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# Advancing Recordkeeping and Reporting

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ASEM- Advanced Safety Engineering  
Management  
University of Alabama in Birmingham  
April 1, 2014

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In 1971 the Occupational Safety and Health Administration, or OSHA was formed. One of the various rules it passed was the injury and illness recordkeeping regulation, 29 CFR 1904. This regulation mandates all employers of more than 10 employees keep records of all injuries and illnesses that occur within their workplace. Since the effort to enforce this regulation over 30 years ago, few changes have been made with the exception of adding a hearing loss column to the recordkeeping form and the addition and later extraction of tracking musculoskeletal disorders, or MSDs. Currently OSHA is working towards improving the tracking system of workplace injuries and illnesses to allow employers across the U.S. to share information on injuries and illnesses which could alleviate time spent on finding new ways to avoid certain injuries and to improve the accuracy of recordkeeping and statistics. The proposed docket ID: OSHA-2010-0055 states:

Occupational Safety and Health Administration (OSHA) is proposing changes to its reporting system for occupational injuries and illnesses. An updated and modernized reporting system would enable a more efficient and timely collection of data and would improve the accuracy and availability of the relevant records and statistics. This proposal involves modification to 29 CFR part 1904.41 to expand OSHA's legal authority to collect and make available injury and illness information required under part 1904 (United States).

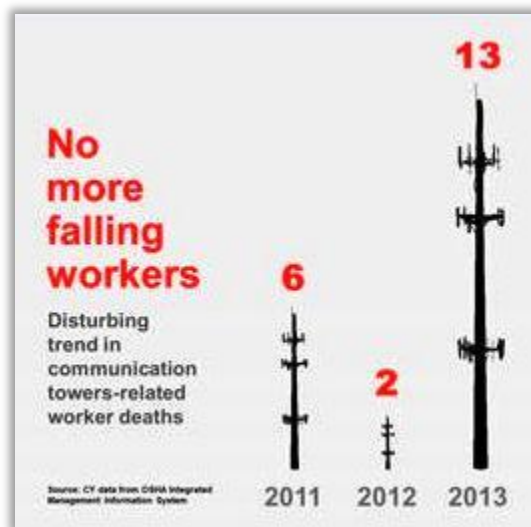
With the advances made annually on correcting workplace injuries as well as the digital and technological advances made by use of worldwide databases to share and compare information, I see this proposed rule as being an advantageous opportunity which allows employers to improve

their workplace accidents and illnesses by sharing information within their respective fields. By allowing assorted workplaces in similar fields to work together and share techniques on how to correct specific injuries and illnesses, the number of injuries can be substantially lowered annually. This change would offer employers the ability to focus more on the job at hand and less on correcting a dangerous workspace through the use of this site. If an employer could simply go onto this database and create a search on the environment and the injury incurred, it would lessen time spent and help to alleviate workers' compensation.

It is common practice to share familiar documents throughout various units and hold similar outcomes in the Army. The use of an online database allows soldiers that hold an additional duty of a safety officer to share successful practices and practices that have failed under specific conditions. So a safety officer in Fort Hood, Texas might have the need of a risk assessment for a weapons range during the peak hot weather conditions. Meanwhile, a unit in Fort Benning, Georgia recently had the same weapons range exercise and submitted their risk assessment on this shared database. The safety officer in Ft. Hood could locate the risk assessment and utilize the information from the Ft. Benning location and be able to not only easily identify some of the hazards that might have been missed, but also identify additional causes and outcomes of a certain condition; such as working in the extreme heat with little to no shade and the use of weapons that might overheat after prolonged use. The Ft. Benning unit might have had an incident that took a soldier out of commission, such as having a heat stroke due to high temperatures, lack of hydrating, and not identifying the ongoing symptoms. This would cause the soldier to be hospitalized, weakening the unit's overall strength and moral. So

by sharing the information on the Army database, this safety officer in Ft. Hood could avoid the loss of one or possibly various soldiers by identifying the failures of the Ft. Benning unit. This same exercise could work for various civilian workplaces of similar fields such as in construction, mining, and drilling organizations.

In February a news release was issued through the DOL.gov website in regards to a need for urgent action to protect communication tower workers. The cause for concern was initially sparked after the sharp rise of deaths to tower workers in 2013. The National Association of Tower Erectors, or NATE, reported that the disturbing trend of deaths in 2013 was more than the previous two years combined.



(DOL, 2014)

Analysis of the data provided proves an urgent need throughout the communication tower community to find a quick and safe way to prevent deaths to tower workers. By allowing shared data throughout the community, attention may be brought to the obvious requirement to correct this trend. As an example, one tower company in the southeast region of the United States might

have found a pattern that is causing these accidents and could be working towards making corrections to avoid this pattern. Meanwhile, a separate tower company in the northwest might not be part of this deadly trend because they have already found ways to avoid such hazardous conditions; such as through increased employee awareness and training, or the use of faulty harness equipment. By employing OSHA's proposed change, these two companies would benefit from one another by sharing the data they both have found. Of course the southeast company would benefit because they could avoid serious injuries and deaths but the northwest company would also be able to benefit from the patterns found and use this information to correct any necessary actions that could result in an accident in their own workplace.

