

Evaluating OSHA's Requirement that Employers Report Work-Related Hospitalizations

Surveillance data is essential to identify and target prevention for public health activity. Accurate and timely surveillance data are needed to identify causes of injury and illness, monitor prevention activity, plan interventions and evaluate the efficacy of these interventions. Unlike general public health surveillance, employers are a potential source of work-related injury and illness surveillance data.

The Challenge

Repeated studies report employers' compliance with occupational injury and illness reporting and recordkeeping regulations are incomplete, missing 50 to 60% of work-related injuries and even more of work-related illnesses. In 2014, federal OSHA implemented a new reporting requirement that requires employers to report any employee who has an inpatient (overnight) hospitalization within 24 hours of their acute work-related injury or illness. No evaluation of the usefulness of these reports to identify correctable hazards has been conducted.

A roofing worker was on a steep roof of a house when he fell 22 feet onto the concrete driveway and was hospitalized for a fractured leg. The company was inspected 181 days later. They were issued a serious citation for ongoing failure to provide guardrail systems with toe boards, safety net systems, or personal fall arrest systems when working on a steep roof.

The Response

Michigan state regulations require hospitals to report work-related hospitalizations. Michigan State University's Division of Occupational and Environmental Medicine analyzed hospitalizations where workers' compensation was the payer for 2016-2018. Medical records were reviewed and only injuries and illnesses that met the OSHA criteria to be reported by an employer were used. The hospitalized injuries and illnesses reported by employers to OSHA were matched to those reported by the 134 hospitals in Michigan by employee first and last name, company name, injury date and type of injury.

The Impact

Employers only reported 44% of worker hospitalizations to OSHA. Of the 465 inspections conducted in response to work-related hospitalizations, 246 (52.9%) employers had not corrected the injury-causing hazard prior to the inspection even though the inspection occurred months after the hospitalization. Of the 608 violations, 383 were serious with over one million dollars in penalties.

An employee assisting a coworker with moving a 1,000 lb. granite slab from a truck to a storage bin, was struck by the slab when it tipped forward and fell from the forklift tines. The employee was hospitalized for a collapsed lung and shoulder and rib fractures. The company was inspected 83 days later and received a serious citation for ongoing failure to lift or carry a load that cannot fall out of a basket or container during normal movements.

For a complete description of the evaluation see: Reilly MJ, Wang L, Rosenman KD. Evaluation of the Characteristics of Workers Injured on the Job Requiring Hospitalization and Employer Compliance with OSHA's Reporting Requirement for these Work-Related Hospitalizations Am J Ind Med 11/26/22.