A9.751 RECORDING OCCUPATIONAL INJURIES AND ILLNESSES

1. Purpose

To set forth procedures for recording occupational injuries and illnesses of employees pursuant to Chapter 396, Hawaii Occupational Safety and Health Act and Title 12, Subtitle 8, Chapter 52, Recording and Reporting Occupational Injuries and Illnesses.

2. Objectives

a. To prescribe the systemwide procedures for recording occupational injuries/illnesses.

b. To prescribe and provide the necessary forms and supporting documents to record occupational injuries/illnesses in compliance with Hawaii Occupational Safety & Health (HIOSH) regulations.

3. References

a. Occupational Safety & Health Administration (OSHA) Record Keeping Guidelines (29 CFR 1904)

b. A Brief Guide to Recordkeeping Requirements for Occupational Injuries and Illnesses

c. Title 12, Chapter 52, Hawaii Administrative Rules

d. Administrative Procedures, A9.720, Worker’s Compensation

4. Applicability/Responsibility

The Personnel Officer/Administrative Officer or Designated Workers’ Compensation Coordinator (PO/AO/Designee) shall be responsible for recording the injuries/illnesses of employees in their respective departments and shall follow applicable administrative rules and University procedures pertinent to recording occupational injuries and illnesses and shall serve as the point of contact for the Department of Labor and Industrial Relations.
5. Guidelines

The purpose of Title 12, Chapter 52 is to ensure enforcement of Hawaii Occupational Safety and Health standards, to develop information regarding the causes and prevention of occupational injuries and illnesses, and to maintain a program of compilation and analysis of occupational safety and health statistics.

Recording Requirements: Under the HIOSH law, each occupational incident which results in a fatality, an illness, or an injury which involves either medical treatment (other than first aid), loss of consciousness, restriction of work or motion, or transfer to another job must be recorded on the OSHA 200 form as early as practical but no more than six (6) days after receiving information that a recordable incident has occurred.

Posting Requirements: A copy of the totals and information following the fold line of the last page for the year must be posted at each establishment in the place or places where notices to employees are customarily posted. This copy must be posted no later than February 1 and must remain in place until March 1.

6. Procedures

The PO/AO/Designee shall record the occupational injury/illness on the OSHA 200 form in accordance with the instructions provided below.

7. Forms - OSHA 200 (Attachment 1). Also available at OSHA website http://www.osha-slc.gov/OshDoc/Additional.html - scroll down to OSHA Forms and click on “OSHA 200 Form”)

Instructions

In order to be recordable, an incident must be occupational. An incident is presumed to be occupational if it happens on the employer’s premises. An incident is presumed NOT to be occupational if it happens off the employer’s premises UNLESS the employee is engaged in occupational activity, is present at the location as a condition of employment, or is in travel status and is engaged in work.

If the incident is not occupational, it is not recordable.

If the incident is occupational, determine if it is a fatality, an illness, or an injury.
An injury results from an instantaneous event; any other condition is an illness.

All occupational fatalities and illnesses are recordable.

Not all occupational injuries are recordable. In order to be recordable, an occupational injury has to involve one of the following:

- a. Medical treatment (other than first aid)
- b. Loss of consciousness
- c. Restriction of work or motion
- d. Transfer to another job.

To record an injury or illness, follow the instructions on the back of the OSHA 200 form. If the recordability of an incident is questionable, record it. If the incident is later deemed nonrecordable, line out the entry.
**Log and Summary of Occupational Injuries and illnesses**

**NOTE:** This form is required by Public Law 91-596 and must be kept in the establishment for 5 years. Failure to maintain and post can result in issuance of citations and assessment of penalties. (See posting requirements on the other side of form)

**RECORDABLE CASES:** You are required to record information about every occupational death; every nonfatal occupational illness; and those nonfatal occupational injuries which involve one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment (other than first aid). (See definitions on the other side of form)

