



ADMINISTRATIVE POLICY

Policy Title	Occupational Injury & Illness Recordkeeping and Reporting
Policy Subtitle/Subject	Click or tap here to enter text.
Responsible Executive(s) (RE)	Sr. VP and COO, Patrick Norton
Responsible Office(s) (RO)	Enterprise Risk Services; Office of Environmental Health & Safety
Primary Point of Contact from RO	Associate Vice President, Enterprise Risk Services
Contact Information (email and phone)	oehs@tulane.edu 504-715-5393
Date Proposed	5/15/23
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Permanent

Temporary

1.0 POLICY STATEMENT

It is the policy of Tulane University (Tulane) to implement occupational injury and illness recordkeeping and reporting procedures in compliance with regulations promulgated by federal, state, and municipal agencies. Tulane University supports and will strive to meet or exceed the objectives outlined by the Occupational Safety and Health Administration (OSHA).

2.0 PURPOSE AND SCOPE

The purpose of this policy is to provide direction and assistance to employees with reporting and recording work-related injuries and illnesses. Through this policy, Tulane University seeks to fulfill its legal reporting requirements under applicable Workers' Compensation and OSHA regulations,

investigate and record work-related injuries and illnesses, take appropriate action to prevent recurrence of similar incidents, and collect necessary information to track incidents and identify potential trends.

In accordance with Occupational Safety and Health Administration (OSHA) standards administered by the U.S. Department of Labor, Bureau of Labor Statistics, the University has been selected to participate in an ongoing survey of occupational injuries and illnesses. Participation mandates that all reasonable steps be taken to ensure that occupational injuries/illnesses be reported and investigated promptly and accurately, and that records of same be retained.

3.0 APPLICABILITY OF THIS POLICY

This policy applies to personnel of Tulane University who experience an incident or close call associated with their work duties. This includes incidents that occur when an employee is on work-related travel status (e.g., travel to and from work-related meetings, conducting job tasks and other work activities in the interest of Tulane.) Incidents that occur during an employee’s normal commute to and from work are not considered work-related and therefore do not need to be reported or recorded.

4.0 WEBSITE ADDRESS FOR THIS POLICY

www.policy.tulane.edu

5.0 CONTACTS

Subject	Contact	Telephone	E-mail/Web Address
Clarification and General Information regarding reporting work-place injuries and/or illnesses at Tulane.	Office of Environmental Health & Safety	504-715-5393	oehs@tulane.edu

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7.0 DEFINITIONS

Close Call – An unplanned event that does not result in injury/illness, death, or property damage, but could have.

Incident - An event or occurrence that results in injury/illness, death, or property damage.

Occupational illness – any abnormal condition or disorder resulting from a non-instantaneous event or exposure in the work environment during working hours.

Occupational injury - result from an accident that occurred on the job. This is a one-time event that can be pinpointed with an exact date, time, and reason for injury.

Severe work-related injuries – Amputation, in-patient hospitalization or loss of an eye.

Supervisor - An individual having authority and exercising independent judgment to effectively recommend to hire/promote, discipline, assign, reward or adjust the grievances of other employees. Person who can take immediate, direct action to make sure that his or her work area is safe and healthful for all employees. In the context of this policy, a supervisor is an employee acting as an agent of Tulane University who is defined by OSHA as the employer.

8.0 POLICY AND PROCEDURES

8.1 Reporting an Incident/Close Call

Accurate and prompt reporting of incidents/illness/close calls provides Tulane University with the statistical information needed to identify and isolate patterns of injury/illness/property damage. Investigation and evaluation of such problems help determine the corrective measures needed to prevent or reduce the possibility of a similar incident.

The following steps should be followed when reporting an occupational injury or illness (Appendix I):

- Report the occupational injury to your Supervisor immediately.
- Request that your Supervisor assist you to immediately call Tulane’s 24/7 Injury and Illness hotline (855) 433-9938.

NOTE: It is the responsibility of the Supervisor/Department to report the occupational injury to Tulane's 24/7 Injury and Illness hotline within 24 hours of the injury.

If the occupational injury is severe, call Tulane Police immediately. Tulane Police will call 911, if considered necessary.

- Downtown/Uptown Campus Police – (504) 865-5911 or ext. 55911
- TNPRC Police – (985) 871-6411 or ext. 6411
- OSHA must be notified with 8 hours of work-related fatality and with 24 hours of a severe occupational injury or illness or hospitalization.

