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ATTORNEYS:

[Jeffrey P. Clark](#)
[Robert K. Sholl](#)
[David J. Sisson](#)
[Christopher P. Banaszak](#)
[John G. Pawley](#)
[Carolyn A. Sullivan](#)
[Robert J. Muten](#)
[Kirstin A. Goetz](#)
[Martin A. Machtan](#)

1000 North Water Street
P.O. Box 2965
Milwaukee, Wisconsin
53201-2965
414-298-1000
800-553-6215

ATTORNEYS:

[John H. Zawadsky](#)
[Lynn M. Stathas](#)
[Raymond M. Roder](#)
[Daryll J. Neuser](#)

22 East Mifflin Street
P.O. Box 2018
Madison, Wisconsin
53701-2018
608-229-2200
800-728-6239

ATTORNEYS:

[Donald P. Gallo](#)

W233 N2080
Ridgeview Parkway
P.O. Box 2265
Waukesha, Wisconsin
53187-2265
262-951-4500
800-928-5529

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OSHA Keeps Recordkeeping Form Requirements

Recently, the Occupational Safety and Health Administration announced that it would not add a column for recording musculoskeletal disorders ("MSDs") to its 300 Log for Injury and Illness Recording and Recordkeeping.

In January 2001, OSHA revised its recordkeeping rule (29 C.F.R. § 1904.12(a)) to require employers to check a new MSD column on the OSHA 300 Log if an employee experienced a work-related MSD. However, the effective date of the MSD requirement was postponed so that OSHA could hold a series of forums to develop a comprehensive plan to address ergonomic hazards. After holding the ergonomic forums, OSHA decided not to modify the recordkeeping form. Consequently, an MSD column will not be added to the 300 Log and the current method of recording injuries or illnesses will continue.

For a review of the recordkeeping requirements published by OSHA in January 2001, please see

http://www.reinhartlaw.com/apps/newsletters/archive/osha/osha_01_02.pdf.

If you have questions regarding this final rule or if you would like assistance in preparing for an OSHA inspection, please contact a member of our OSHA Practice Group.

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