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• **Standard Number:** 1904; 1904.7

July 6, 2015

Jim Thornton
National Athletic Trainers' Association
1620 Valwood Parkway, Suite 115
Carrollton, TX 75006

Dear Mr. Thornton:

Thank you for your letter dated January 27, 2015, to the Occupational Safety and Health Administration (OSHA) regarding the recordkeeping regulation contained in 29 CFR 1904 — Recording and Reporting Occupational Injuries and Illnesses. Specifically, you asked OSHA to reconsider its interpretation regarding the use of kinesiology tape.

As requested, OSHA has reevaluated its classification of the application of kinesiology tape as constituting medical treatment. OSHA reviewed information associated with such tape from patent applications, from relevant instructional materials and directions for when and how to use it, from evaluations and descriptive experiences involving recommended uses and their efficacy, from assessments regarding the nature and mechanisms of its effects, and from reviews of the extent and nature of any medicinal, neurological, and physical properties and impacts.

Pursuant to 29 CFR 1904.7, first aid treatment includes "any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc." The use of kinesiology tape and other types of elastic taping is included within the definition of first aid treatment, and thus the use of such tape alone would not be considered medical treatment.

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. 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 www.osha.gov.

Sincerely,

Amanda Edens, Director
Directorate of Technical Support and Emergency Management

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