sutures, Rx meds, physical therapy.
 - (v) Loss of consciousness → Even brief fainting is recordable.
 - (vi) Significant diagnosis → Cancer, fractures, punctured eardrum always count.
-
- Intent: Remove ambiguity in classifying severe conditions.

§1904.7(b)(2) Death

- Every work-related fatality must be logged.
- Example: A fall from a ladder causing death = recordable fatality.
- Employer must update OSHA 300 log and report to OSHA within 8 hours.
- Clarification: Death trumps all other outcomes.

§1904.7(b)(3) Days away — Overview

- This section explains how to count and classify days away from work.
- Nine detailed rules (i–ix) ensure consistency across employers.

§1904.7(b)(3)(i) Counting begins

- Count starts the day after the injury/illness.
- Example: Worker injured Monday, returns Thursday → 2 days away recorded.
- Intent: Prevents confusion about day-of-injury.

§1904.7(b)(3)(ii) Count until recovery

- Continue counting until the employee fully resumes normal duties.
- Example: Employee misses 5 days, returns on Day 6 = 5 days away.
- Clarification: Partial returns (light duty) are classified separately.

§1904.7(b)(3)(iii) Clinician recommendation — Summary

- Employers must follow physician/licensed clinician instructions.
- If multiple opinions conflict, use the most authoritative/best documented.
- Employers cannot downgrade restrictions.
- Example: Doctor orders 3 days off → employer must record 3 days.

§1904.7(b)(3)(iii) Clinician recommendation — Case

- Case: Worker insists they can work, but doctor orders rest.
- Employer must follow doctor, record as 2 days away.
- OSHA rule: Clinician's decision overrides worker or employer preference.

§1904.7(b)(3)(iv) 180-day cap — Summary

- Employers must cap days away at 180 per case.
- Reason: Prevents unlimited counts for chronic cases.
- Clarification: Calendar days, not just scheduled shifts.

§1904.7(b)(3)(iv) 180-day cap — Visual

- Case: Worker absent 250 days after severe injury.
- Log entry: 180 days recorded (cap).
- Example: 250 → 180 cutoff.

§1904.7(b)(3)(v) Delayed treatment

- If medical treatment starts later, begin counting when absence begins.
- Example: Injury Friday, worker finishes week, doctor orders rest Monday → count starts Monday.

§1904.7(b)(3)(vi) Weekends/holidays — Summary

- Include weekends/holidays if worker could not have worked.
- Rule: Ability to work is the standard, not whether shift was scheduled.

§1904.7(b)(3)(vi) Weekends/holidays — Example

- Case: Worker injured Friday, unable to work Saturday–Sunday.
- Employer must count both days.

- Intent: Prevent underreporting using calendar gaps.

§1904.7(b)(3)(vii) Transfers

- If employee is transferred or restricted, classify as the more severe outcome.
- Example: 2 days away + 10 restricted → log as days away.

§1904.7(b)(3)(viii) Multiple outcomes — Summary

- If multiple outcomes occur, record the most severe.
- Severe order: Death > Days away > Restricted work/transfer > Medical treatment > First aid.

§1904.7(b)(3)(viii) Multiple outcomes — Example

- Case: Employee misses 3 days, then restricted duty 2 weeks.
- Result: Record as days away.

- Clarification: One case per incident, most severe applies.

§1904.7(b)(3)(ix) Death mid-case — Summary

- If worker dies after days away/restriction, reclassify as fatality.
- All prior days remain logged, but case outcome = death.

§1904.7(b)(3)(ix) Death mid-case — Example

- Case: Worker injured, 10 days away, then dies.
- OSHA log: Update to fatality, retain 10 days record.
- Intent: Fatality overrides prior classification.

Scenario 1: Massage Treatment

- An employee strains their lower back while lifting a box.
- Trainer Lopez provides a 15-minute massage to reduce muscle tension.
- This case is NOT recordable, because massage is defined as first aid under §1904.7(b)(5)(ii)(M).

Scenario 2: Splinter Removal

- An employee gets a wood splinter in their hand.
- Injury Prevention Specialist Kim removes the splinter with tweezers.
- This case is NOT recordable, as removing splinters with simple tools is first aid (§1904.7(b)(5)(ii)(K)).

Scenario 3: Tetanus Shot

- An employee suffers a puncture wound from a rusty nail.
- Trainer Davis administers a tetanus shot.
- This case is NOT recordable, because tetanus immunizations are first aid (§1904.7(b)(5)(ii)(B)).

Scenario 4: Non-Rigid Support

- An employee twists an ankle while stepping off a ladder.
- Trainer Nguyen wraps the ankle with an elastic bandage.
- This case is NOT recordable, because non-rigid supports are first aid (§1904.7(b)(5)(ii)(F)).

Scenario 5: Cold Therapy

- An employee bumps their shoulder on equipment and feels soreness.
- Trainer Patel applies an ice pack for 20 minutes.
- This case is NOT recordable, because hot and cold therapy is first aid (§1904.7(b)(5)(ii)(E)).

Scenario 6: Eye Irrigation

- An employee gets dust particles in their eye while working in the yard.
- Trainer Rivera flushes the eye with saline solution.
- This case is NOT recordable, because removing foreign bodies from the eye with irrigation is first aid (§1904.7(b)(5)(ii)(J)).

Scenario 7: Wound Covering

- An employee cuts their hand on a sharp edge.
- Trainer Carter cleans the wound and applies a gauze pad and Band-Aid™.
- This case is NOT recordable, because simple wound coverings are first aid (§1904.7(b)(5)(ii)(D)).

Scenario 8: Temporary Immobilization

- An employee slips and injures their wrist.
- Trainer Thompson applies a temporary sling to transport the worker to urgent care.
- This case is NOT recordable, because temporary immobilization during transport is first aid (§1904.7(b)(5)(ii)(G)).

Scenario 9: Fluids for Heat Stress

- An employee feels dizzy and overheated after outdoor work.
- Trainer White provides water and electrolyte drinks for recovery.
- This case is NOT recordable, because drinking fluids for heat stress is first aid (§1904.7(b)(5)(ii)(N)).

Scenario 10: Advanced Treatment Example

- An employee suffers a deep cut requiring sutures.
- Trainer Johnson cleans the wound and the employee later receives stitches at a clinic.
- This case IS recordable, because sutures go beyond first aid (§1904.7(b)(5)(i)).

Quiz Questions 1-5

Q1. What is 'medical treatment' under OSHA 1904?

- A) Management and care of a patient to combat disease/disorder
- B) Any visit to a healthcare provider
- C) Only when hospitalization is required
- D) Use of bandages or gauze

Q2. Which of the following is NOT considered medical treatment?

- A) Sutures
- B) Prescription medication
- C) Observation-only visits
- D) Rigid braces

Q3. What does OSHA consider 'first aid'?

- A) Any treatment that avoids hospitalization
- B) Specific treatments listed in §1904.7(b)(5)(ii)
- C) Any treatment provided by a nurse
- D) Treatments that cost less than \$500

Q4. Is loss of consciousness recordable?

- A) Only if longer than 5 minutes
- B) Yes, always, regardless of duration
- C) No, unless hospitalized
- D) Only if diagnosed as heat stress

Q5. Which of these must always be recorded as significant?

- A) Flu
- B) Fractured rib
- C) Sprained ankle
- D) Muscle strain

Quiz Questions 6-10

Q6. Using over-the-counter ibuprofen at normal strength is:

- A) Medical treatment
- B) First aid
- C) Recordable if provided at work
- D) Not considered treatment

Q7. Which immunization is considered first aid?

- A) Hepatitis B
- B) Rabies
- C) Tetanus
- D) Flu shot

Q8. Applying butterfly bandages to close a wound is:

- A) First aid
- B) Medical treatment
- C) Recordable only if stitches are later required
- D) Neither

Q9. Using hot/cold packs for soreness is:

- A) First aid
- B) Medical treatment
- C) Recordable because provided by trainer
- D) Not treatment

Q10. Which support device is still first aid?

- A) Rigid brace with metal stays
- B) Hard cast
- C) Elastic wrap bandage
- D) Surgical fixation device

Quiz Questions 11-15

Q11. Temporary use of a sling during transport is:

- A) Medical treatment
- B) First aid
- C) Recordable because immobilization occurred
- D) Not treatment

Q12. Draining a blister is considered:

- A) Medical treatment
- B) First aid
- C) Recordable if performed by physician
- D) Not treatment

Q13. Removing dust from the eye with irrigation is:

- A) Medical treatment
- B) First aid
- C) Recordable only if vision is affected
- D) Not treatment

Q14. Using massages for sore muscles is:

- A) Medical treatment
- B) First aid
- C) Recordable only if provided by physician
- D) Neither

Q15. Drinking fluids for heat stress relief is:

- A) Medical treatment
- B) First aid
- C) Recordable only in outdoor jobs
- D) Not treatment

Quiz Questions 16-20

Q16. Jamal cuts his finger and receives stitches.

- A) First aid
- B) Medical treatment (recordable)
- C) Not recordable
- D) Depends on who provides the stitches

Q17. Jamal sprains his wrist. Trainer applies an elastic bandage.

- A) First aid
- B) Medical treatment
- C) Recordable because injury occurred
- D) Not treatment

Q18. At Horizon Logistics, a worker faints briefly due to heat.

- A) Not recordable unless hospitalized
- B) Recordable (loss of consciousness)
- C) First aid
- D) Not treatment

Q19. Horizon Logistics worker diagnosed with silicosis.

- A) Not recordable until symptoms worsen
- B) Always recordable at diagnosis
- C) First aid only
- D) Recordable only if hospitalized

Q20. Trainer Lopez massages an employee's strained back.

- A) Recordable
- B) First aid (not recordable)
- C) Medical treatment
- D) Only recordable if pain continues

Quiz Questions 21-25

Q21. Trainer Kim removes a splinter with tweezers.

- A) Recordable
- B) First aid (not recordable)
- C) Medical treatment
- D) Not treatment

Q22. If a doctor recommends medical treatment but the employee refuses:

- A) The case is still recordable
- B) Not recordable since no treatment given
- C) Only recordable if hospitalized
- D) Recordable only if employer agrees

Q23. Professional status affects first aid classification:

- A) True — physician treatment is always medical
- B) False — first aid remains first aid regardless of provider
- C) True only for nurses
- D) True only if at a clinic

Q24. Which is a complete list of first aid procedures?

- A) Any treatment that avoids surgery
- B) Treatments listed in §1904.7(b)(5)(ii)
- C) Treatments costing less than \$1,000
- D) Treatments approved by employer

Q25. Which is an example of a significant diagnosed illness?

- A) Flu
- B) Cracked bone
- C) Mild headache
- D) Muscle fatigue

Q1. What is 'medical treatment' under OSHA 1904?

- **Correct Answer → A) Management and care of a patient to combat disease/disorder**
- CFR Reference → §1904.7(b)(5)(i)
- Discussion → Medical treatment is defined as the active management and care of a patient. Visits only for observation or diagnostic purposes are not medical treatment.

Q2. Which of the following is NOT considered medical treatment?

- **Correct Answer → C) Observation-only visits**
- CFR Reference → §1904.7(b)(5)(i)(A)
- Discussion → Observation-only visits are not medical treatment under OSHA. They do not involve active care or intervention.

Q3. What does OSHA consider 'first aid'?

- **Correct Answer → B) Specific treatments listed in §1904.7(b)(5)(ii)**
- CFR Reference → §1904.7(b)(5)(ii)
- Discussion → Only the procedures listed in §1904.7(b)(5)(ii) are considered first aid. Anything beyond this list is medical treatment.

Q4. Is loss of consciousness recordable?

- **Correct Answer → B) Yes, always, regardless of duration**
- CFR Reference → §1904.7(b)(6)
- Discussion → Any work-related loss of consciousness must be recorded, even if it lasts only a few seconds.

Q5. Which of these must always be recorded as significant?

- **Correct Answer → B) Fractured rib**
- CFR Reference → §1904.7(b)(7)
- Discussion → Significant injuries such as fractures must always be recorded at the time of diagnosis, even without other criteria like days away or treatment.

Q6. Using over-the-counter ibuprofen at normal strength is:

- **Correct Answer → B) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(A)
- Discussion → Using non-prescription medication at non-prescription strength is first aid. If prescribed at prescription strength, it becomes medical treatment.

Q7. Which immunization is considered first aid?

- **Correct Answer → C) Tetanus**
- CFR Reference → §1904.7(b)(5)(ii)(B)
- Discussion → Tetanus shots are considered first aid. Other immunizations such as Hepatitis B or rabies are medical treatment.

Q8. Applying butterfly bandages to close a wound is:

- **Correct Answer → A) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(D)
- Discussion → Butterfly bandages and Steri-Strips™ are first aid. Stitches, staples, or surgical glue are medical treatment.

Q9. Using hot/cold packs for soreness is:

- **Correct Answer → A) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(E)
- Discussion → Heat and cold therapy is explicitly listed as first aid, regardless of who provides it.

Q10. Which support device is still first aid?

- **Correct Answer → C) Elastic wrap bandage**
- CFR Reference → §1904.7(b)(5)(ii)(F)
- Discussion → Non-rigid supports such as elastic bandages and wraps are first aid. Rigid braces or casts are medical treatment.

Q11. Temporary use of a sling during transport is:

- **Correct Answer → B) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(G)
- Discussion → Temporary immobilization devices used during transport (slings, splints) are first aid. Long-term immobilization is medical treatment.

Q12. Draining a blister is considered:

- **Correct Answer → B) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(H)
- Discussion → Simple draining of a blister is first aid and does not make a case recordable.

Q13. Removing dust from the eye with irrigation is:

- **Correct Answer → B) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(J)
- Discussion → Removing foreign bodies from the eye using irrigation or cotton swab is first aid. Using instruments is medical treatment.

Q14. Using massages for sore muscles is:

- **Correct Answer → B) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(M)
- Discussion → Massages are first aid. Physical therapy or chiropractic treatment, however, is medical treatment.

Q15. Drinking fluids for heat stress relief is:

- **Correct Answer → B) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(N)
- Discussion → Providing fluids for heat stress is considered first aid, even when symptoms appear work-related.

Q16. Jamal cuts his finger and receives stitches.

- **Correct Answer → B) Medical treatment (recordable)**
- CFR Reference → §1904.7(b)(5)(i)
- Discussion → Sutures are medical treatment and make the case recordable, regardless of other criteria.

Q17. Jamal sprains his wrist. Trainer applies an elastic bandage.

- **Correct Answer → A) First aid**
- CFR Reference → §1904.7(b)(5)(ii)(F)
- Discussion → Elastic bandages and non-rigid wraps are first aid and do not make the case recordable.

Q18. At Horizon Logistics, a worker faints briefly due to heat.

- **Correct Answer → B) Recordable (loss of consciousness)**
- CFR Reference → §1904.7(b)(6)
- Discussion → Any work-related loss of consciousness, regardless of duration, is recordable.

Q19. Horizon Logistics worker diagnosed with silicosis.

- **Correct Answer → B) Always recordable at diagnosis**
- CFR Reference → §1904.7(b)(7)
- Discussion → Chronic irreversible diseases such as silicosis must be recorded immediately upon diagnosis.

Q20. Trainer Lopez massages an employee's strained back.

- **Correct Answer → B) First aid (not recordable)**
- CFR Reference → §1904.7(b)(5)(ii)(M)
- Discussion → Massages are first aid. This case is not recordable unless other criteria apply.

Q21. Trainer Kim removes a splinter with tweezers.

- **Correct Answer → B) First aid (not recordable)**
- CFR Reference → §1904.7(b)(5)(ii)(K)
- Discussion → Removing splinters with simple means (tweezers, swabs, irrigation) is first aid.