***If there is a death or severe injury involving employee hospitalization as the result of an occupational incident, the supervisor, principal investigator, or Unit Head must immediately notify Enterprise Risk Services at (504) 247-1716.**

To report a close call, notify oehs@tulane.edu.

The following steps should be followed when reporting an occupational injury or illness while at an off-site location :

- Report the occupational injury to your Supervisor immediately.
- Request that your Supervisor assist you to immediately call Tulane's 24/7 Injury and Illness hotline **(855) 433-9938**.
- If working at another facility, follow the facility's policies and procedures.
- If the injury or illness constitutes an emergency contact the appropriate authorities.

8.2 Responsibilities

To ensure compliance with regulatory requirements and with policies and procedures set forth at Tulane University, personnel shall act jointly with the Office of Enterprise Risk Services, including Office of Environmental Health and Safety, and CorVel, Tulane's third-party administrator.

8.2.1 Responsibilities of Tulane Employees

Tulane employees shall:

- Immediately report the incident/close call to their supervisor.
 - Should emergency personnel be needed contact TUPD prior to the supervisor.
 - TNPRC employees shall report to the Occupational Health Clinic.
- Request that the Supervisor assist the employee to immediately call Tulane's 24/7 Injury and Illness hotline, **(855) 433-9938**.
 - Representative triage nurse will advise the employee on seeking medical treatment for the injury.
- Provide written notification to their immediate supervisor and Enterprise Risk Services via

workcomp@tulane.edu of any lost or restricted work days ordered by a treating physician and also inform their supervisors of any changes and/or reevaluations that may delay a return to work.

- Forward any follow-up medical bills (related to the occupational injury/illness) and supporting medical document directly to Enterprise Risk Services via workcomp@tulane.edu.
- Receive certification from a medical profession to return to work due to work-related injury/illness. This certificate to return to work shall be forwarded to Enterprise Risk Services via workcomp@tulane.edu and copy the employee's supervisor.

8.2.2 Responsibilities of Tulane Supervisors

Tulane Supervisors shall:

- Assist the employee to immediately call Tulane's 24/7 Injury and Illness hotline, **(855) 433-9938**.
 - Should emergency personnel be needed, contact TUPD prior to the hotline.
- Ensure accurate and complete reporting to the hotline within 24 hours of the incident/close call notification.
- Immediately notify Enterprise Risk Services via workcomp@tulane.edu if an employee is placed out of work or on modified duty by their physician.
- Make known to the treating facility, in an emergency situation, that an injury/illness is classified as an "occupational" injury/illness and that any medical reports concerning treatment of the injured/ill employee resulting from the injury/illness must be sent to Enterprise Risk Services via workcomp@tulane.edu.
- Ensure that the physician's orders are implemented following a medical examination wherein a treating physician determines that the employee's injury/illness warrants restricted work duties or an adjustment in the employees work environment.
 - The supervisor may contact Enterprise Risk Services via workcomp@tulane.edu if the limitations imposed on the employee's job or work environment require further assessment to satisfy physician's orders.
- Encourage employees under their supervision to notify them of any potentially hazardous situation in the work environment. If a supervisor does not follow up on an employee's complaint, the employee may follow the unit's chain of command (a unit is a department, section center, or program or any number or configuration of these components). If nothing is done, the employee may by-pass the chain of command by reporting directly to Tulane's Office of Environmental Health & Safety (OEHS).
- Enforce rules and regulations concerning employees under their supervision.
- Correct any health and safety concerns resulting from the incident, findings, for corrective action.
- Ensure that personal protective equipment issued to employees is worn, that unsafe acts/conditions or practices of employees are not tolerated, that a safe working environment is maintained, and that the work area is kept free of hazard.
- Maintain and post all legally required posters which include but are not limited to Form 3165 "It's the Law" poster and State Department of Labor poster.
 - Employment law posters are available at: <https://hr.tulane.edu/employee-relations/employment-law-posters>.

8.2.3 Responsibilities of OEHS

OEHS shall:

- Maintain an “Open door” policy whereby any employee who, having followed the normal chain of command in reporting potentially hazardous situations, finds that no action has been taken to eliminate a reported hazard. OEHS shall investigate and, if necessary, advise those responsible for the unit that corrective measures are needed.
- Investigate incidents/injuries which include but are not limited to:
 - Any incident that results in temporary or permanent disabling injury/illness or loss of work time
 - Incidents that do not result in disabling injury/illness but are near misses that might have developed into disabling injury/illness.
 - An epidemic of incidents resulting in minor injuries/illnesses that represent a substantial cumulative loss.
- Inform all units of any trends or patterns involving accidents or illnesses that may need further study and/or possible corrective action.
- Provide Enterprise Risk Services with follow-up investigation reports.

