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## **Employers Must Begin Using OSHA's New Log 300 on January 1, 2002**

This CSRMA Bulletin covers the new OSHA Log 300 system for recording occupational injuries and illnesses.

The OSHA Log 300 record keeping system for recording occupational injuries and illnesses was adopted by federal OSHA on January 19, 2001 and must be implemented by employers nationwide *beginning January 1, 2002*. It is codified in 29 CFR §1904.

In California, this federal record keeping system (with minor differences) is adopted by reference in 8 CCR §14301.

We are providing this compliance information as the first in a series to assist CSRMA members with the transition to the new reporting form. CSRMA Risk Control will provide members with easy-to-understand instructions for completing the new reporting log throughout 2001. It is important that members begin learning the many changes from OSHA's current system for reporting occupational injuries and illnesses (Log 200) as every Cal/OSHA inspection can include a review of the employer's log.

The 310 citations issued in 1999 for Log 200 record keeping system violations ranked fourteenth in standards cited. It is likely that this ranking will increase in 2002, as employers struggle with the new system and Cal/OSHA checking the log to ensure proper implementation.

In California, all governmental employers with more than ten (10) employees are covered. Furthermore, governmental employers in California are subject to monetary penalty after January 1, 2000 due to AB 1127 (Steinberg) for violations of this record keeping requirement.

### **Major Form Changes**

Log 300 is a modernized version of the Log 200. The information required to complete the form generally is the same; however the Log 300 requires, in addition to the employee name (with exceptions), job title, date of injury and description of injury or illnesses; and where the injury or illness occurred.

The formerly required "lost time" has been eliminated as too difficult to define. Included in the remaining categories are the terms: "death," "days away from work" and "remained at work," which includes job transfers or restrictions and other recordable cases.

Another notable departure from the Log 200 form is the elimination of the major distinctions between "injuries" and "illnesses" in completing the form. Instead, injuries and illnesses are subject to the same fields of data entry, except for the last column, which requires checking the correct box for one of the following:

- ✓ injury;
- ✓ musculoskeletal disorder;
- ✓ skin disorder;
- ✓ respiratory condition;
- ✓ poisoning;
- ✓ hearing loss; and
- ✓ all other illnesses

There is a place to total the numerical data on the form. However, unlike the Log 200 form, the Log 300 does not become the annual summary that must be posted. Instead, there is a new form: “Form 300A Summary of Work-Related Injuries and Illnesses”.

Form 300A must be completed at the end of each calendar year by every employer and posted in the workplace. The posting requirement is no longer for the month of February, but from February 1 to April 30. In addition, the Form 300A summary not only requires a numerical summary of cases divided by severity, the number of days of transfer and work restriction or days away from work, and totaling the types of cases, but requires employer industrial classification information and a calculation of total hours worked by all employees during the year covered, and the average number of employees.

Enclosed in this Bulletin is the 12-page guidance document provided by OSHA. It includes a sample form and detailed instructions. **PLEASE NOTE: The Log 200 MUST be completed for this year(2001). The Log 300 must be implemented beginning in January, 2002.**

**CSRMA Risk Control is available to answer questions on the new OSHA Log 300 and other risk control and loss prevention issues at:**

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**-or-**

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