Recordkeeping Regulation

Hawaii Occupational Safety & Health Division (HIOSH)

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OBJECTIVES

• BACKGROUND & CURRENT STATUS
• HIGHLIGHTS
• SIGNIFICANT REQUIREMENTS
• ENFORCEMENT
• COMPLIANCE ASSISTANCE
BACKGROUND & STATUS

• Former Recordkeeping Rule –
  – Last Major Clarification – 1986

• Present Regulation –
  – “Regulation” NOT “Standard”
  – Published in Federal Register – Jan 19, 2001
  – Present Status
RECORDKEEPING REGULATION

Highlights

• New Forms (300, 301, 300A)
• One Criteria for Recording Injury & Illness
• New Definitions (Medical Treatment, First Aid, Restricted Work)
RECORDKEEPING REGULATION

Highlights

- Preexisting Injury or Illness
- Exemptions for Work-Relationship
- Clarifies “Light Duty”, Restricted Work
- Recording All Needlestick and Sharps Injuries
RECORDKEEPING REGULATION

- Recording Standard Threshold Shifts
- Same Criteria for MSD’s and Other Injuries and Illnesses
- Separate Criteria for TB and Medical Removal
RECORDKEEPING REGULATION

• Eliminates “Lost Workdays” (Now “Days Away” or “Days Restricted or Transferred”)
• Counts Calendar Days Instead of Workdays
• Requires Procedure for Employees to Report Injuries/Illnesses
• Prohibits Discriminating Against Employees
RECORDKEEPING REGULATION

Highlights

- Access to Parts of OSHA 301 by Employee Representatives
- Protects Employee Privacy –
  - Certain Types of Injury/Illnesses
  - Nature of Sensitive Injuries
  - Limited Access to OSHA 301 (No Personal IDs)
  - Remove Names Before Providing Data to Persons Without Access Rights
RECORDKEEPING REGULATION

Highlights

• Annual Summary Posting for 3 Months
• Summary Certified by Company Executive
• Excludes Some Reporting of Motor Carrier and Motor Vehicle Accident Fatalities
ACTIVITY DATES

• 2001 – Keep Injury/Illness Information on OSHA 200
• Jan 1, 2002 – Keep Data on OSHA 300
• Feb 1, 2002 – Post OSHA 200 (2001 Data)
• Mar 1, 2002 – Remove OSHA 200
• Feb 1, 2003 -  Post OSHA 300 (2002 Data)
• May 1, 2003 – Remove OSHA 300
ENFORCEMENT ISSUES

- REGULATORY VIOLATION
- INSPECTION TOOL (WHO, WHAT, WHERE, WHEN, HOW)
COMPLIANCE ASSISTANCE

- WRITTEN IN PLAIN LANGUAGE – Q&A FORMAT
- OSHA Home Page (www.osha.gov)
  - INFORMATION KIT
  - STANDARD
  - FORMS
- CONSULTATION AND TRAINING BRANCH (586-9100)
  - SELF-HELP TRAINING (www.state.hi.us/dlir/hiosh)
  - TRAINING FOR TRAINERS
  - FORMS
Any Questions?