

## Question & Answers for Recordkeeping Participants:

Q: Does closure of a wound using super glue constitute Medical Treatment or First Aid?

A: It is Medical Treatment. If the item is not specifically listed as First Aid, it is Treatment.

Q: In the case of someone having an epileptic seizure at work, is it recordable? What if they hit their head, break a bone, etc. when the seizure occurs?

A: Epileptic seizures are not work related unless the seizures occur as a result of a work injury. In most instances, it is not work related. You also would not record any additional injuries that happen solely as a result of the seizure occurring in the work environment.

Q: Are injuries occurring during breaks work related since the person is paid for this time?

A: It depends on where the employee is when the injury occurs. If they are at the workplace, it would be work related. If they have left the workplace, such as going to a local restaurant, or off the premises for the break, the injury would not be work related and would not be recorded on the 300 log.

Q: Since you do not record injuries which occur while the individual is commuting, do you consider an injury to be work related if it is in a company owned/maintained parking lot?

A: A commuter must have parked their car and started walking into the building. For example: If an individual slams their finger in their car door, it would not be work related. If they trip after they start walking across the parking lot, it would be. Injury to an employee who walks to work would not be recordable unless it happens on company property. An injury is recordable if they were walking somewhere as a work activity regardless of where it happened.

Q: How do you decide when an employee enters the workplace when coming to work in the morning?

A: The question you need to ask yourself is--At what point does the employer have control over removing or fixing hazardous conditions? If they are responsible for repairs to the parking lot, it starts there. If they own and maintain the sidewalks, it starts there. It may be that the employer's control over hazards does not start until the employee enters the front door of their business.

Q: When would a heart attack be work related?

A: When there is a medical diagnosis that mental or physical stress from work activities contributed to the heart attack.

Q: Is there any time when an injury of a student would be recordable on the 300 log?

A: Yes. If the student is receiving remuneration and/or is covered by Workers Compensation.

Q: Is the administration of oxygen medical treatment?

A: Usually. OSHA considers most uses of oxygen medical treatment because oxygen administration is a treatment that can only be provided by trained medical personnel, uses relatively complex technology, and is used to treat serious injuries and illnesses. However, if oxygen is administered as a purely precautionary measure to an employee who does not exhibit any symptoms of an injury or illness, the case is not recordable

Q: Can any employee at a workplace ask to see all the 301 forms as well as the 300 log?

A: Employees are only given a copy of their own 301 form assuming they have a recordable injury. All employees also have a right to receive a copy of the entire 300 log for their workplace.

Q: Are employers ever required to post any part of the 300 log?

A: No. The only posting requirement in the 300 rules is the requirement to post the 300A (Summary Sheet) from Feb. 1 through April 30.

Q: When you have a large employer with multiple establishments doing the same type of work, or an entity like a county that has distinctly different divisions performing different work, do you keep one 300 log or one for each establishment?

A: You would keep one for each separate establishment, or Standard Industrial Classification. For example, a county might have a fire department, water department, roads, etc. You would need to be able to pull out information regarding each department's 300 entries. The summary sheets posted from February 1 through April 30 each year would reflect the injuries for the worksite where it is posted, not the entire company.

Q: We have multiple establishments that rarely, if ever, have recordable incidents, and those incidents are reported to our main office. Do we have to keep separate OSHA 300 logs for each establishment?

A: If those locations operate for one year or longer, the rule requires separate 300 logs for each location. However, you can keep all of the incidents on one central master log as long as each incident is recorded within seven days of notification. Also, you must prepare 300A summary forms for each separate location, so you must be able to extract information from the master 300 form to reflect where each incident occurred. You must also be able to extract all of the information for a specific location from that master 300 log within four hours when that data is requested by Oregon OSHA.

Q: If there is an establishment like a hospital with distinctly different functions which all fall under one Standard Industrial Classification, is it O.K. to have separate 300 logs for distinctly different functions and just roll all the information into one 300 log and 300A summary sheet when it comes time to do the annual posting for the establishment?

A: That would be acceptable.

NOTE #1: In Oregon if an employer is required to have an Exposure Control Plan, they must maintain a sharps log regardless of whether or not they must maintain a 300 log.

NOTE #2: Whenever the federal question and answer sheet references the 301, think 801.