

## **INJURY/ILLNESS RECORDING/REPORTING**

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### **1.0 SCOPE**

This Performance Assessment Guide for Injury/Illness Recording/Reporting will be used to carry out the oversight responsibility of the U.S. Department of Energy (DOE) Brookhaven Group. This guide was prepared to assist in conducting performance-based assessments of DOE prime contractors and subcontractors to ensure that their injury/illness recording/reporting programs identify, disposition, and take corrective action on issues that affect satisfactory facility performance. The goals are to determine if an injury/illness recording/reporting program has been established at the laboratory level to maximize the effectiveness of respective activities/processes and to minimize the risk of economic loss or worker/public injury/illness consistent with the risk of the activity or process.

Injury/illness recording/reporting assessments will be directed at all prime contractors and subcontractors working at DOE sites. DOE line management must ensure that these contractors comply with DOE Orders and applicable Federal and State regulations. Information developed from this assessment will determine the degree to which this is being done as well as the effectiveness of the laboratory's program.

### **2.0 ATTRIBUTES AND LINES OF INQUIRY**

This section provides lines of inquiry to help assess whether the laboratory has implemented a program that ensures that injury/illness recording/reporting requirements are incorporated into line activities. This section will be used to evaluate the laboratory's line organization.

**2.1** A documentation system supporting an injury/illness recording/reporting program compatible with OSHA requirements exists.

- Does the laboratory have a management process for satisfying the OSHA requirements for recordkeeping and reporting of occupational injuries and illnesses at the site?
- Does the laboratory maintain in each establishment a log and summary of all recordable occupational injuries and illnesses for the site?
- Is each recordable injury and illness entered on the log and summary within 6 working days after receipt of a report that a recordable injury or illness has occurred at the laboratory?

- Is OSHA Form No. 200 or an equivalent (one that is as readable and comprehensible to a person unfamiliar with it) used at the site? Is the log and summary completed in the detail provided in the form and instructions on OSHA Form No. 200?
- If log and summary records are maintained in various central locations, is there available in each establishment a copy of the log that reflects separately the injury and illness experience of the site complete and current to a date within 45 calendar days?
- Is there available at the place where the log is maintained sufficient information to complete the log to a date within 6 working days after receiving information that a recordable case has occurred?
- Are the records established on a calendar-year basis?
- Within 6 working days after the occurrence of a reportable case, is there a supplementary record for each occupational injury or illness occurring at the site (OSHA Form No. 101) available for inspection?
- Does the laboratory allow for the use of workers compensation, insurance, or other reports (that are acceptable alternative records if they contain the information required by OSHA Form No. 101)?

**2.2** The laboratory follows the OSHA/BLS guidelines/requirements when determining which injuries or illnesses must be recorded at the site.

- Does the laboratory record information about every occupational death, every nonfatal occupational illness, and those nonfatal occupational injuries that involve one or more of the following: loss of consciousness, restriction of work or motion, transfer to another job, or medical treatment other than first aid occurring at the site?
- Is there a differentiation between lost-workday cases involving days away from work as opposed to those involving restricted work activity?
- Are lost-workday cases that occur at the end of the recording year recorded properly?
- Are injuries and illnesses determined appropriately?
- Are cases that are initially determined to be nonrecordable properly recorded if the case converts to being recordable?

**2.3** The laboratory posts an annual summary of injuries and illnesses at the site.

- Does the summary consist of a copy of the year's totals from OSHA Form No. 200 and the following information from that form: Calendar year covered? company name? establishment name? establishment address? certification signature? title and date?
- Is OSHA Form No. 200 used in presenting the summary? If no injuries or illnesses occurred in the year, are zeros entered on the totals line, and is the form still posted?
- Is the summary completed and posted at the site by February 1 and is it certified true and complete by the supervisor of the preparation of the report?
- Is certification accomplished by affixing the signature of the employer, or the officer or employer who supervises the preparation of the annual summary of occupational injuries and illnesses, at the bottom of the last page of the log and summary or by appending a separate statement to the log and summary certifying that the summary is true and complete?
- Is the summary posted no later than February 1 and does it remain in place until March 1?
- For employees who do not primarily report to work to any fixed establishment on a regular basis, does the laboratory satisfy this posting requirement by presenting or mailing a copy of the summary during the month of February of the following year to each such employee who receives pay during the month?
- Is the laboratory aware that a failure to post a copy of the site's annual summary report may result in the issuance of citations and assessment of penalties?

**2.4** The laboratory has methods for ensuring proper OSHA record preparation, retention, and dissemination.

- Are the records mentioned in 2.1 and 2.2 retained at the site for 5 years following the end of the year to which they relate?
- Is the laboratory aware of the penalties for falsification or failure to keep records or reports?
- Are the logs (e.g., OSHA Form No. 200) of all recordable occupational injuries and illnesses made available by the laboratory to any current or former employee and/or their representatives for examination and copying in a reasonable manner and at reasonable times?

- Does the laboratory tell the employees about the existence, location, and availability of exposure and medical records?
- Does the laboratory allow employees access to their exposure and medical records?
- Does the laboratory define the employees' rights of access to these records?
- Does the laboratory tell the employees who is responsible for maintaining and providing access to the records at the site?

