

# OSHA Recordkeeping for Workplace Exposures to COVID-19

## Frequently Asked Questions

**Q: Is COVID-19 a recordable illness?**

**A:** Yes in cases of work-related exposure.

*NOTE: Although the OSHA standard exempts recording of the common cold and flu but COVID-19 is recordable when a worker is infected on the job.*

**Q: How do I determine if an exposure is work related?**

**A:** You must consider an injury or illness to be 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.

*NOTE: This determination may be easier in high risk work environments such as healthcare and nursing homes but not so in lower risk environments. As the COVID-19 outbreak becomes more widespread, determining whether a work-related exposure caused or contributed to an employee becoming infected with COVID-19 may be impossible in the absence of clear evidence regarding the source of transmission.*

**Q: What is considered the “work environment?”**

**A:** OSHA defines the work environment as “the establishment and other locations where one or more employees are working or are present as a condition of their employment. The work environment includes not only physical locations, but also the equipment or materials used by the employee during the course of his or her work.”

**Q: How do I handle a case if it is not obvious whether the precipitating event or exposure occurred in the work environment or occurred away from work?**

**A:** In these situations, you must evaluate the employee’s work duties and environment to decide whether or not one or more events or exposures in the work environment either caused or contributed to the resulting condition or significantly aggravated a pre-existing condition.

*NOTE: Where it is not clear whether the exposure occurred in the work environment, you must examine the employee’s work duties and environment to determine whether it is more likely than not that one or more events or exposures at work caused or contributed to the condition.*

**Q: How do I record cases of work-related COVID-19 exposure?**

**A:** Work related cases of COVID-19 should be recorded in the same manner as all occupational illnesses.

**Q: How do I record presumptive cases of COVID-19?**

**A:** If a case is presumed to be a work-related COVID-19 exposure it should be recorded as an occupational illness.

**Q: Do I record cases of involuntary quarantine as days away from work?**

**A:** Yes. Days of quarantine ordered or recommended by a physician or licensed health care professional are considered days away from work.

*NOTE: OSHA has issued no specific guidance on quarantine, however, the standard requires that when an injury or illness involves one or more days away from work, you must record the injury or illness on the OSHA 300 Log.*

**Q: How do I record quarantine time?**

**A:** You must enter the number of calendar days away from work recommended by a physician or licensed health care professional.

**Q: If medical testing determines that a presumed case is not COVID-19 can I remove the case from the OSHA 300 Log?**

**A:** Yes. If medical testing determines that the case is not COVID-19 and the illness is not otherwise recordable, it should be removed from the OSHA 300 log.

**Q: How quickly must each injury or illness be recorded?**

**A:** You must enter each recordable injury or illness on the OSHA 300 Log within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

**References**

29 CFR 1904 Part C: Recordkeeping Forms and Recording Criteria  
29 CFR 1904.4: Recording Criteria  
29 CFR 1904.5: Determination of Work Relatedness  
29 CFR 1904.7: General Recording Criteria  
29 CFR 1904.29: Forms

**For additional information on OSHA COVID-19 guidance:**  
[OSHA Safety & Health Topics: COVID-19](#)

**For additional information on OSHA recordkeeping requirements:**  
[OSHA Recordkeeping Page](#)