

## Recording COVID-19 on OSHA Form 300

### Introduction:

On May 19, 2020, OSHA released a memo in reference to the Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19). It provides guidance on the recording of occupational illnesses, and will remain in effect until further notice.

**SAFETY AND HEALTH**



### Discussion Points:

- Recording COVID-19 on the OSHA Form 300 per OSHA recordkeeping requirement 29 CFR Part 1904.7
- Determining work-relatedness of COVID-19 illness
- Checking for updates on OSHA's webpage frequently

### Discussion:

Under OSHA's recordkeeping requirements, Coronavirus is a respiratory illness which is a recordable illness, and employers are responsible for recording COVID-19 cases on the OSHA Form 300, if: The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC), the case is work-related as defined by 29 CFR 1904.5, and the case involves one or more of the general recording criteria set forth in 29 CFR 1904.7.

OSHA is exercising enforcement discretion to assess employer's efforts in making work-related determinations due to the difficulty with determining work-relatedness.

Employers are not responsible for making extensive medical inquiries, because of employee medical privacy laws and most employer's limited knowledge in this area. It is sufficient in most circumstances for the employer, when learning of an employee's COVID-19 illness, to ask the employee how he/she believes the COVID-19 illness was contracted, discuss with the employee his/her work and non-work related activities that may have led to the COVID-19 illness while respecting employee privacy, and review the employee's work environment for potential SARS-CoV-2 exposure. The employee should be informed of any other instances of workers in that environment who contract or who have contracted COVID-19 illness.

The employer should be able to determine work-relatedness based on the information available. If the employer is presented with more information related to an employee's COVID-19 illness at a later time, then that information should be taken into account as well in determining whether an employer made a reasonable work-relatedness determination.

Please check OSHA's webpage at [www.osha.gov/coronavirus](http://www.osha.gov/coronavirus) for updates as information is updated frequently.