

Recordkeeping –

- Interpretations,
 - Proposed Rules &
 - New Emphasis Programs
-



January 13, 2011 Webinar

OSHA is taking a closer look at injury/illness records and employers' procedures that influence their accuracy. Proposed rules types of injuries that are recorded continue to loom on the horizon. And, even before these can be promulgated, OSHA is pushing forward with emphasis programs and new compliance ideas. This webinar reviewed recordkeeping basics in relation to OSHA initiatives. It also took a closer look at how OSHA injury/illness records relate to NECA safety and awards programs .

A copy of the PowerPoint file has been posted on the **NECA eSafetyLine software website. It is available free to all subscribers.** If you are currently registered for eSafetyLine, you can access it under the training section in the Accident reporting module. If you are not registered for eSafetyLine, you can contact NECA at for more information on how to subscribe to eSafetyLine.

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Objectives

1. Identify pending regulations that may affect recordkeeping
2. Describe OSHA's National Emphasis Program on recordkeeping and the direct, as well as indirect, impact it may have on inspection of contractor records
3. Determine whether to record a given injury/illness
4. Give an example of a common mistake contractors make in their recordkeeping
5. Explain why lagging and leading measures should be part of a safety award program

Pending Regulations

NAICS Update and Reporting Revisions

- Action - Proposed Rule
- Action Date - March 2011
- Summary
 - update list of exempt industries
 - change from SIC codes to NAICS codes
 - change requirements around notification of fatalities and serious injuries

Pending Regulations

Modernizing OSHA's Reporting System

- Action - Proposed Rule
- Action Date - September 2011
- Summary
 - modernize reporting system
 - electronic submittal of recordable incident data??



Pending Regulations

Musculoskeletal Disorders

- Action - Final Rule
- Action Date - February 2011
- Summary
 - add a column for Work-Related Musculoskeletal Disorders (WMSD) to the OSHA 300 Log.
 - first step to a possible resurrection of an ergonomics standard ??????



National Emphasis Program

Purpose/Scope

- Address under-recorded injuries and illnesses
- Targets manufacturing
- Pilot construction
- Construction NEP to be developed



National Emphasis Program

Records to be reviewed

- Medical records
- Workers' comp
- Insurance records
- Payroll absentee
- Company safety incident
- First-aid logs
- Alternate duty rosters
- Disciplinary



National Emphasis Program**Persons to be interviewed**

- Designated Recordkeeper
- Employee
- Healthcare Professional
- Management representatives

**National Emphasis Program****Questions**

- Training
- Reporting policy
- Incentive/Award programs
- Medical treatment and first aid
- Authority
- Records access

National Emphasis Program**Other Actions**

- Limited walk-around
- Consistency with recorded injuries and illnesses, but will address any violations in plain view
- Expand scope or make referral to address areas that may pose safety and health issues

National Emphasis Program**Citations**

- Classified as other-than serious
- If "willful," "repeat," or "failure to abate," Regional Administrator or Regional Solicitor
- NOT to be cited for over-reporting cases

Recordkeeping Basics**Forms**

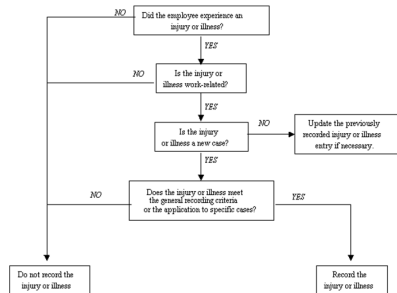
- OSHA forms
 - 300- Injury/Illness Log
 - 300A- Injury/Illness Summary
 - 301- Individual Incident Report
- 300A posted February 1st – April 30th

 A screenshot of the OSHA Form 301, titled 'Injury and Illness Incident Report'. The form contains various fields for recording details of an incident, including date, time, location, and a description of the incident.
Recordkeeping Basics**Understandings**

- Does not indicate fault
- Does not prove an OSHA rule was violated,
- Does not determine eligibility for comp

Recordkeeping Basics

Decision Flowchart



Recordkeeping Basics

General Criteria

- Death
- Days away from work
- Restricted work activity
- Transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness



Recordkeeping Basics

Miscellaneous

- Entries to forms within 7 calendar days of event
- Day counts (days away or days restricted)
 - count calendar days employee unable to work
 - cap at 180 days
 - stop count if employee leaves for unrelated reason
- Privacy cases
- Multiple Establishments
 - Separate 300 for each establishment

Common Errors, Questions & Interpretations

Misunderstanding work restrictions (1)

- Q** Employee has work-related occupational injury and examined by physician. Employee can be returned to full duty; however, is given 20-pound lifting restriction or "do not use left hand" for 3 weeks. Restriction given because employees may get rotated for non-routine tasks, or equipment breakdown that might occur once or twice a month. Is this still considered a work restriction for recordkeeping?
- A** This case should **not** be recorded as restricted work. For recordkeeping purposes, an employee's routine functions are those work activities the employee regularly performs at least once per week.

