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The Occupational Safety and Health Administration's revised recordkeeping rule includes two key changes:



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First, the rule updates the list of industries that are exempt from the requirement to routinely keep OSHA injury and illness records, due to relatively low occupational injury and illness rates. The previous list of industries was based on the old Standard Industrial Classification (SIC) system and injury and illness data from the Bureau of Labor Statistics (BLS) from 1996, 1997, and 1998. The new list of industries that are exempt from routinely keeping OSHA injury and illness records is based on the North American Industry Classification System (NAICS) and injury and illness data from the Bureau of Labor Statistics (BLS) from 2007, 2008, and 2009. Note: The new rule retains the exemption for any employer with ten or fewer employees, regardless of their industry classification, from the requirement to routinely keep records.

News & Notes

- The rule expands the list of severe work-related injuries.
- New requirements start on January 1, 2015
- All employers under OSHA jurisdiction must report fatalities, in-patient hospitalizations, amputations, and losses of an eye to OSHA, even if they are exempt from routinely keeping OSHA records.

Second, the rule expands the list of severe work-related injuries that all covered employers must report to OSHA. The revised rule retains the current requirement to report all work-related fatalities within 8 hours and adds the requirement to report all work-related in-patient hospitalizations, amputations and loss of an eye within 24 hours to OSHA.

Establishments located in States under Federal OSHA jurisdiction must begin to comply with the new requirements on January 1, 2015.

OSHA Reporting: Who Keeps Records?

There are two classes of employers that are partially exempt from routinely keeping injury and illness records.

First, employers with ten or fewer employees at all times during the previous calendar year are exempt from routinely keeping OSHA injury and illness records. OSHA's revised recordkeeping regulation maintains this exemption.

Second, establishments in certain low-hazard industries are also partially exempt from routinely keeping OSHA injury and illness records. Starting on January 1, 2015 there will be a new list of industries that will be partially exempt from keeping OSHA records.

[Fact sheet on who must keep records](#)

Remember, OSHA states that companies who have direct control and supervision over temporary and leased employees are to report incidents on their OSHA log. Employer Flexible can provide you with information to assist you but it is the responsibility of the client company to complete these logs.





News & Notes

- A number of OSHA standards require employers to have written compliance programs.
- Written safety Programs are site specific.
- Employer Flexible can assist with making an assessment of your written safety programs.

Site—Specific Written Safety Programs

A formal written safety and health program serves as a framework for systematically detecting and correcting OSHA violations, as well as for remedying hazards not covered by OSHA standards.

The written programs also focuses the company's work practice rules and employee training by showing where safety rule development, enforcement and training is needed.

A number of OSHA standards require employers to have written compliance programs. The most far-reaching is the hazard communication program, which affects most employers. Other written program requirements include blood borne pathogens, respiratory protection, personal protective equipment and process safety management of highly hazardous chemicals. These programs can be incorporated into the general safety and health program.

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Commonly Required Written Safety Programs

From a Best Practice standpoint, companies are required to have these written safety programs. Some or all of these may apply to your operation. Risk Control personnel from Employer Flexible can assist you in making this assessment.

- Bloodborne Pathogen, CPR and First Aid
- Confined Space Entry Program
- Electrical Safety - including Assured Equipment Grounding & Lockout/Tagout programs
- Emergency Action Plan
- Fire Prevention, Fire Protection and Fire Extinguishers
- Fall Protection (if working at heights)
- Fleet Safety Program - policy on driver qualifications and use of electronic devices
- Hand and Power Tools
- Hazard Communication/Global Harmonization System (GHS)
- Hazardous Materials and Handling
- Hearing Conservation Program - when noise levels are 85 dBA or higher
- Hydrogen Sulfide Gas (Oil and Gas industry specific)
- Ladders and Stairways
- Lifting, Cranes and Hoists - including slings and chains
- Machine Guarding
- Personal Protective Equipment (PPE) - certified specific use of PPE and type required?
- Powered Industrial Trucks (Forklifts)
- Respiratory Protection - if employees wear respirators
- Short Service Employee - use of temporary employees at your location
- Walking and working surfaces
- Welding, Cutting, Brazing and Hot Work Permitting