<table>
<thead>
<tr>
<th>Case or File Number</th>
<th>Date of Injury or Onset of Illness</th>
<th>Employee’s Name</th>
<th>Occupation</th>
<th>Department</th>
<th>Description of Injury or Illness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enter a non-repeating number which will facilitate comparison with supplementary records.</td>
<td>Enter first name or initial, middle initial, last name</td>
<td>Enter regular job title, not activity employee was performing when injury occurred or at onset of illness. In the absence of a formal title, enter a brief description of the employee's duties.</td>
<td>Enter department in which the employee is regularly employed or a description of normal workplace to which employee is assigned, even though temporarily working in another department at the time of injury or illness.</td>
<td>Enter a brief description of the injury or illness and indicate the part or parts of the body affected. Typical entries for this column might be: Amputation of 1st joint right forefinger; Strain of lower back; Contact dermatitis on both hands; Electrocution - body.</td>
<td></td>
</tr>
</tbody>
</table>

(A) (B) (C) (D) (E) (F)

PREVIOUS PAGE TOTALS =>

TOTALS (Instructions on other side of form) =>

OSHA No. 200
### Forms of Injuries and Illnesses

<table>
<thead>
<tr>
<th>Fatality</th>
<th>Nonfatal</th>
<th>Illnesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fatality</td>
<td>Nonfatal</td>
<td>Illnesses</td>
</tr>
</tbody>
</table>

#### Extent of and Outcome of Injury

<table>
<thead>
<tr>
<th>Type of Injury</th>
<th>Extent of</th>
<th>Outcome of</th>
</tr>
</thead>
</table>

- **Fatalities**
  - Injuries with Lost Workdays
  - Injuries Without Lost Workdays

- **Nonfatal Illnesses**
  - Enter a DATE of death, mm/dd/yy
  - Enter a number of DAYS away from work or restricted work activity or both.

- **Illnesses with Lost Workdays**
  - Enter a number of DAYS away from work or of restricted work activity or both.

- **Illnesses Without Lost Workdays**
  - Enter a number of DAYS away from work or restricted work activity or both.

- **Certification of Annual Summary Totals**
  - Certification of Annual Summary Totals by: ______________________________
  - Title: ______________________________________________
  - Date: _____________

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**OSHA 200 POST ONLY THIS PORTION OF THE LAST PAGE NO LATER THAN FEBRUARY 1**
Instructions for OSHA No. 200

I. Log and Summary of Occupational Injuries and Illnesses

Each employer who is subject to the recordkeeping requirements of the Occupational Safety and Health Act of 1970 must maintain for each establishment, a log of all recordable occupational injuries and illnesses. This form (OSHA No. 200) may be used for that purpose. A substitute for the OSHA No. 200 is acceptable if it is as detailed, easily readable, and understandable as the OSHA No. 200.

Enter each recordable case on the log within six (6) workdays after learning of its occurrence. Although other records must be maintained at the establishment to which they refer, it is possible to prepare and maintain the log at another location, using data processing equipment if desired. If the log is prepared elsewhere, a copy updated to within 45 calendar days must be present at all times in the establishment.

Logs must be maintained and retained for five (5) years following the end of the calendar year to which they relate. Logs must be available (normally at the establishment) for inspection and copying by representatives of the Department of Labor, or the Department of Health and Human Services, or States accorded jurisdiction under the Act. Access to the log is also provided to employees, former employees and their representatives.

II. Changes in Extent of or Outcome of Injury or Illness

If, during the 5-year period the log must be retained, there is a change in an extent and outcome of an injury or illness which affects entries in columns 1, 2, 6, 8, 9, or 13, the first entry should be lined out and a new entry made. For example, if an injured employee at first required only medical treatment but later lost workdays away from work, the check in column 6 should be lined out and checks entered in columns 2 and 3 and the number of lost workdays entered in column 4.

