

Recordkeeping 201, part 11: Combining, splitting establishments

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Do multiple locations mean multiple logs?

Each business establishment needs a separate OSHA log. Usually, business establishments consist of one business location contained in one building, but some business establishments might consist of multiple buildings. For other businesses, their organizations are so complex that multiple logs are needed for a single location. This edition of Recordkeeping 201 uses OSHA e-correspondence (www.osha.gov/recordkeeping/faq-search) to clarify how businesses should decide how many logs to use. A separate OSHA log summary form must be prepared for each OSHA log.

Combining multiple locations into a single log

When a business has multiple buildings or multiple locations, it is sometimes tempting to keep a single OSHA log to simplify recordkeeping. However, OSHA only allows businesses to use a single log when their locations are in close proximity to each other. In two responses to questions about proximity of establishments, OSHA e-correspondence explains that close proximity means separation of less than one mile. There is an exception for businesses that operate in a campus environment, with multiple buildings across a large area that is all considered one business. College campuses, corporate campuses and some health care centers can be considered campuses for recordkeeping purposes.

You must maintain a set of OSHA forms (including the 300A log summary) for each individual establishment in operation for more than a year. An employer may combine two or more physical locations into a single establishment only when:

- the employer operates the locations as a single business operation under common management;
- the locations are all located in close proximity to each other (within one mile); and
- the employer keeps one set of business records for the locations, such as records about the number of employees, their wages and salaries, sales or receipts, and other kinds of business information.

For example, one manufacturing establishment might include the main plant, a warehouse a few blocks away and an administrative services building across the street.

Splitting locations into multiple logs

Normally, one business location is considered one establishment. Under limited conditions, the employer may consider two or more separate businesses that share a single location to be separate establishments. An employer may divide one location into two or more establishments only when:

- each of the establishments represents a distinctly separate business;
- each business is engaged in a different economic activity;
- no one industry description in the North American Industrial Classification System (NAICS) applies to the joint activities of the establishments; and
- separate reports are routinely prepared for each establishment about the number of employees, their wages and salaries, sales or receipts, and other kinds of business information.

For information about industry descriptions for NAICS codes, visit www.census.gov/naics.

Another reason to consider when deciding how many injury and illness logs to maintain is the employer's obligation to provide access to the logs for employees and their representations (Recordkeeping Regulations Section 1904.35). An employee, former employee, personal representative or authorized employee representation can ask for copies of current and stored logs (up to five previous years) for an establishment the employee or former employee has worked in. The log(s) you provide depend on how you have defined the work establishment on your log(s).

A business that has several establishments can still maintain the information in one computer file; however, it must be able to produce separate logs and log summaries for each separate establishment.