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U.S. DEPARTMENT OF LABOR
Bureau of Labor Statistics
Washington, D.C. 20212

September 28, 1970

Mr. Francis L. LaQue, President
American National Standards
Institute
1430 Broadway
New York, New York 10018

Dear Mr. LaQue:

I am pleased to submit to you the report of the Study Group on Reporting Work Injuries on a Nationwide Basis, which you appointed in January of this year. We have prepared a proposed National System for Uniform Recording and Reporting of Occupational Injuries and Illnesses, reflecting the consensus of the study group. It is enclosed as Exhibit I, together with a report on our work as Exhibit II. The study group has completed its formal assignment and should be discharged.

In a very real sense, however, the work of the study group has just begun. Departures from long-established modes of thought are suggested and a new method of measuring occupational safety and health proposed. We recognize that there are controversial aspects to the proposal. A thorough review by those with an interest in the subject is required. The study group did not clear our proposal with the groups from which we came or with others. It is recognized that the system needs testing in use.

On behalf of the members of the study group and those we invited to consult with us, I thank you for the opportunity to participate in this useful and important work.

Yours most sincerely,

Maurice F. Bresnahan

Maurice F. Bresnahan
Study Group Chairman

Enclosures

PLAINTIFF'S EXHIBIT
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Proposed National System
for
Uniform Recording and Reporting
of
Occupational Injuries and Illnesses

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EXHIBIT I

PROPOSED

NATIONAL SYSTEM

FOR

UNIFORM RECORDING AND REPORTING

OF

OCCUPATIONAL INJURIES AND ILLNESSES

August 21, 1970

# Proposed National System for Uniform Recording and Reporting of Occupational Injuries and Illnesses

## 1. Introduction

The National System proposed herein is designed to provide an annual profile on the numbers of occupational injuries and illnesses occurring in the American work place. The measurement will provide indicators as to where occupational safety and health problems exist and can be used as a guide for those responsible for the prevention of future occupational fatalities, injuries and illnesses.

## 2. Definitions

In this reporting system the following definitions shall apply:

2.1 A Reportable Occupational Injury or Illness is any disability or permanent impairment to an employee which results from any exposure in the work environment that either:

1. Results in death; or
2. Prevents the employee from performing his normal assignment during his next regular or subsequent work day or shift; or
3. Requires 2 or more visits to a physician.

2.2 An Occupational Injury is any injury such as a cut, fracture, sprain, amputation, etc., which results from a work accident.

2.3 An Occupational Illness of an employee is any abnormal physical condition or disorder, other than one resulting from an occupational injury, caused by exposure to environmental factors associated with his employment. It includes acute and chronic illnesses or diseases which may be caused by inhalation, absorption, ingestion or direct contact and which can be included in categories 1 through 7 listed in Section 4.

2.4 Classification of Reportable Occupational Injuries or Illnesses

The following classifications shall apply to reportable occupational injuries or illnesses:

1. Fatalities: Injuries and illnesses that result in the death of any employee regardless of the time between the injury or the diagnosis of illness and death.

2. Lost Time Cases: Injuries and illnesses other than fatalities that prevent the employee from performing his normal assignment during any part of the next regular or any subsequent work day or shift.

3. Two-Visit Physician Treatment Cases: Injury and illnesses, other than fatalities and lost time cases, that require 2 or more visits to a physician.

2.5 Occupational Injury and Illness Records. A recording of each reportable occupational injury (including fatality) and illness is required of every employer covered by the reporting system.

2.6 Annual Summary is a compilation of the total number of reportable occupational injuries and illnesses (including fatalities) by classification for posting by employers in a manner accessible to the employees.

2.7 Annual Report is a report of occupational injury and illness data that is to be completed and submitted upon the request of the Secretary of Labor.

2.8 Work Days Lost. The actual number of days the employee would have worked but could not because of an occupational injury or illness.

2.9 Establishment. An economic unit which produces goods or services, and generally is in one physical location engaged in one economic activity.

2.10 Work Environment is comprised of the physical location, equipment, materials processed or used, and the kinds of operations performed by an employee in the performance of his work.

