



# Don't Ignore OSHA Paperwork

by Perry Safran and Andy Anderson

Every builder who has been through an OSHA inspection is familiar with OSHA's safety regulations for job sites. But OSHA has paperwork requirements as well, and complying with the rules for completing, posting, and updating the forms is just as important as using approved ladders and GFCIs.

## Form 200

Most employers with more than ten employees are required to use an OSHA Form 200 (or an equivalent private form) to record and summarize work-related injuries and illnesses. Form 200 must be tallied each year, signed, and kept for five years. Some states also require a supplementary record of each injury. In North Carolina, for example, you must keep a record on OSHA Form 101 or on Form 19 of the North Carolina Industrial Commission.

Employers are required to maintain the form at each "establishment." Since separate job sites are considered separate establishments, you should have copies of your OSHA Form 200 and supplementary record at each job site. Your main office must update the log within six days of an accident. Remote job sites may have as much as 45 days to update the OSHA Form 200.

The year-end tally must be completed and certified by signature of the person supervising the preparation of the

document. Don't leave anything blank — you must enter zeroes in the appropriate spaces and sign even if there are no accidents or illnesses. The tally of Form 200 must be posted for one month each year — from February 1 to March 1 — and the form must be available for OSHA representatives to copy.

## Penalties

Failure to maintain or post the OSHA Form 200 is usually cited as a nonserious violation carrying a \$500 to \$1,000 penalty per occurrence. But penalties for willful or repeat violations can range up to \$70,000 per occurrence. Errors can also be costly. Failure to sign and tally a form, for example, are considered violations. And each mistake in each form in each year is counted as an "occurrence," so be careful that you correctly complete and keep the forms for five years.

Even if you aren't required to keep OSHA forms at the job site, it's a good idea to give copies to each project foreman. It's much cheaper to prevent a citation than to get a wrongful citation removed. Form 200 can be obtained from your state and local OSHA office. ■

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