

**Subject: Recording and Reporting Occupational Injuries and Illnesses**  
**References: Occupational Safety and Health Standards (OSHA), Toxic and Hazardous Substances, Bloodborne**

## **1. Purpose**

- a. This policy has been established to ensure:
  1. that all injuries and illnesses that occur on campus or off campus while attending or participating in a School sponsored activity are reported to the Department of Environmental Health and Safety (EHS) at the San Juan Bautista Medical Center (SJBMC);
  2. that all individuals experiencing an injury or illness as a result of an accident or incident receive timely and responsive medical attention; and,
  3. that, where applicable, claims for compensation for medical expenses are investigated and processed according to regulatory requirements.
- b. This policy is applicable to all School and Medical Center employees, students, volunteers, and visitors.

## **2. Definitions**

For the purpose of this policy, the following definitions will apply:

- a. **Accident.** The occurrence of an event that results in injury and/or illness to an individual.
- b. **Incident.** The occurrence of an event that could have but did not cause injury or illness to the individual(s) involved.
- c. **School and Medical Center employee.** Faculty, staff, or student employee who receives compensation from the School or Medical Center for his/her employment and who is covered under Puerto Rico Bureau of Worker's Compensation.
- d. **Occupational injury and/or illness.** An injury and/or sudden illness which occur to a School employee during the course of his/her work for the School, regardless of the location.

- e. **Non-occupational injury and/or illness.** An injury and/or sudden illness which occurs to a School student, volunteer, or visitor while he/she is on campus or off campus attending or participating in a School sponsored activity including but not limited to intramural and recreational sports and activities sponsored by registered student organizations. This category also would be assigned to School employees under the following conditions:
1. The employee is in a non-work status and becomes injured or ill while attending or participating in a School sponsored activity.
  2. The employee is injured or becomes ill while conducting non-work related activities, such as jogging, weight lifting, racquetball, basketball, and swimming, while in an official work status.
- f. **Reportable injury.** All injuries (occupational and non-occupational) which occur at any School facility or which occur at any School sponsored activity, regardless of location. All such occurrences shall be reported to the EHS at the SBMC.
- g. **Reportable illness.** All illnesses (occupational and non-occupational) which occur at any School facility or which occur at any School sponsored activity, regardless of location. All such occurrences shall be reported to the EHS at the SJBMC, provided the illness occurred as a result of exposure to environmental factors in the workplace or at the location of a School sponsored activity. Environmental factors are normally considered to be biological, chemical, and/or physical agents with exposure occurring by way of inhalation, skin or mucous membrane absorption, ingestion, injection, or by direct contact. Illness may result from either an acute or chronic exposure to environmental factors. *Acute exposure* is one that results in immediate or soon-to-follow symptoms of an illness which occur from an intentional or accidental exposure to a hazardous and/or toxic substance. *Chronic exposure* is associated with continuous or repeated exposure to substances, presumably throughout a working lifetime. Conditions such as headache, nausea, general malaise, or the occurrence of a communicable disease (cold, influenza, measles, mononucleosis, etc.) not associated with environmental factors in the workplace are not classified as reportable illnesses and should not be reported.
- h. **Lost workday.** A lost workday occurs when an employee would have worked but could not due to an occupational injury or illness. Supervisors are required to report the number of lost workdays experienced by his/her employees to the EHS at SJBMC as outlined in paragraph.3 d).
- i. **Restricted workday.** A restricted workday occurs when an employee who has experienced an occupational injury or illness returns to work, but in

the capacity of limited or restricted duty. Supervisors are required to report the number of restricted workday experiences by his/her employees to the EHS at the SJBMC, as outlined in paragraph 3 d).

### **3. Reporting Procedures**

#### **a. Non-injury/illness incident**

Any incident which could have but did not result in injury or illness to an employee or non-employee while on campus or while attending or participating in any School sponsored activity will be reported to the EHS at the SJBMC. Reporting such conditions provides for an investigation of the circumstances surrounding the incident and initiation of remedial action to prevent injury or illness in the future. In the workplace, reporting the incident is the responsibility of the immediate supervisor of the activity or a Police officer should that officer witness an incident or respond to the location of an incident. Incidents involving motor vehicles where there are no injuries are not to be reported to EHS; rather, these incidents should be reported to the Police Department. Exception: Incidents where an employee is cited for unsafe vehicle operation or where there is an indication that driver refresher training is needed, an incident report form will be submitted to the EHS at the SJBMC. Reports of non-injury/illness can be made either in writing or by telephone to EHS. Reports should be made promptly following the incident to allow for timely investigation.

#### **b. Non-occupational injury/illness**

All non-occupational injuries and illnesses shall be reported to the EHS at the SJBMC on the Incident Report form, which can be obtained at the office. The injured or ill individual should complete and sign the form whenever possible. Should the extent of injury or illness preclude this action, the form shall be completed by a representative from Employee Clinical Staff, a Police officer, or the individual responsible for the activity, if he/she is in attendance. Otherwise, a witness to the incident should complete and sign the Incident Report form. The witness can be anyone who was present at the time of the incident.

1. Any incident involving a student, visitor, volunteer, or off-duty employee while on the Campus shall be reported to the EHS at SJBMC by any of the following means, as soon as possible: using the emergency telephones located throughout the campus, or by dialing 911. The responding officer shall complete an Incident Report form, if conditions warrant.
2. Copies of the Incident Report form (non-occupational injury/illness) shall be distributed to Office of the Student's Dean (if the non-occupational incident involved a student).

c. Occupational injury/illness

All occupational injuries/illnesses shall be reported to the Department of Environmental Health and Safety on Occupational Safety and Health Administration (OSHA) Form 101, which can be obtained at the EHS office. The immediate supervisor of an injured or ill employee shall complete OSHA Form 101. Supervisors must ensure that the form is completed in its entirety. Incomplete submittals will be returned to the supervisor of the individual who completed the form.

1. The employee's immediate supervisor shall complete and forward OSHA Form 101 to the EHS at the SJBMC as soon as possible, but no later than three workdays following the incident. **Exception:** Immediate notification must be made to EHS for incidents that result in a fatality or the hospitalization of three or more employees. In this case, the School is required by law to make a report within eight hours of the incident to the superintendent of the Division of Labor and Worker Safety.
2. Copies of completed OSHA Form 101 (Occupational Injury/Illness) shall be distributed to the Office of the Student's Dean (if the occupational incident involved a student employee).

d. Reporting lost and/or restricted workdays


Supervisors are required to report, for each occupational injury or illness, the total number of lost and/or restricted workdays experienced by an employee. Because the criteria for reporting occupational illnesses to Regulatory Authority is different from the criteria for reporting occupational injuries, the EHS will determine the number of lost and/or restricted workdays experienced as a result of an occupational illness. A report must be made to EHS within two workdays following the employee's return to work. For those cases involving extended lost and/or restricted workdays, a report is to be made weekly to EHS. The report can be made in writing or by telephone.

1. Medical Care

Guidelines for obtaining medical assistance for injuries or illnesses are contained in Emergency Care for Injuries and Illnesses.

- a. In the course of their education, when do students learn how to avoid or prevent exposure to infectious diseases, especially from contaminated body fluids? When and how are they taught the procedures to follow in case of exposure (e.g., a needlestick injury)?

- During the Orientation Week, the first year students receive the Student Manual, which include the norms and procedures for management of students with Transmissible Diseases, including A.I.D.S.



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