2.11 Man-Hours Worked. In the reporting system, man-hours will be used as the common denominator and is the total hours worked by the employees during the reporting period. To make the rates more meaningful, they will be presented in terms of "per 100 full-time employees."

3. Occupational Injury and Illness Reporting System

The uniform system of recording and reporting occupational injuries and illnesses consists of a required Annual Report Form, Section 3.2.1; a required Annual Summary, Section 6; and a suggested Log, Section 5.

3.1 Occupational Injury and Illness Records

3.1.1 Records

Each occupational injury (including fatality), and illness shall be recorded by every employer using his own record keeping system, which can be a first report of injury or equivalent form. The suggested Log of Section 5 can also be used.

The records shall be used as a source for completing the Annual Report of Section 3.2 and the Annual Summary of Section 3.

Every occupational illness, diagnosed by a physician as included in the definition of Section 2.3, and reported to the employer, shall be recorded, provided the extent of disability is that of one of the classes of Section 2.4.

3.2 Annual Report. The annual report which shall be completed and filed with the Secretary of Labor, upon request, is that report form described in Section 3.2.1.

3.2.1 Annual Report Form

# OCCUPATIONAL INJURY AND ILLNESS REPORT FOR 1970

Individual establishment reports will only be available for statistical compilation, inspection services, and consultation services. Information will not be published so that the individual establishment can be identified or its report deduced.

Codes

*(Please change mailing address if incorrect—Include postal ZIP code)*

Establishment name and location

## I. Employment and Hours. (See instructions I.)

(Please complete this section even though there were no injuries.)

1. **Average number of** full- and part-time **employees** (Enter average of year; include all classes of employees) . . . .....

2. **Total hours worked** by all employees during entire year . . . .....

## II. Nature of Business. (See instructions II.)

3. Principal type of activity of this establishment (i.e., manufacturing, wholesale, retail, construction, hotel, etc.):

.....

4. Enter in order of importance the principal products manufactured, lines of trade, specific services, or other activities.

| | Percent of total annual sales value or receipts, 1970 |
|---|---|
| (a) ..... | .....% |
| (b) ..... | .....% |
| (c) ..... | .....% |
| (d) ..... | .....% |
| (e) ..... | .....% |

5. For manufacturing only, indicate:

(a) Principal materials used (e.g., Aluminum castings, machined parts, assembled parts; rayon staple, wool yarn, cotton fabrics, etc.—in the form brought into plant; do not list materials produced in this plant.)

.....

.....

(b) General types of operations performed (e.g., foundry, machine shop, assembly; spinning, weaving, sewing, etc.) .....

.....

.....

.....

## III. Reportable Occupational Injuries and Illnesses (See instructions III.)

| | Fatalities (1) | Lost Time Cases: Number of Cases (2) | Lost Time Cases: Work Days Lost (3) | Two-Visit Physician Treatment Cases (4) |
|---|---|---|---|---|
| (a) Occupational Injuries | | | | |
| (b) Occupational Illnesses<br>1. Occupational skin diseases or disorders | | | | |
| 2. Dust diseases of the lungs (pneumoconioses) | | | | |
| 3. Respiratory conditions due to toxic agents | | | | |
| 4. Poisoning (systemic effects of toxic materials) | | | | |
| 5. Disorders due to physical agents (other than toxic materials) | | | | |
| 6. Disorders due to repeated trauma | | | | |
| 7. All other occupational illnesses | | | | |
| Total -- occupational illnesses (1-7) | | | | |
| (c) Total -- Occupational Injuries and Illnesses | | | | |

Comments: .....

.....

Report prepared by..... Position..... Date .....

3.2.2 Instructions for Completing the Annual Report Form

3.2.2.1 General

a) This report is required upon request of the Secretary of Labor
b) The annual report period shall be for a calendar year, with the report to be completed by January 30, the following year.

Establishment Name and Location: Enter the location if different from the mailing address and the name, number, or other designation that identifies this establishment.

3.2.2.2 Specific Instructions

I. Employment and Hours

Item 1. Employees.--Enter the average number of employees for the year. Include all classes of employees (administrative, supervisory, clerical, professional, technical, sales, delivery, installation, construction and service personnel, as well as operating and related workers) employed full- or part-time by this establishment. To obtain this figure (a) add the number of employees reported to your State Unemployment Insurance Agency for each month and divide by 12, or (b) add the number on each payroll during the year and divide by the number of such payrolls in the year.

