Courage Safety Systems | **Safety Training** | **Info Handout**

Recording and Reporting Requirements for COVID-19 Cases

Frequently Asked Questions

1. **Do employers have to record COVID-19 illnesses on their Log 300?** Yes, California employers that are required to record work-related fatalities, injuries and illnesses must record a work-related COVID-19 fatality or illness like any other occupational illness. To be recordable, an illness must be work-related and result in one of the following:
   - Death.
   - Days away from work.
   - Restricted work/transfer to another job.
   - Medical treatment beyond first aid.
   - Loss of consciousness.
   - A significant injury or illness diagnosed by a physician/licensed health professional.

   If a work-related COVID-19 case meets one of these criteria, then covered employers in California must record the case on their 300, 300A and 301 or equivalent forms. See California Code of Regulations, title 8, Chapter 7, Subchapter 1, Article 2, Employer Records of Occupational Injury or Illness for details on which employers are obligated to report and other requirements.

2. **Does a COVID-19 case have to be confirmed to be recordable?** Pursuant to recent federal OSHA guidance, a COVID-19 case should generally be confirmed through testing to be recordable. However, due to testing shortages and a variety of other reasons, not all persons determined to have COVID-19 have been tested. While Cal/OSHA considers a positive test for COVID-19 determinative of recordability, a positive test result is not necessary to trigger recording requirements. There may be other situations in which an employer must make a recordability determination even though testing did not occur or results are not available to the employer. In these instances, the case would be still be recordable if it meets any of the other general recording criteria from Section 14300.7 above, such as resulting in days away from work.

3. **How does an employer determine if a COVID-19 case is work-related for recordkeeping purposes?** For recordkeeping purposes, an injury or illness is considered 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. An injury or illness is presumed to be work-related if it results from events or exposures occurring in the work environment unless an exception in section 14300.5(b)(2) applies.

   A work-related exposure would include interaction with people known to be infected with COVID-19; working in the same area where people known to have been carrying COVID-19 had been; sharing tools, materials or vehicles with persons known to have been carrying COVID-19. Given the incubation period of 3 to 14 days, exposures will usually be determined after the fact.

   If there is not a known exposure that would trigger the presumption of work-relatedness, the employer must evaluate the employee's work duties and environment to determine the likelihood that the employee was exposed during the course of their employment.
   - The type, extent and duration of contact the employee had at the work environment with other people, particularly the general public.
   - Physical distancing and other controls that impact the likelihood of work-related exposure.
   - Whether the employee had work-related contact with anyone who exhibited signs/symptoms of COVID.

4. **Is time an employee spends in quarantine considered "days away from work" for recording purposes?** No. Unless the employee also has a work-related illness that would otherwise require days away from work, time spent in quarantine is not "days away from work" for recording purposes.