Common Errors, Questions & Interpretations

Misunderstanding work restrictions (2)

- Q.** Clerical worker injures knee in work-related accident. Has out-patient surgery 1 month after injury and released with only restriction being: "May work at home." Company sets up employee to work at home. Employee works from home, but not the full 8 hours/day Employee is able to perform all routine job functions from home. Should days be treated as restricted work activity or days-away-from work?
- A** Assuming that the employee does not work from home as part of her normal work schedule, the case should be recorded as days away from work.

Common Errors, Questions & Interpretations

Using policy to immediately report as basis for recording

- Q.** Employee injures back lifting materials, but doesn't feel it is serious enough to report. Later that week he is still in pain and visits his physician. The physician prescribes pain medication and issues a restriction to refrain from any lifting. The employer has a rule that all injuries must be reported within 24 hours. Is this recordable?
- A** Even though an injury is reported late, in violation of an employer's rule, if the employee's account of the injury is credible meeting all other criteria of the standard, it must be recorded.

Common Errors, Questions & Interpretations

Misunderstanding aggravations

Q. Employee gets a bad case of tennis elbow on vacation, returns to work and picks up a small box of pencils. Lifting the pencil box pushes her elbow over the edge. She requires medical treatment and unable to type. Is the case recordable?

A Although the standard states "significantly" aggravates a previous non-occupational condition, a provision in the standard also defines "significantly" aggravated as being severe enough to tip a non-occupational injury into the usual recordability criteria. In this case the incident resulted in aggravation sufficient enough to require treatment. The case is recordable.

Common Errors, Questions & Interpretations

Misunderstanding work-relatedness

Q. An employee arrives at work and parks his car in the company parking lot. As the employee is getting out of his car, he inadvertently slams the car door on his finger, and the injury requires "medical treatment." Is the case work-related and recordable?

A Exception requires injury to occur commuting to or from work, to take place in company parking lot or company access road and be the result of a motor vehicle accident. The case is recordable.

Common Errors, Questions & Interpretations

Failure to rely on OSHA First-aid List

Q. A foreign object (metal filing) is removed from an employee's eye by using a magnet. Is the case recordable?

A *The case is recordable.* OSHA's "first aid" list is considered an exclusive list. It only considers removing foreign bodies from the eye by irrigation or a cotton swab as first aid.

Safety Awards

How are top safety performers measured?



Safety Awards

"... benchmarking ...[is]... an on-going outreach activity; the goal of the outreach is identification of best operating practices that, when implemented, produce superior performance."

—Bogan and English, Benchmarking for Best Practices

Safety Awards

Metrics

- *Lagging Measures:*
 - * *results oriented*
(RIR, LWDR, DART, Severity, Comp #s/\$, EMR)
- *Leading Measures:*
 - * *performance drivers*
(near miss reports, safety meeting attendance, safety work orders open vs closed / resolution, inspections)

Safety Awards

<http://www.esafetyline.net/necaaward/>



2011 NECA Safety Excellence Award Application

Log In
User Name:
Password:
Log In
Forgot your password

Intent to Enter Application

Welcome to the NECA Safety Excellence Award application. Members participating in this year's program can submit their data beginning January 3, 2011. The deadline for submitting your online data in March 1, 2011. You can create an account using the fields on the right to begin the application process. If you have already created an account, use the login fields above.

Contact [Keith Williams](#) at 800-745-4818 with any questions related to the online application / registration.

User Name:

Password:

Confirm Password:

E-mail:

Company Name:

Company Membership ID:

Submitter's Name:

CEO/President's Name:

Address (P.O. Box 163):

City (Waverly):

Safety Awards



2011 NECA Safety Excellence Award Application

[Logout](#)
[Assistance](#)
[Instructions](#)

SAFETY SURVEY CONTACT INFORMATION
(Person responsible for completing this survey)

Company Name:

Company Membership ID:

Submitter's Name:

CEO/President's Name:

Address (P.O. Box 163):

City (Waverly):

