

Recordkeeping 101: Part 6

Summarizing the injury and illness log

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Editor's note: This is the sixth installment of a series about using the OSHA Form 300 and summarizing its results. This information is directed to people who are new to OSHA recordkeeping activities, who are unfamiliar with the 2002 recordkeeping changes or who want to review their recordkeeping practices. This installment deals with the annual log summary. The previous installments are available at www.doli.state.mn.us/recordkeeping.html.



This installment covers how to avoid errors when creating the annual log summary. The previous five installments of this series discussed how to fill in the log (OSHA form 300). At the end of each year, you must complete an annual log summary (OSHA form 300A). Every establishment that keeps a log must create an annual summary, even if there are no log entries. Completing the summary will help you realize the full potential of keeping the log. Information from the annual review can be used to educate employees, keep upper management apprised of safety and health issues, set goals for the coming year and prioritize safety committees activities.

OSHA recordkeeping requirements list four required actions for the annual summary:

- review the log entries;
- create the summary;
- certify the summary; and
- post the summary.

To best follow this installment, it would help to have an OSHA log and a summary form available. The forms are available on the federal OSHA recordkeeping Web site at www.osha.gov/recordkeeping/RKforms.html. Please note that the average employment and total hours worked worksheets are not available on the Excel version of the forms.

What to summarize

Instructions on the annual summary form ask you to summarize only recordable cases. (See Recordkeeping 101: Part 1.) If you make log entries for all reported cases, do not include the nonrecordable cases in the summary. It may help

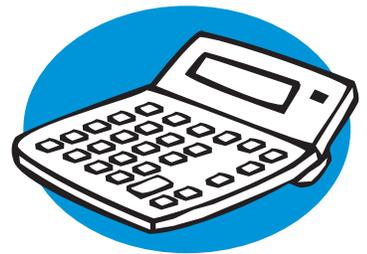
to draw a line through the nonrecordable cases or highlight the recordable ones.

Sometimes, an OSHA log entry for an injury or illness that has been filed as a workers' compensation claim is denied workers' compensation benefits. A denial of workers' compensation benefits has no effect on the recordability of a log entry. Each state runs its own workers' compensation system, with its own set of laws, and liability determinations vary greatly among the states. The OSHA log is a federal recordkeeping tool and the OSHA recordkeeping requirements are the only rules in effect. A denial of workers' compensation benefits is not a reason to remove an entry from the log.

Review

Carefully review all the log entries. Verify that each entry is complete and accurate, and correct any deficiencies. If you need help with this task, review Recordkeeping 101: Parts 2 through 5.

- Each case must have a description. Re-read each description to make sure it makes sense and fill in any missing information.
- Each case must have only one box checked in columns G, H, I or J (case classification). Mark the correct classification if the status of a case has changed since it was originally entered and correct the counts of days away from work and days with job transfer or restriction.
- For each case with a check mark in column H (days-away-from-work case), there must be at



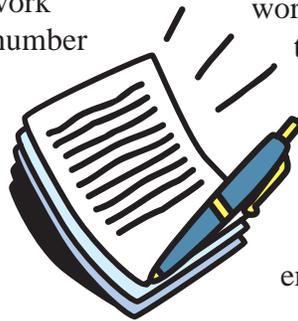
least one day entered in column K (number of days away from work). There can be no cases with entries in column K that do not also have a check mark in column H.

- For each case with a check mark in column I (job transfer or restriction case), there must be at least one day entered in column L (number of days on job transfer or restriction). Each case with an entry in column L must have a check mark in either column H or I.
- Each case must have one box checked in column M (injury or type of illness).

Total the columns

After all the cases have been reviewed, counting the entries and totaling the days becomes an easy task. Remember to include each page of the log if more than one page was needed to record all the cases. Enter “0” in the total if there are no cases (or days) in that column.

- The sum of columns G, H, I and J must equal the sum of columns M1 to M6.
- The total number of days away from work (column K) must not be less than the number of cases entered in column H.
- The total number of days of job transfer or restriction (column L) must not be less than the number of cases entered in column I.



Establishment information

The right side of the summary asks for some basic information about the work establishment, including the average annual number of workers and their total hours of work.

- Fill in the establishment’s name and address, and provide a brief description of the work done at that establishment.
- Provide the industry classification code for the establishment. You should already have a six-

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Recordkeeping packet
(651) 284-5042
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digit North American Industry Classification System (NAICS) code, the same NAICS code used to report employment and wages for unemployment insurance. NAICS codes are online at www.census.gov/epcd/naics02 and can be obtained from the Minnesota Department of Employment and Economic Development at (651) 297-2242.

- Computing the annual average number of employees who worked for the establishment during the year can be complicated for some businesses. A worksheet is provided on the back of the annual summary form. While the worksheet focuses on payroll employees, the OSHA recordkeeping rules also include as employees those nonpayroll workers that you supervise on a day-to-day basis. Owners of sole proprietorships and partners of partnerships are not considered employees.

- The average annual number of employees is not the same as the number of full-time-equivalent workers. Do not calculate the number of full-time-equivalent workers for this summary.
- The total hours worked by all employees, both those on the payroll and those nonpayroll workers subject to day-to-day supervision by your establishment, does not include paid time away from work. If you do not have ready access to this number, use the worksheet provided on the back of the form.

Certify the summary

Because the annual summary is an official federal form for business establishments, it is necessary for an officer of the business to sign the form to certify it is a correct and complete set of information about that establishment.

Post the summary

The summary must be posted in a conspicuous place so that all employees can see their worksite's injury and illness record and understand their worksite's health and safety environment.

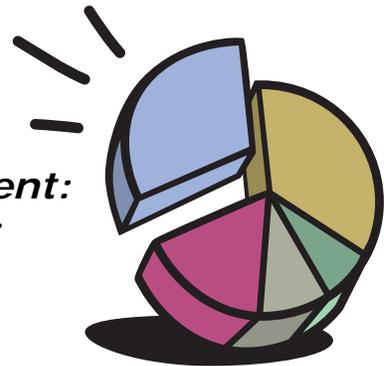
- A copy of the completed summary must be posted no later than Feb. 1 of the year following the year covered by the log. The summary must be kept posted until April 30.
- A copy of the summary must be posted in each work establishment. In some large

establishments, it may be necessary to post more than one copy. Post a copy in a conspicuous place where other notices to employees are customarily posted. You will need to periodically check that the summary is not altered, defaced or covered by other material.

Completing the annual summary does not mean the injuries and illnesses from the prior year can be put to rest. Once summarized, the injury and illness data becomes a tool for monitoring and improving your establishment's safety. There will be more on this in the next installment.

The OSHA log, the summary, any privacy case list and case incidence reports must be saved for five years following the end of the year that the records cover. This means that the log and summary for 2005 injuries and illnesses must be kept through 2010.

***Next installment:
Using your
log results***



ONLINE RESOURCES

Federal OSHA recordkeeping resources

- www.osha.gov/recordkeeping/index.html

MNOSHA recordkeeping resources

- www.doli.state.mn.us/recordkeeping.html

MNOSHA WSC recordkeeping training

- www.doli.state.mn.us/osheven.html

Survey of Occupational Injuries and Illnesses

- www.bls.gov/iif
- www.doli.state.mn.us/dlistats.html

Packet of recordkeeping forms, instructions

- www.osha.gov/recordkeeping/RKforms.html

Booklet: Minnesota OSHA recordkeeping requirement

- www.doli.state.mn.us/pdf/recordkeepingstandard.pdf