



## What Is A TRIR And How Does It Affect My ISNetworld Account?

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If your company has one or more OSHA recordable incidents in the last 3 years and your TRIR number has gone up, there are a couple of things you can look at to help lower your TRIR.

Here is the formula for the TRIR:

$$\text{TRIR} = \frac{\text{(Number of OSHA recordable incidents) X 200,000}}{\text{(Total number of hours worked.)}}$$

There are two numbers that you must input that will directly affect your score.

- Number of OSHA Recordable Incidents
- Total Number of Hours Worked by Everybody

The first number is the number of OSHA recordable incidents that your company had. To keep your TRIR as low as possible report only OSHA recordable incidents not First Aid cases.

I recommend to my clients to review all of their OSHA recordables for the last three years to determine if they are truly OSHA recordable incidents instead of First Aid cases.

Many of my clients reported each and every little incident that may have occurred at work as an OSHA recordable incident. But not every incident has to be recorded on your OSHA logs. Because many of the hiring clients in ISNetworld will grade your company based on your TRIR it is important to keep this number as low as possible.

# **But What Is A First Aid Case And What Is An OSHA Recordable Incident?**

There is no easy answer to this but there are some guidelines provided by OSHA to help us out. First, here are three situations that are always OSHA recordable incidents (if the employee is engaged in work related activities):

- Any fatality is an OSHA recordable incident.
- Any days missed from work due to an incident is an OSHA recordable incident.
- If an employee is unable to perform his normal duties and is on restricted work duty or is transferred to another job while they heal will always be an OSHA recordable incident.

But what about the situations when an employee is injured but doesn't miss any work and can perform his normal job? Here are some situations that are considered First Aid cases and not OSHA recordable incidents (United States Department of Labor 1904.7(b)(5)(ii).)

- Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes);
- Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);
- Cleaning, flushing or soaking wounds on the surface of the skin;
- Using wound coverings such as bandages, Band-Aids, gauze pads, etc.; or using butterfly bandages or Steri-Strips (other wound closing devices such as sutures, staples, etc., are considered medical treatment);
- Using hot or cold therapy;
- Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes);
- Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;
- Using eye patches;

- Removing foreign bodies from the eye using only irrigation or a cotton swab;
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;
- Using finger guards;
- Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes);
- Drinking fluids for relief of heat stress.

What if the person administering the treatment was a medical doctor, is it an OSHA recordable? According to [\[OSHA 1904.7\(b\)\(5\)\(iv\)\]](#), the professional status of the person administering the treatment is irrelevant. If one of your employees has a piece of metal fly into their eye and a medical doctor flushes the foreign body out their eye, even though a doctor performed the task, this is still considered a First Aid case.

Sometimes determining if an incident is an OSHA recordable or not can be very difficult. Here is a link to the OSHA website where they have 5 articles about different scenarios ([OSHA Articles – Standard Interpretations](#)). If you have doubts if your incident is an OSHA recordable or not, read these five articles and maybe they will answer your questions.

To illustrate how confusing this all can be. I once had a client who had 4 employees show up to work. They loaded the work truck with tools and then proceeded to the worksite in the company vehicle. On the way to the worksite they were involved in a car accident where the other driver was 100% at fault. All four employees missed a couple of days from work. Is this an OSHA recordable?

Since the company employees were on company time, in a company truck and lost time from work this seems to be an OSHA recordable. Not necessarily. If these employees took it upon themselves to handle some personal business on the way to the worksite, for example to pick up their laundry or maybe some hardware for personnel use, and the accident happened during their little side trip, then this would not be a recordable incident. (from [OSHA-1904.5\(b\)\(1\)](#), "*injuries and illnesses that occur to employees who are off the employer's establishment during work hours and are not engaged in work activities 'in the interest of the employer' are not considered work related.*")

If you have any questions about one of your OSHA recordable incidents, please feel free to contact me and we'll help you determine if it is an OSHA recordable or not.

# Are There Situations Where An Injury Or Illness Occurs In The Work Environment And It Is Not Considered Work-Related?

Yes, [from [OSHA 1904.5\(b\)\(2\)](#)] an injury or illness occurring in the work environment that falls under one of the following exceptions is not work-related, and therefore is not recordable.

