

Hard hat & safety shoes must be worn beyond this point

Edwin G. Foulke, Jr.  
efoulke@laborlawyers.com  
(404) 240-4273

**OSHA Injury & Illness Recordability Worksheet\***

Name of Employee: \_\_\_\_\_ Date of Injury/Illness Onset: \_\_\_\_\_

Description of Injury or Illness: \_\_\_\_\_

(a) Where in the facility did the injury or illness occur? For example, break room, South Receiving dock, etc. Do not just list "office" or "warehouse" – be specific. \_\_\_\_\_

(b) What piece of equipment, item, product, etc. caused the injury or illness? \_\_\_\_\_

(c) What was the injury or illness the employee experienced? \_\_\_\_\_

Right or left side, hand, eye, etc. \_\_\_\_\_  
If a finger or toe injury, which digit? \_\_\_\_\_

**\*\*All of your responses to (a)-(c) above should be captured in your explanation of the injury/illness in Column F of the OSHA 300 Log, once you've determined whether the injury/illness should be recorded.\*\***

***I. Did the Injury/illness occur in the work environment?***

Yes, please explain:



If the injury/illness occurred in the work environment move to Section II.

No, please explain:



If you do not believe the injury/illness occurred in the work environment, or if you are unsure, contact counsel to confirm the event is not recordable. Once confirmed, move to Section IX.

**II. Is the Injury or Illness a New Case?**

Yes, please explain:

No, please explain:



If the injury/illness is a new case move To Section III.



If the injury/illness is not a new case or you are not sure if the case is new or not contact counsel to make a determination. If you determine it is not a new case. The incident is NOT recordable as a new entry, however, you must update the previously recorded entry (assuming it occurred in the last 5 years). Move to Section IX.

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**III. Does the injury/illness meet any of the following exceptions for recordability despite having occurred in the workplace?**

Employee was on the premises as a member of the general public. \_\_\_\_\_

Symptoms were the result of **voluntary** participation in a wellness or recreational event. \_\_\_\_\_

Symptoms were related to a common cold or flu or similar non-work related disease. (note: Pandemic flu may recordable in certain circumstances) \_\_\_\_\_

Symptoms were the result of personal self medication, grooming, or intentionally self-inflicted. \_\_\_\_\_

Symptoms were the result of a mental illness that has not been confirmed by a LHCP to be work related. \_\_\_\_\_

Symptoms surfaced at work **but** were the **sole** result of a non-work related event or exposure that occurred outside the work environment. \_\_\_\_\_

Symptoms were the sole result of the **personal preparation** or consumption of food or drink. \_\_\_\_\_

Symptoms were the result of a personal task performed **outside** of normal work hours. \_\_\_\_\_

Incident involved a motor vehicle accident while the employee was in the **act of commuting**. \_\_\_\_\_

Did not result in a significant aggravation of a pre-existing condition. \_\_\_\_\_

Yes, the injury/illness meets the exception checked above because:

Attach any supporting documentation for your decision to this document.

No, the injury/illness does not meet any of the above exceptions.

If you believe that the event may meet one of the exceptions for recordability, contact counsel to confirm that the event is not recordable. Once confirmed, move to Section IX.

If the injury/illness does not meet any of the exceptions move to Section IV.

**IV. Did the incident result in any of the following?** Circle all that apply.

- Death
- Days Away From Work
- Restricted Work
- Job Transfer
- Loss of Consciousness
- Significant Injury/Illness Diagnosed by a LHCP

Yes. Provide details:

No.

The incident is recordable\*. Move to Section IX.

If none of the above apply, move to Section V.

\*If you circled more than one outcome above, only record the most serious outcome circled above on the 300 log in one of the Columns (g) through (j). However, you must still count the less serious outcome's days in Column(s) (k) and/or (l).

**V. Did the employee visit a licensed health care professional?**

Yes. Provide details:

No.

Move to Section VI.

Move to Section VII.

**VI. Was the visit with the LHCP's limited to the following? In other words, no medical treatment (as defined in the regulations – see definition section below) was provided and nothing other than those items circled below occurred at the visit.** Circle all that apply.

- Observation
- Counseling
- X-Ray's
- Blood Test
- Other Diagnostic Testing
- Administration of Medication ONLY for purposes of performing diagnostic Testing

Yes. The employee's visit to the LHCP did not include any "medical treatment" and was limited to the items circled above. Specifically, other diagnostic tests performed were as follows:



Move to Section VII.

No. Employee received medical treatment during employee's visit to the LHCP including the following:



If medical treatment was provided, or you are not sure if medical treatment was provided contact counsel to make a determination. If you determine medical treatment was provided, move to Section VIII.

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**VII. Did the employee provide any treatment to himself?**

Yes. Provide details:



Move to Section VIII.

No.



The injury is not recordable.  
Move to Section IX.

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**VIII. Did the treatment fall within any of the following categories of "First Aid?"**

- Use of nonprescription medication at nonprescription strength.
- Tetanus immunization.
- Cleaning, flushing or soaking of surface wounds.
- Use of wound coverings such as bandages, gauze pads, butterfly enclosures or Steri-Strips.
- Use of hot or cold therapy.
- Use of non-rigid means of support; i.e., elastic bandages, wraps, non-rigid back belts, etc.
- Use of temporary immobilization devices while transporting an accident victim.
- Drilling of a fingernail or toenail to relieve pressure or draining of fluid from a blister.
- Removal of foreign bodies from the eye using **only** irrigation or cotton swabs.
- Removal of splinters or foreign materials from areas other than the eye using irrigation, tweezers, cotton swabs or other simple means.
- Use of finger guards.