8.2.4 Responsibilities of Health Care Providers

Health Care Providers shall:

- Provide appropriate medical care to an injured/ill employee.
- Complete a medical status report clearly indicating the diagnosis of the injury/illness, treatment, contemplated length of disability, if any, and if hospitalized, the name of the hospital.
- Submit completed medical status reports and any other related information to Enterprise Risk Services when follow up treatment is required. All such documents must be signed by the treating physician.
- Directions to the Downtown Tulane Living Well Occupational Health Clinic and Hours of Operation are included in Appendix II.

8.2.5 Responsibilities of Enterprise Risk Services

The Office Risk Management and Workers’ Compensation within the Office of Enterprise Risk Services shall:

- Review and evaluate the information provided in the First Report of Occupational Injury/Illness form, and, if it is determined that the injury/illness meets one or more of the necessary criteria, an “Employer’s Report of Occupational Injury or Disease” form (State of Louisiana, Office of Workers Compensation Administration Form WC-1007) shall be sent to the University’s Workers’ Compensation Insurance Company. Criteria warranting submission of Form WC-1007 include:
 - More than seven days of disability;
 - Injury resulting in death; or
 - Amputation or disfigurement.
- Distribute Form WC-1007 to the following:
 - The carrier copy and office copy are sent to the University’s Workers Compensation Insurance Company
 - The employer’s copy is retained by Risk Management

- The medical copy and injured employee's copy shall be forwarded to the injured/ill employee with instructions to have the medical copy completed by the treating physician and returned to Risk Management.
- Ensure compliance with OSHA and state Department of Labor regulations regarding occupational injuries/illnesses reporting and recordkeeping
- OEHS shall maintain all First Report of Occupational Injury/Illness forms which include OSHA Form 300, Log and Summary of Occupational Injuries and Illnesses, and OSHA 300A, Summary of Work-Related Injuries/Illnesses, for a period of five years. In the event of an OSHA audit, all reports on file must be produced within four business hours.
- Based on criteria established by OSHA, Enterprise Risk Services shall:
 - Determine whether reported injuries, illnesses, deaths, and multiple employee hospitalizations are recorded in the OSHA Form 300 log, and
 - Report any work-related fatality or employee hospitalizations to OSHA within eight hours of notification of such occurrence.

8.2.6 Responsibilities of Tulane's Third-Party Administrators

Tulane's Third-Party Administrators shall:

- Record the following:
 - The nature of the incident (including details).
 - The name and contact phone number of the person(s) who reported the incident/close call.
 - The name and contact number of the cognizant supervisor/construction manager
 - The name and contact number of the medical responder (if applicable)
- Notify Enterprise Risk Services of the occurrence of an incident/close call upon learning of the event.
- Determine if an employee is eligible for Workers ' Compensation, payment of compensation benefits, and medical bills.
- Use appropriate means to investigate claims, refer employees to physicians, and certify that employees can return to work when medically appropriate. Any information relating to on-the-job injuries, such as medical bills, medical reports, or other documents, should be promptly forwarded to CorVel by Enterprise Risk Services.

8.3 Incident/Close Call Investigation

Enterprise Risk Services has investigative authority in matters concerning occupational injury or illness.

Reasons for Incident/close call Investigations:

- An incident/close call is investigated primarily
 - To ascertain whether the incident was indeed work related for Workers Compensation and OSHA recordkeeping purposes
 - To detect incident/close call patterns or trends in an effort to prevent recurrences.

An investigation can be activated for:

- Any incident resulting in a fatality or the hospitalization of three or more employees.
- Any incident resulting in a disabling injury/illness or loss of workdays.
- Incidents that do not result in disabling injury/illness but are "close calls" that might lead to

- a disabling injury/illness if conditions remain unchanged.
- An epidemic of incidents resulting in minor injuries/illnesses that represent a substantial cumulative loss.
- Work related muscular skeletal disorders or repetitive motion injuries.
- Hearing loss injuries in jobs where noise exposure may be the causative factor.
- Trends in injuries or illnesses.

8.4 Workers' Compensation, Claims Management, And Return to Work

For additional information regarding Workers' Compensation, claims management, and the practices regarding returning to work after a work-related injury, please contact Enterprise Risk Services.