Safety Awards

COMPANY TOTALS ONLY					
TOTAL NUMBER OF COMPANY EMPLOYEES					
0 <input type="text"/>					
ACTUAL MAN-HOURS					
0 <input type="text"/>					
SUMMARY CASE, DAYS DATA					
# of deaths	# of cases with days away from work	# of cases with job transfer or restriction	# of other recordable cases	total # of days away from work	total # of days of job transfer or restriction
(Column G)	(Column H)	(Column I)	(Column J)	(Column K)	(Column L)
0 <input type="text"/>	0 <input type="text"/>	0 <input type="text"/>	0 <input type="text"/>	0 <input type="text"/>	0 <input type="text"/>
INJURY OR ILLNESS DATA					
# of injuries	# of skin disorders	# of respiratory conditions	# of poisonings	# of hearing loss	# of all other illnesses
(Column M-1)	(Column M-2)	(Column M-3)	(Column M-4)	(Column M-5)	(Column M-6)

Safety Awards

EXPERIENCE MODIFIER INFORMATION
Workers' Compensation Experience Modification Rate from your insurance company.

2010

0

OSHA CITATION/VIOLATION
Provide the number of OSHA Citations you were issued for 2010. Do not include citations for which no penalty was paid.

2010

0

Safety Awards

OPERATIONS & BEST PRACTICE INFORMATION

Number of dedicated full-time safety professionals?
0

What are the qualifications of your dedicated full-time safety professionals?

If your organization does not employ dedicated full-time safety professionals, identify the percentage of time spent by supervisors on safety.
0

How many employees received OSHA 30 Hour training?
0

How many employees received OSHA 10 Hour training?
0

How many received competent person training?
0

[Save / Update Record](#)




Home

Safety Topics

Access Records

News & Features

Safety Talk Calendar

Safety Manual

Safety Database

Message Board

Product Orientation

Contact Us

Ergonomic Safety

Compliance Materials
This guide provides instructions for using the compliance materials contained in this module. The safety talks, activities and tests will assist you in developing electrical safety training.

Training Materials
The training materials in this module will assist you in addressing the training requirements for ergonomic safety.

Compliance Guide W
This guide provides instructions for using the compliance materials contained in this module.

Checklist

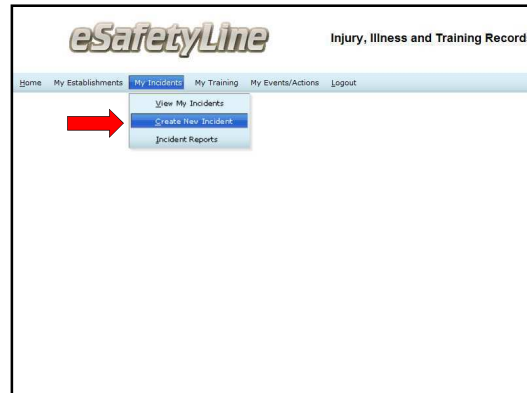
Written Program
This guide provides instructions for using the training materials contained in this module. The safety talks, activities and tests will assist you in developing electrical safety training.

Model Documents

- Basic Screening Tool
- Hazard Zone Checklist
- HCP Evaluation Checklist
- Job Hazard Analysis

Talks

- What are MSD's
- Causes of MSD's
- Preventing MSD's
- Cumulative Trauma
- Health Effects of Video Display Terminals
- Video Display Terminal Work Stations




Establishment	Case Number	Date	Employee	Edit	Delete	OSHA 301	Accident Rpt
Acme Company	20080001	01/14/2008	Steve Etkin	Edit	Delete	OSHA 301	Accident Rpt
Acme Company	20080002	08/04/2008	K B	Edit	Delete	OSHA 301	Accident Rpt

[illegible]

The screenshot shows the eSafetyLine website interface. At the top, the 'eSafetyLine' logo is on the left, and the text 'Injury, Illness and Training Record' is on the right. Below this is a navigation bar with links: 'Home', 'My Establishments', 'My Incidents', 'My Training', 'My Events/Actions', and 'Logout'. The main content area is divided into three sections: 'Report', 'Establishment', and 'Year'. The 'Report' section contains a list of radio button options: 'Accident Analysis', 'Accident Summary', 'OSHA 300', 'OSHA 300A', and 'Privacy Cases'. A red arrow points to the 'OSHA 300A' option. The 'Establishment' section has a dropdown menu set to 'All Establishments'. The 'Year' section has a dropdown menu set to 'All Years'. Below these sections, there is a note: '*must select an establishment to report on a specific year:'. At the bottom, there is a 'Output Format' section with radio button options for 'PDF', 'Excel', and 'RTF (Word compatible)'. A blue button labeled 'Create Report' is positioned below the 'Excel' option.

eSafetyLine Injury, Illness and Training Record

Home My Establishments My Incidents My Training My Events/Actions Logout

Report

- ☐ Accident Analysis
- ☐ Accident Summary
- ☐ OSHA 300
- ☒ OSHA 300A
- ☐ Privacy Cases

Establishment

All Establishments

Year

All Years

*must select an establishment to report on a specific year:

Output Format

- ☒ PDF
- ☐ Excel
- ☐ RTF (Word compatible)

Create Report

Adobe Reader - [OSHA_300(1).pdf]

File Edit View Document Tools Window Help

Open Save & Copy Print Email Search Select Text Select Image

OSHA's Form 300
Log of Work-Related Injuries and Illnesses

Year 2007

U.S. Department of Labor
Occupational Safety and Health Administration


Example Corp.

