

CAROLINA FAMILY HEALTH CENTERS, INC.

PROCEDURE

TITLE: OSHA-100.01 Recording Work-Related Injuries and Illnesses

EFFECTIVE DATE: May 2019

SECTION: OSHA

REFERENCE POLICY: OSHA-100 General Duty Clause

RESPONSIBLE CHIEF: Chief Compliance Officer

RESPONSIBLE COMMITTEE: Central Compliance

REVIEW: 07/11/2022, 03/10/2025, 01/12/2026

I. PURPOSE

The purpose of this procedure is to comply with the Occupational Safety and Health Act (OSHA) of 1970, which requires employers to prepare and maintain records of work-related injuries and illnesses (29 CFR 1904).

II. PROCEDURE

Carolina Family Health Centers, Inc. (CFHC, Inc.) is required to keep records of fatalities, injuries, and illnesses that are work-related, are new, and meet one of the following criteria:

- Caused death;
- Resulted in days away from work, restricted work, or transfer to another job;
- Involved medical treatment beyond first aid (this included exposure to a patient's blood or body fluids through needlestick injury or other means);
- Caused loss of consciousness; or
- Resulted in a significant injury or illness diagnosed by a physician or other licensed health care professional.

CFHC, Inc. must consider an injury or illness to be work-related if an event or exposure in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing injury or illness. Work-relatedness is presumed for injuries and illnesses resulting from events or exposures occurring in the work environment, unless one of the following exceptions specifically applies.

CFHC, Inc. is not required to record injuries or illnesses under the following circumstances:

- At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or

brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related.

Note: If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead) or gets food poisoning from food supplied by the employer, the case would be considered work-related.

- The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The injury or illness is solely the result of personal grooming, self-medication for a non-work-related condition, or is intentionally self-inflicted.
- The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work)
- The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the CFHC, Inc. With an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

Medical treatment does not include visits to the doctor or health professional solely for observation or counseling; diagnostic procedures, including administering prescription medications that are used solely for diagnostic purposes; and any procedure that can be labeled first aid.

CFHC, Inc. must report all work-related needlestick injuries and cuts from sharp objects that are contaminated with another person's blood or other potentially infectious material (i.e., human body fluids, tissue, and organs). CFHC, Inc. is also required to report illnesses caused by poisoning and tuberculosis or injuries that cause hearing loss.

In order to determine if the precipitating event or exposure occurred in the work environment or occurred away from work, CFHC, Inc. evaluates the employee's work duties and environment to decide whether or not one or more events or exposures in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing condition. CFHC, Inc. may require the employee provide a statement that the illness or injury is related to the work-related event or exposure from a physician or other licensed health care provider. The Human Resource staff is responsible for investigating to evaluate the event. Employees are required to participate in such investigations.

CFHC is required to report directly to OSHA for:

- All work-related fatalities occurring within 30 days of the injury. The report must be made within 8 hours of the death; or
- All work-related in-patient hospitalizations, all amputations, and all losses of an eye. The report must be made within 24-hours of the injury.

Staff report to OSHA by calling the free and confidential number 1-800-321-OSHA, by contacting the nearest area office during normal business hours, or using the online form, www.osha.gov.

Information required includes:

- Name of the establishment (i.e., CFHC, Inc.)
- The location of the work-related incident
- The type of reportable event (i.e., fatality, in-patient hospitalization, amputation, or loss of eye)
- The number of employees involved
- The names of the employees
- Contact person and phone number
- Brief description of the event.

The Director of Human Resources or his/her designee is responsible for recording and maintaining the *Log of Work-Related Injuries and Illnesses* (Form 300). All work injuries or illnesses are recorded via an incident report within 48-hours of the occurrence. Refer to *RM-101 Incident Reporting*. The Director of Human Resources establishes whether the case was work-related and if the case is recordable. When completing the form, the Director or his/her designee identifies the employee involved unless there is a privacy concern; identifies when and where the case occurred; describes the case as specifically as possible; classifies the seriousness of the case, and identifies whether the case is an injury or illness. Cases listed on the log are not necessarily eligible for workers' compensation or other insurance benefits. Listing on the log does not mean that CFHC, Inc. or the employee is at fault or that the OSHA standard was violated. For more information on how to complete Form 300, the staff should refer to www.osha.gov. Separate logs are kept for each of the CFHC, Inc. locations for a period of five years.

OSHA requires the *Summary of Work-Related Injuries and Illness* form (Form 300-A) be posted for employees. This form is posted in each breakroom from February 1 to April 30th of each year and summarizes the previous year's employee-related illnesses and injuries. The Director or his/her designee is responsible for the posting.

III. DEFINITION

An injury or illness is a **preexisting condition** if it resulted solely from a non-work-related event or exposure that occurred outside the work environment.

IV. ATTACHMENTS

- *OSHA Forms 300, 300A & 301*