Newly Effective OSHA Rule Changes Recordkeeping and Reporting Requirements

JANUARY 29, 2015

The Occupational Safety and Health Administration's ("OSHA") updated recordkeeping and reporting rule which became effective on January 1, 2015 ("Rule"), makes significant changes to requirements applicable to colleges and universities. First, the Rule classifies colleges and universities as being engaged in a low hazard industry and, therefore, partially exempt from recordkeeping and reporting requirements. As partially exempt entities, colleges and universities are no longer required to keep an injury and illness log (OSHA Form 300) or to post the annual summary of work-related injuries and illnesses (OSHA Form 300A).

Second, the Rule expands the list of severe work-related injuries and illnesses that all covered employers are required to report to OSHA. The Rule now requires reporting of: (1) work-related fatalities within 8 hours; (2) work-related inpatient hospitalizations, all amputations and all losses of an eye within 24 hours. However, employers are not required to report fatalities occurring more than thirty days after a work-related incident or an in-patient hospitalization, amputation or loss of an eye if they do not occur within twenty-four hours of the work-related incident.

Required reporting of severe work-related injuries and illnesses can be made by: (1) telephone to the nearest OSHA office during business hours; (2) telephone to the 24-hour OSHA hotline at 1-800-321-OSHA; or (3) by using a soon to be active electronic report format hosted on OSHA's website, www.osha.gov.

Client Tip: *While institutions are no longer required to keep an injury and illness log or to post an annual summary of work-related injuries and illnesses, maintaining such records for use in evaluating the workplace for potential hazards and to develop and test the effectiveness of preventive measures as part of a workplace safety program will go a long way to demonstrating compliance with your general duty under The Occupational Safety and Health Act ("Act") to provide a workplace free from serious recognized hazards and comply with standards, rules and regulations issued under the Act.*

©2024 Bowditch & Dewey LLP. All Rights Reserved.