Item 2. Hours.--Enter the total hours worked by all employees during the entire year. Include all time on duty, but exclude vacation, holiday, sick leave, and all other off-duty time, even though paid for. The hours reported should be obtained from payroll or other time records. If actual hours of office, sales, or other groups are not available, they may be estimated on the basis of scheduled hours or 8 hours per day. (Example: If 10 employees worked 8 hours per day, 5 days a week, for 50 weeks the total would be 10X8X5X50=20,000 hours for the year.) Allowance should be made

for overtime, slack periods, irregular and part-time work, holidays, vacations, and other absences.' For standby employees such as seamen, firemen, emergency crews, etc., use the number of hours the employee is confined to the employers premises, up to 24 hours per day. For employees living on the property but not confined to it, use the actual hours worked. Include actual hours worked by casual employees.

II. Nature of Business

Under Item 3, indicate the general type of activity, and under item 4 list the specific products manufactured, lines of trade, services, or other activities engaged in. Please describe each product or activity fully. (Example: Manufacturing upholstered household furniture, retail men's shoes, auto body repair, etc.) If more than one product or activity is listed, show in the second column the approximate percent of total annual sales value or receipts derived from each. If engaged in manufacturing, please list under 5(a) the principal materials used (in the form in which they were brought into establishment), and under (b) indicate the general types of operations performed by this establishment.

III. Reportable Occupational Injuries and Illnesses

Enter the total number of fatal cases, lost time cases, and two-visit physician treatment cases (These make up reportable injuries and illnesses.) for each of the classes of occupational injuries and illnesses listed. Include all reportable injuries and illnesses incurred by employees of the establishment during the calendar year. If the final extent is not known by the reporting date (February 1 of the following year) use the doctor's best estimate.

If you are unable to estimate final extent, give details of the case in "Comments." For lost time cases, enter the number of work days lost. If there is none, enter "0" in the box.

A Reportable Occupational Injury or Illness is any disability or permanent impairment to an employee which results from any exposure in the work environment that either:

1. Results in death; or
2. Prevents the employee from performing his normal assignment during his next regular or subsequent work day or shift; or
3. Requires 2 or more visits to a physician.

Fatalities: (column 1) Injuries and illnesses that result in the death of any employee regardless of the time between the injury or the diagnosis of illness and death.

Lost Time Cases: (column 2) Injuries and illnesses other than fatalities that prevent the employee from performing his normal assignment during any part of the next regular or any subsequent work day or shift.

Note: Lost Time refers to the inability to perform the normally assigned job and shall be counted even though the employee is temporarily placed on a different job.

Work Days Lost: (column 3) The actual number of days the employee would have worked but could not because of an occupational injury or illness.

The total number of days lost does not include the day of the injury (or the first day of inability to perform the normal assignment because of illness); nor the day of return to full-time work at the normal assignment; and also excludes days on which no regular work was scheduled for this employee. It does include as Lost Time all work days lost until the employee returns to his former or a new permanently assigned job.

For employees not having a regularly scheduled shift, i.e., certain truck drivers, construction workers, longshoremen, farm labor, casual labor, etc., it may be necessary to estimate the number of work days lost.

Two-Visit Physician Treatment Cases: (column 4) Injuries and illnesses, other than fatalities and lost time cases, that require 2 or more visits to a physician.

(a) Occupational Injury

An occupational injury is any injury such as a cut, fracture, sprain, amputation, etc., which results from a work accident.

(b) Occupational Illnesses

Because occupational illnesses are rarely attributable to a specific incident, they should be reported in the year in which the illness was first diagnosed and reported to the employer.

For this report, an occupational illness of an employee is any abnormal physical condition or disorder, other than one resulting from an occupational injury, caused by exposure to environmental factors associated with his employment. It includes acute and chronic illnesses or diseases which may be caused by inhalation, absorption, ingestion or direct contact and which can be included in categories 1 through 7 listed in Section 4.