9.0 CONSEQUENCE OF VIOLATING THE POLICY

Violation of this policy may result in disciplinary action, up to and including termination.

For consequences of violating the policy refer to the Faculty and Staff handbooks found at policy.tulane.edu.

APPENDIX I

Instructions for Reporting an Exposure Incident or an Injury

APPENDIX II

Directions to Downtown Tulane Living Well Occupational Health Clinic and Hours of Operation

Occupational Injury & Illness Recordkeeping and Reporting Policy

Appendix I.

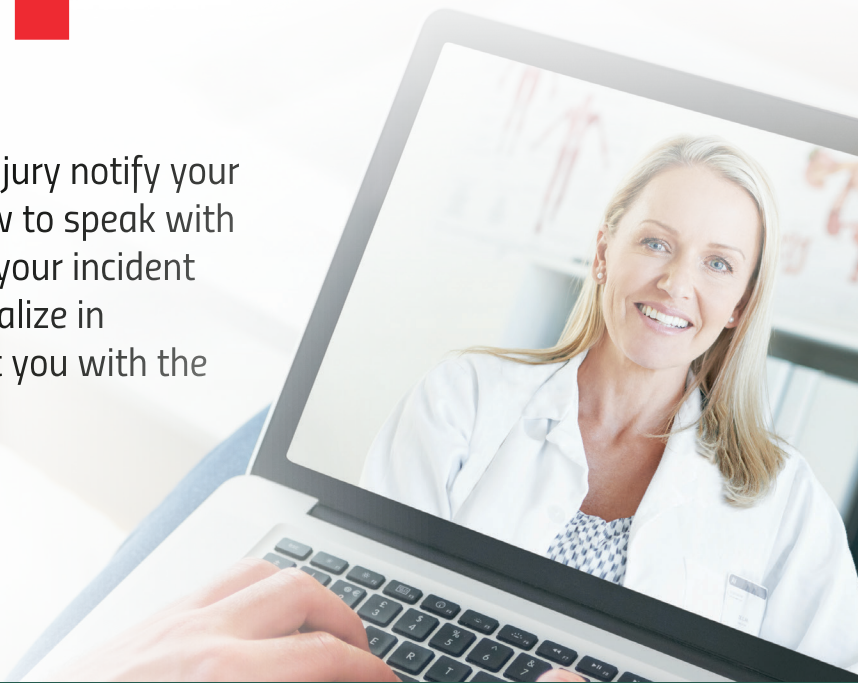
Instructions for Reporting an Exposure Incident or an Injury



Reporting a Workplace Injury



Immediately following a workplace injury notify your supervisor, and call the number below to speak with a registered nurse who will evaluate your incident and determine care. Our nurses specialize in occupational injuries and will connect you with the quality care you need.



Employee Injury Call Center
(855) 433-9938

Call TUPD for Emergencies
(504) 865-5911





Reporting a Workplace Injury



Immediately following a workplace injury notify your supervisor, and call the number below to speak with a registered nurse who will evaluate your incident and determine care. Our nurses specialize in occupational injuries and will connect you with the quality care you need.



Employee Injury Call Center

(855) 433-9938

TNPRC – Call TUPD for Emergencies

(985) 871-6411



Occupational Injury & Illness Recordkeeping and Reporting Policy

Appendix II.

Directions to Downtown Tulane Living Well Occupational Health Clinic and Hours of Operation



Tulane
OCCUPATIONAL
HEALTH

Workplace Injuries

Tulane Living Well Occupational Health Clinic provides an injured worker with the medical care and return-to-work status they need to ensure a safe, quick recovery. Our Staff works with the University to make it easy for you and your employees to navigate the workers' compensation process with minimal business interruption. With Tulane Medical Providers on staff, the clinic treats any non-emergent injury with high quality and efficiency.

Report Workplace Injuries to
855.433.9938

Occupational Healthcare Surveillance Services

- Audiometric testing
- Vision screening
- Respiratory Fit Testing
- Vaccinations
- Titers
- TB screening & testing



1430 Tulane Avenue, School of Medicine,
Hutchinson Building
Suite 1510
(on the first floor)



Monday – Friday
8:00 a.m. – 4:00 p.m.
(closed 12 – 1 for lunch)
tlwochealth@tulane.edu
504.988.6224

If your department has a medical surveillance need, please contact the Manager of Occupational Healthcare Surveillance via OccHealthMgr@tulane.edu or 504.314.2737.

risk.tulane.edu/ohs