Recording and posting workplace injuries and illnesses

Am I required to keep records of workplace injuries and illnesses?
The list of industries exempt from the requirement to routinely keep OSHA injury and illness records was recently updated. The list is based on the North American Industry Classification System (NAICS). Some industries changed from an exempt industry to non-exempt – meaning they now have to keep records. Others, who were required to keep records, are now on the exempt list because of relatively low occupational injury and illness rates. The complete list of the designated industries that are not required to keep injury and illness records are found in Table – 1 Exempt industries in Oregon OSHA’s Recording Workplace Injuries and Illnesses Rule (OAR 437-001-0700).

What if I am not on the exempt list?
If your organization had more than 10 employees at any time during the last calendar year and is not listed on the exempt list in Table 1, you must keep the following injury and illness records for five years for each establishment.

- **OSHA 300 Log** – Enter each recordable injury or illness within 7 calendar days of receiving information that a recordable injury or illness occurred. Enter information about your business at the top and a one or two line description for each recordable injury or illness.

- **OSHA 300A Summary** – Summarize the OSHA 300 Log information form at the end of the year.

- **DCBS Form 801** – Complete for each recordable injury or illness entered on the OSHA 300 Log.

You may use a computer to keep your records if it can produce equivalent forms when needed.

If you close one of your establishments, you must keep all records for that establishment.

What if I am on the exempt list?
If your industry is exempt or your organization never had more than 10 employees at any time during the last calendar year, you are not required to keep the OSHA Form 300 or 300A Summary form for that year. The exemption for size is based on the number of employees in the entire company within the state of Oregon. The list of exempt industries, regardless your number of employees, is found on Table 1.

You must keep the DCBS Form 801 or equivalent for five years for each occupational injury or illness that may result in a compensable claim.

What are the paperwork retention and updating requirements?
You must retain your OSHA 300 Logs, 300As, and 801 forms for five years following the end of the calendar year that they cover. You are only required to update the OSHA 300 Log, as necessary, during that five year period.

Employers that are newly exempt from keeping OSHA injury and illness records do not need to retain the prior 300 logs or 300A summary forms.
Who else must keep record of injuries and illnesses?

Hospitals and ambulatory surgical centers must keep a log of health care assaults that complies with Oregon OSHA’s Recordkeeping for Health Care Assaults Rule (OAR 437-001-0706).

What are the annual summary posting requirements?

OSHA 300A Summary is the annual summary of injuries and illnesses recorded on your OSHA 300 Log. Review the OSHA 300 Log to verify that the entries are accurate and to correct deficiencies. The OSHA 300A Summary must be certified (signed and dated) by a company executive. A designated representative can certify the OSHA 300A Summary as long as a company executive reviews the OSHA 300 Log to familiarize themselves with its contents.

Each year you must post a copy of each establishment’s OSHA 300A Summary in a conspicuous place no later than February 1 of the year following the records and keep it posted until April 30. The summary must be posted at the establishment where the injuries or illnesses occurred. In cases where the employees are mobile, the OSHA 300A Summary may be posted at a location where employees regularly report to work.

Do not post your OSHA 300 Log.

Rules:

- Recording Workplace Injuries and Illnesses: OAR 437-001-0700
- Reporting Fatalities and Injuries to Oregon OSHA: OAR 437-001-0704
- Rules for all Workplaces: OAR 437-001-0760
- Recordkeeping for Health Care Assaults: OAR 437-001-0706

Program directives:

- Inspection Criteria: Temporary Employment and Leasing Agencies (A-246)
- Forms: OSHA 300 and 300A forms DCBS Forms 801