4. Categories of Reportable Occupational Illnesses

The following listing gives the categories of occupational illnesses and disorders that will be utilized for the purpose of classifying reportable illnesses. For purposes of information, examples of each category are given. These are typical examples, however, and are not to be considered to be the exclusive listing of the types of illnesses and disorders that are to be counted under each category.

1. OCCUPATIONAL SKIN DISEASES OR DISORDERS

Examples: Contact dermatitis, eczema, or rash caused by primary irritants and sensitizers or poisonous plants; oil acne; chrome ulcers; chemical burns or inflammations; etc.

2. DUST DISEASES OF THE LUNGS (Pneumoconioses)

Examples: Silicosis, asbestosis, coal worker's pneumoconiosis, byssinosis, and other pneumoconioses.

3. RESPIRATORY CONDITIONS DUE TO TOXIC AGENTS

Examples: Pneumonitis, bronchitis, pharyngitis, rhinitis or acute congestion due to chemicals, dusts, gases, or fumes; farmer's lung; etc.

4. POISONING (Systemic Effects of Toxic Materials)

Examples: Poisoning by lead, mercury, cadmium, arsenic, or other metals; poisoning by carbon monoxide, hydrogen sulfide or other gases; poisoning by benzol, carbon tetrachloride, or other organic solvents; poisoning by insecticide sprays such as parathion, lead arsenate; poisoning by other chemicals such as formaldehyde, plastics and resins; etc.

5. DISORDERS DUE TO PHYSICAL AGENTS (Other than Toxic Materials)

Examples: Heat stroke, sunstroke, heat exhaustion and other effects of environmental heat; freezing, frostbite and effects of exposure to low temperatures; caisson disease; effects of ionizing radiation (isotopes, x-rays, radium); effects of non-ionizing radiation (welding flash, ultra-violet rays, microwaves, sunburn); etc.

6. DISORDERS DUE TO REPEATED TRAUMA

Examples: Noise-induced hearing loss; synovitis, tenosynovitis, and bursitis; Raynaud's phenomena; and other conditions due to repeated motion, vibration or pressure.

7. ALL OTHER OCCUPATIONAL ILLNESSES

Examples: Anthrax, brucellosis, infectious hepatitis, malignant and benign tumors, food poisoning, histoplasmosis, coccidioidomycosis, etc.

## 5.1 Log of Reportable Occupational Injuries and Illnesses (Reduced)

| Case Number | Employee's Name (and Occupation at Time of Injury) | Date of Injury 1/ | Class of Injury or Illness 2/ | Brief Description of Injury or Illness | Extent of Injury or Illness (Count each case in only one of these classes of extent.) | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | Fatalities | Non-Fatal Lost Time Cases | | Non-Fatal Cases Requiring Physician Visits Only (No Days Lost From Permanent Job) | |
| | | | | | Date of Death | Date of Return to Permanent Job | Work-Days Lost From Permanent Job | First Visit Date | Second Visit Date |
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1/ For occupational illness, date of first day of absence in connection with which it was diagnosed as an occupational illness and reported to the employer.

2/ Enter one of these codes: A, Occupational injuries; B, Occupational skin diseases or disorders; C, Dust diseases of the lungs (pneumoconioses); D, Respiratory conditions due to toxic agents; E, Poisoning (Systemic effects of toxic materials); F, Disorders due to physical agents (other than toxic materials); G. Disorders due to repeated trauma; H, All other occupational illnesses. Examples appear in Section 4.

Note: Maintenance of this log is intended only as an aid to accurate completion of the annual summary.

6. Annual Summary

An annual summary similar to Section 6.1 shall be completed and posted in the employers establishment by February 15 of the following year, in a manner accessible to the employees.

The posted summary shall be of sufficient size so as to be easily read by the employees.

7. Reporting Method

7.1 Establishments required to report will be determined by the Secretary of Labor.

7.2 Method of reporting to be determined by the Secretary of Labor.

8. Data Output of the System

The system is designed to provide, for the nation as a whole, estimates of:

The total number of reportable work injuries and illnesses,
the number of fatalities,
the number of lost time cases,
the number of work days lost, and
the number of two-visit physician treatment cases.