In another example, if an employee with an occupational illness lost workdays, returned to work, and then died of the illness, any entries in columns 9 through 12 would be lined out and the date of death entered in column 8.

The entire entry for an injury or illness should be lined out if later found to be nonrecordable. For example, an injury which is later determined not to be work related, or which was initially thought to involve medical treatment but later was determined to have involved only first aid.

III. Posting Requirements

A copy of the totals and information following the total line of the last page for the year, must be posted at each establishment in the place or places where notices to employees are customarily posted. This copy must be posted no later than February 1 and must remain in place until March 1. Even though there were no injuries or illnesses during the year, zeros must be entered on the totals line, and the form posted.

The person responsible for the annual summary totals shall certify that the totals are true and complete by signing at the bottom of the form.

IV. Instructions for Completing Log and Summary of Occupational Injuries and Illnesses

Column A - CASE OR FILE NUMBER. Self Explanatory

Column B - DATE OF INJURY OR ONSET OF ILLNESS
For occupational injuries, enter the date of the work accident which resulted in the injury. For occupational illnesses, enter the date of initial diagnosis of illness, or, if absence from work occurred before diagnosis, enter the first day of the absence attributable to the illness which was later diagnosed or recognized.

Columns C through F - Self Explanatory

Columns 1 and 8 - INJURY OR ILLNESS-RELATED DEATHS - Self Explanatory

Columns 2 and 9 - INJURIES OR ILLNESSES WITH LOST WORKDAYS - Self Explanatory
Any injury which involves days away from work, or days of restricted work activity, or both, must be recorded since it always involves one or more of the criteria for recordability.
Columns 3 and 10 - INJURIES OR ILLNESSES INVOLVING DAYS AWAY FROM WORK - Self Explanatory

Columns 4 and 11 - LOST WORKDAYS -- DAYS AWAY FROM WORK. 
Enter the number of workdays (consecutive or not) on which the employee would have worked but could not because of occupational injury or illness. The number of lost workdays should not include the day of injury or onset of illness or any days on which the employee would not have worked even though able to work. NOTE: For employees not having a regularly scheduled shift, such as certain truck drivers, construction workers, farm labor, casual labor, part-time employees, etc., it may be necessary to estimate the number of lost workdays. Estimates of lost workdays shall be based on prior work history of the employee AND days worked by employees, not ill or injured, working in the department and/or occupation of the ill or injured employee.

Columns 5 and 12 - LOST WORKDAYS -- DAYS OF RESTRICTED WORK ACTIVITY. 
Enter the number of workdays (consecutive or not) on which because of injury or illness:
1. the employee was assigned to another job on a temporary basis, or
2. the employee worked at a permanent job less than full time, or
3. the employee worked at a permanently assigned job but could not perform all duties normally connected with it.

The number of lost workdays should not include the day of injury or onset of illness or any days on which the employee would not have worked even though able to work.

Columns 6 and 13 - INJURIES OR ILLNESSES WITHOUT LOST WORKDAYS - Self Explanatory

Columns 7a through 7g - TYPE OF ILLNESS. Enter a check in only one column for each illness.

TERMINATION OR PERMANENT TRANSFER - Place an asterisk to the right of the entry in columns 7a through 7g (type of illness) which represented a termination of employment or permanent transfer.

V. Totals
Add number of entries in columns 1 and 8.
Add number of checks in columns 2, 3, 6, 7, 9, 10 and 13.
Add number of days in columns 4, 5, 11 and 12.
Yearly totals for each column (1-13) are required for posting. Running or page totals may be generated at the discretion of the employer.

If an employee's loss of workdays is continuing at the time the totals are summarized, estimate the number of future workdays the employee will lose and add that estimate to the workdays already lost and include this figure in the annual totals. No further entries are to be made with respect to such cases in the next year's log.

