

Yes, you can keep the records at a central location as long as you can:

- Transmit the information about the injuries and illnesses from the establishment to the central location within seven calendar days.
- Produce and send the records from the central location to the establishment within the time frames required by 1904.35 and 1904.40.

4. We would like to use a computer database or spreadsheet instead of paper forms, but all of our injuries and illnesses may be one file or database. Is this acceptable?

Yes, as long as you can sort and print the information by establishment.

5. An employee was visiting one of our sites and was injured. Where do we record the injury?

You must record the injury on the log of the establishment where the employee was injured.

6. How do we count the days away from work or days of restricted activity?

You are required to count every calendar day that the employee is not capable of working regardless of whether the employee was supposed to work. This includes weekends, holidays and scheduled vacations.

Training Questions and Answers

1. Is training available to help us understand the requirements?

Yes. The OSH Division's Education, Training and Technical Assistance Bureau (ETTA) provides or hosts many types of training events. There are safety and health schools at locations across the state throughout the year. Additionally, ETTA provides training through the small business centers at many community college campuses.

ETTA conducts free 10-hour and 30-hour workshops in general industry and construction. These classes are conducted by NCDOL personnel.

More information about these classes and schools can be found at our website: www.labor.nc.gov, on the Occupational Safety and Health Training Schedule page.



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PUBLIC SECTOR Injury and Illness

SURVEY



Information



Occupational Safety and Health Division

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Printed 3/20

250 copies of this public document were printed at a cost of \$50, or \$.20 per copy.





PUBLIC SECTOR Injury and Illness SURVEY



Public Sector Injury and Illness Survey

The N.C. Department of Labor (NCDOL), Occupational Safety and Health Division (OSH), evaluated occupational injury and illness data for local government and state agencies and determined that a reduction of workplace injuries and illnesses is essential.

The OSH Division's Planning, Statistics and Information Management Bureau (PSIM) conducts the annual North Carolina Public Sector Occupational Safety and Health Injury and Illness Survey each spring. Survey forms are mailed to public sector (state and local government) employers with 11 or more employees controlled by the employer as a whole. NCDOL uses the survey data to focus activities in areas such as consultation, training, technical assistance, inspections and other outreach programs to reduce workplace injuries and illnesses.

The survey requests employment information (average number of employees and total hours worked) and summary information from an employer's injury and illness log. These data are used to calculate a survey responder's days away, restricted or transferred (DART) rate, which is then compared to the survey responder's specific category calculated DART rate. A thorough explanation of this program can be found in the OSH Division's Field Operations Manual, Chapter 2—

Compliance Programming and Operational Procedure Notice 128—Public Sector Surveys and Inspections, which are available on our web site: www.labor.nc.gov.

Survey Questions and Answers

While conducting the annual public sector injury and illness survey, the PSIM Bureau has noted questions that have been consistently raised by survey participants.

1. *Is this an annual survey?*

The public sector injury and illness survey, administered by the PSIM Bureau, is an annual survey conducted in the spring of each year.

2. *Is this the same survey as the one conducted by the U.S. Bureau of Labor Statistics (BLS)?*

The public sector injury and illness survey is very similar to the annual BLS survey, but they are two distinct surveys. The NCDOL conducts both surveys; however, the BLS survey is administered by the federal government and is considered confidential information.

3. *Since it's similar to the BLS survey, why not use the information from that survey?*

The BLS survey is conducted by the NCDOL Research and Policy Division, and it requests more detailed information related to injuries and illnesses that occurred in the workplace.

As previously mentioned, the public sector injury and illness survey is conducted by the NCDOL PSIM Bureau.

4. *Is this survey the same as OSHA's Injury Tracking Application (ITA)?*

No, the ITA and the public sector injury and illness survey are two distinct avenues for collecting data. The ITA is a requirement under OSHA in which certain employers must submit electronic injury and illness data annually. Additional information about the ITA can be found on the NCDOL website.

5. *Is our response to this survey mandatory?*

Yes. Government agencies are required under North Carolina General Statute (NCGS) 95-148—Safety and Health Programs of State Agencies and Local Governments, to respond to the public sector survey.

Each public sector employer must participate in the survey.

Survey participants have the most difficulty completing the survey in two areas. These two areas are calculating the *average* number of employees and calculating the *total* employee hours.

The DART rates are computed using both of these figures, and it is essential that these numbers are as accurate as possible. The average number of employees includes all employees (full-time, part-time, temporary, seasonal, salaried and hourly) on the payroll during an entire calendar year. This number can be calculated by adding together the total number of employees on the payroll for each pay period during the year, then dividing that total by the number of pay periods in that year (including any pay periods with no employees). The total employee hours is the total number of hours worked by employees for an entire calendar year (not including vacation, sick leave, holidays or any other non-work time). For example, the average employee working 40 hours a week, 50 weeks per year, with two weeks of vacation, will work 2,000 hours per year.

What is NCDOL doing with the survey information?

The PSIM Bureau has had a high response rate for the annual public sector injury and illness survey. However, if a public sector employer decides not to respond to the PSIM Bureau requests for annual injury and illness information, the non-responding employers will be included on the next inspection assignment list.

Employers with a calculated DART rate at or above the target rate for their specific category will be included on the NCDOL inspection assignment list. These survey responders will be sorted into four groups or classes by their DART rate, from higher to lower, and will be divided in the targeting system database by specific employer categories (See OPN 128, Appendix A).

Compliance inspection assignments will be generated with a higher priority placed on those survey responders with the highest DART rates within their specific category. Any public sector survey responder

whose current rate is below the target rate may also be randomly assigned for inspection. Any site may be inspected at any time as a result of a work-related accident, fatality, complaint or referral.

Recordkeeping Questions and Answers

1. *Our North American Industry Classification System (NAICS) code is on the exemption list. Why does 1904 apply to me?*

Federal OSHA does not provide coverage for the public sector; however, the NAICS code exemption list in the 1904 standards contains public sector NAICS codes. In 1904.37(b)(3), federal OSHA requires state-plan states to gather injury and illness statistics from the public sector. Therefore, the public sector NAICS code exemptions apply only to states where federal OSHA has jurisdiction, but not in states such as North Carolina with state OSHA programs. Additionally, NCGS 95-148—Safety and Health Programs of State Agencies and Local Governments, and NCGS 95-143—Record Keeping and Reporting, require public sector employers to maintain these records.

2. *Can we have one 300 log for the entire city/county? Can we separate our 300 logs by division or department?*

Yes and yes; however, you must be able to sort and print the information by "establishment." The standard requires you to maintain or make available a 300 log for each "establishment" that is expected to be in business for one year or longer. The standard defines an establishment as:

"A single physical location where business is conducted or where services or industrial operations are performed. For activities where employees do not work at a single physical location, such as construction; transportation; communications, electric, gas and sanitary services; and similar operations, the establishment is represented by main or branch offices, terminals, stations, etc. that either supervise such activities or are the base from which personnel carry out these activities."

3. *May we keep the records for all our establishments at a central location so that we can ensure properly trained employees are making the entries?*