Also it is designed to provide, for each of these, a rate such as the number of two-visit physician treatment cases per 100 employees.

Either an estimate of the total or a rate, or both, could be provided for the following:

Each State,
industry categories (a total of about 1,000 under the Standard Industrial Classification),
size-of-establishment categories, and
occupational injuries and occupational illnesses separately.

Cross tabulations of the above could be provided in a large number of cases. For example the system might provide the total number of lost time cases from occupational illness in 1971 per 100 employees in Massachusetts chemical manufacturing establishments with from 20 to 100 employees.

Individual establishment totals will be available for comparison to any of the aggregate figures or rates.

6.1 ANNUAL SUMMARY - 1970

OCCUPATIONAL INJURIES AND ILLNESSES
XYZ MANUFACTURING COMPANY
PLANT No. 3

| III. Reportable Occupational Injuries and Illnesses (See instructions III.) | Fatalities | Lost time cases | | Two-visit Physician treatment cases |
|---|---|---|---|---|
| | | Number of cases | Work days lost | |
| (a) Occupational Injuries | | | | |
| (b) Occupational Illnesses | | | | |
| 1. Occupational skin diseases or disorders | | | | |
| 2. Dust diseases of the lungs (pneumoconioses) | | | | |
| 3. Respiratory conditions due to toxic agents | | | | |
| 4. Poisoning (systemic effects of toxic materials) | | | | |
| 5. Disorders due to physical agents (other than toxic materials) | | | | |
| 6. Disorders due to repeated trauma | | | | |
| 7. All other occupational illnesses | | | | |
| Total -- occupational illnesses (1-7) | | | | |
| (c) Total -- Occupational Injuries and Illnesses | | | | |

Exhibit II

# Report
# to the
# American National Standards Institute
# from the
# Study Group
# on
# a National System for Uniform Recording and Reporting of Occupational Injuries and Illnesses

This report records the beginning and work of the study group, the assumptions under which it operated, and the principal matters it considered.

## Study Group Charge

Secretary of Labor J. D. Hodgson (then Under Secretary) noted, in a letter to the American National Standards Institute in December 1969, that the proposed Occupational Safety and Health Act included a proposed national system for the collection of occupational accident and health statistics. He expressed concern over the appropriateness and applicability of ANSI Standard Z16.1-1967, Methods of Recording and Measuring Work Injury Experience, for the broad universe of employees subject to the jurisdiction of the Act particularly with reference to the complexity of Z16.1 and its treatment of health questions. Mr. Hodgson requested that ANSI initiate a review and evaluation of the effectiveness and application of Z16.1 as the national standard for injury statistics collection.

An informal conference of injury statistics experts met at ANSI headquarters on January 5, 1970, to review the question. The conferees agreed that there was substance to Mr. Hodgson's concern and proposed that a study group be formed with the following charge:

> Review available reporting methods and standards of reporting injuries on a nationwide basis and if necessary develop a simple method of reporting injuries. This shall be in the form of recommendations to the Standards Institute.

The conferees based their proposal on considerations including the following:

Z16.1 has grown complex through efforts to make it equitable in varying circumstances, but the complexity has led to inequity for small reporters who do not know the full standard. It is now too complicated for a mandatory national reporting system.

For establishments and companies with good safety records, Z16.1 does not reflect trends in injury experience adequately.

Z16.1 is not adequate for the recording of health experience, e.g., noise and occupational illnesses.

The conferees also found that the Z16.1 Standard could not be separated from its use, and proposed review of reporting systems and their samples, the detail in which statistics are required, and nature of reports in a national system.

President Francis L. LaQue of ANSI accepted the report of the conferees and appointed a study group to make a report to the Institute in 90 days.

Review of Problem

The study group held full-day meetings on January 16, February 3 and 17, March 9 and 23, April 6, 7 and 23 and July 28. Consultants, particularly in the field of occupational illness, were invited to sit with the group and provided a considerable amount of useful information and advice. Members of the ANSI staff participated in the work and provided brief minutes of the meetings.

