



2016 SAFETY AND HEALTH BULLETIN

TO: All SMACNA Members **SB: 16-07**

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DATE: November 4, 2016

SUBJECT: **OSHA Recordkeeping – First Aid Defined (What NOT to Record)**

With the new regulations from OSHA regarding submitting injury and illness records (see Safety Bulletins 16-03 and 16-04), it is imperative that SMACNA members understand and properly record occupational injuries and illnesses. Specifically, it is important to understand what NOT to record on your OSHA injury and illness logs. “Over-reporting”, or recording injuries and illnesses unnecessarily, can lead to a falsely inflated OSHA incidence rate.

Under the new regulation, starting in 2017, companies will be required to submit OSHA injury and illness information electronically and OSHA will be making this information available to the public and your company incidence rate will be available for all to see.

How does OSHA define a recordable injury or illness?

- Any work-related fatality.
- Any work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job.
- **Any work-related injury or illness requiring medical treatment beyond first aid.**
- Any work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth, and punctured eardrums.
- There are also special recording criteria for work-related cases involving: [needlesticks and sharps injuries](#); [medical removal](#); [hearing loss](#); and [tuberculosis](#).

Under OSHA recordkeeping rules, you do NOT need to record an injury if it is considered “first aid”. Only those injuries and illnesses that require “medical treatment” need to be recorded.

A classic example for sheet metal companies are cuts. See 1904.7(b)(5)(ii)(D) below that a cut typically does not need to be recorded unless it requires “...other wound closing devices such as sutures, staples, etc.”

Here is the full list of first aid treatments that DO NOT need to be recorded on your OSHA logs.

For the purposes of Part 1904, "first aid" means the following:

- 1904.7(b)(5)(ii)(A) Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
- 1904.7(b)(5)(ii)(B) Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
- 1904.7(b)(5)(ii)(C) Cleaning, flushing or soaking wounds on the surface of the skin;
- 1904.7(b)(5)(ii)(D) Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™ (other wound closing devices such as sutures, staples, etc., are considered medical treatment);
- 1904.7(b)(5)(ii)(E) Using hot or cold therapy;
- 1904.7(b)(5)(ii)(F) Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
- 1904.7(b)(5)(ii)(G) Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- 1904.7(b)(5)(ii)(H) Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- 1904.7(b)(5)(ii)(I) Using eye patches;
- 1904.7(b)(5)(ii)(J) Removing foreign bodies from the eye using only irrigation or a cotton swab;
- 1904.7(b)(5)(ii)(K) Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
- 1904.7(b)(5)(ii)(L) Using finger guards;
- 1904.7(b)(5)(ii)(M) Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes);
- or 1904.7(b)(5)(ii)(N) Drinking fluids for relief of heat stress.

For further information on OSHA recordkeeping, go to [OSHA's recordkeeping webpage](#). For additional information or guidance, contact Mike McCullion, SMACNA's director of market sectors and safety at mmccullion@smacna.org or 703-995-4027.