

Recordkeeping 101: Part 3

The days of our cases

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Editor's note: This is the third 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 counting days away from work and days of job transfer or restriction.

The first installment of this series discussed basic OSHA recordkeeping requirements, describing the conditions for including an injury or illness as part of the OSHA log. Part two of the series described the process for classifying cases as either days away from work, job transfer or restriction, or other recordable cases. This installment reviews how to count the days for the days-away-from-work cases and cases with job transfer or restriction. It is helpful to have a clear grasp of the case classification process before tackling the counting of days.

Why count days? The Bureau of Labor Statistics and OSHA use median days as an indicator of case severity. Days are also used to evaluate OSHA and employer performance. Even if there is little or no change in an injury rate, there may be a change in the median number or distribution of days away from work.

Ranking the industries, occupations and types of injuries and illnesses by the median number of days away from work helps identify those categories needing more attention from employers, government agencies, and safety and health professionals. For example, sprains and strains account for 45 percent of Minnesota's 2003 cases with days away from work, while carpal tunnel syndrome accounts for only 2.5 percent of the cases. However, the carpal tunnel syndrome cases had a median of 16 days away from work, compared to a median of five days for sprain and strain cases.

Counting days seems intuitive, but there are rules to follow regarding when to count, what to count, stopping the count and finalizing the count. Sometimes days are counted even if the injured worker never misses a day of work or days are not counted even if the injured worker has not returned to work.

Classify the case					
CHECK ONLY ONE box for each case based on the most serious outcome for that case:				Enter the number of days the injured or ill worker was:	
Death	Days away from work	Remained at work		Away from work (days) (K)	On job transfer or restriction (days) (L)
		Job transfer or restriction (I)	Other recordable cases (J)		
(G)	(H)	(I)	(J)	(K)	(L)
	X			3	
	X			2	32
		X			14
			X		

When to count

- After a case is classified by checking a box in log columns G through J, employers enter the number of days in columns K and L (see figure above).
- Cases with days away from work must have a count of days away from work in column K and may also have a count of days of job transfer or restriction in column L. (See the first two example entries in the figure above.)
- Cases with only job transfer or restriction (i.e., with no full days away from work) must have a count of days entered in column L (and nothing in column K). This includes cases with a partial day away from work. (See the third example entry in the figure above.)
- Other recordable cases will not have any days entered in columns K and L. (See the fourth example entry in the figure.)
- In some instances, a physician or other licensed health care provider may recommend days away from work, job transfer or job restriction, but the

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employee remains at work and ignores all restrictions. Such cases are recorded as days-away-from-work cases or job transfer or restriction cases, and the recommended number of days away from work or on job restriction are entered in the appropriate column.

What days to count

General rules for counting days away from work and days of job transfer or restriction include the following.

- The number of days is a count of calendar days, not just scheduled work days or days the business was open.
- Weekends, holidays, vacation days and other days off are all included in the total number of days.
- Begin counting days on the day after the injury occurred or illness began.
- A day of partial work is counted as a day of job transfer or restriction. However, it is not counted if it is the day of the injury or the day the illness began.
- If a worker gets hurt mid-shift on a Tuesday, is then away from work until the returning mid-shift on Thursday of the following week and normally is off on Saturday and Sunday, eight days away from work and one day of job transfer or restriction would be reported. (The eight days are Wednesday through Wednesday; the partial day – Thursday – is counted as a day of job transfer or restriction.)
- If a worker did not miss any time away from work on the day of an injury or the beginning of an illness, the day count starts when the worker did start missing days of work, was transferred to a temporary job or worked with restrictions. For example, if a worker was injured on Thursday, but remained at work on Thursday and did not miss any days away from work until Tuesday of the next week, and remained out for Wednesday and Thursday, then three days would be entered in column K.
- If a worker will be out an extended period of time, an estimate is entered and then updated when the actual day count number is known.
- If a worker is injured and leaves mid-shift on a Friday, takes Saturday and Sunday off as usual, and returns to work as usual on Monday, and has no further days away from work, but there is information from a licensed health care provider that the worker was disabled during the weekend, the case is classified as a days-away-from-work case and two days are recorded in column K. Without the information from the health care provider, the case would be considered an “other recordable” case, column J would be marked and no days would be recorded.
- If, due to a single workplace injury or illness, a worker has days away from work or days of job transfer or restriction in more than one year, enter the day count for all years on the log for the year in which the injury or illness occurred. For example, a worker is injured in December 2005, is away from work for eight days in December 2005, is away from work for four days in January 2006, which is followed by 18 days of work with restrictions. Twelve days away from work (column K) and 18 days of job transfer or restriction (column L) are entered on the OSHA log for that case in 2005. No entry for that injury would be recorded on the 2006 log.

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1-877-470-6742

Workplace Safety Consultation (WSC)

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

Recordkeeping packet

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

Stopping the count

- The total number of days away may be “capped” at 180 days. Employers are not required to keep track of the number of days away from work if the injury or illness resulted in more than 180 days away from work and/or days of job transfer or restriction. However, if an injured worker has days

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away from work and days of job transfer or restriction, then an entry is needed in both columns K and L, and this can be more than 180 days combined. For example, if a worker had one day away from work and 300 days of work with job restrictions, then one day must be entered in column K and either 180 days or 300 days in column L.

- If a licensed health care provider reports that an injured worker should return to work, but the employee remains away from work, the count of the days away from work must end the day the health care provider recommends the employee return to work.
- Counting days should be stopped if the employee retires or leaves the company for reasons unrelated to the injury or illness. If the employee leaves for reasons related to the injury or illness, an estimate of the total days away from work and days of job transfer or restriction is entered on the log.
- If a job transfer assignment becomes permanent or the worker's routine job functions change as a result of the injury or illness, the counting of days of job transfer or restriction is stopped when the job modification or change is made. At least one day of job transfer or restriction is entered in column L.

Finalizing the counts

- All cases should be reviewed when preparing the annual summary on OSHA form 300A. Ensure all cases have been properly classified and that the number of days for the days-away from work cases and cases of job transfer or restriction are accurate or have been re-estimated.
- While the OSHA Form 300A summary does not need to be updated after posting, employers are required to update the OSHA 300 log during the five-year storage period. Enter newly discovered recordable cases and changes in the classification of cases. If a case changes classifications to

become a days-away-from-work case or a case of job transfer or restriction, enter the appropriate number of days in column K and/or L.

- If new information is available about a case entered with an estimated number of days, update the log entry when the day count is known or reaches the 180-day cap. Employers are not required to update the day counts on the log entries after the summary has been posted for cases that do not change classifications or that are not estimates.
- If your company is participating in the Bureau of Labor Statistics survey or the OSHA Log Data Initiative, update your entries before sending your data collection form.

More detail is available about the finer points of counting days from the online resources listed below. Also check out the national and state injury and illness survey results to see how the days away from work are presented and are available for comparison with your company's results.

Next installment: describing the injury or illness

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