

**OSHA COVID-19 Recordkeeping and Reporting Policy and Procedure Template**

**Date Implemented:**

**Reviewed/Updated Date(s):**

**Policy**

On June 21, 2021 The Occupational Safety and Health Administration issued [Emergency Temporary Standards (ETS)](https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.502) for the health care sector. The healthcare provider was required to develop and implement an OSHA ETS COVID-19 plan, addressing strategies to prevent transmission of COVID-19 within the healthcare entity. On December 21, 2021 the OSHA Healthcare ETS expired, however, OSHA stated that the recordkeeping section of the Healthcare ETS was still in effect.

Recordkeeping and reporting as required are outlined in the procedures below for employers with more than 10 employees.

**Procedures**

**Recordkeeping:**

All versions of the OSHA ETS COVID-19 plan will be maintained by [Facility name].

A log will be maintained, identifying all COVID-19 positive employees, regardless of where the exposure occurred. Recording on the COVID-19 log shall occur within 24 hours of the employer learning that the employee is COVID-19 positive and must be maintained as though it is a confidential medical record and must not be disclosed except as required by the ETS or other federal law.

The COVID-19 log will include:

* The employees name
* One form of contact information
* Location of work and position held
* The date the employee last worked prior to developing symptoms and the date the employee tested positive.

 **Record Availability**:

All records requested must be available by the end of the following business day after the request. The employer must provide records for examination and copying as described below:

* All versions of the written COVID-19 plan to any employees, their personal representatives, and their authorized representatives.
* The COVID-19 log entry for a particular employee to that employee and to anyone having written authorized consent of that employee.
* A version of the COVID-19 log that removes the names of employees, contact information, and occupation. The COVID-19 log should only include the location where the employee worked, the last day that the employee was at the workplace before removal, the date of the employee’s positive test for, or diagnosis of COVID-19, and the date the employee first had one or more COVID-19 symptoms, if any were experienced, to employees, their personal representatives, and their authorized representatives.

**Records Required to be Maintained by the OSHA Healthcare ETS to the Assistant Secretary**

Employers must continue to record all work-related confirmed COVID-19 cases of COVID-19 on their OSHA Forms 300, 300A, and 301, or the equivalent forms, if required to do so under 29 CFR part 1904.

**Reporting to OSHA**

The employer must report the following to OSHA:

* Work-related COVID-19 fatalities within 8 hours of the employer learning about the fatality.
* Work-related COVID-19 inpatient hospitalizations to OSHA that are determined to be work-related exposures, within 24 hours after the in-patient hospitalization.

See Also: [Respiratory Protection Plan Template](https://lai.memberclicks.net/respiratory-protection-program-template)

**References:**

OSHA. *Healthcare Emergency Temporary Standard 1910.502.* <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.502> (2021, June 21)

OSHA. Recording and Reporting Occupational Injuries and Illness 1904.39. *Reporting fatalities, hospitalizations, amputations, and losses of an eye as a result of work-related incidents to OSHA.* <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.39>. (2001, Jan. 19)