



OSHA INJURY & ILLNESS REPORTING

THE “300 LOG”

It will soon be time to close out your OSHA Injury & Illness logs. The summary, Form 300A, must be certified by a company executive and posted in an area where employee notices are normally posted, i.e. lunch room, stock room, etc. The posting starts February 1 and ends April 30 each year. The OSHA 300A Summary must be posted even if no recordable cases occurred during the year.

The basis for the Form 300A is the OSHA Form 300, or the “log”. It is to be updated throughout the year and must be current to within 7 days. All work-related injuries and illnesses to your employees resulting in death, loss of consciousness, days away from work or restricted duty, or medical treatment beyond first aid must be recorded. Recording injuries on the OSHA 300 is independent of the decision to file a worker’s compensation claim and does not imply any “fault” by the employer.

Some key points to know when completing your OSHA Form 300:

- Columns G, H, I, J – Check only ONE of the boxes per case. Choose the one that describes the most serious consequence of the incident. For example, if a worker was temporarily disabled and then returned to modified duty, the box in Column H would be checked for “days away from work”. Incorrectly marking these boxes will cause inaccuracy in your incident rate calculations.
- Columns K & L – These columns represent calendar days and not business days. Once the total days entered in both columns reaches 180, you may stop counting. The total of the two columns for any given case should not exceed 180 days. There are a number of conditions that can impact these numbers and OSHA has guidance and interpretations available at http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9638

A separate OSHA Form 300 must be kept for each worksite expected to be in operation for one year or longer. A single OSHA Form 300 may be kept to cover multiple short-term worksites. The logs may be kept electronically as long as they can be retrieved within 4 hours of request by an OSHA representative.

You do not have to submit the completed Form 300 or 300A to OSHA unless specifically requested to do so. Select businesses may be requested to complete and submit an Annual OSHA Injury and Illness Survey. This survey would be received via mail and have Department of Labor markings. The Forms must be kept on file for 5 years following the year to which they pertain.

Occasionally, the OSHA Form 301 is encountered. This essentially serves the same purpose as an incident report. Worker’s compensation forms and company incident reports are an acceptable substitute for the Form 301 as long as they contain at least as much of the required information.

If you are unsure about the recordkeeping requirements for your business, OSHA provides a list of exempt industries on its website at <http://www.osha.gov/recordkeeping/ppt1/RK1exempttable.html>.

For more information, interpretations, and the forms needed to meet the recordkeeping requirements, visit <http://www.osha.gov/recordkeeping/index.html>.

As always, please feel free to contact us for guidance on this or other OSHA compliance concerns.