



# OSHA Recording and Reporting COVID-19 Cases

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## INTRODUCTION

How do you determine what is an OSHA-recordable or OSHA-reportable case when it comes to dealing with cases of COVID-19? OSHA has provided some additional guidance for employers to make these decisions.

The three most frequently asked questions include:

1. Is it work related? In some cases, employees were exposed to the virus in the non-work-related environment such as shopping or being with family/friends. The OSHA rules define related exposures.
2. Is the case “recordable and/or reportable?”
3. What’s the difference between an “exposure” to COVID-19 compared to an “illness” from COVID-19?

## DEFINITIONS

### Work relatedness

Just as in determining whether there is a “claim” under workers’ compensation, it must be determined if the illness was work related. Employers are only responsible for recording cases of COVID-19 when each of the below conditions are met.

OSHA does not consider common illnesses, such as the common flu or colds, to be recordable. COVID-19 can be a recordable work-related illness if a worker is infected as a result of performing their work-related duties and the infection occurred at work and meets the following conditions.

- The case is a confirmed case of COVID-19 (see CDC information on persons under investigation and presumptive positive and laboratory-confirmed cases of COVID-19).
- The case is work-related, as defined by 29 CFR 1904.5.
- The case involves one or more of the general recording criteria set forth in 29 CFR § 1904.7.[4]

Cases of COVID-19 may be considered work related when there is no other explanation and:

- Several cases develop among workers in the same area.
- Following close exposure to a person who was confirmed to test positive
- Job duties include close frequent contact with the public

## Recordable vs. reportable

Once it has been determined there is work relatedness, the next step is to determine what level of treatment was provided.

There is confusion between the terms “reportable and recordable,” and they are frequently used interchangeably. Each defines a unique action under the OSHA rules.

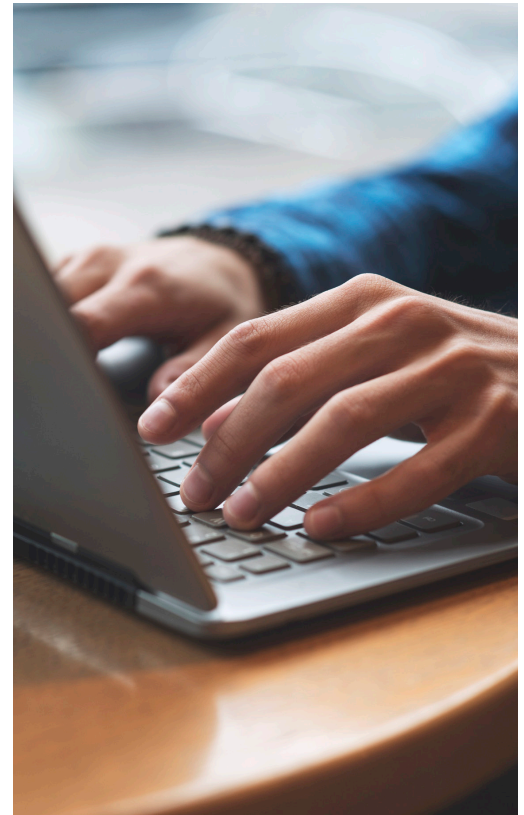
### Recordable to the OSHA 300 Log

If a healthcare worker was exposed to a person with the virus and their PPE failed, but resulted in no illness, you may want to record that on the incident tracking log. It would not be a recordable event. However, once a worker who had a work-related exposure has a positive test, becomes ill and receives medical treatment or has time away from work, the case then becomes recordable.

- The case involves medical treatment beyond first-aid, days away from work, job duty restrictions. 29 CFR 1904.7 (e.g.).
- OSHA specifically lists communicable diseases that are covered (OSHA 1904.5(b)(2)).

### Reportable to OSHA by Phone

A reportable incident is a separate action from recording a case on the OSHA 300 log. A lost work time case for the virus, or any injury/illness that results in overnight hospitalization, death, amputation or loss of an eye, would require the employer to call the local OSHA regional office within eight hours for death and 24 hours for hospitalization upon learning about the escalation in the case.



## CONCLUSION

COVID-19 cases that meet the work-related rules and result in medical treatment or lost time will be recorded on the OSHA 300 log and are required to be reported by phone to OSHA within eight hours to report death cases or 24 hours for hospitalization.

**For additional information visit:**

<https://www.osha.gov/memos/2020-05-19/revised-enforcement-guidance-recording-cases-coronavirus-disease-2019-covid-19>



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