\_\_\_\_\_ Use of simple massages. Note: physical therapy or chiropractic treatment is considered to be medical treatment.

\_\_\_\_\_ Drinking fluids for relief of heat stress.

\_\_\_\_\_ Use of eye patches.

Yes, the injury/illness was treated ONLY as marked above:

Attach any supporting documentation for your decision to this document.



The injury/illness is **not** recordable. Move to Section IX.

No, the injury/illness was not treated ONLY by the above first aid "exceptions," but the employee received other treatment as follows:

Attach any supporting documentation for your decision to this document.



The injury/illness is recordable. Move to Section IX.

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### IX. Summary of Findings

Based on the above analysis:

\_\_\_\_\_ The injury or illness is recordable. **Proceed to complete the OSHA 300 log.**

\_\_\_\_\_ The injury or illness is NOT recordable because:

\_\_\_\_\_ It did not occur in the work environment

\_\_\_\_\_ It occurred in the work environment but met one of the exceptions in Section III.

\_\_\_\_\_ It did not meet any of the criteria for recordability – death, lost workdays, loss of consciousness, transfer to another job, or medical treatment beyond first aid.

\_\_\_\_\_ Other reasoning: \_\_\_\_\_

\_\_\_\_\_ The injury or illness is NOT recordable as a new entry, but the previous entry must be updated with the new information (assuming the previous injury/entry was within the last 5 years). **Proceed to update the appropriate prior OSHA 300 log.**

Name of Evaluator: \_\_\_\_\_

Signature: \_\_\_\_\_

Date of Evaluation: \_\_\_\_\_

List the supporting documents attached:

Other Comments or Notes:

*\*This worksheet is intended only as a guide to assist the employer in analyzing the issues relevant to making a determination as to recordability of a workplace injury or illness. Each injury or illness will require a specific evaluation of the facts in determining recordability. Not all scenarios can be accounted for and this worksheet should not be construed to provide legal advice regarding the recordability or non-recordability of a particular injury or illness. Contact Edwin G. Foulke, Jr. at (404) 240-4273 or [efoulke@laborlawyers.com](mailto:efoulke@laborlawyers.com), co-chair of the firm's Workplace Safety and Catastrophe Management Practice Group or your Fisher & Phillips attorney to provide more detailed advice on the recordability of an injury or illness.*

## Definitions & Explanations

### **Section 1904.5 Determination of work-relatedness**

**(a) Basic requirement.**

You must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless an exception in Section 1904.5(b)(2) specifically applies.

**(b) Implementation.**

*(1) What is the "work environment"?*

OSHA defines the work environment as "the establishment and other locations where one or more employees are working or are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of his or her work."

### **Section 1904.6 Determination of new cases**

**(a) Basic requirement.**

You must consider an injury or illness to be a "new case" if:

(1) The employee has not previously experienced a recorded injury or illness of the same type that affects the same part of the body, or

(2) The employee previously experienced a recorded injury or illness of the same type that affected the same part of the body but had recovered completely (all signs and symptoms had disappeared) from the previous injury or illness and an event or exposure in the work environment caused the signs or symptoms to reappear.

### **Section 1904.7. Medical Treatment/First Aid**

"Medical treatment" means the management and care of a patient to combat disease or disorder. For the purposes of Part 1904, medical treatment does not include:

- A. Visits to a physician or other licensed health care professional solely for observation or counseling;
- B. The conduct of diagnostic procedures, such as x-rays and blood tests, including the administration of prescription medications used solely for diagnostic purposes (e.g., eye drops to dilate pupils); or
- C. "First aid" as defined in paragraph (b)(5)(ii) of this section.

paragraph (b)(5)(ii), defines first aid as follows:

- A. Using a nonprescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes).
- B. Administering tetanus immunizations (other immunizations, such as hepatitis B vaccine or rabies vaccine, are considered medical treatment).
- C. Cleaning, flushing or soaking wounds on the surface of the skin;
- D. Using wound coverings, such as bandages, Band-Aids®, gauze pads, etc.; or using butterfly bandages or Steri-Strips® (other wound closing devices, such as sutures, staples, etc. are considered medical treatment);
- E. Using hot or cold therapy;
- F. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
- G. Using temporary immobilization devices while transporting an accident victim (*e.g.*, splints, slings, neck collars, back boards, etc.)
- H. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- I. Using eye patches;
- J. Removing foreign bodies from the eye using only irrigation or a cotton swab;
- K. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs, or other simple means;
- L. Using finger guards;
- M. Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes);
- N. Drinking fluids for relief of heat stress.

This list of first aid treatments is comprehensive, *i.e.*, any treatment not included on this list is not considered first aid for OSHA recordkeeping purposes. OSHA considers the listed treatments to be first aid regardless of the professional qualifications of the person providing the treatment; even when these treatments are provided by a physician, nurse, or other health care professional, they are considered first aid for recordkeeping purposes.

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