

## How to avoid under- and over-reporting on your OSHA log

The OSHA log is a useful tool for keeping track of workplace injuries and illnesses. Some employers use the log to track all injuries and illnesses in their worksite, which leads to over-reporting; others don't record injuries and illnesses that should be on the log, which leads to under-reporting. This article provides information and advice to help employers track OSHA-recordable injuries and illnesses without over- or under-reporting.

The OSHA recordkeeping requirements (see <a href="osha.gov/recordkeeping">osha.gov/recordkeeping</a>) specify which work-related injuries and illnesses need to be entered on the log; cases falling outside OSHA's definitions should not be entered. Employers need to keep track of cases until they are able to decide if a case is recordable; they have seven days after they are aware of an OSHA-recordable case to enter it on the log.

After a case is entered on the log, it is the employer's responsibility to update the injury information. The description of the injury might change due to a medical diagnosis, as might the number of days away from work and days of job restriction.

Employers should not list everything that happens at the workplace on the log "just in case" it might become an OSHA-recordable case. Many employers, especially those with safety professionals on staff or on contract, keep track of a wide variety of cases and incidents that occur in their workplace or that might be work-related. These companies might use another document, a working log, to hold cases that may reflect safety hazards and issues but did not (yet) result in an OSHA-recordable case. This includes injuries that were treated with first aid and near-misses. This information is important for safety managers and workplace safety committee members but is outside the scope of the OSHA log. Workers sick with the common cold and influenza, even if contracted through work, are not considered OSHA recordable cases, regardless of the amount of time lost from work.

Additionally, any cases that were entered on the log and were later found not to be recordable can and should be removed from the log. One reason for this is that current and former employees have the right to ask to see the current log and the logs from the previous five years. These logs need to be provided by the end of the next business day. The current log should be maintained so that it includes the legally required information you must share with your employees, should they ask.

Maintaining an **official** log with only cases that meet the OSHA recordability requirements makes it easier to prepare the year-end log summary, to report the summary numbers via the OSHA electronic reporting system and to respond to the U.S. Bureau of Labor Statistics' Survey of Occupational Injuries and Illnesses. The resulting injury and illness rates will also be comparable with the state and national rates for each industry.