Q22. If a doctor recommends medical treatment but the employee refuses:

- **Correct Answer → A) The case is still recordable**
- CFR Reference → §1904.7(b)(5)(v)
- Discussion → Cases must be recorded if medical treatment is recommended, even if the employee does not follow the recommendation.

Q23. Professional status affects first aid classification:

- **Correct Answer → B) False — first aid remains first aid regardless of provider**
- CFR Reference → §1904.7(b)(5)(iv)
- Discussion → Whether first aid is given by a doctor, nurse, or supervisor, it remains first aid. Similarly, medical treatment is always medical treatment.

Q24. Which is a complete list of first aid procedures?

- **Correct Answer → B) Treatments listed in §1904.7(b)(5)(ii)**
- CFR Reference → §1904.7(b)(5)(iii)
- Discussion → OSHA provides a closed list of what is considered first aid. Anything not on the list is medical treatment.

Q25. Which is an example of a significant diagnosed illness?

- **Correct Answer → B) Cracked bone**
- CFR Reference → §1904.7(b)(7)
- Discussion → Fractures, punctured eardrums, cancer, and chronic irreversible diseases are always recordable when diagnosed.

§1904.8 Needlestick and Sharps Injuries – Basic Rule

- All work-related needlestick injuries and cuts from sharps contaminated with another person's blood or other potentially infectious material (OPIM) must be recorded.
- These cases must be logged on the OSHA 300 Log as injuries.
- Employee privacy must be protected: do not list employee's name. Instead, mark 'privacy case.'
- Example: A nurse is stuck by a used syringe → recordable as an injury and a privacy case.

§1904.8(b)(1) What is OPIM?

- OPIM = Other Potentially Infectious Material.
- Defined in the Bloodborne Pathogens standard (29 CFR 1910.1030).
- Includes human bodily fluids, tissues, and organs.
- Includes laboratory materials infected with HIV or HBV, including infected animal tissues.
- Example: A lab worker cut with an HIV-infected scalpel → recordable.

§1904.8(b)(1)(i) Human Bodily Materials

- OPIM includes human bodily fluids, tissues, and organs.
- These are considered potentially infectious for recordkeeping purposes.
- Example: Cut while handling human tissue sample → recordable.

§1904.8(b)(1)(ii) HIV/HBV-Infected Materials

- OPIM also includes materials infected with HIV or Hepatitis B (HBV).
- Covers laboratory cultures and infected tissues from experimental animals.
- Example: Cut from a cage containing HBV-infected animal tissue → recordable.

§1904.8(b)(2) Recording Cuts and Lacerations

- You do not need to record every cut, laceration, puncture, or scratch.
- Record only if BOTH are true:
 - • Work-related, AND
 - • Involves contamination with another person's blood or OPIM.
- If the object is clean or the contaminant is not blood/OPIM, record only if it meets general criteria (§1904.7).
- Example: Paper cut (clean) → not recordable. Needle contaminated with blood → recordable.

§1904.8(b)(3) Updating OSHA 300 Log

- If a recorded injury later results in diagnosis of a bloodborne illness:
 - • Update the OSHA 300 Log.
 - • Change classification from injury to illness.
 - • Update if it leads to death, days away, restrictions, or transfer.
- Example: A needle stick later diagnosed as Hepatitis C → update to illness on the log.

§1904.8(b)(4) Blood/OPIM Exposure Without Injury

- If an employee is exposed to blood or OPIM without being cut or scratched:
- Record as an illness IF:
 - The employee is diagnosed with a bloodborne illness (HIV, HBV, HCV), OR
 - The case meets one or more criteria in §1904.7 (death, days away, restricted work, medical treatment beyond first aid, or loss of consciousness).
- Example: Worker splashed with blood but not infected → not recordable. Worker splashed and later diagnosed with Hepatitis B → recordable.

§1904.8(b)(4)(i) Bloodborne Illness Diagnosis

- If exposure leads to a diagnosis of a bloodborne illness such as HIV, Hepatitis B, or Hepatitis C, record the case as an illness.
- Example: Lab worker splashed with infected blood later tests positive for HIV → recordable illness.

§1904.8(b)(4)(ii) Meeting General Criteria

- If exposure leads to outcomes covered in §1904.7 (death, days away, restrictions, treatment beyond first aid, or loss of consciousness), record the case.
- Example: Worker splashed in eye with infected blood, develops restricted work orders → recordable.

§1904.9 Medical Removal – Basic Requirement

- If an employee is medically removed under the medical surveillance requirements of an OSHA standard, the case must be recorded on the OSHA 300 Log.
- This ensures cases of chemical or occupational exposure requiring medical removal are tracked as work-related illnesses or injuries.
- Example: A worker exposed to lead exceeds the removal threshold under OSHA's lead standard → recordable.

§1904.9(b)(1) Classifying Medical Removal Cases

- Medical removal cases must be entered on the OSHA 300 Log as:
 - • A case involving days away from work, OR
 - • A case involving restricted work activity.
- If the medical removal results from chemical exposure, classify the case under the 'poisoning' column.
- Example: An employee removed due to benzene exposure and placed on restricted duty → recorded as restricted work and poisoning.

§1904.9(b)(2) Standards With Medical Removal

- Not all OSHA standards include medical removal provisions.
- Standards WITHOUT provisions: Bloodborne Pathogens, Noise.
- Standards WITH provisions include many chemical standards such as Lead, Cadmium, Methylene chloride, Formaldehyde, Benzene.
- Example: An employee medically removed due to cadmium exposure must be recorded.

§1904.9(b)(3) Voluntary Medical Removal

- If an employer voluntarily removes an employee from exposure before OSHA's medical removal criteria are met, the case is NOT recordable.
- Only removals required by an OSHA standard must be recorded.
- Example: An employer reassigns a worker to a different area as a precaution even though OSHA removal criteria are not triggered → not recordable.

§1904.10 Hearing Loss – Basic Requirement

- Record case if BOTH are true:
 - • Work-related Standard Threshold Shift (STS) in one or both ears.
 - • Total hearing level is 25 dB or more above audiometric zero (avg. at 2000, 3000, 4000 Hz).
- Example: 12 dB STS with 28 dB total hearing level
→ recordable.

What is an STS?

- STS = average 10 dB or more change at 2000, 3000, 4000 Hz compared to baseline audiogram.
- Defined in OSHA noise exposure standard (29 CFR 1910.95).
- STS can occur in one or both ears.
- Example: Worker shows 12 dB shift at 2000–4000 Hz → meets STS definition.

Evaluating Audiograms – STS

- No prior recordable hearing loss: compare current audiogram to original baseline.
- Prior recordable case: compare to revised baseline.
- Example: Employee with earlier hearing loss uses revised baseline for comparisons.

Evaluating Audiograms – 25 dB Loss

- Audiograms reflect total hearing ability vs. audiometric zero.
- Average hearing level at 2000, 3000, 4000 Hz must be ≥ 25 dB above zero.
- Example: STS present, but total hearing 20 dB above zero \rightarrow not recordable.

Age Adjustment

- Employers may adjust audiogram results for normal aging when evaluating STS (Appendix F tables, 29 CFR 1910.95).
- No age adjustment allowed for 25 dB threshold test.
- Example: Aging adjustment reduces STS below 10 dB → not recordable.

Retesting Within 30 Days

- Retest within 30 days:
 - • If retest does not confirm STS → not recordable.
 - • If retest confirms STS → record within 7 days.
- Later testing shows STS not persistent → line-out entry.
- Example: Initial test shows STS, retest clears → no recording required.

Work-Relatedness

- Use §1904.5 rules to determine if hearing loss is work-related.
- If work exposure contributed or aggravated condition → recordable.
- Non-work exposures (e.g., loud personal music) → not recordable.

Physician Determination

- If physician or licensed health professional determines hearing loss is not work-related → not recordable.
- Employer must follow medical judgment and OSHA's rules on work-relatedness.

Recording on OSHA 300 Log

- When recording a hearing loss case, check the 'hearing loss' column on the OSHA 300 Log.
- Ensures proper classification of occupational hearing loss.

Example Section – Case 1 (Recordable)

- Audiogram shows 15 dB STS at 2000–4000 Hz.
- Total hearing level is 30 dB above audiometric zero.
- Meets BOTH STS and 25 dB threshold → Recordable.

Example Section – Case 2 (Not Recordable: No 25 dB Loss)

- Audiogram shows 14 dB STS compared to baseline.
- Total hearing level is only 20 dB above zero.
- Fails the 25 dB requirement → Not recordable.

Example Section – Case 3 (Not Recordable: No STS)

- Audiogram shows only 7 dB shift compared to baseline.
- Total hearing level is 27 dB above zero.
- Fails 10 dB STS requirement → Not recordable, despite 25 dB loss.

Example Section – Case 4 (Recordable After Retest)

- Initial audiogram: 11 dB STS with 26 dB total loss.
- Retest within 30 days confirms STS and 25 dB loss.
- Confirmed STS → Recordable within 7 days.

§1904.11 Tuberculosis – Basic Requirement

- If an employee is occupationally exposed to someone with active TB, and later develops TB infection, the case must be recorded.
- Evidence: Positive skin test or diagnosis by a physician/licensed health care professional.
- Record on the OSHA 300 Log by checking the 'respiratory condition' column.
- Example: Healthcare worker exposed to a TB patient later tests positive for TB → recordable case.

§1904.11(b)(1) Pre-Employment TB Tests

- A positive TB skin test result obtained during a pre-employment physical is NOT recordable.
- Reason: The employee was not yet occupationally exposed in your workplace.
- Example: A new hire tests positive during screening but had prior exposure outside work → not recordable.

§1904.11(b)(2) Erasing TB Cases

- You may line-out or erase a recorded TB case if evidence proves it was not caused by workplace exposure.
- Employers must document supporting evidence when removing the case.
- Example: Investigation shows infection came from household exposure → case can be erased from log.

§1904.11(b)(2)(i) Household Exposure

- If the worker lives with a person diagnosed with active TB, the case may be erased from the log.
- Example: Employee's spouse has TB; infection traced to home → not work-related.

§1904.11(b)(2)(ii) Public Health Department Findings

- If the Public Health Department identifies the worker as a contact of someone with TB unrelated to the workplace, the case may be erased.
- Example: Health department confirms exposure occurred at a community event, not at work → erase case.

§1904.11(b)(2)(iii) Medical Investigation

- If a medical investigation proves infection was caused by non-work exposure, or not related to workplace TB exposure, the case may be erased.
- Example: Doctor confirms TB infection originated during overseas travel, unrelated to job → not recordable.

§1904.29 Forms – Basic Requirement

- Employers must use OSHA 300, 300-A, and 301 forms (or equivalent) to record work-related injuries and illnesses.
- • Form 300: Log of Work-Related Injuries and Illnesses.
- • Form 300-A: Annual Summary of Work-Related Injuries and Illnesses.
- • Form 301: Injury and Illness Incident Report.
- Example: Each recordable injury requires entries on Form 300 and Form 301, summarized on Form 300-A at year end.

§1904.29(b)(1) Completing the OSHA 300 Log

- Enter business information at the top of the form.
- Provide one or two line description for each recordable injury or illness.
- Summarize this information annually on OSHA Form 300-A.
- Example: 'Laceration to right hand – required 3 stitches' entered on Form 300, summarized on Form 300-A.

§1904.29(b)(2) Completing OSHA 301 Incident Report

- Complete an OSHA 301 Incident Report (or equivalent) for each recordable injury or illness entered on the OSHA 300 Log.
- The 301 provides detailed information on the incident, employee, and treatment.
- Example: Employee sprains ankle lifting boxes → Form 300 entry AND detailed Form 301 report.

§1904.29(b)(3) Timing Requirement

- Employers must record each recordable injury or illness within 7 calendar days of receiving information.
- This applies to both OSHA Form 300 Log and OSHA Form 301 Report.
- Example: Injury occurs Monday, reported Friday → must be entered by following Friday.

§1904.29(b)(4) Equivalent Forms

- Employers may use equivalent forms if they:
 - • Contain all required OSHA information.
 - • Are as understandable as official OSHA forms.
 - • Are completed using the same instructions.
- Example: Employer uses workers' comp insurance forms supplemented with OSHA-required data → acceptable equivalent.

§1904.29(b)(5) Computer Recordkeeping

- Employers may maintain OSHA records electronically.
- Condition: Must be able to produce equivalent OSHA forms when required.
- Example: Safety software generates OSHA 300 Log and 301 forms on demand → compliant.

§1904.29(b)(6) Privacy Concern Cases

- Do not enter employee's name on OSHA 300 Log for privacy concern cases.
- Enter 'privacy case' instead.
- Maintain a separate, confidential list of case numbers linked to employee names.
- Example: Worker with HIV infection recorded as 'privacy case' on Form 300.

§1904.29(b)(7) What Are Privacy Concern Cases?

- You must treat certain cases as privacy concern cases:
 - • Intimate body part or reproductive system injuries.
 - • Injuries/illnesses from sexual assault.
 - • Mental illnesses.
 - • HIV infection, Hepatitis, or TB.
 - • Needlestick injuries with blood/OPIM.
 - • Other illnesses where employee requests privacy.

Privacy Case Category (i)

- Injury or illness to an intimate body part or reproductive system.
- These are sensitive cases requiring protection of employee identity.
- Example: Lower abdominal injury involving reproductive organs → record as 'privacy case.'

Privacy Case Category (ii)

- Injury or illness resulting from sexual assault.
- Must always be treated as a privacy concern case.
- Example: Case recorded as 'injury from assault,' not identifying the nature of the assault.

Privacy Case Category (iii)

- Mental illnesses must be recorded as privacy concern cases.
- Protects employee confidentiality when dealing with psychological diagnoses.
- Example: Work-related PTSD diagnosis recorded as 'privacy case.'

Privacy Case Category (iv)

- Cases involving HIV infection, Hepatitis, or Tuberculosis.
- Due to stigma and sensitivity, names must not be listed.
- Example: Employee diagnosed with Hepatitis B after occupational exposure → recorded as 'privacy case.'

Privacy Case Category (v)

- Needlestick injuries and sharps injuries contaminated with another person's blood or OPIM.
- Example: Nurse stuck with contaminated needle → recorded as 'privacy case' on the log.

Privacy Case Category (vi)

- Other illnesses if the employee voluntarily requests privacy.
- Employer must honor such requests and record case as 'privacy case.'
- Example: Worker requests confidentiality for stress-related illness → log entry protects identity.

§1904.29(b)(8) Privacy List Is Complete

- No other types of injuries or illnesses may be classified as privacy concern cases.
- The list provided in §1904.29(b)(7) is exhaustive.
- Example: Employer cannot classify a sprain as a privacy case.

§1904.29(b)(9) Using Discretion in Descriptions

- If details could identify an employee, use discretion when describing the case.
- Enter enough information to identify cause and severity, without intimate details.
- Examples:
 - • Sexual assault → 'injury from assault.'
 - • Injury to reproductive organ → 'lower abdominal injury.'

§1904.29(b)(10) Privacy When Disclosing Forms

- If OSHA forms are shared with others (outside government or authorized representatives), employee names and identifiers must be removed.
- Exception: Names may be shared only under specific situations listed in the rule.

§1904.29(b)(10)(i) Disclosure Exception

- Employers may disclose personally identifying information to auditors or consultants hired to evaluate safety and health programs.
- Example: Third-party safety consultant reviews records for compliance audit.

§1904.29(b)(10)(ii) Disclosure Exception

- Names may be disclosed to process workers' compensation or other insurance claims.
- Example: Employer provides injury records to insurance company handling claim.

§1904.29(b)(10)(iii) Disclosure Exception

- Employers may disclose names to public health authorities or law enforcement agencies when legally permitted under HIPAA privacy standards (45 CFR 164.512).
- Example: Records released to public health agency investigating disease outbreak.

