





Workplace Safety

OSHA Recordable vs. Reportable Incidents: How to Tell the Difference

Vanessa Jo Roberts | Jun 10, 2021

For four specific incidents, OSHA requires businesses to make a report directly to the government.

Businesses must file reportable incidents to OSHA within strict time frames.

Beyond the four reportable incident types, OSHA specifies that businesses write up what it defines as recordable incidents and maintain a running log of injuries, illnesses and fatalities.

OSHA also requires that businesses maintain the recordable incident rate for their facilities.

If you have more than 10 employees or work in an industry with a higher-than-average potential for hazardous incidents—which covers nearly all metalworking shops and manufacturing facilities—then you're subject to OSHA recording and reporting rules.

OSHA's recordable versus reportable incidents: What's the difference? What must a manufacturing plant share with the Occupational Safety and Health Administration?

Manufacturing floor chiefs and safety managers need to know the answer to both these questions and be aware of the recordkeeping and reporting requirements necessary to stay in compliance with government regulations.

Every business should start with this baseline: If a worker suffers an injury, illness or dies while on the job, the company will likely need to record it. That's the most basic definition of a recordable incident.

What Is an OSHA Reportable OSHA Incident?

OSHA is specific on what constitutes a reportable incident, as well as what information must be reported to the government and how quickly.

A fatality, inpatient hospitalization, amputation, or loss of an eye is considered a "serious" workplace incident that must be reported directly to OSHA—by phone or online—usually *within hours*.

A business must notify OSHA of any fatality within eight hours of learning of the death.

It must notify OSHA of any inpatient hospitalization, amputation or loss of an eye within 24 hours of becoming aware of it.

Inpatient hospitalization encompasses all formal admissions to the inpatient service of a hospital or clinic for care or treatment, safety compliance services firm *KPA notes in a blog post*. "Hospitalization doesn't necessarily mean that the employee stays overnight; if they've been admitted for inpatient treatment, the event must be reported," the organization says.

The reporting windows took effect when OSHA updated its recordkeeping standard, **29 CFR 1904**, in 2015.

Is the Incident Work-Related?

According to the KPA's **OSHA reporting blog post**, some injuries and illnesses that occur in the workplace and its surroundings are not, in fact, work-related.

Here are some examples of non-work-related injuries and illnesses that do not need to be recorded:

- Injuries that occur to the general public
- Certain parking lot accidents
- Non-work-induced mental illnesses
- Colds and cases of flu
- Injuries that arise from personal meals or grooming
- Injuries that are self-inflicted or from self-medication
- Injuries occurring on the premises due to outside factors (such as a natural disaster)

The chief reason for the change was to help identify workplaces with potentially chronic safety issues, former OSHA administrator *David Michaels said in the fall of 2014*.

"Hospitalizations and amputations are sentinel events, indicating that serious hazards are likely to be present at a workplace and that an intervention is warranted to protect the other workers at the establishment," Michaels said. "Too often, after a fatality, when we inspect, we learn that other workers have already been injured at that establishment."

For more information, see OSHA's direct guidance on the recordkeeping standard.

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Handling COVID-19 Cases

Not only did the start of the COVID-19 pandemic force employers to take wide-ranging steps to prevent the spread of the disease among their workforces, it also left many grappling with whether the illness was work-related and, consequently, recordable (or reportable) under OSHA's recordkeeping standards.

With the advent of vaccines, boosters and new treatments, OSHA *has updated* its website to clarify its requirements on reporting the disease.

Read More: OSHA Seeks More Details on High-Risk Workplace Injuries

Businesses must report COVID-19 deaths if they occur within 30 days of a work-related exposure, OSHA says. The report must be made within eight hours of learning that the worker has died from a confirmed, work-related case of COVID-19. Inpatient hospitalizations meeting the same standard must be reported within 24 hours.

How to Use OSHA Form 301, Form 300 and Form 300A

Reports and logs are key elements of the OSHA recordkeeping rules. A business must maintain on-site incident reports and logs of all recordable incidents for at least five years. While that information doesn't have to be submitted to OSHA, managers must be able to provide it if requested or during onsite inspections.

Inspectors typically review logs when they visit a facility. OSHA also requires businesses to fill out and keep on-site *three types of forms* for documenting recordable incidents.

- 1. Form 301: Injury and Illness Incident Report
 - This is the form that businesses must fill out to document each recordable incident within seven days of learning of it. It includes the most detail about who was harmed and how.
- 2. Form 300: Log of Work-Related Injuries and Illnesses
 - This form is a running log capturing all of a business's recordable incidents in a calendar year, encapsulating pertinent details from each incident documented in a Form 301. It can help the safety team identify and address areas of concern in order to make improvements.
- 3. Form 300A: Summary of Work-Related Injuries and Illnesses
 This form is a "dashboard" report of a facility's recordable incidents for a year by number of cases, days of lost work and incident type. OSHA requires that businesses display it from February through April each year. This data is used to calculate the recordable incident rate.

OSHA requires that businesses allow workers to request and review Forms 300 and 300A in their entirety and be given access to much of Form 301, too, as specified in **29 CFR Part 1904.35**.

Failure to maintain the records can lead to a \$7,000 fine from OSHA.

What Are OSHA Recordable Events?

OSHA has explicitly outlined the kinds of incidents safety managers need to manage and document:

- Any work-related diagnosed case of cancer or chronic irreversible disease.
- Any work-related injury resulting in punctured eardrums or fractured/cracked bones or teeth.
- Any work-related injury or illness requiring medical treatment beyond first aid.
- Any work-related injury or illness that results in loss of consciousness, days away from work, restricted work or transfer to another job.
- Any work-related fatality.

There are also special recording criteria for work-related cases involving needlesticks, sharps injuries, medical removal, hearing loss and tuberculosis.

It's crucial to note that not every incident is recordable. Generally speaking, recordable incidents involve events or exposures in the work environment that either caused or contributed to the resulting condition during work hours. If not, the case is not recordable.

If you're ever in doubt about whether you must log an incident, OSHA recommends that you contact the agency and ask. That's the easiest way to avoid a compliance issue.

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What Is the Total Recordable Incident Rate?

Beyond the incident reports required after an injury, illness or fatality—and the ongoing log of them—OSHA inspectors (and many others) use recordable incident data to determine the total recordable incident rate (TRIR) for a facility.

The TRIR is a percentage rate of recordable incidents per 100 employees. To *calculate your TRIR*, you multiply the number of recordable incidents by 200,000, then divide by the total number of hours worked in a year by your employees.

OSHA uses the 200,000 number because it represents the hours 100 employees would work in a year, or 100 employees times 40 hours a week times 50 weeks a year.

To help figure out your TRIR, use our helpful, interactive calculator for TCR (Total Case Rate) and DART.

The lower the number, the better your safety record. And TRIR is important because it's used in many different ways that can affect a business's bottom line, according to a *Slice Products blog post*.

Read more: Confined Space Safety: What's the Correct PPE, Equipment for Working in Hazardous Locations?

OSHA uses the TRIR to monitor your business's progress on improving its safety record; investors weigh it when evaluating your business for funding; insurers look at it when setting rates; buyers inquire about it when selecting suppliers; and would-be workers check it out when applying for jobs and evaluating safety culture.

Given how much rides on this number, it's worth paying close attention to it. Not keeping your TRIR low can cost you money, damage your reputation, hurt your ability to hire and keep high-quality workers, and lead to lost time dealing with annoying paperwork.

In the video below, MSC safety consultants discuss how to create a safer workplace. To request a safety consultation, *click here*.

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