



Recordable vs. Reportable: Understanding the Difference

With OSHA records, three main terms are commonly used, and they'll be used throughout this article. You'll learn more about each later on, but here are the basics.

Recording is simply the act of tracking an on-the-job injury or illness. Multiple forms and logs need to be filled out and maintained by each organization, with different details required of each one.

Reporting means notifying OSHA of certain outcomes from occupational incidents, such as a death. These types of incidents must be reported within a certain time frame, depending on the occurrence.

Submitting is similar to recording, in that the requirement doesn't apply to all employers.

However, for those who fall within the restrictions, a specific injury and illness form needs to be electronically submitted to OSHA each year.

Who needs to record injuries?

Under 29 CFR 1904, any employer covered by the Occupational Safety and Health Act of 1970 with 11 or more employees must maintain OSHA injury and illness records. Employers with 10 or fewer employees and organizations in certain low-hazard industries are partially exempt from keeping such records.

Within many smaller organizations, employee numbers may fluctuate throughout the year. In these instances, employers should review their maximum employment numbers. If at any time during the year you have more than 10 employees, you're required to record safety incidents, unless you're in an exempt industry.

Additionally, not all employers are covered by federal OSHA regulations. Currently, 26 states and two U.S. territories operate under an OSHA-approved State Plan.

Although these plans may differ from federal regulations in some aspects, OSHA has been clear in noting that "State Plans must have occupational injury and illness recording and reporting requirements that are substantially identical to the requirements in this part."

What makes something recordable?

Simply put, a recordable incident is a work-related injury or illness that results in any of the following:

- Fatality
- Loss of consciousness
- Day(s) away from work
- Restricted work activity or job transfer
- Diagnosis of cancer or chronic irreversible diseases
- Punctured eardrum
- Fractured or cracked bones
- Medical treatment beyond first aid

With regard to the last item, OSHA provides a detailed list of treatments it considers to be basic first aid. Because this list covers such a wide variety of treatments, such as nonprescription medications, simple wound coverings, and even hot or cold therapy, this will likely be enough to treat many less severe incidents.

If basic first aid is all that is needed to treat an injury, that incident doesn't need to be noted in your recordkeeping logs.

On the other hand, if anyone – no matter if that person is a medical professional or not – has to administer a “medical treatment” for an injury or illness, the incident is required to be recorded.

The list of things OSHA considers to be medical treatment in these instances includes:

- Nonprescription medication used at prescription strength
- Stitches and staples to close wounds
- Rigid devices for support
- Physical therapy or chiropractic treatment
- Certain vaccines, such as those for rabies or hepatitis B

Additionally, if a health care professional recommends one of these treatments and the affected employee doesn't follow-up on that recommendation, the incident still must be recorded.

There are also specific cases that must be recorded, regardless of the type of treatment applied or the physical result (e.g., death or days away from work) may be. They are:

- Hearing loss
- Medical removal
- Needlestick injuries
- Tuberculosis

One final thing to keep in mind is that each recorded incident must be a new case. According to OSHA, an injury or illness can be considered a new case if the employee:

- Has not previously experienced a recorded injury or illness of the same type that affects the same part of the body.
- Previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely from the previous injury or illness.

What makes an injury or illness reportable?

Most work-related injuries and illnesses that occur may need to be recorded on the proper OSHA logs, but the majority won't be reported directly to OSHA, other than during an annual submission. However, certain situations call for immediate action from the employer.

Any incident that results in a fatality or a severe injury – in-patient hospitalization, amputations or the loss of an eye – must be directly reported to the nearest OSHA area office, the 24-hour OSHA hotline or via the online reporting form.

Work-related fatalities must be reported within eight hours of learning about the death. All other severe injuries listed above must be reported within 24 hours. Unlike any of the recordkeeping restrictions, all employers under OSHA jurisdiction must report these types of incidents.

However, it's important to remember that employers don't have to report an incident to OSHA if the injury or illness:

- Resulted from a motor vehicle incident on a public street or highway (except in a construction work zone)
- Occurred on a commercial or public transportation system
- Involved hospitalization for diagnostic testing or observation only

In such instances, the injury or illness should still be documented on the appropriate OSHA logs; they don't need to be reported directly to OSHA.

What gets submitted to OSHA?

Although the various OSHA forms – outlined in more detail below – include specific information about injuries and illnesses, and these forms must be maintained onsite and may be requested for an inspection, the good news is that the majority of organizations won't need to submit data to OSHA.

As of 2017, the only establishments that must electronically submit data from their Form 300A are those with 250 or more employees and those with 20 or more employees in certain high-risk industries. In these cases, employers must use OSHA's Injury Tracking Application portal to submit Form 300A data by March 2 for the previous calendar year.

One thing to note is that, for organizations that fall under the requirements for submitting data to OSHA, an Injury Tracking Application must be completed even if no injuries or illnesses occurred. In that case, zeroes would be reported, but this information must still be officially documented.

How to document occupational incidents

OSHA has different recordkeeping logs that need to be completed and maintained by all applicable organizations. The names of the logs are similar, so they can be easily confused, but here is a simple breakdown of the function of each.

Form 301: Also known as an Injury and Illness Incident Report form, this contains any injury deemed to be recordable by OSHA. This form will list the extent and severity of an injury or illness and medical information. Incidents must be documented within seven calendar days of learning about the injury or illness. This form doesn't get submitted to OSHA, but it must be maintained at your worksite for five years.

OSHA 300 Log: This form must include incident information such as employee details and whether the incident resulted in death, days away from work, a job transfer or other outcomes. Similar to Form 301, the 300 Log doesn't get submitted to OSHA, but must be maintained on the jobsite for five years. Employers may need to produce a copy of the 300 Log upon request during an OSHA inspection.

Form 300A: In 2019, OSHA updated the recordkeeping regulation so that applicable organizations need to submit only Form 300A, which serves as an annual summary of all work-related incidents. Much like the other OSHA forms, Form 300A must be kept at the worksite for five years. Additionally, the form also needs to be signed by a company executive and displayed in the office from Feb. 1 to April 30 each year.

Training to avoid recordable incidents

Although it may go without saying, training your entire workforce not only helps to minimize safety risks, it also means you may be less likely to have an on-the-job incident that needs to be recorded.