Supervisor: [Name]

Employee: [Name]

Injury/Illness Details:

Date	Description of Injury/Illness	Days Away from Work	Job Transfer	Medical Treatment	Job Restriction	Other
01/01/07	[Description]	0				



Injury, Illness and Training Records

Home
My Establishments
My Incidents
My Training
My Events/Actions
Logout

Report

- Accident Analysis
- Accident Summary
- OSHA 300
- OSHA 300A
- Privacy Cases

Establishment

All Establishments

Year

All Years

*must select an establishment to report on a specific year:

Output Format

☒ PDF
☐ Excel
☐ RTF (Word compatible)

Create Report

[illegible]

eSafetyLine

Injury, Illness and Training Records

HomeMy EstablishmentsMy IncidentsMy TrainingMy Events/ActionsLogout

Report

⦿ Accident Analysis

⦿ Accident Summary

⦿ OSHA 300

⦿ OSHA 300A

⦿ Privacy Cases

Establishment

All Establishments

Year

All Years

Output Format

*must select an establishment to report on a specific year:

🌐 PDF

☒ Excel

☐ RTF (Word compatible)

Create Report

Adobe Reader - [Accident_Analysis(1).pdf]

File Edit View Document Tools Window Help

Open Save a Copy Print Email Search

Select Text Select Image

110%

Download New Rights

Download New Rights

Statistical Summary

Severely Rate = 13

DART Incidence Rate = 0

Lost Work Day Case Rate = 3

Total Recordable Incidence Rate = 2

ABC Electric

2007

Days Away x 200,000

Total Hours of Exposure

Restricted, Transferred, Lost Days x 200,000

Total Hours of Exposure

Death Cases x 200,000

Total Hours of Exposure

Total Cases x 200,000

Total Hours of Exposure

Accident Classification Summary

STRUCK BY

0 Hand Tool or Machine

0 Rolling, Sliding or Tipping Object

0 Moving Object (Occupant)

0 Other Person

0 Falling or Flying Object

0 Moving Vehicle (Pedestrian)

0 Object Handled by Another Person

0 No Classification

STRUCK AGAINST / CONTACT

0 Object Being Handled

0 Stationary Objects

0 Contact With Sharp Objects

0 Moving Objects

0 No Classification

CAUGHT IN, BETWEEN OR UNDER

0 Machine or Moving Parts

0 No Classification

0 Unstable Conditions

0 Lifting

0 Pushing or Pulling

0 Reaching

0 Cumulative Trauma

0 Using Tool or Machine

0 Holding or Carrying

0 Unnatural Position

0 No Classification

File Edit View Document Tools Window Help

Open Save a Copy Print Email Search

Select Text Select Image

110%

Download New Rights

Download New Rights

OCCUPATIONAL DISEASE

0 Unwitnessed or Infrared

0 Chemical Burn

0 No Classification

SLIP, TRIP OR FALL

0 On Same Level

0 Stairs

0 From Elevation

0 No Classification

0 Foreign Body in

0 Stroke / Heart Attack

0 Psychological

0 No Classification

RUBBED OR ABRADED

0 Fixed Objects

0 Objects Being Handled

0 No Classification

Body Part Summary

0 Brain

0 Head

0 Face

0 Eye

0 Ear

0 Neck

0 Chest

0 Heart

0 Lung

0 Abdomen

0 Internal

0 Groin

0 Multiple

0 Other

0 Shoulder

0 Back

0 Arms

0 Elbow

0 Wrist

0 Hand

0 Finger

0 Hips

0 Legs

0 Knee

0 Ankle

0 Feet

0 Toes

eSafetyLine Injury, Illness and Training Records

Home My Establishments My Incidents My Training My Events/Actions Logout

View Training Topics

Create New Training Topic

View Training Records

Create New Training Record

Training Reports

eSafetyLine Injury, Illness and Training Records

Home My Establishments My Incidents My Training My Events/Actions Logout

View Event/Action Categories

Create New Event/Action Category

View Events/Actions

Create New Event/Action

Event/Action Reports

NECA NATIONAL ELECTRICAL CONTRACTORS ASSOCIATION

eSafetyLine

End of Session

For Help Contact

NECA

301.657.3110

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