- At the time of the injury or illness, the employee was present in the work environment as a member of the general public rather than as an employee.
- The injury or illness involves signs or symptoms that surface at work but result solely from a non-workrelated event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical examination, flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). For example, if the employee is injured by choking on a sandwich while in the employer's establishment, the case would not be considered work-related. Note: If the employee is made ill by ingesting food contaminated by workplace contaminants (such as lead), or gets food poisoning from food supplied by the employer, the case would be considered work-related.
- The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The injury or illness is solely the result of personal grooming, self medication for a non-work-related condition, or is intentionally self-inflicted.
- The injury or illness is caused by a motor vehicle accident and occurs on a company parking lot or company access road while the employee is commuting to or from work.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).
- The illness is a mental illness. Mental illness will not be considered work-related unless the employee voluntarily provides the employer with an opinion from a physician or other licensed health care professional with appropriate training and experience (psychiatrist, psychologist, psychiatric nurse practitioner, etc.) stating that the employee has a mental illness that is work-related.

Double check your OSHA recordable incidents for the last 3 years and see if any of them are actually First Aid cases. If you find some incidents that can be removed from your OSHA logs. Create new OSHA logs for that year and upload them into your ISNetworld account. Don't

forget to go into the Questionnaire section and update those numbers as well.

[\(click here for blank OSHA forms in PDF or Excel format\)](#)

## The Total Number of Hours Worked is Very Important

The second number we need to look at to keep your TRIR as low as possible is the total number of hours worked.

We want this number to be as large as possible. This helps to lower your TRIR. So we want to count each and every hour that is worked by everybody. It's important to count the total number of hours worked by the hourly employees, the salaried employees and the owners. You must count all overtime and any other time that OSHA would consider, as actions in the interest of the company.

Most of my clients, usually for convenience, will multiply their number of employees by a standard 40 hour work week to figure out the total number of hours worked. When it comes to your TRIR score this is a mistake.

Here is an example:

Let's say a company has 10 employees and they had 1 OSHA recordable incident during the year. If this company assumes a standard 40 hour work week for all of its employees (2080 hours per employee per year) then their TRIR would be 9.6 ( $1 \text{ OSHA Recordable} \times 200,000 / 10 \text{ employees} \times 2080 \text{ hours.}$ )

But what if in reality each employee averaged 50 hours per week and the company forgot to include the hours worked by the owner. If they totaled up the actual hours worked by everybody and then recalculated their TRIR, their number would be 6.99 ( $1 \text{ OSHA Recordable} \times 200,000 / 28,600 \text{ total hours worked.}$ )

As you can see, calculating the TRIR based on actual hours worked dropped this companies TRIR by 2.6 points.

## What Methods Can We Use To Calculate Total Hours Worked?

Calculating total hours worked for hourly employees is simple. This number will come straight from your accounting department. The number of hours worked by salaried employees, commissioned employees or the owners is often more difficult because records are often not kept on the amount of time they spent at work.

How do we calculate these numbers?

According to OSHA you can use any "reasonable manner" that you want (from [OSHA Recordkeeping Handbook p. 130.](#))

- "*[T]he rule does not require employers to use any particular method of calculating the totals, thus providing employers who do not maintain certain records--for example the total hours worked by salaried employees--or employers without sophisticated computer systems, the flexibility to obtain the information in any reasonable manner that meets the objectives of the rule. Employers who do not have the ability to generate precise numbers can use various estimation methods."*

When it comes to calculating the hours worked by your salaried or commissioned employees, you can calculate them in any fashion that you want, as long as OSHA deems your method reasonable.

**In summary your company should complete these 3 steps if you are having TRIR problems:**

- Double check all of your OSHA recordables for the last three years and see if any of them are actually First Aid cases. Remove all First Aid cases from your OSHA logs.
- Double check all hours worked for the last 3 years. Many hiring clients in ISNetworld will grade your company based on your 3 year average TRIR. What this means is that even though you may not have had any OSHA recordable incidents during 2 years of a 3 year period, those hours will be used in your 3 year average TRIR calculation and you want this number to be as large as possible.
- Revise your OSHA logs and then re-upload them into your ISNetworld account.

If you have any questions or need help with your TRIR please feel free to call us any time.

Sincerely,

**Conrad Cooper**  
**Safety Manual Today**  
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**Other Resources:**

**Recording and Reporting Occupational Injuries and Illness**

**OSHA Recordkeeping Handbook**

**OSHA Help Desk**