Five (5) Checklist Items for OSHA General Recordkeeping

The OSHA Small Business Handbook is intended to help small businesses meet the legal requirements imposed by the Occupational Safety and Health Act, and “achieve an in-compliance status before an OSHA inspection. As always regarding OSHA standards, be aware that 24 states have their own OSHA-approved safety and health programs. Based on the Self-Inspection checklist offered in the Handbook, there are five specific recordkeeping requirements.

In addition, the Handbook recommends organizations document their activities relative to a workplace safety and health program or activity. OSHA is currently considering an update to the current 1989 voluntary guidelines for safety and health programs.

Importantly, good recordkeeping will be evidence of “good faith in reducing any penalties from OSHA inspections”. (Handbook, page 11)

The checklist offers five (5) assessment considerations for general industry recordkeeping:

1. Are occupational injuries or illnesses, except minor injuries requiring only first aid, recorded as required on the OSHA 300 log?

See Five (5) Steps for OSHA Injury and Illness Recordkeeping Requirements (5-02-2016). Employers falling within the NAICS Code, 4441, Building material and supplies dealers, must comply with OSHA injury and illness recordkeeping. Small businesses with 10 or fewer employees throughout the year are exempt from most of the requirements of the OSHA recordkeeping rules for injuries and illnesses; however, all employers must report all work-related fatalities within 8 hours and all work-related inpatient hospitalization, all amputations and all losses of an eye within 24 hours. Only fatalities occurring within 30 days of a work-related incident, and only an in-patient hospitalization, amputation, or loss of an eye that occur within 24 hours of the work-related incident, must be reported to OSHA. Employers may report to OSHA by calling a designated 1-800 number, calling the closest OSHA Area Office, or using an online form. See OSHA’s Reporting Fatalities and Severe Injuries/Illnesses for more information.

2. Are employee medical records and records of employee exposure to hazardous substances or harmful physical agents up-to-date and in compliance with current OSHA standards?

OSHA’s Hazard Communication Standard (HazCom) triggers a number of recordkeeping requirements, including having on file an up-to-date Hazard Communication Program. Safety Data Sheets required by HazCom must also be maintained and accessible by employees.

3. Are employee training records kept and accessible for review by employees, as required by OSHA standards?

There are a number of training records expected in the LBM sector, including forklift training, Hazard Communication training, training in the operation of potable fire extinguishers if fire extinguishers are made available for use by designated employees.
For example, among the most frequently cited violations of OSHA standards in the LBM sector is Standard 1910.157 on portable fire extinguishers. Standard 1910.157(g) requires employers to provide an educational program to familiarize employees with the general principles of fire extinguisher use and to train designated employees to use the fire extinguishers available and accessible at the workplace.

4. Have arrangements been made to retain records for the time period required for each specific type of record? (Some records must be maintained for at least 40 years.)

Injury and illness logs must be retained for 5 years after the occurrence of a reportable incident. Records considered to be “medical records” must be maintained for 30 years.

5. Are operating permits and records up-to-date for items such as elevators, air pressure tanks, liquefied petroleum gas tanks, etc.?

Know your recordkeeping requirements. Do an internal audit of all required records – how they are compiled and where they are retained.

For example, portable fire extinguishers must be visually inspected monthly and must undergo an annual maintenance check pursuant to the requirements of OSHA Standard 1910.157. Standard 1910.157(c) requires the employer to record the annual maintenance date and retain this record for one year after the last entry or the life of the fire extinguisher, whichever is less. The record must be made available to OSHA upon request.

Was this helpful? How could we improve the information to make it more relevant to your business? Do you have your own checklist or audit that you can share with us? Please let us know.