It's Time to Post Your OSHA Form 300A

Employers with 10 or more employees must post their completed OSHA Form 300A by Feb. 1 and keep it posted in their workplace until April 30.

The form must be posted where the company usually posts other employee notices, like minimum wage and workplace safety notices. Form 300A summarizes the total number of fatalities, missed workdays, job transfers or restrictions, and injuries and illnesses as recorded on Form 300.

The Annual Summary (Form 300A) requires the following information from the Form 300 Log:

- The total number of non-first-aid occupational injury and illness cases.
- The total number of cases with days away from work and cases with job transfer or restriction, and total number of other recordable cases.
- The cumulative total number of days from all injuries or illnesses, including days away from work and job transfer restrictions.
- The number of occupational injury/illness cases, including skin disorders, respiratory conditions, poisoning, hearing loss and all other illnesses.

Despite the form being relatively simple, many employers make mistakes filling it out. Here are the most common errors:

Keeping one log for multiple locations — Employers are required to keep one OSHA 300 Log per location where they have employees and that is in operation for a year or longer. The corresponding 300A form must also be posted at each location.

Improperly certifying the log — Under regulations, a company executive must certify the 300 Log and the 300A Annual Summary Form. An executive is defined as:

- An owner of the company,
- An officer of the corporation,
- The highest-ranking company official working at the location, or
- The immediate supervisor of the highest-ranking company official working at the location.

Listing all workers' compensation cases — Only the injuries listed under the regulations must be included in the log. But deciphering OSHA's recordkeeping rules to determine if an employee's injury or illness is recordable is challenging.

The requirements and definitions differ significantly from those established under state workers' compensation laws and, while there may be some overlap, some cases may be one and not the other.

It is important to only record and report those injuries that are required under the regulations, which require that an employer must record a work-related injury or illness if it results in one or more of the following:

- Death
- Days away from work
- Restricted work
- Transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- Diagnosis by a physician or health care professional of a significant injury or illness.

Failing to record temp worker injuries — Regulations require that company employees and contract labor or temp worker injuries must be included in the OSHA 300 and OSHA 300A logs. The key is that the company must be in direct supervision of those workers.

Failing to post the form when there were no recordable injuries or illnesses — This is one of the most common mistakes that employers make. They think since they had no workplace injuries, the form does not need to be posted. That would be incorrect.

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