OSHA Form 300

OSHA's Form 300 (Rev. 04/2004) Log of Work-Related Injuries and Illnesses

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#). In addition, the forms are programmed to auto-calculate as appropriate.

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20 
U.S. Department of Labor
Occupational Safety and Health Administration

Please Record:

- Information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid.
- Significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional.
- Work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12.

Reminders:

- Complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.
- Feel free to use two lines for a single case if you need to.
- Complete the 5 steps for each case.

Form approved OMB no. 1218-0176

Establishment name

City State

Step 1. Identify the person		Step 2. Describe the case				Step 3. Classify the case				Step 4.		Step 5.						
(A) Case no.	(B) Employee's name	(C) Job title <i>(e.g., Welder)</i>	(D) Date of injury or onset of illness <i>(e.g., 2/10)</i>	(E) Where the event occurred <i>(e.g., Loading dock north end)</i>	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill <i>(e.g., Second degree burns on right forearm from acetylene torch)</i>	SELECT ONLY ONE circle based on the most serious outcome:				Enter the number of days the injured or ill worker was:		Select one column:						
						Remained at Work						Illness						
						Death (G)	Days away from work (H)	Job transfer or restriction (I)	Other recordable cases (J)	Away from work (K)	On job transfer or restriction (L)	(M)						
												Injury	Skin disorder	Respiratory condition	Poisoning	Hearing loss	All other illnesses	
						(1)	(2)	(3)	(4)	(5)	(6)	(1)	(2)	(3)	(4)	(5)	(6)	
Reset			month / day			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	days	days	<input type="radio"/>						
Reset			month / day			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	days	days	<input type="radio"/>						
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Reset			month / day			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	days	days	<input type="radio"/>						

Page totals **0 0 0 0 0 0**

Add a Form Page

Be sure to transfer these totals to the Summary page (Form 300A) before you post it.

Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instructions, search and 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 about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

Injury
Skin disorder
Respiratory condition
Poisoning
Hearing loss
All other illnesses
(1) (2) (3) (4) (5) (6)

OSHA Form 300-A

OSHA's Form 300A (Rev. 04/2004)

Summary of Work-Related Injuries and Illnesses

Note: You can type input into this form and save it.
Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#).

Year 20



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

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."

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
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of . . . (M)			
(1) Injuries	0	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

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 58 minutes per response, including time to review the instructions, search and 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 about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name

Street

City State Zip

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

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

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Employment information (If you don't have these figures, see the Worksheet on the next 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

Phone

Date

Reset

OSHA Form 301

OSHA's Form 301 (Rev. 04/2004) Injury and Illness Incident Report

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#). In addition, the forms are programmed to auto-calculate as appropriate.

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.



U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

This *Injury and Illness Incident Report* is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the *Log of Work-Related Injuries and Illnesses* and the accompanying *Summary*, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers' compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

According to Public Law 91-596 and 29 CFR 1904, OSHA's recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains.

If you need additional copies of this form, you may photocopy the printout or insert additional form pages in the PDF, and then use as many as you need.

Information about the employee

- 1) Full name
- 2) Street
City State ZIP
- 3) Date of birth
Month Day Year
- 4) Date hired
Month Day Year
- 5) Male Female

Information about the physician or other health care professional

- 6) Name of physician or other health care professional
- 7) If treatment was given away from the worksite, where was it given?
Facility
Street
City State ZIP
- 8) Was employee treated in an emergency room?
 Yes
 No
- 9) Was employee hospitalized overnight as an in-patient?
 Yes
 No

Information about the case

- 10) Case number from the Log (Transfer the case number from the Log after you record the case.)
- 11) Date of injury or illness
Month Day Year
- 12) Time employee began work (HHMM) AM PM
- 13) Time of event (HHMM) AM PM Check if time cannot be determined

* **Re fields 14 to 17:** Please do not include any personally identifiable information (PII) pertaining to worker(s) involved in the incident (e.g., no names, phone numbers, or Social Security numbers).

- 14)* **What was the employee doing just before the incident occurred?** Describe the activity, as well as the tools, equipment, or material the employee was using. Be specific. *Examples:* "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key-entry."

- 15)* **What Happened? Tell us how the injury occurred.** *Examples:* "When ladder slipped on wet floor, worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist over time."

- 16)* **What was the injury or illness?** Tell us the part of the body that was affected and how it was affected. *Examples:* "strained back"; "chemical burn, hand"; "carpal tunnel syndrome."

- 17)* **What object or substance directly harmed the employee?** *Examples:* "concrete floor"; "chlorine"; "radial arm saw." *If this question does not apply to the incident, leave it blank.*

- 18) **If the employee died, when did death occur?** Date of death
Month Day Year

Add a Form Page

Reset

Completed by
Title
Phone Date
Month Day Year

Employee Example 1 – Needlestick Injury

- Scenario: Jamal punctures his hand with a used needle containing blood.
- Recordability: Recordable.
- Reason: Contaminated sharps injuries must be recorded (§1904.8).

Case#	Employee	Date	Description	Outcome
1	Jamal S.	02/03	Hand puncture – needle with blood	Days away (1)

Employee Example 2 – Hearing Loss Below Threshold

- Scenario: Jamal's audiogram shows 12 dB STS but only 20 dB total hearing above zero.
- Recordability: Not recordable.
- Reason: Fails 25 dB threshold requirement (§1904.10).
- Note: Case does not meet both STS and 25 dB requirements.

Employee Example 3 – TB Household Exposure

- Scenario: Employee develops TB but lives with family member with active TB.
- Recordability: Not recordable.
- Reason: Exposure traced to household, not workplace (§1904.11).
- Note: Case can be erased from log after investigation.

Employee Example 4 – Privacy Case (Mental Illness)

- Scenario: Employee diagnosed with work-related depression.
- Recordability: Recordable.
- Reason: Mental illnesses must be recorded if work-related (§1904.29).

Case#	Employee	Date	Description	Outcome
2	Employee A	02/10	Work-related depression	Restricted work

Employer Example 1 – Chemical Medical Removal

- Scenario: Horizon Logistics removes worker from lead exposure due to OSHA surveillance requirement.
- Recordability: Recordable.
- Reason: Mandatory removals under OSHA standards must be logged (§1904.9).

Case#	Employee	Date	Description	Outcome
3	Employee B	02/17	Removed due to lead exposure	Days away (3)

Employer Example 2 – Voluntary Removal

- Scenario: Horizon Logistics voluntarily reassigns worker as precaution before OSHA removal criteria met.
- Recordability: Not recordable.
- Reason: Voluntary removals are not required to be logged (§1904.9).
- Note: Only mandatory removals must be recorded.

Employer Example 3 – Disclosure for Insurance

- Scenario: Horizon Logistics shares OSHA forms with insurer handling workers' compensation claim.
- Recordability: Recordable (for case itself).
- Reason: Disclosure of names allowed for processing claims (§1904.29(b)(10)(ii)).

Case#	Employee	Date	Description	Outcome
4	Employee C	02/24	Back injury – lifting incident	Restricted work

Employer Example 4 – Hearing Loss Retest

- Scenario: Audiogram shows 11 dB STS and 26 dB loss. Retest confirms results.
- Recordability: Recordable.
- Reason: Confirmed STS and ≥ 25 dB hearing loss must be logged (§1904.10).

Case#	Employee	Date	Description	Outcome
5	Employee D	03/03	Confirmed hearing loss	Illness – Hearing loss

Trainer Example 1 – Needlestick Privacy Case

- Scenario: Trainer responds to worker with needlestick contaminated with blood.
- Recordability: Recordable.
- Reason: Contaminated sharps injuries must be logged (§1904.8).

Case#	Employee	Date	Description	Outcome
6	Employee E	03/10	Needlestick with blood exposure	Illness – Bloodborne

Trainer Example 2 – First Aid Elastic Bandage

- Scenario: Trainer applies elastic bandage for a wrist strain.
- Recordability: Not recordable.
- Reason: Elastic bandages are considered first aid (§1904.7).
- Note: Case does not involve medical treatment.

Trainer Example 3 – TB Workplace Exposure

- Scenario: Trainer identifies employee contracted TB after workplace exposure.
- Recordability: Recordable.
- Reason: Work-related TB cases must be logged (§1904.11).

Case#	Employee	Date	Description	Outcome
7	Employee F	03/17	Workplace TB infection	Illness – Respiratory

Trainer Example 4 – Updating Bloodborne Illness Case

- Scenario: Trainer initially records needlestick as injury. Later diagnosed as Hepatitis C.
- Recordability: Recordable (update required).
- Reason: Case must be reclassified from injury to illness (§1904.8).

Case#	Employee	Date	Description	Outcome
8	Employee G	03/24	Needlestick later Hepatitis C	Illness – Bloodborne

Quiz Questions 1-5

- Q1. Which injuries must always be recorded on the OSHA 300 Log?
 - A) All cuts and scratches
 - B) Clean paper cuts
 - C) Needlestick with blood exposure
 - D) Minor bruises
- Q2. 'Other potentially infectious materials' include:
 - A) Only blood
 - B) Human tissues and organs
 - C) Dust particles
 - D) Clean fluids
- Q3. If a cut is caused by a clean knife with no contamination, it is:
 - A) Recordable
 - B) Not recordable unless it meets §1904.7 criteria
 - C) Always recordable
 - D) Privacy case
- Q4. If an injury later results in diagnosis of Hepatitis B, what must you do?
 - A) Nothing
 - B) Update OSHA 300 Log to illness
 - C) Erase the case
 - D) Record as first aid only
- Q5. Splash exposure without cut is recordable only if:
 - A) Employee is diagnosed with bloodborne illness
 - B) Exposure was visible
 - C) Supervisor requires it
 - D) Always

Quiz Questions 6-10

- Q6. Medical removal cases are recorded as:
 - A) Property damage
 - B) Days away or restricted work
 - C) First aid
 - D) Not recorded
- Q7. Voluntary removal of an employee before OSHA criteria are met is:
 - A) Recordable
 - B) Not recordable
 - C) Privacy case
 - D) Illness
- Q8. If removal is due to lead exposure, the case must be classified under:
 - A) Hearing loss
 - B) Poisoning
 - C) Respiratory condition
 - D) Other illness
- Q9. A Standard Threshold Shift (STS) is:
 - A) 5 dB average shift
 - B) 10 dB average shift at 2000–4000 Hz
 - C) 20 dB shift at any frequency
 - D) Physician opinion
- Q10. For hearing loss to be recordable, employee must have:
 - A) Only STS
 - B) Only 25 dB total loss
 - C) Both STS and ≥ 25 dB total loss
 - D) Any hearing complaint

Quiz Questions 11-15

- Q11. Retesting within 30 days shows no STS. You must:
 - A) Record case
 - B) Not record case
 - C) Record as privacy case
 - D) Classify as restricted work
- Q12. Age adjustments may be applied:
 - A) To both STS and 25 dB tests
 - B) Only to STS calculations
 - C) Only to 25 dB threshold
 - D) Never
- Q13. If physician determines hearing loss is not work-related:
 - A) Still record case
 - B) Do not record case
 - C) Record as illness
 - D) Privacy case
- Q14. On OSHA 300 Log, hearing loss cases must be marked:
 - A) Poisoning column
 - B) Hearing loss column
 - C) Respiratory condition
 - D) Injury column
- Q15. Work-related TB case must be recorded when:
 - A) Employee has positive skin test from pre-employment
 - B) Employee develops TB infection after workplace exposure
 - C) Employee lives with TB patient
 - D) Employee requests it

Quiz Questions 16-20

- Q16. A positive TB test at pre-employment physical is:
 - A) Recordable
 - B) Not recordable
 - C) Privacy case
 - D) Illness
- Q17. You may erase a TB case if:
 - A) Public Health Dept. identifies non-work exposure
 - B) No symptoms appear
 - C) Employee transfers jobs
 - D) 6 months have passed
- Q18. OSHA requires use of which forms?
 - A) 200, 201, 202
 - B) 300, 300-A, 301
 - C) 100, 200, 300
 - D) None
- Q19. Recordable cases must be logged within:
 - A) 3 days
 - B) 7 days
 - C) 14 days
 - D) 30 days
- Q20. Equivalent forms may be used if:
 - A) Approved by insurance
 - B) Contain all OSHA-required information
 - C) Shorter than OSHA form
 - D) Supervisor agrees

Quiz Questions 21-25

- Q21. For privacy concern cases, log entry must list:
 - A) Full name
 - B) Privacy case
 - C) Job title
 - D) Initials only
- Q22. Which of these is a privacy concern case?
 - A) Sprained ankle
 - B) Injury to reproductive system
 - C) Paper cut
 - D) Burn on hand
- Q23. Mental illness is considered:
 - A) Not recordable
 - B) Privacy concern case
 - C) First aid
 - D) Always erased
- Q24. Employers may describe sexual assault cases on the log as:
 - A) 'Sexual assault injury'
 - B) 'Injury from assault'
 - C) 'Confidential case'
 - D) 'Employee A'
- Q25. Names may be disclosed on OSHA forms only:
 - A) To auditors, insurance, or public health/law enforcement
 - B) To any employee
 - C) To the public
 - D) Never

Answer Key

- **Question: Which injuries must always be recorded on the OSHA 300 Log?**
- **Correct Answer: C) Needlestick with blood exposure**
- CFR Reference: §1904.8(a)
- Discussion: Sharps contaminated with blood/OPIM must always be recorded.

Answer Key

- **Question: 'Other potentially infectious materials' include:**
- **Correct Answer: B) Human tissues and organs**
- CFR Reference: §1904.8(b)(1)
- Discussion: OPIM includes human tissues/organs and infected lab materials.

Answer Key

- **Question: If a cut is caused by a clean knife with no contamination, it is:**
- **Correct Answer: B) Not recordable unless it meets §1904.7 criteria**
- CFR Reference: §1904.8(b)(2)
- Discussion: Clean object injuries are only recordable if they meet general criteria.

Answer Key

- **Question: If an injury later results in diagnosis of Hepatitis B, what must you do?**
- **Correct Answer: B) Update OSHA 300 Log to illness**
- CFR Reference: §1904.8(b)(3)
- Discussion: Update the log and reclassify from injury to illness.

Answer Key

- **Question: Splash exposure without cut is recordable only if:**
- **Correct Answer: A) Employee is diagnosed with bloodborne illness**
- **CFR Reference: §1904.8(b)(4)**
- **Discussion: Splash exposures are recordable if they result in illness or meet criteria.**

Answer Key

- **Question: Medical removal cases are recorded as:**
- **Correct Answer: B) Days away or restricted work**
- CFR Reference: §1904.9(b)(1)
- Discussion: Record as days away/restricted work; chemical removals marked as poisoning.

Answer Key

- **Question: Voluntary removal of an employee before OSHA criteria are met is:**
- **Correct Answer: B) Not recordable**
- CFR Reference: §1904.9(b)(3)
- Discussion: Only mandatory removals under OSHA standards must be recorded.

Answer Key

- **Question: If removal is due to lead exposure, the case must be classified under:**
- **Correct Answer: B) Poisoning**
- CFR Reference: §1904.9(b)(1)
- Discussion: Chemical-related removals go in the poisoning column.

Answer Key

- **Question: A Standard Threshold Shift (STS) is:**
- **Correct Answer: B) 10 dB average shift at 2000–4000 Hz**
- CFR Reference: §1904.10(b)(1)
- Discussion: STS is a 10 dB average shift at specified frequencies.

Answer Key

- **Question: For hearing loss to be recordable, employee must have:**
- **Correct Answer: C) Both STS and ≥ 25 dB total loss**
- CFR Reference: §1904.10(a)
- Discussion: Both STS and 25 dB hearing loss must be present.

