

## **OSHA RECORDKEEPING REVISIONS IN EFFECT JANUARY 1**

Be aware that the Occupational Safety and Health Administration (OSHA) has issued its final version of new recordkeeping requirements effective January 1, 2002 and the Vermont Occupational Safety and Health Administration (VOSHA) has adopted the same provisions. The rules represent the first truly comprehensive overhaul of such requirements in 30 years. While cities and towns will need to get up to speed quickly to ensure compliance, the initial focus will be on compliance assistance rather than on enforcement.

This final ruling follows more than five years of proposed rules being available publicly for analysis and discussion. It should be noted that the imposition of some controversial aspects of the proposed rules with which OSHA has been struggling have been postponed for at least a year. These include the criteria for identifying job-related musculoskeletal disorders (ergonomic injuries) as well as for recording work-related hearing loss.

Some highlights of the new rules include:

- New forms: Replacement forms for recording work-related injury and illness information (form 300, the Log of Work-Related Injuries and Illnesses and form 101 the OSHA Injury and Illness Incident Report,) as well as an additional form (300A, the Summary of Work- Related Injuries and Illnesses) for use as the annual summary.

- For privacy, names must be withheld from the OSHA 300 Log.

- Posting of the annual summary must be for three months instead of one; it must state the annual average number of employees and total hours worked by all covered employees; and it must be certified by an executive;

- Examples of changes affecting recording criteria include:

1. Minor illnesses are no longer recordable.
2. Aggravation of a pre-existing condition is only recordable if “significant.”
3. Parking lot vehicle accidents are recordable when occurring during a work-related task.
4. Common colds or flu are not recordable even if contracted at work.
5. Mental illness is recordable only with a written professional opinion of work-relatedness.

Packets containing the newly required forms will be sent out to employers. Additionally, OSHA has established a new web page [www.osha-slc.gov/recordkeeping](http://www.osha-slc.gov/recordkeeping) from which forms can be downloaded; the site also provides an outline of the major changes and provides a side-by-side comparison of the old and new requirements. The OSHA forms can also be downloaded from VOSHA’s web site, which can be found at [www.state.vt.us/labind](http://www.state.vt.us/labind) by clicking on VOSHA Home Page. VOSHA’s site also includes frequently asked questions and other helpful information such as upcoming trainings, ergonomics standards, available videos and more. For those who prefer not to use the Internet, written materials on recordkeeping requirements are available from OSHA’s publications office by calling 800/321-OSHA or by calling VOSHA at 802/828-2765.

- Jill Muhr, VLCT Human Resources Administrator

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