



**VOSH PROGRAM DIRECTIVE: 02-004A**

**ISSUED: February 15, 2004**

**SUBJECT: Collection of OSHA-300 Log Data**

**A. Purpose.**

This directive transmits to field personnel VOSH policy which requires that employer injury/illness information for the past three (3) years be collected and recorded during all VOSH inspections.

*This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.*

**B. Scope.**

This directive applies to all VOSH personnel.

**C. Reference.**

OSHA memorandum from Paula O. White, Director, Federal-State Operation (August 8, 1996).

**D. Cancellation.**

VOSH Program Directive 02-400 (August 15, 1997).

**E. Action.**

The Commissioner, Directors and Managers shall assure that policy and procedures for collecting OSHA-300, which supercedes OSHA-200 Logs, and Lost Workday Injury and Illness (LWDII) data established in this directive are adhered to in conducting all general industry, construction and agriculture inspections and investigations.

**F. Effective Date.**

February 15, 2004

**G. Expiration Date.**

Not Applicable.

**H. Background.**

Federal OSHA decided that this policy on the collection of OSHA-300 Log Data is necessary for the following reasons:

1. This historical data is being collected for national Performance Measurement purposes and to assess local initiatives. Improvements in an individual establishment's experience or group of establishments can be tracked over time and the impact of OSHA interventions assessed.
2. This data will help OSHA to move to a more results-oriented/performance-based monitoring of State programs as well as federal program efforts.
3. The data can be combined with information from the OSHA Data Initiative for analysis and future collection.
4. The Consultation Data System is being reprogrammed to allow the collection of this same data during consultation visits.
5. The OSHA-55 Intervention form provides for the collection of this data during other interventions, including VVPP visits.
6. The data can be accessed from the local database; standard reports will be developed that will allow more sophisticated statistical manipulation of the data at the local level.

**I. Summary.**

For all general industry, construction and agriculture inspections, VOSH Compliance Safety and Health Officers (CSHOs) shall review the employer's injury and illness records for three (3) prior calendar years, record the information on a copy of the OSHA-200 (now OSHA-300) screen, and enter the employer's data using the IMIS Application on the NCR (micro).

For construction inspections, only the OSHA-300 information for the prime/general contractor need be recorded.

CSHOs will not need to calculate the LWDII rate since it is automatically calculated when the OSHA-300 data is entered into the micro. If one of the three (3) years is a partial year, so indicate, and the software will calculate accordingly. CSHOs shall, however, collect the Number of Employee Hours Worked in each of the reference years, or if the information is not available, the Average Number of

Full-Time employees (FTEs).

CSHOs can print blank OSHA-300 screens through any form containing establishment processing (1A, 7, 36, 90, 55). The NCR s Systems Administrator can also print blank 200 (now 300) forms from selection **N. Blankforms Menu** on the Systems Administration Screen. Select **Q. UnNumbered 200 & PEP**.

C. Ray Davenport  
Commissioner

Attachment: None

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