**2.5** Fatality or multiple hospitalization (five or more employees) accidents are reported to the nearest Federal OSHA Area Director within 48 hours after occurrence.

- Does the laboratory have a process in place to ensure proper reporting of one or more fatalities to the nearest Federal OSHA Area Director within 48 hours after occurrence?
- Does the laboratory have a process in place to ensure proper reporting of incidents that result in the hospitalization of five or more employees to the nearest Federal OSHA Area Director within 48 hours after occurrence?

**2.6** The laboratory meets the DOE Investigation Requirements contained in the Environmental Protection, Safety, and Health Protection Information Reporting Requirements.

- Are Type A investigations conducted by a DOE Headquarters or field organization board?
- Are Type B investigations conducted by a DOE board appointed by the head of the field organization to consist of DOE or laboratory personnel or both?
- Are Type C investigations conducted by DOE laboratory personnel when their operations are involved and by the DOE personnel when Federal operations are involved?
- Do the boards appointed for the investigations listed above follow the standards for the appointment of the board, for conducting the investigation, and for preparing the investigation report contained in the Environmental Protection, Safety, and Health Protection Information Reporting Requirements?
- Is any fatal or imminently fatal injury or illness involving a DOE or DOE contractor employee or a member of the public due to an occurrence associated with a DOE or DOE laboratory operation designated as a Type A investigation?

- Is any one occurrence involving either occupational injuries or illness that results in five or more lost-workday cases in a DOE or DOE laboratory operation designated as a Type A investigation?
- Is any occupational illness that results in inpatient hospitalization designated as a Type B investigation?
- Is any series of occupational illnesses with the same or similar causes involving five or more persons of which at least one is a lost-workday case designated as a Type B investigation?
- Is any occupational illness that is a lost-workday case involving more than 5 days away from work designated as a Type B investigation?
- Are the Type A and B investigation reports submitted as required by the Environmental Protection, Safety, and Health Protection Information Reporting Requirements?
- Are these reports accompanied by a memorandum signed by the head of the reporting office/organization that contains, but is not limited to, the actions taken, or to be taken, as a result of the findings?
- Do all occupational injuries and illnesses undergo a Type C investigation to determine corrective action appropriate to minimize or preclude similar injuries or illnesses?
- Is a Type C report made on DOE Form 5484.3, "Supplementary Record of Occupational Injuries and Illness," for occupational injuries and illnesses as defined by OSHA?
- Is DOE Form 5484.3, "Supplementary Record of Occupational Injuries and Illnesses," prepared by each DOE office and DOE laboratory organization, for all "recordable occupational injuries and illnesses," as defined on OSHA Form No. 200?
- Does the laboratory submit one copy of the 5484.3 form or its equivalent to the System Safety Development Center, EG&G Idaho, Inc. on or before the 25th of April, July, October, and January?
- Are all logs and forms maintained on file by the laboratory for a period of at least 5 years?

**2.7** The laboratory ensures that its employees are aware of their responsibilities in regard to occupational safety and health at the site.

- Are employees made aware on a continuing basis that they are required to notify supervisors immediately of exposures to harmful agents and to certain conditions or practices that may cause illness or injury?
- Are employees aware that they must report work-related injuries and illnesses in a timely manner?

### **3.0 STANDARDS AND REQUIREMENTS**

#### **3.1 Specific DOE Orders and Standards.**

- DOE O 231.1, "Environment, Safety, and Health Reporting."
- DOE O 232.1A, "Occurrence Reporting and Processing of Operations Information."
- DOE O 440.1, "Worker Protection Management for DOE Federal and Contractor Employees."
- DOE 5484.1, "Environmental Protection, Safety, and Health Protection Information Reporting Requirements."
- DOE 5700.6C, "Quality Assurance."

#### **3.2 Title 10 CFR Requirements.**

- 10 CFR 830.120, "Quality Assurance for DOE Nuclear Facilities."

#### **3.3 OSHA Title 29 CFR Requirements.**

- 29 CFR 1904, "Recording and Reporting Occupational Injuries and Illnesses."
- 29 CFR 1910.20, "Access to Employee Exposure and Medical Records."
- Bureau of Labor Statistics ("blue" handbook), "Recording Guidelines for Occupational Injuries and Illnesses," September 1986.

### **4.0 GUIDANCE TO ASSESSOR**

This assessment guide is intended to assist in conducting a performance assessment of injury/illness recording/reporting. It is not to be considered as all-inclusive, inflexible, or limiting reasonable assessment concentration when lines of inquiry responses dictate that an area must be more thoroughly probed.

During this assessment, it is important to realize that the recordkeeping and reporting decisions must be made at the laboratory level. The decisionmaking authority has been assigned by the legislative and regulatory process to the individual employers. The decisions made by employers to record or not record an injury or illness must be made in good faith and in accordance with the requirements of the OSHA Act. Therefore, it is important to not only assess the "management programs" for satisfying the mechanics of a recordkeeping and reporting program, but also to assess the integrity of the records and the validity of the statistics that the records provide.

The assessor may have difficulty assessing the completeness of the program due to the laboratory organizational level decisionmaking process. A suggestion would be for the assessor to compare first aid station or medical facility check-in logs against the injuries/illnesses actually recorded. Another method may be to check injury/illness absentee records against the recorded/reported items.