
RECORDING AND REPORTING OCCUPATIONAL INJURIES ILLNESSES – PART 1904

The Occupational Safety and Health Act of 1970 requires most private sector employers to prepare and maintain records of work related injuries and illnesses. These records include the OSHA Form No. 200, Log and Summary of Occupational Injuries and Illnesses, and the OSHA Form No. 101, Supplementary Record of Occupational Injuries and illnesses.

Employers Required to Keep Records

All employers with 11 or more employees in the following' industries; as determined by their Standard Industrial Classification (SIC), must keep injury and illness records:

- Agriculture, Forestry and Fishing (SIC's 01-02 and 07-09)
- Oil and Gas Extraction (SIC 13)
- Construction (SIC's 15-17)
- Manufacturing (SIC's 20-39)
- Transportation, Communications, and Public Utilities (SIC's 41-42 and 44-49)
- Wholesale Trade (SIC's 50-51)
- Building Materials, Hardware, Garden Supply and Mobile Home Dealers (SIC 52)
- General Merchandise Stores (SIC 53)
- Food Stores (SIC 54)
- Hotels, Rooming Houses, Camps, and Other Lodging Places (SIC 70)
- Repair Services (SIC's 75 and 76)
- Amusement and Recreation Services (SIC 79)
- Health Services (SIC 80)

Employers Normally Exempt, but Periodically Required to Keep Records

The following employers are normally exempt from these record keeping requirements unless notified in advance by- the Bureau of Labor Statistics (BLS) that they have been selected to participate in the mandatory Annual Survey of Occupational Injuries and Illnesses:

- 1) Employers who had no more than ten employees (full- and part-time) at any time during the previous calendar year; or
- 2) Employers who conduct business primarily in one of the following SIC's, regardless of the number of employees:

Retail Trade

55 Automotive Dealers and Gasoline service Stations

56 Apparel and Accessory Stores

57 Furniture, Home Furnishings and Equipment Stores

58 Eating and Drinking Places

59 Miscellaneous Retail

Finance, Insurance and Real Estate

60 Banking

61 Credit Agencies other than Banks

62 Security and Commodity Brokers, and Services

63 Insurance

64 Insurance Agents, Brokers and Services

65 Real Estate

67 Holding and other Investment Offices

Services

72 Personal Service

73 Business Services

78 Motion Pictures

81 Legal Services

82 Educational Services

83 Social Services

84 Museums, Botanical and Zoological Gardens

86 Membership Organizations

87 Engineering, Accounting, Research, Management, and Related Services

88 Private Households

89 Miscellaneous Services

These exemptions do not excuse any employer from coverage by OSHA or from compliance with all applicable safety and health standards (which may include other types of record keeping requirements).

The recordkeeping exemptions apply to all eligible workplaces under the jurisdiction of Federal OSHA. However, 25 states and territories operate their own OSHAs. Employers in the following areas should contact the state agency to determine if it has or intends to adopt the exemptions: Alaska, Arizona, California, Hawaii, Indiana, Iowa, Kentucky, Maryland, Michigan, Minnesota, Nevada, New Mexico, North Carolina, Oregon, Puerto Rico, South Carolina, Tennessee, Utah, Vermont, Virginia, Virgin Islands, Washington, and Wyoming. Connecticut and New York cover state and local government employees only.

Records That Must Be Kept

OSHA requires the use of OSHA Form No.200, the Log and Summary of Occupational Injuries, or an equivalent form. On the OSHA Log, employers provide some brief descriptive information and then use a simple check-off procedure to maintain a running total of occupational injuries and illnesses for the year. Authorized Federal and State government officials, employees, and their representatives are guaranteed access, upon request, to the injury and illness log for the establishment.

Employers are required to post an annual summary of occupational injuries and illnesses for the previous calendar year. The summary

must be posted no later than February 1 and must remain in place until March 1.

OSHA Form No.101 is used to supply supplementary information regarding each injury and illness entered on the log. This form names the person and describes the circumstances on his or her injury or illness. Substitute forms (such as workers' compensation reports) may be used if they contain all the specified information. Authorized government officials shall be provided access to these records also.

