



Loss Prevention
Risk Management, Portland, OR

Why Do I Have To Keep OSHA 300/300A Records?

Did you ever wonder where work place injury data comes from?

Many sources are used to monitor and understand what types of injuries occur in the nation's workplaces. One source is derived from the OSHA log you keep. The rules that dictate what data is kept and how it is kept are designed to allow consistency across all workplaces in every state. So keeping the OSHA 300 is an essential element in the national workplace safety and health system. It's serious business.

It also helps you to discover trends in your own workplace, where are incidents happening, what is involved, what times of years? All of this helps you to evaluate your own workplace .

Recordkeeping is required by law; and holds stiff mandatory penalties for failure to keep, maintain and post. The penalty by law is at least \$100 but not more than \$1000 for **each** violation.

Think about this – if you have 12 recordable incidents, and none are on your log at the time of an inspection, that is potentially a \$12,000 penalty!

Each February you need to post the summary of the injuries that happened at your workplace the year before.

This requirement is intended to let the people who work at the location, know how safe the work place is. In itself, it does not give useful information. But it can be one piece of your safety communication to employees.

If you fail to post the summary, it is a mandatory \$500 penalty. There are other penalties which may be assessed for filling out incorrectly, or falsifying. Penalty for falsification is \$10,000 or 6 months imprisonment or both.

If your company had more than ten (10) employees at any time during the last calendar year, you must keep OR-OSHA injury and illness records (a few industries are exempt – we will address this individually with Bureaus – an example of this would be the Performing Arts Center)

Multiple Business Establishments

Why Do I have To Keep OSHA 300/300A Records?

You must keep a separate OSHA 300 Log for each establishment that you expect to operate for 1-year or longer.

Why Do I have To Keep OSHA 300/300A Records?

If you have multiple locations, where do you log injuries?

If the injury or illness occurs **at one of your establishments**, you must record the injury or illness on the OSHA 300 Log of the establishment where the injury or illness occurred. For example, a Parks employee who normally works in The Portland Building goes to Mt Tabor and is injured – the injury would be recorded on the log for the Mt Tabor location.

If the employee is injured or becomes ill and is **not at one of your establishments**, you must record the case on the OSHA 300 Log at the establishment where the employee normally works.

Here are some examples:

1. A police officer, injured in a vehicle crash, would be entered on the log of the precinct the officer is assigned to.
2. An injury to a BDS inspector happens at a privately owned location; the injury would be recorded on the log at the inspector's office.
3. A Risk Management employee who works in the Portland Building is injured from slipping and falling at the Water Treatment Plant; the injury would be recorded on the log at the Water Treatment Plant

How soon must injuries/ illnesses be recorded?

You must enter each recordable injury or illness on the OSHA 300 Log and DCBS 801 form within 7 calendar days of receiving information that a recordable injury or illness has occurred. In addition, an incident report or First Report of Injury must also be completed. This report must contain specific information, similar to the DCBS Form 801. The 801 is a workers' compensation claim form found in the injured workers Packet. It must be completed if the injured employee seeks medical treatment or is unable to complete a scheduled shift.

The form 801 is a claim for workers' compensation benefits. It must be sent to City Risk within 5 days of the date a manager or supervisor knows the employee seeks medical treatment or has missed work because of the injury.

If we have no injuries at a location, do we need to keep a log?

You need to fill out the 300A, showing that no injuries occurred at that location in the past year and post.

What information must be put on the 300/300A?

You must enter information about your bureau at the top of the OSHA 300 Log, enter a one or two line description for each recordable injury or illness, and summarize this information on the OSHA 300-A at the end of the year.

Why Do I have To Keep OSHA 300/300A Records?

Who may complete the log and summary?

Anyone you designate may keep the log, however: the highest ranking official on site or has jurisdiction over this location must sign the OSHA 300A.

By signing this document, the office is certifying that he or she has reviewed it and it is correct, to the best of his or her knowledge.

How long do we have to keep the OSHA 300 logs and summary?

You must maintain the OSHA 300 logs and summary (OSHA 300A) for a minimum of 5 years.

How do we determine what is a location?

The recordkeeping rule states that you must keep a separate OSHA 300 Log for each location that you expect to operate for 1-year or longer.

If one of your employee's first reports to one work location but is then supervised and budgeted out of a different location, this workplace may not have to maintain a separate OSHA 300/300A. If you have this situation and are unsure, please contact your bureau Safety Manager, City Risk or Oregon OSHA for clarification. (An example of this would be Water Bureaus pump houses).

What if our location has less than 10 employees?

The "under 10" exemption applies to businesses as a whole. In our case it would be the entire City of Portland. No city workplace or location would meet this exemption.

What if I have questions?

Here is the website link for **Oregon OSHA's** recordkeeping section. This will have copies of the rules, free online training, tutorials, and publications: <http://orosh.org/subjects/recordkeeping.html>

OR-OSHA's telephone number is 503 299-5910.

City Risk's Loss Prevention Unit can assist you with determining whether a location requires a separate log, and what injuries and illnesses need to be recorded. Call City Risk at 503-823-5101 and ask to speak with a member of the Loss Prevention Team.