

MBAA Safety Tool Box Talk



OSHA Injury & Illness Recordkeeping

The Occupational Safety and Health Act (OSHA ACT) was based on having an accurate accounting of industry's injuries & illnesses. Not having this would seriously hinder their entire mission.

Recordkeeping Rule's Evolution:

Initially rules were relatively simple

- (1) Any business with 10 or more employees was required to keep injury & illness records;
- (2) Recordkeeping Logs were required the Recordkeeping Log to be updated within 8 days – or to be able to do so.
- (3) First Aid treatment was a specific List. If it was not on this list it was medical treatment.
- (4) There were Lost Work Days (LWD), Restricted Work Days (RWD) and Other Injuries.
- (5) A Restricted Work Day (RWD) was any day that an employee could not do even one thing – even if they only had to do it once in a day. It does not matter that you had someone else do that one thing.
- (6) You only had to keep track of each injury's/illnesses daily count for 180 consecutive work days – after 180 you stopped counting.

Then the rules got altered:

Numbers 1-5 above still apply – #5 was changed to consecutive day counting. Whereas before you did not count holidays and weekends.

Other things were added – an "Injury" column was added for "Hearing Loss". Also OSHA

Provided an Excel Spreadsheet online that would do the math for you. You also had 8 hours to report a death, an amputation, the loss of an eye and when multiple hospitalizations occur.

During all this Time OSHA's Focus was on Accuracy:

If you ever heard of a multi-million dollar fine that was most likely recordkeeping violation. Violating recordkeeping rules can be costly.

Some of the Common Trip-Ups

- 1) Misclassifying a cause of injury:
 - a. "Injury" means "I did this and therefore I hurt"
 - b. "All Other Injuries" means "I'm not sure when it happened"
- 2) Not paying strict attention to the doctor's notes – a restriction is a restriction unless the employee NEVER had to do it during their regular job. (No lifting over 20 lbs and the employee would only lift a maximum of 10 lbs – not someone else does it for them).
- 3) Not counting accurately. 5 LWD, then 15 RWD, then 10 LWD and lastly 5 RWD = 15 LWD & 20 RWD on the OSHA 300.
- 4) Not keeping the past year's OSHA Recordkeeping forms up to date – OSHA will look at the last 5 years.
- 5) Not completing the OSHA 300A – this is the year ending form that must be posted February 1st and taken down May 1st.
- 6) You never change the 300A once it's been signed by January 31st. You do continue updating the OSHA 300 until there is nothing more to update.

Now OSHA Requires Electronic Reporting for some Businesses:

Starting with the 2016's OSHA 300 forms businesses with 250, or more, employees are required to report. If your business, is in certain NAICS Codes, and has 20-249 employees you are required to report. (Yes breweries are in those codes) If you have less than 20 you do not need to report. If you have less than 10 employees you do not need to keep these OSHA 300 records.

Those in the 20-249 range have to report OSHA 300A information – do understand that OSHA does not want to see old information, they want to see updated information. If you are in the 250 and above range you also will have to report the details of these injuries & illnesses (OSHA 300, OSHA 301 and OSHA 300A Details). July 1st of each year is the due date for on-line reporting of the prior year. 2016 records are needed by Dec 31st

So....what is OSHA going to do with this information?

They will be posting this information for the world to access in upcoming years and for targeting inspections.

LINKS

- www.osha.gov/injuryreporting/

FOR MORE INFORMATION ON BREWERY SAFETY PROGRAMS, PLEASE VISIT THE MBAA SAFETY WEBSITE AT www.mbaa.com/brewresources