

Recordkeeping 201: Part nine

Matching workplaces and workers to OSHA logs

By Brian Zaidman, Senior Research Analyst; Policy Development, Research and Statistics

Editor's note: This installment discusses OSHA recordkeeping requirements in Section 1904.30 of the Code of Federal Regulations.

Businesses come in many different configurations, from single permanent locations to multi-state operations involving multiple permanent locations and multiple temporary project sites. While the general rule is each business establishment needs to have its own OSHA log to record the injuries and illnesses to the workers at that business location, the OSHA recordkeeping requirements allow employers flexibility to accommodate different types of business organizations.

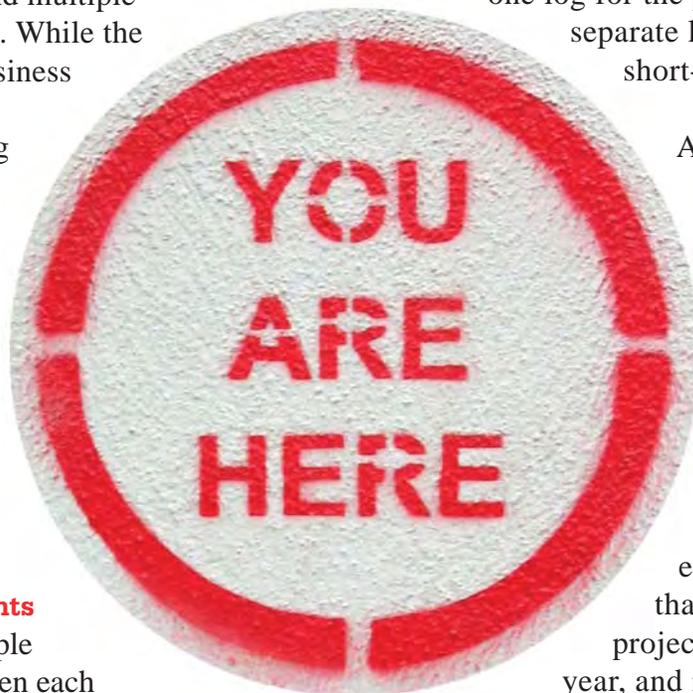
Multiple establishments

If a company has multiple permanent locations, then each location needs to have its own OSHA 300 log. Each worker needs to be assigned to one or another of the company's locations.

Some businesses include a home office, perhaps some other permanent locations, and then have one or more short-term sales outlets, construction sites or project locations. If a short-term establishment is expected to be in operation for less than one year, then it is not required to keep a separate OSHA 300 log for that establishment. An employer may record the injuries and illnesses on the main company log, on a separate log that covers all of the short-term business locations, assign the recordable cases to a particular company division or use one log for a specific geographic region.

For example, a restaurant company that has a permanent location and has one or more units

that prepare and sell food at local fairs and events can either include the safety record in the same log as the main restaurant or it can keep one log for the permanent location and a separate log combining all of the short-term locations.



A second example is a construction company with multi-state operations. This company can keep a separate log for each state to show the injuries and illnesses of its employees, plus separate logs for each construction project expected to last for more than one year. If none of the projects lasts for more than one year, and it has only one office location, then the company is only required to have one OSHA log – keeping multiple logs is optional.

Where to record cases

Every work-related injury and illness that meets the OSHA recordkeeping requirements needs to be recorded on an OSHA 300 log, but sometimes it is difficult to determine which location's log to use. The recordkeeping requirements provide two principles, and sometimes they appear to offer conflicting advice. The first principle is each employee must be linked with one business location and any injury that occurs to that employee would be recorded on that establishment's log. The second principle is the events or exposures that cause an injury or illness are most likely to be present at the location where the event or exposure occurred.



Sometimes an employee at one establishment is injured or becomes ill while visiting or working at another establishment of the same company. In these instances, the employer must record the injury or illness on the log of the establishment where the event occurred. For example, if a manager for a multi-state construction company becomes injured while visiting a site in another state, the injury would be recorded on the log used for that particular construction site.



make it much easier to move the cases to a new log if the temporary location should remain active for longer than one year or if the employer decides to keep a separate log for the temporary locations; this will also assist OSHA inspectors when they review the log.

If a worker is injured or becomes ill and is not at one of the company's establishments, the employer must record the case on the log for the establishment where the employee normally works. This often happens while in transit. For example, if a worker is injured in a traffic accident between two business locations, then the case would be recorded on the OSHA log of the worker's home establishment.

Recording locations

If an employer decides to use one log for multiple locations, the business location where the injury or illness occurred should be noted on the log in column E, "Where the event occurred." This will

Maintaining logs

The OSHA logs for temporary establishments may be maintained at a central office, provided reports of injuries and illnesses can be transmitted from the remote locations to the recordkeeping location within seven days of the occurrence of the injury or illness and incident reports or logs can be provided when required. A copy of the OSHA 301 incident report must be provided within one business day when requested by an employee. A copy of the OSHA log must be provided within four business hours when requested by an OSHA inspector or other government representative.

If you need further assistance in deciding how many OSHA logs to use, contact the Department of Labor and Industry's Policy Development, Research and Statistics unit at dli.research@state.mn.us.



Next Recordkeeping topic:

Is there a difference between workers' compensation claims and OSHA log recordable cases?



2009 injury and illness survey estimates available this fall

By Brian Zaidman, Senior Research Analyst; Policy Development, Research and Statistics

The estimated 2009 incidence rates and number of cases for Minnesota's industries will become available in late October. The U.S. Bureau of Labor Statistics (BLS) has tentatively scheduled the release of the 2009 summary statistics for Oct. 21. On that date, the national and state statistics will be posted on public Web sites. You can

access the Minnesota summary tables at www.dli.mn.gov/RS/StatWSH.asp. The national data will be available at www.bls.gov/iif. A few weeks later, tentatively Nov. 9, BLS will make the case and demographics estimates available, which provide more detailed information about cases with one or more days away from work.