VI. Definitions
OCCUPATIONAL INJURY is any injury such as a cut, fracture, sprain, amputation, etc. which results from a work accident or from an exposure involving a single incident in the work environment. NOTE: Conditions resulting from animal bites, such as insect or snake bites or from one-time exposure to chemicals, are considered to be injuries.

OCCUPATIONAL ILLNESS of an employee is any abnormal condition or disorder, other than one resulting from an occupational injury, caused by exposure to environmental factors associated with employment. It includes acute and chronic illnesses or diseases which may be caused by inhalation, absorption, ingestion, or direct contact.

The following listing gives the categories of occupational illnesses and disorders that will be utilized for the purpose of classifying recordable illnesses. For purposes of information, examples of each category are given. These are typical examples, however, and are not to be considered the complete listing of the types of illnesses and disorders that are to be counted under each category.

7a. Occupational Skin Diseases or Disorders. Examples: Contact dermatitis, eczema, or rash caused by primary irritants and sensitizers or poisonous plants; oil acne; chrome ulcers; chemical burns or inflammation, etc.

7b. Dust Diseases of the Lungs (Pneumoconioses). Examples: Silicosis, asbestosis and other asbestos-related diseases, coal worker's pneumoconioses, byssinosis, siderosis, and other pneumoconioses.

7c. Respiratory Conditions Due to Toxic Agents. Examples: Pneumonitis, pharyngitis, rhinitis or acute congestion due to chemicals, dusts, gases, or fumes; farmer's lung; etc.

7d. Poisoning (Systemic Effects of Toxic Materials). Examples: Poisoning by lead, mercury, cadmium, arsenic, or other metals; poisoning by
carbon monoxide, hydrogen sulfide, or other gases; poisoning by benzol, carbon tetrachloride, or other organic solvents; poisoning by insecticide sprays such as parathion, lead arsenate; poisoning by other chemicals such as formaldehyde, plastics, and resins; etc.

7e. Disorders Due to Physical Agents (Other than Toxic Materials). Examples: Heatstroke, sunstroke, heat exhaustion, and other effects of environmental heat, freezing, frostbite, and effects of exposure to low temperatures; caisson disease; effects of ionizing radiation (isotopes, X-rays, radium); effects of nonionizing radiation (welding flash, ultraviolet rays, microwaves, sunburn); etc.

7f. Disorders Associated with Repeated Trauma. Examples: Noise-induced hearing loss; synovitis, tenosynovitis, and bursitis. Raynaud's phenomena; and other conditions due to repeated motion, vibration, or pressure.

7g. All Other Occupational Illnesses. Examples: Anthrax, brucellosis, infectious hepatitis, malignant and benign tumors, food poisoning, histoplasmosis, coccidioidomycosis, etc.

MEDICAL TREATMENT includes treatment (other than first aid) administered by a physician or by registered professional personnel under the standing orders of a physician. Medical treatment does NOT include first aid treatment (one-time treatment and subsequent observation of minor scratches, cuts, burns, splinters, and so forth, which do not ordinarily require medical care) even though provided by a physician or registered professional personnel.

ESTABLISHMENT: A single physical location where business is conducted or where services or industrial operations are performed (for example: a factory, mill, store, hotel, restaurant, movie theater, farm, ranch, bank, sales office, warehouse, or central administrative office). Where distinctly separate activities are performed at a single physical location, such as construction activities operated from the same physical locations as a lumber yard, each activity shall be treated as a separate establishment.

For firms engaged in activities which may be physically dispersed, such as agriculture; construction; transportation; communications and electric, gas, and sanitary services, records may be maintained at a place to which employees report each day.

Records for personnel who do not primarily report or work at a single establishment, such as traveling salesmen, technicians, engineers, etc., shall be maintained at the location from which they are paid or the base from which personnel operate to carry out their activities.

WORK ENVIRONMENT is comprised of the physical location, equipment, materials processed or used, and the kinds of operations performed in the course of an employee's work, whether on or off the employer's premises.