Injury and illness records shall be maintained at each workplace. In the absence of a regular workplace, records shall be maintained at some central location. The records shall be retained and updated for five years following the calendar year they cover.

Each workplace, regardless of the number of employees or type of business, must:

- Display either an OSHA or State poster containing information for employees, and
- Report to the nearest OSHA office within 8 hours all accidents that result in a work-related fatality or the hospitalization of three or more employees.

Lost Workday Injury (LWDI) Rate

The LWDI Rate is a useful tool for monitoring an establishment's injury severity. This measure represents the number of days lost per 100 full-time workers i.e., the number of days that injured employees were away from work or restricted in their work activity.

Calculation of the LWDI Rate

The first step in the calculation of the LWDI Rate is to determine the reference years. The number of years from which injury and employment data will be used in the calculation of the LWDI Rate is dependent upon the average number of employee hours worked or the average number of workers employed in the establishment during the previous 3 years.

- a) Average employee hours worked may be obtained, if available, from the payroll records for the years involved.
- b) Average annual employment may be determined by adding the number of workers employed in the establishment in

each month included in the reference years, totaling the sum of the monthly employment figures and dividing the total by the number of months involved, rounding to the nearest tenth. Count all full- and part-time workers, including seasonal, temporary, administrative, supervisory and clerical.

EXAMPLE: Monthly employment for 1990:

Jan.	0	April	30	July	0	Oct.	20	
Feb.	0	May	30	Aug.	0	Nov.	20	
March	20	June	0	Sept	20	Dec	20	
							Total	160

$$\frac{160 \text{ employees}}{12 \text{ months}} = 13.3 \text{ (Average Annual Employment)}$$

- For establishments with an average number of employee hours worked of less than 40,000 (20 x 2,000) hours or an annual employment of 20 or fewer employees in any of the 3 preceding years, use data from all 3 years.
- For establishments with an average number of employee hours worked of 40,000 or more or an average annual employment of more than 20 employees in each of the 3 preceding calendar years, use data from the past 2 years.

The LWDI Rate is calculated according to the following formula:

$$\text{LWDI Rate} = \frac{\text{No. LWDI's} \times 200,000}{\text{No. employees hours worked}}$$

Where:

No. of LWDI's = sum of LWDI's in the reference years.

No. of employee hours worked = sum of employee hours in the reference years.

200,000 = base for 100 full-time workers, working 40 hours per week, 50 weeks per year.

EXAMPLE

An establishment employed an average of 54 workers in 1991, 50 workers in 1990, and 50 workers in 1989. Therefore, injury and employment data for the 2 preceding calendar years will be used for the calculation.

No. LWDI's in 1990 = 5

No. LWDI's in 1991 = 3

No. Employees hours worked in 1990 – 100,000

No. Employees hours worked in 1991 – 108,000

$$\begin{aligned} \text{LWDI Rate} &= \frac{(5+3) \times 200,000}{100,000 + 108,000} \\ &= \frac{1,600,000}{208,000} \\ &= 7.69 \end{aligned}$$

NOTE: Calculations are generally carried out to the hundredths place as shown above and rounded to the tenths place. Round up for "5". The above value for LWDI Rate thus becomes 7.7.

The measuring of the above calculations is as follows: If 100 employees worked full-time at this establishment, about 7.7 lost workdays due to injuries would have been recording during the year. The LWDI Rate calculated for the establishment can be compared to the most recent national rate for manufacturing published by BLS.

The BLS Survey

Each year BLS selects about 280,000 firms to take part in a survey used to calculate the job injury and illness rates for various industries nationwide. All employers selected for the survey are required by law to participate. As noted previously, employers that are normally exempt from OSHA recordkeeping are notified of their selection for the survey prior to the calendar year to which the survey relates.

The survey is used to monitor OSHA's progress and to assist the agency in setting standards, evaluating existing standards, scheduling inspections, and evaluating the performance of states and territories which operate their own OSHA-approved safety and health programs.

For More Information

For official instructions on recording occupational injuries and illnesses please refer to the [Recordkeeping Guidelines for Occupational Injuries and Illnesses, 1986](#). You may obtain copies of the Guidelines and OSHA forms by calling the OSHA Area Office or the State OSHA Office in your jurisdiction.