



OSHA Recordkeeping Flowchart

What are my OSHA injury and illness recordkeeping requirements?

Did your company employ 10 or fewer people at all times in the last calendar year?
(If at any time the company had more than 10 employees, including temporary or seasonal workers, answer 'no'. Include yourself and partners.)

Yes

No

Is your NAICS code on the list of [Partially Exempt Industries](#)?

Yes

No

OSHA Recordkeeping is not required.
Only injuries on the OSHA Critical Injury Reporting Flowchart must be reported.

**OSHA
Recordkeeping
Required**

OSHA Recordkeeping Forms:

- Form 300: Log of Work-Related Injuries/Illnesses
- Form 301: Injury and Illness Incident Report
- Form 300A: Annual Summary of Work-Related Injuries/Illnesses

On an Annual Basis:

- Review Recordkeeping Forms for completeness & accuracy.
- Submit 300A data to OSHA if you meet one of the following criteria:
 - 250 or more employees and **not** in an industry listed in the [Partially Exempt Industries](#)
 - 20-249 employees and is a [Designated Industry](#)
- Also submit 300 and 301 data if you have 100 or more employees and are in an industry listed in [Appendix B to Subpart E of 29 CFR Part 1904](#).
 - Use the [ITA Coverage Application](#) to help determine submission requirements.
- Post Form 300A in the workplace from February 1 to April 30
- Retain all forms for 5 years following the year that they cover.

What is a 'Recordable Injury'?

OSHA has a test for determining a Recordable Injury:

1. **Did the employee experience an injury or illness?**
2. **Is the injury or illness work-related?**
 - a. Work-relatedness is presumed unless an exception specifically applies.
 - b. A case is presumed work-related if something in the work environment is the cause of the injury or illness or a significant aggravation of a pre-existing condition. A significant aggravation is when the following results:
 - Death, loss of consciousness, days away, days restricted, or job transfer, or medical treatment.
3. **Is the injury or illness a new case?**
 - a. It is a new case if that employee hasn't had this issue with this part of the body before.
 - b. It is a new case if the employee had a similar injury previously, but has since recovered completely, and a work event caused the symptoms to reappear.
4. **Does the injury or illness meet the general criteria?**
 - a. An injury is recordable when it results in one or more of these:
 - Death, days away from work, restricted work activity or transfer, **medical treatment beyond 'first aid'**, loss of consciousness, significant injury or illness diagnosed by a PLHCP. Examples of significant diagnosis: cancer, chronic irreversible disease, punctured eardrum, fractured or cracked bone or tooth.

If the above criteria are met, record the injury or illness within 7 calendar days.

Questions? Contact the Clark Insurance Safety & Risk Consulting team.

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