

Recordkeeping 101: Part 4

Tell me what happened, describing the event

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Editor's note: This is the fourth installment of a series about using the OSHA Form 300 and summarizing its results. This information is directed to people who are new to OSHA recordkeeping activities, to people who might be unfamiliar with the 2002 recordkeeping changes and to people who want to review their recordkeeping practices. This installment deals with describing injuries and illnesses.

This installment explains how to describe an event's location (OSHA log column E) and injury characteristics (column F). Previous installments of this series discussed basic OSHA recordkeeping requirements, the process for classifying cases as either days away from work, job transfer or restriction, or other recordable cases, and how to count days for the days-away-from-work cases and cases with job transfer or restriction.

Why describe the injuries, illnesses on the log?

While case classification and the number of days away from work provide quantitative descriptions that can be easily summarized, injury and illness descriptions provide specific information that employers, safety directors and workplace safety committees can use to improve workplace safety.

Although employers must complete an Injury and Illness Incident Report (OSHA Form 301) and/or a workers' compensation First Report of Injury (FROI) form for each injury or illness recorded on the log, the log provides an official record of work-related injuries and illnesses for a work establishment that can be reviewed by all employees, former employees, their personal representatives and collective bargaining agents. It provides an at-a-glance overview of the number and types of injuries and illnesses, without providing a too-detailed account of each incident.

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Minnesota OSHA Compliance (MNOSHA)

(651) 284-5050
1-877-470-6742

Workplace Safety Consultation (WSC)

(651) 284-5060
1-800-657-3776

Recordkeeping packet

(651) 284-5042
1-800-342-5354

Incident reports and FROI forms are detailed accounts of a particular injury to a particular worker; only an injured worker or that worker's personal representative is allowed access to the full incident report or FROI form for a particular case.



How much should be written?

At first glance, it appears the log offers too little space in columns E and F to write descriptions of where the event occurred, the nature of the injury, the part of body affected and the source of the injury or illness. However, the instructions at the top of the log allow you to "use two lines for a single case if you need to." You may use even more lines, if needed. Include enough information to provide a complete, though brief, description of the injury. The description "burned arm" provides some information, but "second-degree burns on right forearm from acetylene torch" provides a much better (yet still brief) understanding of the injury.

Do I need to make a diagnosis?

When you are certain of a diagnosis, that diagnosis must be included. Oftentimes, when an injury occurs or when a worker first reports an illness, the actual nature of the injury or illness is not immediately known. The worker may be able to describe only a pain, soreness, discomfort or nausea. In these events, it is not necessary to write down this initial description or to try to diagnose the injury or illness yourself. You have a seven-day period to record a log entry, during which time detailed information may become available. At the time of entry, you should enter the best available diagnosis; afterward, as more information becomes available, you are expected to update the log with that information.

One good strategy is to write a full injury or illness description on the incident report or FROI form. These forms provide more space and divide the description

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into several questions. Then you can summarize the answers into the log. Items 14 through 17 on the incident report can guide you through the process as follows:

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.
15. **What happened?** Describe how the injury occurred.
16. **What was the injury or illness?** Describe the part of the body that was affected and how it was affected. Be more specific than "hurt," "pain" or "sore."
17. **What object or substance directly harmed the employee?**

ONLINE RESOURCES

Federal OSHA recordkeeping resources

- www.osha.gov/recordkeeping/index.html

MNOSHA recordkeeping resources

- www.doli.state.mn.us/recordkeeping.html

MNOSHA WSC recordkeeping training

- www.doli.state.mn.us/osheven.html

Survey of Occupational Injuries and Illnesses

- www.bls.gov/iif
- www.doli.state.mn.us/dlistats.html

Packet of recordkeeping forms, instructions

- www.osha.gov/recordkeeping/RKforms.html

Booklet: Minnesota OSHA recordkeeping requirement

- www.doli.state.mn.us/pdf/recordkeepingstandard.pdf

A fall off a ladder could be described as:

14. Worker painting building exterior with power sprayer
15. Worker lost balance and fell off ladder
16. Broke left ankle
17. Injured when hit the ground

This can be summarized on the log in column E, the event location, as "exterior of building," and in column F as, "fell off ladder, broke left ankle on ground."

Neatness counts!

The log is available for review by employees, former employees, personal representatives, collective bargaining representatives and by government officials. The log must be kept available for five years after the year of the cases described on the log, so there is likely to be turnover in the staff that is responsible for maintaining the log. Therefore, it is important that case entries be kept neat and legible. It is easy for someone to infer that a sloppy log means its accuracy is questionable or that management is not concerned with worker safety and health.

Next installment:



Federal, state OSHA form alliance with polyurethane industry group

Minnesota OSHA joined state OSHA programs from Indiana and Michigan, along with federal OSHA offices in Illinois, Ohio and Wisconsin to form an alliance with the Alliance for the Polyurethanes Industry (API), a business unit of the American Plastics Council, that focuses on reducing and preventing exposure to hazardous substances for workers employed in the application of spray-on truck bed liners.

As part of the alliance, API will encourage the spray-on truck bed liner industry to build relationships with OSHA's regional and area offices to address health and safety issues, including the proper use, storage, fit and evaluation of personal protective equipment and respirators, the proper use and maintenance of truck bed liner application equipment and design of a ventilation booth, and clear, consistent interpretation of OSHA federal or state regulations pertaining to the spray-on truck bed liner industry.



Photo from www.line-x.com

Editor's note: Watch for a summary of MNOSHA's inspections in this industry in the next edition of *Safety Lines*.