Answer Key

- **Question: Retesting within 30 days shows no STS. You must:**
- **Correct Answer: B) Not record case**
- CFR Reference: §1904.10(b)(4)
- Discussion: If retest clears STS, the case does not need to be logged.

Answer Key

- **Question: Age adjustments may be applied:**
- **Correct Answer: B) Only to STS calculations**
- CFR Reference: §1904.10(b)(3)
- Discussion: You may age adjust STS but not the 25 dB threshold test.

Answer Key

- **Question: If physician determines hearing loss is not work-related:**
- **Correct Answer: B) Do not record case**
- CFR Reference: §1904.10(b)(6)
- Discussion: Physician determination governs work-relatedness.

Answer Key

- **Question: On OSHA 300 Log, hearing loss cases must be marked:**
- **Correct Answer: B) Hearing loss column**
- CFR Reference: §1904.10(b)(7)
- Discussion: Recordable hearing loss must be logged in the hearing loss column.

Answer Key

- **Question: Work-related TB case must be recorded when:**
- **Correct Answer: B) Employee develops TB infection after workplace exposure**
- **CFR Reference: §1904.11(a)**
- **Discussion: TB is recordable if workplace exposure causes infection.**

Answer Key

- **Question: A positive TB test at pre-employment physical is:**
- **Correct Answer: B) Not recordable**
- CFR Reference: §1904.11(b)(1)
- Discussion: Pre-employment cases are not work-related.

Answer Key

- **Question: You may erase a TB case if:**
- **Correct Answer: A) Public Health Dept. identifies non-work exposure**
- CFR Reference: §1904.11(b)(2)
- Discussion: Cases can be erased if proven not caused by workplace exposure.

Answer Key

- **Question: OSHA requires use of which forms?**
- **Correct Answer: B) 300, 300-A, 301**
- CFR Reference: §1904.29(a)
- Discussion: Employers must use these forms or equivalent versions.

Answer Key

- **Question: Recordable cases must be logged within:**
- **Correct Answer: B) 7 days**
- CFR Reference: §1904.29(b)(3)
- Discussion: Cases must be entered within 7 calendar days.

Answer Key

- **Question: Equivalent forms may be used if:**
- **Correct Answer: B) Contain all OSHA-required information**
- CFR Reference: §1904.29(b)(4)
- Discussion: Equivalent forms must match OSHA-required content and instructions.

Answer Key

- **Question: For privacy concern cases, log entry must list:**
- **Correct Answer: B) Privacy case**
- CFR Reference: §1904.29(b)(6)
- Discussion: Replace the employee's name with 'privacy case'.

Answer Key

- **Question: Which of these is a privacy concern case?**
- **Correct Answer: B) Injury to reproductive system**
- CFR Reference: §1904.29(b)(7)(i)
- Discussion: Privacy cases include intimate body part/reproductive injuries.

Answer Key

- **Question: Mental illness is considered:**
- **Correct Answer: B) Privacy concern case**
- CFR Reference: §1904.29(b)(7)(iii)
- Discussion: All work-related mental illnesses must be treated as privacy concern cases.

Answer Key

- **Question: Employers may describe sexual assault cases on the log as:**
- **Correct Answer: B) 'Injury from assault'**
- CFR Reference: §1904.29(b)(9)
- Discussion: Generic descriptions protect confidentiality.

Answer Key

- **Question: Names may be disclosed on OSHA forms only:**
- **Correct Answer: A) To auditors, insurance, or public health/law enforcement**
- **CFR Reference: §1904.29(b)(10)**
- **Discussion: These are the limited exceptions where disclosure is permitted.**

Subpart D — Other OSHA Injury and Illness Recordkeeping Requirements

- This subpart covers additional recordkeeping rules beyond general criteria.
- Focus: Special situations such as multiple establishments, central records, and off-site cases.
- Goal: Ensure accurate and consistent OSHA 300 Log entries across complex business structures.

§1904.30(a) Basic Requirement

- Employers must keep a separate OSHA 300 Log for each establishment expected to operate for one year or longer.
- Ensures accurate recordkeeping at each long-term location.
- Example: Company with 3 warehouses (all >1 year) → each warehouse must maintain its own OSHA 300 Log.

§1904.30(b)(1) Short-Term Establishments

- Yes, you must keep records for establishments that exist less than one year.
- However, you do not need a separate log for each short-term site.
- Options:
 - • Maintain one OSHA 300 Log covering all short-term establishments.
 - • Or use a log for each division/region that covers short-term sites.
- Example: Seasonal pop-up stores → record on a single regional log.

§1904.30(b)(2) Central Recordkeeping

- You may keep OSHA records for an establishment at a headquarters or central office.
- Conditions must be met to ensure accuracy and timely access.
- This option is useful for multi-location companies centralizing compliance functions.

§1904.30(b)(2) Central Recordkeeping – Requirements

- Two key requirements:
- 1. Information must be transmitted from each establishment to the central office within 7 calendar days of learning of a recordable case.
- 2. Central office must be able to produce/send records to the establishment when requested within OSHA timelines (§§1904.35, 1904.40).
- Ensures government reps, employees, and their reps can access timely records.

§1904.30(b)(3) Employees Without Fixed Establishment

- Employers must link each employee to one establishment for recordkeeping purposes.
- Injuries and illnesses are recorded on the log of that employee's assigned establishment.
- Covers employees working at multiple sites or without a fixed location.
- Example: Traveling sales rep linked to headquarters log.

§1904.30(b)(4) Injuries at Another Establishment

- If an employee is injured or becomes ill at another of your establishments:
 - Record the case on the log of the establishment where the injury/illness occurred.
- Example: Employee from HQ injured while visiting company plant → recorded on plant log.

§1904.30(b)(4) Injuries Away From All Establishments

- If an employee is injured or becomes ill away from any of your establishments:
 - Record the case on the log of the establishment where the employee normally works.
- Example: Remote field technician injured on customer site → recorded on technician's home establishment log.

§1904.31 — Covered Employees

- This section explains which workers' injuries and illnesses must be recorded.
- Clarifies payroll, temporary, leased, seasonal, contract, and self-employed cases.
- Focus: Who is considered an 'employee' for OSHA recordkeeping purposes.

§1904.31(a) Basic Requirement – Payroll Employees

- Employers must record recordable injuries and illnesses of all employees on their payroll.
- Covers ALL categories: labor, executives, hourly, salaried, part-time, seasonal, migrant.
- No exceptions based on pay type or job level.
- Example: Seasonal farmworker on payroll injured → case must be logged.

§1904.31(a) Basic Requirement – Non-Payroll Supervision

- Also covers non-payroll employees you supervise day-to-day.
- Day-to-day supervision = directing work activities on a regular basis.
- Owners/partners of sole proprietorships or partnerships are NOT considered employees.
- Example: Owner of a landscaping business injures hand → not recordable.

§1904.31(b)(1) Self-Employed – Rule

- If a self-employed individual is injured or ill while working at your site:
 - • You do NOT record the case.
- Reason: Self-employed are not covered by the OSH Act or recordkeeping requirements.

§1904.31(b)(1) Self-Employed – Example

- Example: A self-employed electrician hired for a short job is injured by a fall.
- Employer does not supervise as an employee; he operates independently.
- Conclusion: This case is not recorded on the OSHA 300 Log.

§1904.31(b)(2) Temporary & Leased Employees – Rule

- If you obtain employees from a temp service, leasing company, or personnel agency:
 - Record their injuries/illnesses if YOU supervise them day-to-day.
- Supervision responsibility determines recordkeeping, not who issues the paycheck.

§1904.31(b)(2) Temporary & Leased Employees – Example

- Example: A temp agency sends a forklift driver to your warehouse.
- If your supervisors direct his daily tasks, you must record any injuries.
- If the temp agency supervises him daily at their own site, they record instead.

§1904.31(b)(3) Contractor's Employees – Rule

- If a contractor's employee works at your establishment:
 - • If contractor supervises day-to-day → contractor records the case.
 - • If you supervise day-to-day → you must record the case.
- Responsibility follows daily supervisory control.

§1904.31(b)(3) Contractor's Employees – Example

- Example: A contractor's painter is injured while working at your facility.
- If contractor foreman supervises → contractor records case.
- If your site supervisor directs the work daily → you record the case.

§1904.31(b)(4) Avoiding Double Recording – Rule

- Employers must coordinate with staffing/contractor services to prevent duplicate entries.
- Each injury/illness should be recorded only once:
 - On your log if you supervise day-to-day.
 - On the supplying employer's log if they supervise day-to-day.

§1904.31(b)(4) Avoiding Double Recording – Example

- Example: A temp worker breaks an ankle on the job site.
- Your supervisor directs their work daily → you record the case.
- The temp agency does not also log it, avoiding duplication.

§1904.32 — Annual Summary

- This section explains requirements for the OSHA 300-A Annual Summary.
- Employers must review, complete, certify, and post the summary each year.
- Purpose: Ensure transparent reporting and employee access to injury/illness data.

§1904.32(a) Basic Requirement – Overview

- At the end of each calendar year, employers must:
 - 1. Review the OSHA 300 Log for completeness and accuracy.
 - 2. Create an annual summary.
 - 3. Certify the summary by a company executive.
 - 4. Post the summary for employee access.

§1904.32(a)(1) Review the Log

- Employers must verify that all entries on the OSHA 300 Log are complete and accurate.
- Correct any deficiencies identified before finalizing the annual summary.
- Example: A missed restricted workday case must be corrected before year-end.

§1904.32(a)(2) Create the Summary

- Prepare OSHA Form 300-A at the end of each year.
- The summary condenses data from the OSHA 300 Log.
- Shows totals for injuries, illnesses, days away, and restricted work cases.

§1904.32(a)(3) Certify the Summary

- A company executive must sign the summary to confirm accuracy.
- Certification confirms the executive reasonably believes the information is complete.
- Example: Plant manager signs OSHA 300-A for their establishment.

§1904.32(a)(4) Post the Summary

- Employers must post the annual summary in a conspicuous location.
- Posting ensures employee access and visibility.
- The summary must not be altered, defaced, or covered by other materials.

§1904.32(b)(1) How Extensively to Review

- Employers must review the OSHA 300 Log as extensively as necessary.
- The goal is to ensure accuracy and completeness.
- Example: Double-checking totals, verifying all cases are classified correctly.

§1904.32(b)(2)(i) Annual Totals

- Total the columns on the OSHA 300 Log.
- If no recordable cases occurred, enter zeros for each column.
- Example: A small office with no injuries still files a summary showing zeros.

§1904.32(b)(2)(ii) Establishment Information

- Enter required establishment details:
 - • Calendar year covered
 - • Company and establishment name
 - • Establishment address
 - • Average number of employees covered
 - • Total hours worked by all employees

§1904.32(b)(2)(iii) Equivalent Forms

- If using a form other than OSHA 300-A, it must:
 - Contain all required information.
 - Include employee access and employer penalty statements found on the official form.
- Equivalent forms must not omit required notices.

§1904.32(b)(3) Certification Requirement

- Certification requires a company executive to examine the OSHA 300 Log.
- The executive must confirm accuracy and completeness based on their knowledge of the recordkeeping process.
- This ensures accountability at a high level of management.

§1904.32(b)(4) Who is a Company Executive?

- Certification must be done by one of the following:
 - • Owner (sole proprietorship or partnership)
 - • Officer of the corporation
 - • Highest-ranking company official at the establishment
 - • Immediate supervisor of the highest-ranking company official at the establishment

§1904.32(b)(5) Posting Requirement

- Employers must post the summary where notices are customarily displayed.
- Posting must ensure visibility to employees at each establishment.
- The summary must remain intact and cannot be altered, defaced, or hidden.

§1904.32(b)(6) Posting Timeline

- Post the OSHA 300-A Annual Summary no later than February 1 of the following year.
- Keep the posting in place until April 30.
- Example: 2025 summary (for 2024 data) must be posted from Feb 1 to Apr 30, 2025.

§1904.33 — Retention and Updating

- Employers must retain and, in some cases, update OSHA injury and illness records.
- Covers OSHA 300 Logs, privacy case lists, annual summaries, and OSHA 301 Incident Reports.
- Ensures consistent long-term recordkeeping for compliance and review.

§1904.33(a) Basic Requirement

- Employers must save records for 5 years following the end of the calendar year they cover.
- Records include:
 - • OSHA 300 Log
 - • Privacy case list (if applicable)
 - • Annual summary
 - • OSHA 301 Incident Reports
- Example: 2024 records must be retained through the end of 2029.

§1904.33(b)(1) Updating the OSHA 300 Log – Rule

- Employers must update stored OSHA 300 Logs during the 5-year period.
- Updates required for:
 - Newly discovered recordable injuries/illnesses.
 - Changes in classification of cases.
 - Updated descriptions or outcomes.

§1904.33(b)(1) Updating the OSHA 300 Log – Example

- Example: A case originally classified as restricted work later results in days away from work.
- Employer must line out the old classification and update the entry.
- Another example: Employee develops complications, requiring an update to the outcome description.

§1904.33(b)(2) Updating the Annual Summary – Rule

- Employers are not required to update the annual summary after posting.
- However, employers may update if they wish to reflect new information.
- This is optional, not mandatory.

§1904.33(b)(2) Updating the Annual Summary – Example

- Example: An employer chooses to revise the 2024 summary in 2025 to reflect a case reclassification.
- This is permitted, but not required by OSHA.

§1904.33(b)(3) Updating OSHA 301 Incident Reports – Rule

- Employers are not required to update OSHA 301 Incident Reports once created.
- Employers may update them voluntarily if they wish to keep records current.
- This requirement is less strict than for the OSHA 300 Log.

§1904.33(b)(3) Updating OSHA 301 Incident Reports – Example

- Example: An employer updates a 301 form to add medical details discovered later.
- This is optional and not required by OSHA rules.

§1904.34 — Change in Business Ownership

- This section explains recordkeeping responsibilities when a business changes ownership.
- Focus: Division of responsibility between old and new owners.
- Ensures continuity and proper retention of OSHA records.

§1904.34 — Responsibilities of Old Owner

- Old owner records and reports injuries/illnesses that occur during their ownership period.
- Responsibility ends at the date of sale/transfer.
- Example: If sale occurs in July, old owner logs January–July cases.

§1904.34 — Responsibilities of New Owner

- New owner records and reports injuries/illnesses during their ownership period.
- New owner must save all records kept by the prior owner, as required by §1904.33.
- However, new owner is not required to update or correct the old owner's records.

§1904.34 — Example Scenario

- A manufacturing plant changes ownership on July 15.
- Old owner: responsible for January–July records.
- New owner: responsible for July–December records.
- New owner must also save prior records, but does not update them.

§1904.34 — Key Takeaways

- Responsibilities are split by ownership dates.
- Old owner logs and certifies records up to transfer.
- New owner saves prior records and maintains new logs.
- Ensures historical continuity of OSHA recordkeeping.

§1904.35 — Employee Involvement

- This section explains how employees and representatives must be involved in recordkeeping.
- Focus: Reporting procedures, access rights, and protections against retaliation.

§1904.35(a) Basic Requirement

- Employers must involve employees in the recordkeeping system by:
 - • Establishing reporting procedures.
 - • Providing required information.
 - • Granting access to records.
- Employees have clear rights to participate without fear of retaliation.

§1904.35(a)(1) Reporting Procedures – Rule

- Employers must establish reasonable procedures for reporting injuries/illnesses.
- Procedures cannot deter or discourage employees from reporting.
- Employers must inform employees of these procedures.

§1904.35(a)(1) Reporting Procedures – Examples

- Reasonable: Online portal or direct supervisor reporting with no penalty.
- Unreasonable: Policies that discipline employees for any reported injury.
- Goal: Encourage accurate and prompt reporting.

