



Auto Dealers Will Soon Have To Maintain OSHA 300 Recordkeeping

Insights

11.03.14

Come January 1, 2015, OSHA's newly announced Recordkeeping changes will most harshly affect manufacturers but the largest group affected is auto dealers.

The inclusion of auto dealers in the list of employers who must now maintain OSHA 300 Logs and post the OSHA 300(a) Injury Logs is not as significant a change as having to report every single hospitalization and the loss of even a fingertip, but if not effectively managed will create significant legal problems for dealers. Currently, auto dealers are not a particular focus of OSHA, and do not experience that many recordable injuries, but once their data is eventually entered into OSHA's system, we will inevitably see more attention directed toward dealers.

The biggest immediate problem is that many dealers will mishandle the OSHA recordkeeping. Even the increasingly large dealership groups often do not have a well-developed corporate safety function and dealership safety duties fall on a number of different personnel. Probably a clerical will maintain the records, perhaps the same person handling workers' comp paperwork. OSHA, workers' comp and wage-hour recordkeeping are very different and absent training, some dealers will mishandle the logs. An effort to coordinate the records from corporate will also create problems.

Here are a few suggestions for those of you soon to be required to maintain OSHA Injury and Illness Recordkeeping:

1. Relax, it's not that bad.
2. OSHA recordkeeping differs a lot from workers' comp recordkeeping.
3. Seemingly "nitpicky" details count. Go to the "Recordkeeping" page on OSHA.gov. and first print the OSHA 300 Log. This is the main document. Then print the Form 301, which is similar if not identical to most states' workers comp First Report of Injury form. Read the Instruction Guide associated with the Form 300 you printed. When you have specific questions, go to the "OSHA Recordkeeping Handbook on the Recordkeeping page.
4. Pay attention to instructions about which and how many columns to check.
5. Read carefully the definitions of "first aid" events which are not recordable injuries.

6. Remember that OSHA Recordkeeping bends over backwards to count an injury as “recordable.”
 7. Do not forget to have the top executive in the location sign the form when you post it each year. Save the copy you signed. Many employers retain the logs electronically which obviously are unsigned.
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