



Determining what is recordable on OSHA's Form 300

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By now all hotels should have posted *OSHA's Form 300A, Summary of Work-Related Injuries and Illnesses*. This is an OSHA requirement from February 1 to April 30 for the previous year. OSHA placed a high priority on recordkeeping during 2009, which will likely continue into the current year. Citations have been issued for errors as simple as mathematical mistakes.

All hotels and resorts covered by OSHA Regulation Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during last year. Remember to review the *OSHA 300 Log* to verify that the entries are complete and accurate before completing the *OSHA 300A Summary*. Using the *OSHA 300 Log*, count the individual entries made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If the hotel experienced no cases, write "0."

Employees, former employees, and their representatives have the right to review the *OSHA Form 300* in its entirety. They also have limited access to the *OSHA Form 301* or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms. OSHA officials have stated they will always request the past three (3) years of records during an inspection; the regulation requires each employer to maintain records for the last five (5) years.

Not all injuries are OSHA recordable. Please see the enclosed decision tree taken from the OSHA website which may be helpful in determining which of your associates' injuries are recordable. A template of the current *OSHA 300A Summary* sheet is also enclosed. ✧

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Meth “cookers” teach an average of ten others in a year how to manufacture the drug, so there is no dearth of knowledge or lack of willing workers to replace those that have quit due to injury, death, or arrest. Most Meth labs are “portable” so they can be quickly relocated once outsiders (i.e., Police, rival drug traffickers, users) learn the location of the lab and make it untenable for production to continue. The portable nature of the labs makes it difficult for Police to obtain a search warrant for the legal bust of a Meth lab location, and immediate access to ingredients and equipment makes it easy for the cookers and dealers to roam free, able to spread this poison.

Identifying potential “cookers”

When a potential “lab operator” approaches a hotel or resort front desk to register, there may be some tell-tale signs of the individual’s real intention for contracting a guestroom or cabin, especially if the cooker is also a “user” (addict). There will be scabs and sores on the face and arms and the individual may be scratching at his/her body while registering. The teeth are likely to be rotting (this is known as “meth mouth”), and there will be poor grooming and dilated pupils with redness on the iris. Generally, the individual will be abnormally thin as users tend to experience significant weight loss.

In addition to the physical appearance there are some significant behavioral warnings. The individual may be an incessant talker and very nervous, anxious, and fidgety. The person may also be very argumentative and irritable.

During the registration, the individual will usually pay cash, present a local address, and provide no identification. The registration will normally be at strange hours so as to avoid other registrants, or at times when senior management or supervisory personnel are not present.

Of course, if the individual registering for the guestroom is seen transporting many of the aforementioned ingredients and supplies onto hotel property, it is pretty safe to assume that their intention is not rest and relaxation but rather some illegal endeavor.

Policies and procedures

There are several potential hotel policies that Management can consider enacting to prevent the registration of the “meth addict” or “cooker”. Hoteliers should review with legal counsel interpretation of the discretion allowed to the innkeeper under local and state Innkeeper Laws, or other local regulations which permit refusal of registration. One policy would be to deny registration to any guest that presents a local address, perhaps within 50 miles of the hotel’s location. Rarely do guests who reside nearby need hotel accommodations.