§1904.35(a)(2) Employer Information

- Employers must provide employees with required OSHA information.
- Includes details of reporting rights and employer obligations.
- Ensures employees understand how to exercise their rights.

§1904.35(a)(3) Employee Rights

- Employers must inform employees that:
 - They have the right to report work-related injuries and illnesses.
 - Employers are prohibited from discrimination for reporting.
- Reinforces employee protection under the OSH Act.

§1904.35(a)(4) Anti-Retaliation

- Employers may not discharge or discriminate against employees for reporting injuries/illnesses.
- Examples of retaliation: firing, demotion, reducing hours, intimidation.
- Encourages open and honest reporting culture.

§1904.35(b)(1) Reporting Detail – Establish Procedures

- Employers must establish clear procedures for reporting work-related cases.
- Procedures must be prompt, accurate, and easy to use.
- Employees must not be deterred or discouraged from reporting.

§1904.35(b)(1) Reporting Detail – Informing Employees

- Employers must inform each employee about the reporting procedure.
- Communication methods: training, posters, written instructions.
- Ensures employees know exactly how to report cases.

§1904.35(b)(1) Reporting Detail – Protection

- Employers must not retaliate against employees for reporting.
- Includes protection from discharge, demotion, or discrimination.
- Aligns with OSHA's anti-retaliation provisions.

§1904.35(b)(2) Access to Records – Who Has Rights

- Employees, former employees, personal representatives, and authorized employee representatives have access rights.
- Access includes current and stored OSHA records.
- Promotes transparency and accountability.

§1904.35(b)(2) Authorized vs. Personal Representatives

- Authorized employee representative: collective bargaining agent.
- Personal representative: designated person in writing or legal rep of deceased/incapacitated employee.
- Clarifies who may access records on behalf of employees.

§1904.35(b)(2) Access to OSHA 300 Log

- Employees and reps can request copies of current/stored OSHA 300 Logs.
- Employer must provide copies by the end of the next business day.
- Names must remain visible, except in privacy concern cases.

§1904.35(b)(2) Access to OSHA 301 Reports

- Employees/former employees/personal reps can request their OSHA 301 form.
- Must be provided by end of the next business day.
- Authorized reps may request multiple forms but only receive 'Tell us about the case' section.

§1904.35(b)(2) Privacy and Redaction

- Employee names cannot be removed from OSHA 300 Logs (except privacy cases).
- Privacy concern cases must follow rules in §1904.29(b)(6)–(9).
- For 301 forms, sensitive info must be removed before sharing with reps.

§1904.35(b)(2) Charging for Copies

- Employers cannot charge for the first copy of requested records.
- Reasonable charges may apply for additional copies.
- Protects employee access while allowing recovery of repeated request costs.

§1904.36 — Prohibition Against Discrimination

- This section reinforces protections under the OSH Act §11(c).
- Employers cannot discriminate against employees for reporting injuries, illnesses, or fatalities.
- Expands protections outlined in §1904.35.

§1904.36 — Core Rule

- Prohibits retaliation against employees who report work-related injuries/illnesses.
- Covers reports of fatalities, complaints, and record requests.
- Aligns with general anti-discrimination provisions of the OSH Act.

§1904.36 — Retaliation Examples

- Termination or demotion after reporting an injury.
- Reducing hours or pay as punishment for reporting.
- Harassment, intimidation, or threats tied to safety complaints.

§1904.36 — Expanded Protections

- Employees are also protected if they:
 - • File a safety/health complaint.
 - • Request access to OSHA 1904 records.
 - • Exercise any other rights under the OSH Act.

§1904.36 — Key Takeaways

- Anti-retaliation is a core requirement.
- Protects employees' rights to report freely and without fear.
- Employers must foster a culture of safety and transparency.

§1904.37 — State Recordkeeping Regulations

- Some states operate OSHA-approved State Plans.
- State Plans must be substantially identical to Federal OSHA requirements.
- Ensures national consistency in injury and illness data.

§1904.37(a) Basic Requirement

- State Plans must adopt recording/reporting rules identical to Federal OSHA.
- References: 29 CFR 1902.3(j), 1902.7, and 1956.10(i).
- Guarantees uniform baseline across states.

§1904.37(b)(1) Recordable Cases

- States must use the same rules as Federal OSHA for determining recordable cases.
- Prevents confusion across state lines.
- Example: A laceration requiring sutures is recordable in both Federal and State Plan states.

§1904.37(b)(2) Stringent or Supplemental Rules

- State Plans may have stricter or supplemental provisions (e.g., industry exemptions, reporting rules).
- States must consult with and obtain approval from Federal OSHA before adoption.
- Ensures consistency with the national program.

§1904.37(b)(3) Public Sector Employees

- Federal OSHA does not cover state/local government employees.
- State Plans must provide coverage for these workers.
- State Plan rules for government may differ, but must align with (b)(1) and (b)(2).

§1904.37(b)(4) Recognition of Federal Variances

- State Plans cannot issue private-sector variances independently.
- All Federal OSHA variances must be recognized by State Plans.
- Maintains national consistency for private employers.

§1904.37(b)(5) Variances for Public Employers

- States may only grant variances to state or local government employers.
- Even then, Federal OSHA approval is required before granting such variances.
- Adds oversight to prevent conflicting systems.

§1904.37 — Example Scenario

- Example: A State Plan requires faster reporting of hospitalizations than Federal OSHA.
- This is permitted if approved by Federal OSHA.
- But State Plan cannot exempt recordable injuries differently than Federal standards.

§1904.38 — Variances from Recordkeeping Rule

- Employers may request variances if they want to keep records differently than required.
- Variance allowed only if alternative system:
 - • Collects the same information,
 - • Meets the Act's purposes, and
 - • Does not interfere with administration of the Act.

§1904.38(a) Basic Requirement

- Variance petitions must show equivalence in data collection and compliance.
- Alternative recordkeeping cannot reduce data quality or worker protections.
- Assistant Secretary decides approval.

§1904.38(b)(1) Petition Contents — Part 1

- Petition must include:
 - • Employer name and address.
 - • States where variance would apply.
 - • Addresses of establishments involved.
 - • Explanation of why variance is sought.

§1904.38(b)(1) Petition Contents — Part 2

- Petition must also include:
 - • Description of proposed alternative procedures.
 - • How procedures collect the same information and meet the Act's purpose.
 - • Statement confirming employees were informed, with notice posted and copies provided.

§1904.38(b)(2) Processing Petitions — Employee Input

- Assistant Secretary must allow employees/representatives to comment.
- Employees can submit written data, views, and arguments.
- Ensures workers' voices are part of the decision-making.

§1904.38(b)(2) Processing Petitions — Public Input

- Assistant Secretary may publish petition in the Federal Register.
- This allows public comment and potential public hearings.
- Adds transparency to the variance process.

§1904.38(b)(2) Decision and Publication

- Assistant Secretary reviews petition, comments, and data.
- If approved:
 - • Variance may include conditions.
 - • Notice published in Federal Register with reasons and scope.
- If denied: employer must continue with part 1904 rules.

§1904.38(b)(3) No Use Before Approval

- Employers cannot use proposed procedures until variance is formally approved.
- While pending, employers must comply with existing part 1904 regulations.
- Prevents premature adoption of unverified systems.

§1904.38(b)(4) Effect on Citations

- Filing a variance petition does not erase prior OSHA citations.
- Assistant Secretary may refuse to review if related citations are under appeal.
- Variance process is forward-looking only.

§1904.38(b)(5) Revocation of Variances — Rule

- Assistant Secretary may revoke variance for good cause.
- Revocation process mirrors initial petition process.
- Except in cases of willfulness/public safety, employer is notified and allowed to respond.

§1904.38(b)(5) Revocation of Variances — Example

- Example: Employer granted variance fails to meet reporting quality standards.
- Assistant Secretary notifies employer of intent to revoke.
- Employees and reps are given chance to participate in revocation process.

§1904.38 — Example Scenario

- Employer seeks variance to use digital-only log system.
- Petition explains system ensures equal data quality and access.
- If approved, Federal Register notice announces the variance with conditions.
- If revoked later, employer reverts to standard recordkeeping rules.

§1904.30 — Horizon Seasonal Warehouse Injury

- Horizon Logistics opens a temporary warehouse for holiday demand.
- An employee strains his back lifting boxes and requires medical treatment.
- Case must be recorded on the OSHA 300 Log covering short-term facilities.
- **CFR Reference: §1904.30(b)(1)**

Case#	Employee	Date	Description	Outcome
1	Alex R.	12/05/25	Back strain at seasonal warehouse	Restricted work

§1904.30 — Horizon Employee Visiting Another Warehouse

- An employee from Horizon’s main warehouse is injured while visiting a second Horizon facility.
- Case must be recorded on the OSHA 300 Log of the warehouse where the injury occurred.
- **CFR Reference: §1904.30(b)(4)**

Case#	Employee	Date	Description	Outcome
2	Maria K.	04/14/25	Slip and fall at secondary warehouse	Days away

§1904.30 — Horizon Remote Technician Injury

- A Horizon field technician is injured while unloading cargo at a customer site.
- Case must be recorded on the OSHA 300 Log of the warehouse where the employee normally works.
- **CFR Reference: §1904.30(b)(4)**

Case#	Employee	Date	Description	Outcome
3	Ethan W.	05/22/25	Knee sprain while at customer site	Restricted work

§1904.31 — Horizon Temp Worker Injury

- A forklift operator supplied by a temp agency is supervised daily by Horizon Logistics.
- He suffers a hand laceration requiring sutures.
- Because Horizon supervises him day-to-day, Horizon must log the case.

Case#	Employee	Date	Description	Outcome
4	James T.	03/12/25	Hand laceration requiring sutures	Days away

§1904.31 — Contractor's Employee Supervised by Contractor

- A contractor's employee is injured while servicing Horizon's HVAC system.
- Contractor supervisor directs the work daily.
- Therefore, Horizon does not record this case.
- **CFR Reference: §1904.31(b)(3)**

§1904.31 — Self-Employed Driver

- A self-employed truck driver making a delivery at Horizon's warehouse slips on ice and breaks an ankle.
- Self-employed individuals are not covered under OSHA recordkeeping.
- Horizon does not record the case.
- **CFR Reference: §1904.31(b)(1)**

§1904.32 — Horizon Posts Annual Summary Correctly

- Horizon reviews its 300 Log, totals the columns, and posts the 300-A summary on time.
- Case: worker suffers heat stress requiring medical treatment, properly logged and summarized.
- **CFR Reference: §1904.32(a)**

Case#	Employee	Date	Description	Outcome
5	Liam P.	08/02/25	Heat stress, treated by physician	Days away

§1904.32 — Failure to Post Annual Summary

- Horizon Logistics fails to post its OSHA 300-A Annual Summary by February 1.
- This is a compliance violation, though not an injury case.
- **CFR Reference: §1904.32(b)(6)**

§1904.33 — Updating Classification

- A Horizon worker originally logged as restricted work develops complications requiring days away.
- Employer must update the OSHA 300 Log accordingly.
- **CFR Reference: §1904.33(b)(1)**

Case#	Employee	Date	Description	Outcome
6	Noah F.	09/10/25	Shoulder injury, escalated to days away	Days away

§1904.33 — Optional Summary Update

- Horizon voluntarily updates its annual summary after a reclassification.
- This update is allowed but not required.
- **CFR Reference: §1904.33(b)(2)**

§1904.34 — Horizon Sells a Warehouse

- Horizon sells one of its warehouses on July 1.
- Old owner logs January–June cases.
- New owner logs July–December cases and retains prior records.
- **CFR Reference: §1904.34**

§1904.35 — Retaliation Example

- A Horizon employee is threatened with reduced hours for reporting an injury.
- This is prohibited retaliation under OSHA rules.
- **CFR Reference: §1904.35(a)(4)**

§1904.35 — Access to Records

- A union representative at Horizon requests access to the OSHA 300 Log.
- Horizon must provide it by the end of the next business day.
- **CFR Reference: §1904.35(b)(2)(iii)**

§1904.36 — Termination for Reporting

- A Horizon driver is fired after filing a safety complaint.
- This is a violation of OSH Act §11(c).
- **CFR Reference: §1904.36**

§1904.37 — State Plan Stricter Timeline

- Horizon's warehouse is located in a State Plan state.
- The state requires hospitalization reports within 4 hours instead of 8.
- Employer must comply with the stricter state rule.
- **CFR Reference: §1904.37(b)(2)**

§1904.37 — State/Local Government Coverage

- In a State Plan state, Horizon Logistics logs private sector injuries.
- The state also covers public sector employees separately.
- **CFR Reference: §1904.37(b)(3)**

§1904.38 — Horizon Requests Variance

- Horizon petitions OSHA to use an electronic-only system for recordkeeping.
- Petition demonstrates system collects all required data and ensures access.
- Variance approved with conditions.
- **CFR Reference: §1904.38(b)(2)**

§1904.38 — Using Variance Before Approval

- Horizon begins using its electronic-only system before OSHA approves the variance.
- This is a violation because employers must wait until variance is granted.
- **CFR Reference: §1904.38(b)(3)**

§1904.32 — Horizon Certification Example

- Horizon’s warehouse manager certifies the annual summary as accurate and complete.
- Case: employee suffered a forklift-related contusion requiring medical treatment.
- **CFR Reference: §1904.32(b)(3)**

Case#	Employee	Date	Description	Outcome
7	Oliver H.	11/18/25	Forklift accident, contusion treated	Restricted work

§1904.38 — Variance Revocation Example

- Horizon received a variance to use digital-only logs.
- After failing to meet data quality standards, OSHA revokes the variance.
- Employer must return to standard recordkeeping.
- **CFR Reference: §1904.38(b)(5)**

Subpart D Quiz (Questions 1–6)

1. If a Horizon employee from one warehouse is injured at another site, where is the case recorded?

- A) Home warehouse
- B) Both warehouses
- C) Site of injury
- D) Not recorded

2. Do short-term establishments (<1 year) need a separate 300 Log for each site?

- A) Yes, always
- B) No, one combined log is allowed
- C) Only if >50 workers
- D) Never

3. If records are kept centrally, within how long must info be sent to HQ?

- A) Same day
- B) 7 calendar days
- C) 14 days
- D) 30 days

4. Who records a temp employee injury if Horizon supervises day-to-day?

- A) Temp agency
- B) Horizon Logistics
- C) Both
- D) Neither

5. Are self-employed workers included on OSHA 300 Logs?

- A) Yes
- B) No
- C) Only if full-time
- D) Only if >30 days contracted

6. If a contractor's employee is supervised by the contractor, who records the case?

- A) Horizon
- B) Contractor
- C) Both
- D) Neither

Subpart D Quiz (Questions 7–12)

7. Should both Horizon and the temp agency record the same supervised case?

- A) Yes
- B) No
- C) Only for severe cases
- D) Only if requested by OSHA

8. When must the OSHA 300-A annual summary be posted?

- A) Jan 1–Mar 1
- B) Feb 1–Apr 30
- C) Dec 1–Jan 31
- D) Year-round

9. Who can certify the annual summary?

- A) Any employee
- B) HR manager
- C) Company executive
- D) Safety consultant

10. Which information must be on the summary?

- A) Year, company/site info, totals, avg employees & hours worked
- B) Only totals
- C) Only employee names
- D) None of the above

11. What consequence best fits failing to post the annual summary on time?

- A) No consequence
- B) Potential OSHA citation
- C) Employee warning
- D) Not required

12. Must the OSHA 300 Log be updated during the 5-year retention period?

- A) Yes
- B) No
- C) Only quarterly
- D) Only if requested

Subpart D Quiz (Questions 13–18)

