

Pinnacol Pointers for Safety Group Programs

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*Editor's Note: Safety Group Program Monthly Newsletter Article – Jan. 2019
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OSHA's Proposed Rulemaking, Recordkeeping Checklist

To meet OSHA's requirements, many employers with more than 10 employees must keep a record of serious work-related injuries and illnesses. For this reason, we're updating you on a recent final rule by OSHA and providing a handy, brief checklist to guide your organization's injury and illness recordkeeping.

Final rule by OSHA

In July 2018, OSHA issued a Notice of Proposed Rulemaking. The agency is considering removing the requirement to electronically submit information from OSHA Form 300 and 301 for employers with 250 or more workers that are required to maintain injury and illness records. Form 300 is the Log of Work-Related Injuries and Illnesses; Form 301 is OSHA's Injury and Illness Incident Report.

The proposed rule would require employers to electronically submit information only from OSHA Form 300A, the Summary of Work-Related Injuries and Illnesses. Additionally, OSHA's rulemaking would require covered employers to electronically submit their Employer Identification Number with the form.

Checklist for OSHA recordkeeping

To aid your organization's compliance, we share this OSHA recordkeeping checklist:

1. Maintain OSHA logs.
2. Log injury and illness cases when they occur.
3. Complete the OSHA 301 Form or equivalent for each case on the OSHA 300 Form.
4. Complete electronic reporting annually, if required.
5. Document the inclusion or omission of every case.
6. Investigate all cases to determine their causes.
7. Update logged cases as new information becomes available, including lost and restricted days.
8. Keep OSHA logs for five years (i.e., five years from the date of each case).
9. Keep OSHA recordkeeping at your fingertips; make records easy to locate.
10. Don't discriminate against workers who report cases or ask to see OSHA records.

11. Enforce your organization's OSHA recordkeeping policies and practices, encourage employees to report incidents, and train and update workers with recordkeeping responsibilities.

Pinnacol and other resources

The [Knowledge Center](#) on Pinnacol's website provides many resources to help your organization keep accurate, current and compliant OSHA records. These include OSHA logs, Pinnacol's OSHA Report Manager, OSHA Recordkeeping Advisor, OSHA's recordkeeping requirements and more. We encourage you to visit [OSHA's recordkeeping webpage](#), as well.

On Jan. 9, 2019, Pinnacol will conduct an [OSHA recordkeeping course](#) that covers everything you need to know to stay compliant. If you are unable to register for this class, check back, as we offer the course periodically. Additionally, [online training in OSHA recordkeeping for the construction industry](#) is offered by J.J. Keller, through a partnership with Pinnacol.

To learn more, we invite you and your team to contact Pinnacol's Safety On Call at safetyoncall@pinnacol.com or 303.361.4700 or 888.501.4752.

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