



Standard Interpretations - Table of Contents

• **Standard Number:** 1904.0007(b)(5)(ii)(F)

OSHA requirements are set by statute, standards and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Also, from time to time we update our guidance in response to new information. To keep apprised of such developments, you can consult OSHA's website at <http://www.osha.gov>

April 14, 2016

Ms. Barbara Jo Ruble
Specialty Technical Consultants
41 7 Grindall St.
Baltimore, MD 21230

Dear Ms. Ruble:

Thank you for your November 24, 2015, letter to the Occupational Safety and Health Administration (OSHA) regarding the recordkeeping regulation contained in 29 CFR Part 1904 - Recording and Reporting Occupational Injuries and Illnesses. Specifically, you requested an interpretation regarding medical treatment beyond first aid.

Scenario: A worker began to experience wrist pain after spending most of his workday at a computer. Arrangements were made for him to visit the occupational health clinic. Prior to going to the clinic, the employee purchased and used a rigid wrist brace. The doctor at the clinic stated that while the brace was not necessary, if the worker felt he was getting pain relief by using the brace, he should continue to wear it.

Question: Does this constitute medical treatment beyond first aid for recordkeeping purposes?

Response: Yes. OSHA's regulation at Section 1904.7(b)(5)(ii)(F) provides that orthopedic devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment beyond first aid for recordkeeping purposes. Generally, OSHA does not consider self-treatment or self-medication by the employee to constitute medical treatment beyond first aid. The treatment must be directed or recommended by the employer or a health care professional to be considered medical treatment beyond first aid. In the scenario above, a physician recommended to the employee to use the rigid brace for pain relief. Once this recommendation was made, the case involved medical treatment beyond first aid, and the work-related injury must be recorded.

We hope you find this information helpful. OSHA requirements are set by statute, standards, and regulations. Our interpretation letters explain these requirements and how they apply to particular circumstances, but they cannot create additional employer obligations. This letter constitutes OSHA's interpretation of the requirements discussed. Note that our enforcement guidance may be affected by changes to OSHA rules. Recordkeeping FAQs and letters of interpretation can be viewed at <http://www.osha.gov/recordkeeping/index.html>.

Sincerely,

Amanda Edens, Director
Directorate of Technical Support and Emergency Management

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