13. Must the annual summary be updated after posting?

- A) Yes, mandatory
- B) No, optional
- C) Only by December
- D) Never allowed

14. Must OSHA 301 forms be updated after submission?

- A) Yes, mandatory
- B) No, optional
- C) Only if injury worsens
- D) Only if employee asks

15. If Horizon sells a warehouse on July 1, who records cases after July 1?

- A) Old owner
- B) New owner
- C) Both
- D) Neither

16. Must the new owner update the prior owner's records?

- A) Yes
- B) No
- C) Only fatalities
- D) Only if OSHA requests

17. Must Horizon inform employees how to report injuries/illnesses?

- A) Yes
- B) No
- C) Only during onboarding
- D) Only after an injury

18. Can reporting procedures deter or discourage reporting?

- A) Yes
- B) No
- C) Only for repeat injuries
- D) Only for late reports

Subpart D Quiz (Questions 19–24)

19. Must employees be told they have the right to report and are protected from discrimination?

- A) Yes
- B) No
- C) Only union employees
- D) Only managers

20. If a union rep requests the 300 Log, by when must Horizon provide it?

- A) Same day
- B) End of next business day
- C) 7 days
- D) 30 days

21. May Horizon remove employee names from the 300 Log before sharing?

- A) Yes, always
- B) No—except for privacy concern cases
- C) Only for serious cases

22. Which provision protects employees from retaliation for reporting?

- A) OSH Act §11(c)
- B) State law only
- C) Company policy
- D) None

23. Is firing an employee for filing a safety complaint allowed?

- A) Yes
- B) No
- C) Only during probation
- D) Only with HR approval

24. Must State Plan rules for what's recordable be substantially identical to Federal OSHA?

- A) Yes
- B) No
- C) Only for fatalities
- D) Only for private sector

Subpart D Quiz (Questions 25–30)

25. Can State Plans adopt stricter reporting/retention rules with OSHA approval?

- A) Yes
- B) No
- C) Only during emergencies
- D) Only every 5 years

26. Do State Plans cover state and local government workers?

- A) Yes
- B) No
- C) Only state workers
- D) Only local workers

27. Which best describes what a variance petition must include?

- A) Employer info, sites, proposed methods, proof of equivalence
- B) Only employer name
- C) Just a reason
- D) Nothing specific

28. May Horizon use proposed procedures before a variance is approved?

- A) Yes
- B) No
- C) Only with union consent
- D) Only after posting notice

29. Does filing a variance erase existing citations/penalties?

- A) Yes
- B) No
- C) Only severe ones
- D) Only after approval

30. Can OSHA revoke a granted variance for good cause?

- A) Yes
- B) No
- C) Only within 30 days
- D) Only with court order

Subpart D Quiz (Questions 31–31)

31. If OSHA revokes a variance, what must Horizon do?

- A) Return to standard recordkeeping
- B) Stop reporting
- C) Nothing changes
- D) Appeal only

Subpart D Answer Key (Q1–Q2)

Q1. If a Horizon employee from one warehouse is injured at another site, where is the case recorded?

Correct Answer: C. Site of injury

CFR Reference: §1904.30(b)(4)

Discussion: The injury is recorded at the establishment where it actually occurred, not the employee's home site.

Q2. Do short-term establishments (<1 year) need a separate 300 Log for each site?

Correct Answer: B. No, one combined log is allowed

CFR Reference: §1904.30(b)(1)

Discussion: Employers can keep one log covering all short-term establishments.

Subpart D Answer Key (Q3–Q4)

Q3. If records are kept centrally, within how long must info be sent to HQ?

Correct Answer: B. 7 calendar days

CFR Reference: §1904.30(b)(2)(i)

Discussion: Information must be transmitted to the central site within 7 calendar days.

Q4. Who records a temp employee injury if Horizon supervises day-to-day?

Correct Answer: B. Horizon Logistics

CFR Reference: §1904.31(b)(2)

Discussion: The host employer supervising daily must record the case.

Subpart D Answer Key (Q5–Q6)

Q5. Are self-employed workers included on OSHA 300 Logs?

Correct Answer: B. No

CFR Reference: §1904.31(b)(1)

Discussion: Self-employed persons are not considered employees for recordkeeping purposes.

Q6. If a contractor's employee is supervised by the contractor, who records the case?

Correct Answer: B. Contractor

CFR Reference: §1904.31(b)(3)

Discussion: The employer providing day-to-day supervision must record the case.

Subpart D Answer Key (Q7–Q8)

Q7. Should both Horizon and the temp agency record the same supervised case?

Correct Answer: B. No

CFR Reference: §1904.31(b)(4)

Discussion: Only one employer records to avoid duplication.

Q8. When must the OSHA 300-A annual summary be posted?

Correct Answer: B. Feb 1–Apr 30

CFR Reference: §1904.32(b)(6)

Discussion: Annual summary must be posted from Feb 1 until Apr 30 of the following year.

Subpart D Answer Key (Q9–Q10)

Q9. Who can certify the annual summary?

Correct Answer: C. Company executive

CFR Reference: §1904.32(b)(4)

Discussion: Only a company executive may certify, ensuring accountability.

Q10. Which information must be on the summary?

Correct Answer: A. Year, company/site info, totals, avg employees & hours worked

CFR Reference: §1904.32(b)(2)

Discussion: The summary requires complete establishment info, totals, and hours worked.

Subpart D Answer Key (Q11–Q12)

Q11. What consequence best fits failing to post the annual summary on time?

Correct Answer: B. Potential OSHA citation

CFR Reference: §1904.32(b)(5)

Discussion: Failing to post can lead to OSHA citations and penalties.

Q12. Must the OSHA 300 Log be updated during the 5-year retention period?

Correct Answer: A. Yes

CFR Reference: §1904.33(b)(1)

Discussion: Logs must be updated with new cases or changes in classification.

Subpart D Answer Key (Q13–Q14)

Q13. Must the annual summary be updated after posting?

Correct Answer: B. No, optional

CFR Reference: §1904.33(b)(2)

Discussion: Annual summaries are not required to be updated, though employers may do so voluntarily.

Q14. Must OSHA 301 forms be updated after submission?

Correct Answer: B. No, optional

CFR Reference: §1904.33(b)(3)

Discussion: OSHA 301 forms do not need updating, but employers may update them if desired.

Subpart D Answer Key (Q15–Q16)

Q15. If Horizon sells a warehouse on July 1, who records cases after July 1?

Correct Answer: B. New owner

CFR Reference: §1904.34

Discussion: Each owner is responsible only for the period they own the establishment.

Q16. Must the new owner update the prior owner's records?

Correct Answer: B. No

CFR Reference: §1904.34

Discussion: The new owner must retain prior records but is not required to update them.

Subpart D Answer Key (Q17–Q18)

Q17. Must Horizon inform employees how to report injuries/illnesses?

Correct Answer: A. Yes

CFR Reference: §1904.35(a)(1)

Discussion: Employers must establish and communicate reporting procedures.

Q18. Can reporting procedures deter or discourage reporting?

Correct Answer: B. No

CFR Reference: §1904.35(b)(1)(i)

Discussion: Procedures must be reasonable and cannot discourage employees from reporting.

Subpart D Answer Key (Q19–Q20)

Q19. Must employees be told they have the right to report and are protected from discrimination?

Correct Answer: A. Yes

CFR Reference: §1904.35(b)(1)(iii)

Discussion: Employees must be informed of their rights and protections.

Q20. If a union rep requests the 300 Log, by when must Horizon provide it?

Correct Answer: B. End of next business day

CFR Reference: §1904.35(b)(2)(iii)

Discussion: Logs must be provided by the end of the next business day.

Subpart D Answer Key (Q21–Q22)

Q21. May Horizon remove employee names from the 300 Log before sharing?

Correct Answer: B. No—except for privacy concern cases

CFR Reference: §1904.35(b)(2)(iv)

Discussion: Names must remain unless the case is designated a privacy concern.

Q22. Which provision protects employees from retaliation for reporting?

Correct Answer: A. OSH Act §11(c)

CFR Reference: §1904.36

Discussion: Section 11(c) protects employees against retaliation for reporting injuries.

Subpart D Answer Key (Q23–Q24)

Q23. Is firing an employee for filing a safety complaint allowed?

Correct Answer: B. No

CFR Reference: §1904.36

Discussion: Employers may not retaliate, including termination, for safety complaints.

Q24. Must State Plan rules for what's recordable be substantially identical to Federal OSHA?

Correct Answer: A. Yes

CFR Reference: §1904.37(b)(1)

Discussion: State Plans must have identical requirements for determining recordable cases.

Subpart D Answer Key (Q25–Q26)

Q25. Can State Plans adopt stricter reporting/retention rules with OSHA approval?

Correct Answer: A. Yes

CFR Reference: §1904.37(b)(2)

Discussion: States may adopt stricter rules, but OSHA approval is required.

Q26. Do State Plans cover state and local government workers?

Correct Answer: A. Yes

CFR Reference: §1904.37(b)(3)

Discussion: State Plans must provide coverage for state and local government employees.

Subpart D Answer Key (Q27–Q28)

Q27. Which best describes what a variance petition must include?

Correct Answer: A. Employer info, sites, proposed methods, proof of equivalence

CFR Reference: §1904.38(b)(1)

Discussion: Petition must include details of the employer, sites, alternative methods, and proof of equivalence.

Q28. May Horizon use proposed procedures before a variance is approved?

Correct Answer: B. No

CFR Reference: §1904.38(b)(3)

Discussion: Employers must comply with standard rules until variance is formally approved.

Subpart D Answer Key (Q29–Q30)

Q29. Does filing a variance erase existing citations/penalties?

Correct Answer: B. No

CFR Reference: §1904.38(b)(4)

Discussion: Filing does not affect citations already issued.

Q30. Can OSHA revoke a granted variance for good cause?

Correct Answer: A. Yes

CFR Reference: §1904.38(b)(5)

Discussion: OSHA may revoke a variance if standards are not upheld or safety is compromised.

§1904.39 — Reporting Fatalities, Hospitalizations, Amputations, and Eye Loss

- Subpart E requires employers to report the most serious incidents to OSHA.
- This section defines what must be reported, how, and within what timeframes.

Overview of Reporting Requirements

- Employers must report the following work-related events to OSHA:
 - Employee fatality (within 8 hours)
 - In-patient hospitalization (within 24 hours)
 - Amputation (within 24 hours)
 - Loss of an eye (within 24 hours)

Fatalities — Reporting Requirement

- Any employee death due to a work-related incident must be reported to OSHA within 8 hours.
- Reporting is required even if cause is under investigation.
- Example: Employee dies after being pinned by equipment → report within 8 hours.

Hospitalizations — Reporting Requirement

- In-patient hospital admissions must be reported to OSHA within 24 hours of the incident.
- Observation-only admissions are not reportable (covered later).
- Example: Worker admitted for surgery after fall → report within 24 hours.

Amputations — Reporting Requirement

- Traumatic loss of a limb or body part must be reported within 24 hours.
- Includes fingertip amputations and medical amputations.
- Example: Worker loses fingertip in machine accident
→ report within 24 hours.

Eye Loss — Reporting Requirement

- Any work-related loss of an eye must be reported within 24 hours.
- Covers complete loss of sight due to traumatic incident.
- Example: Worker struck by flying object → loss of eye, report to OSHA.

Reporting to OSHA — Options

- Employers can report incidents using one of the following:
 - Telephone or in person to the nearest OSHA Area Office
 - Telephone to OSHA's toll-free hotline (1-800-321-OSHA)
 - Online submission at www.osha.gov/report

Reporting — OSHA Area Office

- Employers may report directly to the nearest OSHA Area Office by phone or in person.
- Must ensure office staff are available to accept report.
- Example: Employer calls nearest Area Office during business hours.

Reporting — Toll-Free Hotline

- Employers may report by calling OSHA's 24-hour toll-free hotline: 1-800-321-OSHA (1-800-321-6742).
- Accessible nationwide and available anytime.
- Example: Employer calls hotline at night when Area Office is closed.

Reporting — Online Submission

- Employers may use OSHA's online reporting application at www.osha.gov/report.
- Ensures immediate electronic record of submission.
- Example: Employer submits hospitalization report online with incident details.

If the Area Office is Closed

- Employers may NOT report by voicemail, fax, or email.
- If offices are closed, use the toll-free hotline or online portal instead.
- Example: Employer leaves voicemail at Area Office → not acceptable.

Required Information — Establishment Details

- Employers must provide:
 - • Establishment name
 - • Location of the incident
 - • Time of the incident
- Example: Horizon Logistics Warehouse, Dallas, 10:30 AM.

Required Information — Incident Details

- Employers must also provide:
 - • Type of event (fatality, hospitalization, amputation, eye loss)
 - • Number of employees affected
- Example: 1 amputation and 2 hospitalizations reported.

Required Information — People and Description

- Employers must additionally report:
 - • Names of affected employees
 - • Contact person and phone number
 - • Brief description of the incident
- Example: Employee John Smith, contact Jane Doe (Safety Manager), incident: forklift rollover.

Motor Vehicle Accidents

- Events on public streets/highways generally not reportable to OSHA.
- Exception: Construction work zones must be reported.
- Example: Delivery truck crash on highway (not in work zone) → recordable, not reportable.

Public or Commercial Transportation

- Events on public transportation systems (bus, train, subway, airplane) are not reportable.
- Must still be recorded on OSHA 300 Logs if required.
- Example: Employee injured on city bus while commuting → recordable, not reportable.

Heart Attacks

- Work-related heart attacks must be reported to OSHA.
- OSHA Area Director decides whether to investigate further.
- Example: Worker collapses from suspected heart attack at jobsite → report immediately.

Reporting Timelines — Fatalities

- Fatalities must be reported only if the death occurs within 30 days of the work-related incident.
- Deaths after 30 days are recorded, but not reported.
- Example: Employee injured in January dies 45 days later → record only, not report.

Reporting Timelines — Hospitalizations, Amputations, Eye Loss

- Must report only if hospitalization, amputation, or eye loss occurs within 24 hours of the incident.
- Later events must be recorded but not reported.
- Example: Employee injured Monday, hospitalized Wednesday (48 hrs later) → record only.

Late Awareness — Event Timing

- If employer learns of event late, clock starts at time of notification:
 - • Fatalities: 8 hours from notification
 - • Hospitalizations/amputations/eye loss: 24 hours from notification
- Example: Supervisor learns of hospitalization next morning → report within 24 hours.

Late Awareness — Work-Relatedness

- If initially unclear whether incident was work-related:
 - Report within 8 hours (fatality) or 24 hours (other) once work-relatedness is confirmed.
- Example: Employee hospitalized for illness later linked to chemical exposure → report when confirmed.

Definition — In-Patient Hospitalization

- Defined as formal admission to hospital/clinic for care or treatment.
- Does not include observation or diagnostic testing only.
- Example: Overnight observation for testing only → not reportable.

Definition — Amputation (Included)

- Amputation = traumatic loss of limb or body part.
- Includes:
 - • Complete or partial severing of appendages
 - • Fingertip amputations (with/without bone loss)
 - • Medical amputations due to irreparable damage
 - • Body parts later reattached

Definition — Amputation (Excluded)

- Does NOT include:
 - • Avulsions
 - • Enucleations
 - • Degloving
 - • Scalpings
 - • Severed ears
 - • Broken or chipped teeth

§1904.39 Key Takeaways

- Report fatalities within 8 hours; report serious injuries (hospitalizations, amputations, eye loss) within 24 hours.
- Use only approved methods: Area Office, hotline, or online submission.
- Provide detailed establishment, incident, and employee information.
- Understand exceptions (motor vehicles, public transit) and apply reporting timelines correctly.
- Know OSHA's definitions for hospitalization and amputation.

§1904.40 — Providing Records to Government Representatives

- Employers must provide injury and illness records to OSHA and other authorized agencies upon request.

