What exactly defines a “First Aid” Injury?

While, in many cases, data on construction fail to adequately describe the industry, the problems - and the potential consequences - are particularly acute relative to safety and health. Most of the shortfalls appear to involve the reporting of injuries. More specifically the underreporting of first aid injuries, this stems from our desire to maintain a perfect safety record and avoid potential increases in workers' compensation premiums.

When the revised injury and illness recordkeeping rule was published in 2001, OSHA made it clear that the only non-recordable treatments are the 14 items listed under "first aid" at 1904.7(b)(5)(ii). All treatments excluded from the list are considered "medical treatments" and recordable on the 300 Log.

I hope this serves as a reminder of what is "first aid"? For the purposes of Part 1904, "first aid" means the following:

1. 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);

2. Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment);

3. Cleaning, flushing or soaking wounds on the surface of the skin;

4. 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);

5. Using hot or cold therapy;

6. 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);

7. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
8. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister;

9. Using eye patches;

10. Removing foreign bodies from the eye using only irrigation or a cotton swab;

11. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means;

12. Using finger guards;

13. Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes); or


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.

1904.5(b)(2) You are not required to record injuries and illnesses if . . .

(i) 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.

(ii) The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.

(iii) 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.

(iv) 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.

(v) 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.

(vi) The injury or illness is solely the result of personal grooming, self medication for a non-work-related condition, or is intentionally self-inflicted.

(vii) 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.

(viii) 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).

(ix) 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.

Another difference between first aid and medical treatment is the employer's and employee’s reporting responsibilities. Specifically: If treatment is considered first aid, the employer is not required to submit an Employer's Report of Occupational Injury or Illness nor provide a Workers' Compensation Claim Form to the employee.

My attempt was to give you a clear understanding of a recordable vs. non-recordable, I hope I accomplished this in this article. There are many great resources to assist you in obtaining this information. The safety of our employees should be our greatest reward!

References: Center for Construction Research and Training, U.S. Department of Labor, Occupational Safety & Health Administration