

Henderson Brothers Risk Control Update

OSHA Serious Incident Reporting Action Plan

OSHA regulations require that an employer report any fatality, hospitalization, amputation, or loss of an eye to their respective area office. These incidents are considered serious and fall within the second tier of OSHA's inspection priorities; only instances of imminent danger are considered a higher priority. Regardless of the conditions or events surrounding the incident being reported, OSHA will have some very serious questions that will require answers.

Reporting an injury direct to OSHA can be stressful and intimidating undertaking. These types of reports feel like admissions to some form of violation of an OSHA standard or requirement, however, that is not necessarily the case. In many cases these incidents are the tragic result of a serious or minor oversights or unforeseen changes in work conditions.

When filing a report with OSHA its important to have a game plan, this may after all lead to an inspection of your work site. The good news is that these game plans are easy to develop and implement. The plan can be practiced as tabletop exercises before an incident ever occurs.

When developing your game plan, the following should be part of the discussion:

- Know the reporting rules; fatalities must be reported within 8 hours of employer notification and all other serious incidents must be reported within 24 hours of notification
- Know your rights as an employer; consider calling on your third-party OSHA compliance support
- Designate a reporting lead who will manage the entire process from start to finish (this can be a third party)
- Develop a simple and efficient system for preliminary incident investigations and include a mechanism for identifying and implementing corrective actions
- Use your primary investigation findings as supporting details for your report to OSHA
 - Determine the method you wish to file your report, over the phone and online are the primary methods
- When you report your incident, you will be asked to provide follow up details and you may also be asked to participate in a rapid response self-investigation
 - If a rapid response self-investigation is not requested its likely that you will have an in-person/on-site investigation
- Implement your investigation and inspection action plan and be ready to manage the on-site compliance inspection process
- Implement your corrective action plans and investigation response plans as soon as feasible once the investigation has closed

If you need any assistance with your injury or illness recordkeeping program, please contact your Risk Control representative for more information and support. You can always email riskcontrol@hb1893.com with questions concerning OSHA compliance programs.