Basic Requirement — §1904.40(a)

- When an authorized government representative requests records under Part 1904:
 - Employers must provide copies within 4 business hours.
 - Applies to all records covered under OSHA recordkeeping rules.

Authorized Government Representatives — §1904.40(b)(1)

- Records must be provided to:
 - • Secretary of Labor representatives (OSHA inspectors/investigators)
 - • Secretary of Health and Human Services representatives (including NIOSH)
 - • State agency representatives administering an OSHA-approved State Plan

Time Zone Considerations — §1904.40(b)(2)

- Records must be provided within 4 business hours of request.
- If records are kept in a different time zone, use the business hours of that location to calculate deadlines.
- Example: Records stored in California, request made in New York → California business hours apply.

Key Points — §1904.40

- • Provide records within 4 business hours.
- • Applies to OSHA, HHS/NIOSH, and State Plan agencies.
- • Time zone differences are accounted for by record location.
- • Delayed or incomplete responses may result in citations.

§1904.41 — Electronic Submission of Records and EIN

- Employers in certain categories must electronically submit injury and illness data to OSHA each year.

Basic Requirements — §1904.41(a)

- Employers must submit:
 - Information from Form 300A (annual summary)
 - In some cases, data from Forms 300 and 301
 - Employer Identification Number (EIN) for each establishment

Who Must Submit — Category 1

- Establishments with 20–249 employees in listed industries (Appendix A):
 - • Must submit annual Form 300A data electronically.
 - • Due by March 2 of the following year.

Who Must Submit — Category 2

- Establishments with 250+ employees required to keep records:
 - • Must submit Form 300A data annually.
 - • Applies to all large employers covered by Part 1904.

Who Must Submit — Category 3

- Establishments with 100+ employees in designated industries (Appendix B):
 - Must submit Forms 300 and 301 in addition to Form 300A.
 - Expands data collection for higher-risk industries.

Employer Identification Number (EIN) — §1904.41(a)(4)

- Each establishment subject to reporting must provide its EIN.
- Helps OSHA identify and link establishments to corporate structures.

Employee Count Rules — §1904.41(b)(2)

- All employees count toward thresholds, including:
 - • Full-time employees
 - • Part-time employees
 - • Seasonal workers
 - • Temporary workers

OSHA Notifications — §1904.41(b)(3)

- OSHA notifies employers of additional required submissions by:
 - • Mail
 - • Publication in the Federal Register
 - • OSHA newsletter or website announcements
- Routine submissions require no notification — they are automatic.

Submission Deadlines — §1904.41(b)(4) & (c)

- Annual submissions are due by March 2 of the year following the records.
- Example: 2023 records must be submitted by March 2, 2024.
- Special collections have deadlines specified by OSHA notification.

Submission Methods — §1904.41(b)(5)

- Employers must submit information electronically via OSHA's secure website.
- • Enterprise/corporate offices may submit for multiple establishments.
- • OSHA provides portal instructions for each reporting cycle.

Exemptions and Special Cases

- • Partially exempt employers (§§1904.1–1904.2) do not routinely submit.
- • State Plan State employers must comply with federal submission rules.
- • Certain identifying fields are excluded from submissions (names, addresses, medical info).

Use of Establishment Codes — §1904.41(b)(10)

- Employers may use codes or numbers to identify establishments.
- • Must still provide a legal company name in submission.
- • Codes are acceptable as internal identifiers only.

Key Points — §1904.41

- • Three employer categories must routinely submit data.
- • Submissions are annual, due March 2.
- • Includes Forms 300A, 300, and 301 depending on category.
- • OSHA may also request data individually.
- • All data must be submitted electronically.

§1904.42 — Requests from the Bureau of Labor Statistics (BLS)

- Employers may be selected to provide data for national injury and illness statistics.

Basic Requirement — §1904.42(a)

- If selected by BLS, employers must:
 - Promptly complete the Survey of Occupational Injuries and Illnesses form.
 - Return it according to instructions provided on the form.

Random Selection — §1904.42(b)(1)

- Not every employer is required to respond each year.
- • BLS randomly selects employers annually.
- • Employers not selected do not need to submit data that year.

Obligations of Exempt Employers — §1904.42(b)(3)

- Even if normally exempt from recordkeeping under §§1904.1–1904.3:
 - Selected employers must keep required records for the survey year.
 - Must complete and return the BLS survey.

Obligations in State Plan States — §1904.42(b)(4)

- All employers selected must respond, even in State Plan States.
- • Federal survey requirements apply nationwide.
- • Ensures consistency in national injury/illness statistics.

Key Points — §1904.42

- • Respond promptly if you receive a BLS survey form.
- • Selection is random — not all employers are chosen each year.
- • Exempt employers must comply if selected.
- • State Plan employers are also required to respond.

Subpart E (§§1904.40–1904.42) — Key Takeaways

- Provide OSHA records within 4 business hours of request.
- Certain employers must electronically submit records annually.
- Submissions due by March 2, via OSHA’s online portal.
- BLS survey responses are mandatory when selected.
- Rules apply in all states, including State Plan States.

Appendix A — Designated Industries (20–249 Employees, Form 300A)

- • Applies to establishments with 20–249 employees in specific industries.
- • Must electronically submit OSHA Form 300A Summary each year.
- • Examples: Warehousing, Transportation, Nursing Care Facilities.

Appendix A — Designated Industries (Part 1)

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.
4522	Department Stores.
4523	General Merchandise Stores, including Warehouse Clubs and Supercenters.
4533	Used Merchandise Stores.
4542	Vending Machine Operators.
4543	Direct Selling Establishments.
4811	Scheduled Air Transportation.
4841	General Freight Trucking.
4842	Specialized Freight Trucking.
4851	Urban Transit Systems.
4852	Interurban and Rural Bus Transportation.
4853	Taxi and Limousine Service.
4854	School and Employee Bus Transportation.
4855	Charter Bus Industry.

NAICS	Industry
8113	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance.
8123	Drycleaning and Laundry Services.

NAICS	Industry
4859	Other Transit and Ground Passenger Transportation.
4871	Scenic and Sightseeing Transportation, Land.
4881	Support Activities for Air Transportation.
4882	Support Activities for Rail Transportation.
4883	Support Activities for Water Transportation.
4884	Support Activities for Road Transportation.
4889	Other Support Activities for Transportation.
4911	Postal Service.
4921	Couriers and Express Delivery Services.
4922	Local Messengers and Local Delivery.
4931	Warehousing and Storage.
5152	Cable and Other Subscription Programming.
5311	Lessors of Real Estate.
5321	Automotive Equipment Rental and Leasing.
5322	Consumer Goods Rental.
5323	General Rental Centers.
5617	Services to Buildings and Dwellings.
5621	Waste Collection.
5622	Waste Treatment and Disposal.
5629	Remediation and Other Waste Management Services.
6219	Other Ambulatory Health Care Services.
6221	General Medical and Surgical Hospitals.
6222	Psychiatric and Substance Abuse Hospitals.
6223	Specialty (except Psychiatric and Substance Abuse) Hospitals.
6231	Nursing Care Facilities (Skilled Nursing Facilities).
6232	Residential Intellectual and Developmental Disability, Mental Health, and Substance Abuse Facilities.
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly
6239	Other Residential Care Facilities.
6242	Community Food and Housing, and Emergency and Other Relief Services.
6243	Vocational Rehabilitation Services.
7111	Performing Arts Companies.
7112	Spectator Sports.
7121	Museums, Historical Sites, and Similar Institutions.
7131	Amusement Parks and Arcades.
7132	Gambling Industries.
7211	Traveler Accommodation.
7212	RV (Recreational Vehicle) Parks and Recreational Camps.
7223	Special Food Services.

Appendix A — Example Application

- Horizon Logistics warehouse employs 150 workers.
- • Industry: General Warehousing (NAICS 493110) — listed in Appendix A.
- • Requirement: Submit OSHA Form 300A Summary electronically by March 2 each year.

Appendix B — Designated Industries (100+ Employees, Forms 300/301/300A)

- • Applies to establishments with 100 or more employees in listed industries.
- • Must electronically submit information from Forms 300, 301, and 300A annually.
- • Expands reporting for higher-risk industries like manufacturing and warehousing.

Appendix B — Designated Industries

NAICS	Industry
1111	Oilseed and Grain Farming.
1112	Vegetable and Melon Farming.
1113	Fruit and Tree Nut Farming.
1114	Greenhouse, Nursery, and Floriculture Production.
1119	Other Crop Farming.
1121	Cattle Ranching and Farming.
1122	Hog and Pig Farming.
1123	Poultry and Egg Production.
1129	Other Animal Production.
1133	Logging.
1141	Fishing.
1142	Hunting and Trapping.
1151	Support Activities for Crop Production.
1152	Support Activities for Animal Production.
1153	Support Activities for Forestry.
2213	Water, Sewage and Other Systems.
2381	Foundation, Structure, and Building Exterior Contractors.
3111	Animal Food Manufacturing.
3113	Sugar and Confectionery Product Manufacturing.
3114	Fruit and Vegetable Preserving and Specialty Food Manufacturing.
3115	Dairy Product Manufacturing.
3116	Animal Slaughtering and Processing.
3117	Seafood Product Preparation and Packaging.
3118	Bakeries and Tortilla Manufacturing.
3119	Other Food Manufacturing.

NAICS	Industry
3121	Beverage Manufacturing.
3161	Leather and Hide Tanning and Finishing.
3162	Footwear Manufacturing.
3211	Sawmills and Wood Preservation.
3212	Veneer, Plywood, and Engineered Wood Product Manufacturing.
3219	Other Wood Product Manufacturing.
3261	Plastics Product Manufacturing.
3262	Rubber Product Manufacturing.
3271	Clay Product and Refractory Manufacturing.
3272	Glass and Glass Product Manufacturing.
3273	Cement and Concrete Product Manufacturing.
3279	Other Nonmetallic Mineral Product Manufacturing.
3312	Steel Product Manufacturing from Purchased Steel.
3314	Nonferrous Metal (except Aluminum) Production and Processing.
3315	Foundries.
3321	Forging and Stamping.
3323	Architectural and Structural Metals Manufacturing.
3324	Boiler, Tank, and Shipping Container Manufacturing.
3325	Hardware Manufacturing.
3326	Spring and Wire Product Manufacturing.
3327	Machine Shops; Turned Product; and Screw, Nut, and Bolt Manufacturing.
3328	Coating, Engraving, Heat Treating, and Allied Activities.
3331	Agriculture, Construction, and Mining Machinery Manufacturing.
3335	Metalworking Machinery Manufacturing.
3361	Motor Vehicle Manufacturing.
3362	Motor Vehicle Body and Trailer Manufacturing.
3363	Motor Vehicle Parts Manufacturing.
3366	Ship and Boat Building.
3371	Household and Institutional Furniture and Kitchen Cabinet Manufacturing.
3372	Office Furniture (including Fixtures) Manufacturing.
3379	Other Furniture Related Product Manufacturing.
4231	Motor Vehicle and Motor Vehicle Parts and Supplies Merchant Wholesalers.
4233	Lumber and Other Construction Materials Merchant Wholesalers.
4235	Metal and Mineral (except Petroleum) Merchant Wholesalers.
4239	Miscellaneous Durable Goods Merchant Wholesalers.
4244	Grocery and Related Product Merchant Wholesalers.
4248	Beer, Wine, and Distilled Alcoholic Beverage Merchant Wholesalers.
4413	Automotive Parts, Accessories, and Tire Stores.
4422	Home Furnishings Stores.

Appendix B — Designated Industries

NAICS	Industry
4441	Building Material and Supplies Dealers.
4442	Lawn and Garden Equipment and Supplies Stores.
4451	Grocery Stores.
4522	Department Stores.
4523	General Merchandise Stores, including Warehouse Clubs and Supercenters.
4533	Used Merchandise Stores.
4543	Direct Selling Establishments.
4811	Scheduled Air Transportation.
4841	General Freight Trucking.
4842	Specialized Freight Trucking.
4851	Urban Transit Systems.
4852	Interurban and Rural Bus Transportation.
4853	Taxi and Limousine Service.
4854	School and Employee Bus Transportation.
4859	Other Transit and Ground Passenger Transportation.
4871	Scenic and Sightseeing Transportation, Land.
4881	Support Activities for Air Transportation.
4883	Support Activities for Water Transportation.
4889	Other Support Activities for Transportation.
4911	Postal Service.
4921	Couriers and Express Delivery Services.
4931	Warehousing and Storage.
5322	Consumer Goods Rental.
5621	Waste Collection.
5622	Waste Treatment and Disposal.
6219	Other Ambulatory Health Care Services.
6221	General Medical and Surgical Hospitals.
6222	Psychiatric and Substance Abuse Hospitals.
6223	Specialty (except Psychiatric and Substance Abuse) Hospitals.
6231	Nursing Care Facilities (Skilled Nursing Facilities).
6232	Residential Intellectual and Developmental Disability, Mental Health, and Substance Abuse Facilities.
6233	Continuing Care Retirement Communities and Assisted Living Facilities for the Elderly.
6239	Other Residential Care Facilities.
6243	Vocational Rehabilitation Services.
7111	Performing Arts Companies.
7112	Spectator Sports.
7131	Amusement Parks and Arcades.
7211	Traveler Accommodation.

NAICS	Industry
7212	RV (Recreational Vehicle) Parks and Recreational Camps.
7223	Special Food Services.

Appendix B — Example Application

- A manufacturing facility has 120 employees.
- • Industry: Plastics Product Manufacturing (NAICS 326100) — listed in Appendix B.
- • Requirement: Submit Forms 300, 301, and 300A electronically by March 2 each year.

Subpart F — Transition from the Former Rule

- Subpart F provides guidance for handling records created under prior OSHA rules.
- Focuses on 2001 data, retention of old forms, and OMB control numbers.

§1904.43 — Summary and Posting of 2001 Data

- Employers required to keep OSHA 200 Logs in 2001 must post a 2000 annual summary.
- Applies to each establishment covered by OSHA recordkeeping rules.

§1904.43 — Information Required

- 2001 OSHA 200 Log summary must include:
 - • Calendar year covered
 - • Company name
 - • Establishment name and address
 - • Certification signature, title, and date

§1904.43 — Special Case: Zero Incidents

- If no injuries or illnesses occurred in 2001:
 - • Employer must enter zeros on the totals line.
 - • Must still post the 2001 summary.

§1904.43 — Deadlines

- • Complete the summary by February 1, 2002.
- • Post the summary from February 1 to March 1, 2002.
- • Post in a conspicuous location where notices are normally placed.
- • Summary must not be altered, defaced, or covered.

§1904.44 — Retention and Updating of Old Forms

- Employers must:
 - Save copies of OSHA 200 and 101 forms for 5 years following the year covered.
 - Provide access to these forms as though they were OSHA 300 and 301 forms.

§1904.44 — Updating Requirements

- • Employers are NOT required to update old OSHA 200 and 101 forms.
- • Retention only; no retroactive classification changes are required.

§1904.45 — OMB Control Numbers

- OSHA's information collection requirements must be approved by the Office of Management and Budget (OMB).
- Each section of Part 1904 has an associated OMB control number.

§1904.45 — OMB Control Numbers Table

29 CFR citation	OMB Control No.
1904.4-35	1218-0176
1904.39-41	1218-0176
1904.42	1220-0045
1904.43-44	1218-0176

Subpart G — Definitions

- Subpart G provides definitions of key terms used throughout Part 1904.
- These definitions are critical to applying OSHA's recordkeeping rules correctly.

Definition — Establishment (General)

- An establishment = a single physical location where business is conducted or services/operations are performed.
- Covers factories, offices, plants, stores, and similar worksites.