After reading many of the public comments made available through the regulations.gov website, I see a common complaint among many of the employers in regards to the impact this rule could make on adding an unwanted administrative burden to employers. It is understandable that employers would foresee this proposed rule as an addition to their workload, but in most cases workplaces have an employee or a whole section whose main focus is to track and record these injuries and illnesses. Most commonly this employee is an Occupational Safety and Health (OSH) Specialist who can then work with other OSH Specialists in their respective field and share techniques, ideas, and strategies on how to avoid the more common and reoccurring injuries and illnesses. §1904.29(b)(5) previously allowed the employer to keep the records on a computer as long as they can produce the form whenever requested, so there is little additional work needed to have this same form submitted to the proposed OSHA reporting system. By

allowing employers to update this on a weekly or monthly basis, the only significant work required would be to simply click one or two additional key strokes.

Dr. David Michaels, the Assistant Secretary of Labor for Occupational Safety and Health is the primary staff member that all comments are directed to in regards to this proposed regulation change. He argues the following:

With the information acquired through this proposed rule, employers, employees, the government and researchers will have better access to data, resulting in improved programs to reduce workplace hazards and prevent injuries, illnesses and fatalities. The proposal does not add any new requirement to keep records; it only modifies an employer's obligation to transmit these records to OSHA (OSHA, 2014).

As I previously mentioned, there is no additional workload added to employers, especially considering most organizations currently use computer databases to record and monitor workplace injuries and illnesses.

Another concern found by some is the possible need to train employees to use the new electronic submission software. This is understandably worrisome, but there is not enough proof of the additional costs this would add to employers. If done correctly, OSHA would be able to create a program that allows employees to choose from two ways to submit the information; either through a quick submission that allows those who are familiar with the program to swiftly submit the work, or a longer but more thorough way that takes the employee step by step along

the process to ensure it is submitted properly. This is just one idea and is already in use with the U.S. Army in regards to reporting accidents in the workplace, either with vehicles or accidents concerning soldiers or civilian employees in the workplace. I have used the program myself on a number of cases and the program, known as *ReportIt!*, has been quite successful in gathering and providing data on a much more efficient level (Report It! Army accident reporting system, 2014).

Although the *ReportIt!* is still in its infancy and is slightly sluggish when working in the training mode, it does allow the user to learn how to maneuver through the system with greater ease and confidence. This new requirement has been able to supply additional safety officers and commanders with information on specific injuries, accidents, and trends that allow them to identify problems occurring throughout the ranks and find efficient ways to avoid such incidents. In order to avoid incorrect data from being entered there is a chain of command that each form moves through and approval at each level must be initiated in order to move onto the next person. This ensures proper data entry and allows any errors to be corrected before final submission is made. So long as the initial user enters all data correctly, there is no additional work for them once it is submitted. If OSHA designs the program suitably, it would also remove an additional step of employers annually submitting their data again. Assuming all injuries and illnesses are up to date, the employer would agree to all data being submitted and be done with it. I see this as being far easier than many employers who are commenting on the negative aspects of the possible changes.

Therefore, despite the numerous public comments submitted many employers and avid safety professionals if OSHA prepares the program properly and gives organizations a transition

period to adjust, this new advancement in the reporting and recordkeeping will be very productive, allow for better accuracy, and build a network that will permit similar organizations to share techniques and identify key injuries and illnesses that need specific attention. As safety professionals, we work in industries that demand a continuous improvement process. With these constant adjustments, the regulations and the federal government need to also continue to evolve and improve. With this proposal, organizations may save on processing needless paperwork and instead possess the capabilities to input their workplace injuries and illnesses directly into the database. This would not only make the data readily available faster but it would cut back on improper data entered. If OSHA properly builds this database it will allow us to enter into an advanced work environment where information is collected and shared, rather than overlooked and improperly submitted.



Works Cited:

United States Department of Labor (DOL). Feb 2014. Web. 01 April 2014. *Assistant Secretary of Labor for Occupational Safety and Health Dr. David Michaels urges action to protect communication tower workers*. U.S. Department of Labor. Washington, D.C.

Occupational Safety and Health Administration (OSHA). 2014. Web. 01 April 2014. *Improve tracking of workplace injuries and illnesses rulemaking*. U.S. Department of Labor. Washington, D.C.

Occupational Safety and Health Administration (OSHA). 2013. Web. 01 April 2014. *§1904.29 Recording and reporting occupational injuries and illnesses*. U.S. Department of Labor. Washington, D.C.

Report It! Army accident reporting system. 2014. Web. 01 April 2014. U.S. Army Combat Readiness/Safety Center. Fort Rucker, Alabama.

United States. Department of Labor (DOL). Occupational Safety and Health Administration (OSHA). OSHA Docket ID: OSHA-2010-0055. *Improve tracking of workplace injuries and illnesses*. Washington, D.C.: U.S. Department of Labor. 08 Nov. 2013. Web. 01 April 2014.