

**UNIVERSITY OF ROCHESTER
ENVIRONMENTAL HEALTH & SAFETY**

Policy No.: IH021	Approved by: Mark Cavanaugh
Title: Reporting Severe Injuries to OSHA	Date: 12/31/15
Revision No.: 1	Page 1 of 4
Prepared by: John Coniglio	

I. PURPOSE

This procedure establishes the process to provide notification to OSHA of severe injuries to University of Rochester (UR) employees. This procedure is effective as of January 1, 2015.

II. PERSONNEL AFFECTED

- Supervision and management of University of Rochester personnel.
- EHS personnel as identified in this document under Section IV Procedures.
- Department of Public Safety

III. DEFINITIONS

Amputation: the traumatic loss of a limb or other external body part. Includes a part, such as a limb or appendage that has been severed, cut off, amputated (either completely or partially); fingertip amputations with or without bone loss; medical amputations resulting from irreparable damage; and amputations of body parts that have since been reattached.

EHS: Environmental Health and Safety

Employee: as used in this document is anyone employed by the UR and receiving wages or salary paid by the university for their services. Included are work-study or other students injured while engaged in or performing their work duties for pay, OSHA does not consider stipends as pay. Not included are the same or other students injured while not performing duties for wages or salary, visitors, vendors, or contract personnel not being supervised in their day-to-day activities by UR.

Employer: as used in this document, EHS will represent the university as employer.

Hospitalization: an in-patient hospitalization is defined as a formal admission to the in-patient service of a hospital or clinic for care or treatment.†

Severe Injury: as defined by OSHA, when an employee is killed on the job or suffers a work-related hospitalization, amputation or loss of an eye.

Work Related Incident: an injury or illness is 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 Environment: OSHA defines the work environment as "the establishment and other locations where one or more employees are working or are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of his or her work."

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ENVIRONMENTAL HEALTH & SAFETY**

Policy No.: IH021	Approved by: Mark Cavanaugh
Title: Reporting Severe Injuries to OSHA	Date: 12/31/15
Revision No.: 1	Page 2 of 4
Prepared by: John Coniglio	

IV. RESPONSIBILITIES

University departments are required to make notification as described in this document when any of their employees experiences a severe injury as defined by OSHA, so that EHS can meet the employer's responsibility in reporting such events.

Employers are required to notify OSHA of work-related fatalities within eight hours of finding out about them. Employers only have to report fatalities that occurred within 30 days of a work-related incident. †

Employers must report any work-related in-patient hospitalizations, amputations or loss of an eye within 24 hours of learning about them. Employers only have to report an inpatient hospitalization, amputation or loss of an eye that occurs within 24 hours of the work-related incident. †

Employers do not have to report an event if it:

- Resulted from a motor vehicle accident on a public street or highway. Employers must report the event if it happened in a construction work zone. †
- Occurred on a commercial or public transportation system (airplane, subway, bus, ferry, streetcar, light rail, train). †
- Employers do not have to report an event if it occurred more than 30 days after the work-related incident in the case of a fatality or more than 24 hours after the work-related incident in the case of an in-patient hospitalization, amputation, or loss of an eye. †

Employers do not have to report an inpatient hospitalization if it was for diagnostic testing or observation only. † The hospital will determine if the employee was formally admitted as an in-patient.

Employers DO have to report an in-patient hospitalization due to a heart attack, if the heart attack resulted from a work-related incident. †

V. PROCEDURES

1. Department shall notify Public Safety (PS) immediately after discovery and ensuring the injured party is cared for when an employee experiences an injury defined by OSHA as severe.
2. Initial notification shall be done in person or by telephone by calling Public Safety at 275-3333. **Leaving a voice mail is not acceptable.**
3. The person notifying PS must provide information about the injury, including at a minimum:

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ENVIRONMENTAL HEALTH & SAFETY**

Policy No.: IH021	Approved by: Mark Cavanaugh
Title: Reporting Severe Injuries to OSHA	Date: 12/31/15
Revision No.: 1	Page 3 of 4
Prepared by: John Coniglio	

- a. Location of the work-related incident (e.g. specific campus, building, room, etc.)
 - b. Time of the work-related incident
 - c. Type of reportable event (i.e., fatality, in-patient hospitalization, amputation (part of body) or loss of an eye)
 - d. Number of employees who suffered the event
 - e. Names of the employee who suffered the event
 - f. Contact person and his or her phone number
 - g. Brief description of the work-related incident
4. Upon learning of the incident, Public Safety will immediately report the incident to EHS, providing the information received. If the incident occurs during normal business hours, Public Safety will report the incident to EHS in person or by calling the main EHS office at 275-3241. **Contact must be made, leaving a voice mail or message on pager is not acceptable.**
 5. Upon learning of the incident, EHS will immediately contact one of its managers to notify OSHA, providing the information received, moving down the list until one can be reached in the following order (**contact must be made, leaving a voice mail or message on pager is not acceptable**):
 - a. Occupational Safety Manager
 - b. EHS Director
 - c. Lab Safety Manager
 - d. Other EHS Manager
 6. If the incident occurs after hours, on weekends or holidays, Public Safety will contact an EHS manager via telephone, using their emergency contact information, to notify OSHA, moving down the list until one can be reached in the following order (**contact must be made, leaving a voice mail or message on a pager is not acceptable**):
 - a. Occupational Safety Manager
 - b. EHS Director
 - c. Lab Safety Manager
 - d. Other EHS Manager
 7. The EHS Manager having been notified will contact OSHA to report:
 - a. All work-related fatalities within 8 hours
 - b. Work-related in-patient hospitalizations, amputations and loss of an eye within 24 hours to OSHA
 8. Ideally, reporting to OSHA should be to the area office (Buffalo: 716-551-3053) having jurisdiction where the fatality, in-patient hospitalization, amputation, or loss of an eye occurred. If that office is not open or the event occurred during off hours, weekends or a holiday, then the EHS Manager is to contact OSHA using the toll-free number 1-800-321-OSHA (6742).

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Policy No.: IH021	Approved by: Mark Cavanaugh
Title: Reporting Severe Injuries to OSHA	Date: 12/31/15
Revision No.: 1	Page 4 of 4
Prepared by: John Coniglio	

- a. **It is not acceptable to leave a voice message.** If the caller cannot speak directly with someone from the local area office, then they are to call the OSHA toll-free number
9. The EHS Manager reporting a fatality, in-patient hospitalization, amputation or loss of an eye to OSHA must report the following information:
 - Establishment name: **University of Rochester**
 - Location of the work-related incident
 - Time of the work-related incident
 - Type of reportable event (i.e., fatality, in-patient hospitalization, amputation or loss of an eye)
 - Number of employees who suffered the event
 - Names of the employees who suffered the event
 - Contact person and his or her phone number
 - Brief description of the work-related incident

VI. REFERENCES

- OSHA Fact Sheet: Updates to OSHA’s recordkeeping Rule: Reporting Fatalities and Sever Injuries:
<https://www.osha.gov/recordkeeping2014/OSHA3745.pdf>
- USDOL Webpage - Updates to OSHA recordkeeping Rule:
<https://www.osha.gov/recordkeeping2014/>
- USDOL News Release: **new requirements for reporting severe injuries:**
https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=NEWS_RELEASES&p_id=26673
- OSHA Letter of Interpretation, March 5, 1999:
https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=22702

VII. APPENDICES/FORMS

OSHA web site on-line reporting form -
<https://www.osha.gov/pls/ser/serform.html>

VIII. REVISION HISTORY

Date	Revision No.	Description
12/31/2015	1	Added link to OSHA web site on-line reporting form