Definition — Establishment (Multiple at One Location)

- Normally, one location = one establishment.
- Employers may divide one location into multiple establishments only if:
 - Each represents a distinctly separate business with a different activity.
 - No single NAICS code applies to both.
 - Separate records are routinely prepared for each.

Definition — Establishment (Multiple Locations)

- Employers may combine multiple physical locations into one establishment if:
 - Operated as a single business operation under common management.
 - Located in close proximity to each other.
 - One set of business records is maintained (employees, payroll, sales, etc.).

Definition — Establishment (Telecommuting)

- Employees who telecommute from home are NOT considered separate establishments.
- Telecommuting employees must be linked to one of the employer's establishments under §1904.30(b)(3).

Definition — Injury or Illness

- An abnormal condition or disorder, including acute and chronic cases.
- Injuries include: cuts, fractures, sprains, amputations.
- Illnesses include: skin diseases, respiratory disorders, poisonings.

Recordability of Injuries and Illnesses

- Cases are recordable only if:
 - • They are new cases, AND
 - • They are work-related, AND
 - • They meet one or more criteria under Part 1904.

Definition — Physician or Other Licensed Health Care Professional

- Defined as an individual legally permitted to independently perform healthcare activities.
- Includes: licensed physicians, nurse practitioners, physician assistants, and others as permitted by state law.

Definition — You

- “You” means an employer as defined in section 3 of the OSH Act (29 U.S.C. 652).
- All obligations under Part 1904 are directed toward employers.

Subpart F & G — Key Takeaways

- • Subpart F covers transition from the old recordkeeping system (OSHA 200/101).
- • Old forms must be retained for 5 years but not updated.
- • OMB control numbers authorize OSHA's information collection.
- • Subpart G defines key terms like establishment, injury/illness, and employer.
- • Accurate understanding of definitions ensures consistent recordkeeping.

Scenario — Fatality (Reportable)

- Jamal is crushed by equipment and dies within 2 hours. The employer must report to OSHA within 8 hours.

Case No.	Employee	Date	Description
01	Jamal	03/15/2025	Fatality reported to OSHA within 8 hours

Scenario — Fatality (Not Reportable)

- Maria is injured in January and dies 45 days later from complications. This must be recorded but is not reportable (death occurred after 30 days).

Scenario — Hospitalization (Reportable)

- Jamal falls from a ladder and is admitted to the hospital for surgery within 12 hours. The employer must report to OSHA within 24 hours.

Case No.	Employee	Date	Description
01	Jamal	03/15/2025	Hospitalization reported to OSHA within 24 hours

Scenario — Hospitalization (Not Reportable)

- Maria is injured Monday but admitted to the hospital 2 days later (more than 24 hours after the incident). This must be recorded but not reported.

Scenario — Amputation

- Jamal loses a fingertip in a machine accident. The employer must report the amputation within 24 hours.

Case No.	Employee	Date	Description
01	Jamal	03/15/2025	Amputation reported to OSHA within 24 hours

Scenario — Eye Loss

- Maria is struck by flying debris and loses an eye. The employer must report the incident within 24 hours.

Case No.	Employee	Date	Description
01	Maria	03/15/2025	Loss of eye reported to OSHA within 24 hours

Scenario — Late Awareness of Event

- Supervisor learns the next day that Jamal was hospitalized overnight. The employer must report within 24 hours of learning.

Case No.	Employee	Date	Description
01	Jamal	03/15/2025	Late report within 24 hours of awareness

Scenario — Late Awareness of Work-Relatedness

- Maria is hospitalized, and days later it is confirmed the cause was chemical exposure at work. The employer must report within 24 hours of confirmation.

Case No.	Employee	Date	Description
01	Maria	03/15/2025	Report made once work-relatedness confirmed

Scenario — Motor Vehicle Accident (Not Reportable)

- Jamal is injured in a highway accident while driving a delivery truck (not in a construction work zone). Recordable, not reportable.

Scenario — Heart Attack (Reportable)

- Maria collapses from a heart attack at work. The employer must report to OSHA; the Area Director decides whether to investigate.

Case No.	Employee	Date	Description
01	Maria	03/15/2025	Heart attack reported to OSHA

Scenario — Records Request

- **Q: An OSHA inspector requests injury and illness logs during an inspection. Must the employer provide them within 4 business hours?**
- A: Yes. Employers must provide requested Part 1904 records within 4 business hours of the request.
- *Reference: §1904.40(a)*

Scenario — Records in Different Time Zone

- **Q: A government representative requests records, but the employer maintains them in a different time zone. How is the deadline calculated?**
- A: OSHA allows calculation based on the business hours of the location where records are maintained.
- *Reference: §1904.40(b)(2)*

Scenario — Failure to Provide Timely

- **Q: If an employer delays providing requested OSHA 300 Logs beyond 4 hours, is this a violation?**
- A: Yes. Employers who fail to provide records within 4 business hours are in violation of §1904.40.
- *Reference: §1904.40(a)*

Scenario — Appendix A Industry (20–249 Employees)

- **Q: Does a warehouse with 150 employees in an Appendix A industry need to submit Form 300A electronically?**
- A: Yes. Employers with 20–249 employees in listed industries must submit OSHA Form 300A annually.
- *Reference: §1904.41(a)(1)*

Scenario — 250+ Employees

- **Q: Does a corporation with 300 employees, not exempt from recordkeeping, need to submit Form 300A electronically?**
- A: Yes. All establishments with 250+ employees required to keep records must submit OSHA Form 300A annually.
- *Reference: §1904.41(a)(1)(ii)*

Scenario — Appendix B Industry (100+ Employees)

- **Q: Does a plastics manufacturer with 120 employees in Appendix B need to submit Forms 300, 301, and 300A electronically?**
- A: Yes. Employers with 100+ employees in listed industries must submit these forms annually.
- *Reference: §1904.41(a)(2)*

Scenario — Not in Appendix A or B

- **Q: Does an office with 50 employees, not in Appendix A or B, need to submit records electronically?**
- A: No. Employers not in these categories submit only if OSHA notifies them.
- *Reference: §1904.41(b)(1)*

Scenario — State Plan Employer

- **Q: Does an employer in a State Plan State with 200 employees need to follow federal electronic submission rules?**
- A: Yes. All employers covered by Part 1904 must comply with federal submission requirements, even in State Plan States.
- *Reference: §1904.41(b)(7)*

Scenario — Selected by BLS

- **Q: If an employer receives a BLS Survey of Occupational Injuries and Illnesses, must they respond?**
- A: Yes. Selected employers must complete and return the survey, regardless of exemption status.
- *Reference: §1904.42(a)*

Scenario — Exempt Employer Selected by BLS

- **Q: If a normally exempt employer receives a BLS survey, do they still have to comply?**
- A: Yes. Even exempt employers must keep records for the survey year and respond if selected.
- *Reference: §1904.42(b)(3)*

Subpart E & G Quiz (Q1–Q6)

1. Within how many hours must a fatality be reported to OSHA?

- A. 4
- B. 8
- C. 24
- D. 48

2. Within how many hours must an in-patient hospitalization be reported?

- A. 8
- B. 12
- C. 24
- D. 48

3. Which of the following is reportable?

- A. Death within 20 days
- B. Hospitalization 2 days after incident
- C. Loss of an eye
- D. Chipped tooth

4. How must employers report to OSHA if the Area Office is closed?

- A. Leave voicemail
- B. Fax
- C. Call 1-800-321-OSHA
- D. Email

5. Which information is NOT required when reporting?

- A. Establishment name
- B. Time of incident
- C. Contact person
- D. Employee salary

6. A worker dies 45 days after incident. Is this reportable?

- A. Yes
- B. No

Subpart E & G Quiz (Q7–Q12)

7. A hospitalization occurs 12 hours after incident. Reportable?

- A. Yes
- B. No

8. A hospitalization occurs 48 hours after incident. Reportable?

- A. Yes
- B. No

9. An employee suffers a heart attack at work. Employer must:

- A. Not record
- B. Report to OSHA
- C. Only record
- D. Ignore

10. An employee injured in highway accident (not work zone). Employer must:

- A. Report
- B. Record only
- C. Do nothing
- D. Report and record

11. How quickly must records be provided to an OSHA inspector?

- A. Immediately
- B. 4 business hours
- C. 24 hours
- D. 48 hours

12. Which representatives may request records?

- A. OSHA
- B. NIOSH
- C. State Plan agency
- D. All of the above

Subpart E & G Quiz (Q13–Q18)

13. If records are kept in another time zone, which hours apply?

- A. Inspector's local
- B. Employer's HQ
- C. Establishment's local
- D. Federal standard

14. A warehouse with 150 employees in Appendix A must submit:

- A. No forms
- B. 300 only
- C. 300A electronically
- D. 300 & 301

15. An employer with 300 employees must submit:

- A. 300 only
- B. 300A electronically
- C. Nothing
- D. Only if asked

16. A manufacturer with 120 employees in Appendix B must submit:

- A. 300
- B. 300 & 301
- C. 300A only
- D. 300, 301 & 300A

17. Which workers count toward employee thresholds?

- A. Full-time
- B. Part-time
- C. Seasonal
- D. All of the above

18. When are annual submissions due?

- A. January 1
- B. March 2
- C. April 30
- D. December 31

Subpart E & G Quiz (Q19–Q24)

19. Who must complete a BLS survey if selected?

- A. All selected employers
- B. Only large employers
- C. Only non-exempt employers
- D. Only State Plan employers

20. If an exempt office receives a BLS survey, must they respond?

- A. Yes
- B. No

21. An establishment is:

- A. Any corporate office
- B. A single physical location where business is conducted
- C. The entire company
- D. A state division

22. Can two businesses at one address be separate establishments?

- A. Yes, if distinct businesses with separate records
- B. No, never

23. Are employee homes considered establishments when telecommuting?

- A. Yes
- B. No

24. Which is considered an injury?

- A. Sprain
- B. Fracture
- C. Amputation
- D. All of the above

Subpart E & G Quiz (Q25–Q25)

25. “You” in the regulations refers to:

- A. Employees
- B. Supervisors
- C. Employers
- D. OSHA inspectors

Answer Key (Q1–Q2)

- **Q1. Within how many hours must a fatality be reported to OSHA?**
- Answer: B. 8
- *Reference: §1904.39(a)(1)*
- Discussion: Fatalities must be reported to OSHA within 8 hours of the employer learning of the event.

- **Q2. Within how many hours must an in-patient hospitalization be reported?**
- Answer: C. 24
- *Reference: §1904.39(a)(2)*
- Discussion: Hospitalizations, amputations, and eye losses must be reported within 24 hours.

Answer Key (Q3–Q4)

- **Q3. Which of the following is reportable?**

- Answer: C. Loss of an eye
- *Reference: §1904.39(a)(2)*
- Discussion: Eye losses are reportable; chipped teeth are not.

- **Q4. How must employers report to OSHA if the Area Office is closed?**

- Answer: C. Call 1-800-321-OSHA
- *Reference: §1904.39(b)(1)*
- Discussion: If the Area Office is closed, employers must use the toll-free hotline or online portal.

Answer Key (Q5–Q6)

- **Q5. Which information is NOT required when reporting?**
- Answer: D. Employee salary
- *Reference: §1904.39(b)(2)*
- Discussion: Salary information is not required; only details of incident and employees.

- **Q6. A worker dies 45 days after incident. Is this reportable?**
- Answer: B. No
- *Reference: §1904.39(b)(6)*
- Discussion: Fatalities are reportable only if they occur within 30 days of the incident.

Answer Key (Q7–Q8)

- **Q7. A hospitalization occurs 12 hours after incident. Reportable?**
- Answer: A. Yes
- *Reference: §1904.39(a)(2)*
- Discussion: Hospitalizations within 24 hours of the incident are reportable.

- **Q8. A hospitalization occurs 48 hours after incident. Reportable?**
- Answer: B. No
- *Reference: §1904.39(b)(6)*
- Discussion: Hospitalizations are reportable only if they occur within 24 hours of the incident.

Answer Key (Q9–Q10)

- **Q9. An employee suffers a heart attack at work. Employer must:**
 - Answer: B. Report to OSHA
 - *Reference: §1904.39(b)(5)*
 - Discussion: Employers must report heart attacks; OSHA decides whether to investigate.

- **Q10. An employee injured in highway accident (not work zone). Employer must:**
 - Answer: B. Record only
 - *Reference: §1904.39(b)(3)*
 - Discussion: Highway accidents outside construction zones must be recorded, not reported.

Answer Key (Q11–Q12)

- **Q11. How quickly must records be provided to an OSHA inspector?**
 - Answer: B. 4 business hours
 - *Reference: §1904.40(a)*
 - Discussion: Employers must provide records within 4 business hours of a request.

- **Q12. Which representatives may request records?**
 - Answer: D. All of the above
 - *Reference: §1904.40(b)(1)*
 - Discussion: OSHA, NIOSH, and State Plan agencies can request records.

Answer Key (Q13–Q14)

- **Q13. If records are kept in another time zone, which hours apply?**
- Answer: C. Establishment's local
- *Reference: §1904.40(b)(2)*
- Discussion: The establishment's local business hours apply to the 4-hour deadline.

- **Q14. A warehouse with 150 employees in Appendix A must submit:**
- Answer: C. 300A electronically
- *Reference: §1904.41(a)(1)*
- Discussion: Appendix A employers with 20–249 employees must submit Form 300A.

Answer Key (Q15–Q16)

- **Q15. An employer with 300 employees must submit:**
 - Answer: B. 300A electronically
 - *Reference: §1904.41(a)(1)(ii)*
 - Discussion: Employers with 250+ employees must submit Form 300A annually.
- **Q16. A manufacturer with 120 employees in Appendix B must submit:**
 - Answer: D. 300, 301 & 300A
 - *Reference: §1904.41(a)(2)*
 - Discussion: Appendix B employers with 100+ employees must submit all three forms.

Answer Key (Q17–Q18)

- **Q17. Which workers count toward employee thresholds?**
- Answer: D. All of the above
- *Reference: §1904.41(b)(2)*
- Discussion: Full-time, part-time, seasonal, and temporary workers all count.

- **Q18. When are annual submissions due?**
- Answer: B. March 2
- *Reference: §1904.41(c)*
- Discussion: All required electronic submissions are due by March 2 of the following year.

Answer Key (Q19–Q20)

- **Q19. Who must complete a BLS survey if selected?**

- Answer: A. All selected employers
- *Reference: §1904.42(a)*
- Discussion: Any employer that receives a survey must complete and return it.

- **Q20. If an exempt office receives a BLS survey, must they respond?**

- Answer: A. Yes
- *Reference: §1904.42(b)(3)*
- Discussion: Even normally exempt employers must respond if selected for a survey.

Answer Key (Q21–Q22)

- **Q21. An establishment is:**

- Answer: B. A single physical location where business is conducted

- *Reference: §1904.46*

- Discussion: An establishment refers to a single physical location such as a plant, store, or office.

- **Q22. Can two businesses at one address be separate establishments?**

- Answer: A. Yes, if distinct businesses with separate records

- *Reference: §1904.46*

- Discussion: Separate establishments may exist at one location if they are distinct operations.

Answer Key (Q23–Q24)

- **Q23. Are employee homes considered establishments when telecommuting?**

- Answer: B. No

- *Reference: §1904.46*

- Discussion: Homes are not considered establishments; employees must be linked to a main site.

- **Q24. Which is considered an injury?**

- Answer: D. All of the above

- *Reference: §1904.46*

- Discussion: Injuries include sprains, fractures, and amputations, among others.

Answer Key (Q25–Q25)

- **Q25. “You” in the regulations refers to:**
- Answer: C. Employers
- *Reference: §1904.46*
- Discussion: “You” in Part 1904 refers to the employer.