Although the study group gave brief attention to workmen's compensation statistics, disability statistics of the Social Security Administration, and current planning by the Bureau of Mines, it was agreed that the system to be considered must be more like the current establishment statistics systems of the Bureau of Labor Statistics and the National Safety Council. Current BLS and NSC statistics were found to suffer from the problems of ANSI Z16.1 noted by the earlier conference, from inadequate samples, and from not reflecting experience by size of establishment.

The study group recommends that every employer covered by the Act be required to keep a record of each reportable occupational injury and illness (including fatality), and that he be required to compile an annual summary of the individual records and post it by February 15 of the following year within the establishment in a manner accessible to the employees. Not all the employers should be required to provide reports to the Federal Government, perhaps BLS, for statistical purposes, however, a well-designed sample would provide sounder statistics than a complete enumeration of covered employers. Subject to technical review by sampling statisticians, the study group estimates that an eventual sample of about 1 million reports would provide adequate national and State statistics by industry and size class.

System Concepts

Bearing in mind the points on which the Z16.1 Standard was criticized, the study group set about devising a system that would be simple, sensitive, and meaningful; would reflect occupational disease experience; and would be usable in a very large-scale survey. The items to be reported were defined and redefined several times in attempts to come closer to this ideal.

The system assumes that each establishment will maintain records of reportable injuries and illness and will make and post an annual summary. A sample of establishments will make annual reports including data from the summary with location, employment, man-hours, and activity data required for the statistics. It is envisaged, however, that some establishments will be required to provide variations of this report, on a more frequent basis or including additional data, to meet information requirements for administration of the legislation.

The study group believes that reports should be held in confidence within the area of administration of the legislation. A statement might be made that "Individual establishment reports will not be made public and no statistics will be published in a way that permits identification of an individual establishment or deducation of its reports. The reports are to be available for statistical compilation, for the direction of inspection and consultation services, and for administration of the Act."

The study group felt that the system should provide insofar as possible a sensitive measure. Counting comparatively numerous minor incidents gives a more sensitive measure. Counting comparatively rare major incidents gives a less sensitive measure. Unfortunately, it is not practical to count every accident and so the most sensitive measure cannot be used. The crucial task of the study group was to choose a measure which on the one hand would be sensitive and on the other practical for a large number of employers. Such a measure must be defined in terms of the extent of the injury of illness. Then all injuries or illnesses of that or greater extent would be "reportable," a term the study group adopted.

The group agreed that traditional frequency and severity rates expressed in terms of millions of man-hours worked are abstract concepts not readily understood by management and others concerned with the protection of workers. Consequently, the study group decided that a more meaningful measure of rates would be "injuries per 100 employees per year" rather than per million man-hours worked. These rates should be in terms of 100 full-time employees.

The system was simplified by eliminating the traditional exceptions and exemptions of 216.1 and by reducing the number of decisions that have to be made by those required to keep records. For example, instructions for use of this system are contained on 4 typewritten pages compared to the 40 printed pages of 216.1.

Rates

Statistics from the system proposed would include some estimated numbers, as the number of fatalities or the number of reportable injuries or illnesses. For comparison purposes, however, experience must be reflected by rates. The study group recommends that the primary base of such rates be the numbers of man-hours at risk, and that they be expressed in terms of a base of 100 full-time employees.

Measurements of the severity of injury and illness that apply arbitrary numbers of days for deaths and permanent impairments are felt to be too complex and obscure for general comprehension and thus the recommended system does not include abritrary charges.

The recommendation of the study group provides for a count of work days lost, but does not provide an all-over severity measure. It is felt that, for purposes of prevention of future losses, the random or accidental factors affecting the extent of disability are of little importance as compared to the occurrence of an occupational injury or illness.

Terms

The Study Group defined the following terms to be part of the reporting system.

Reportable Occupational Injuries and Illnesses are defined in terms of the extent of the injury. Three classes were defined: Fatalities are included, as they are in all measures. Lost Time Cases are defined in a variant of a definition used for over 50 years, the inability of the employee to perform his normal assignment during a day or shift after the day of injury. Two-Visit Physician Treatment Cases are defined as those in which there is neither death nor lost time, but two or more visits to a physician are required. These measures of extent are equally applicable to injuries and illnesses.

To distinguish between the traditional terms of "accidental injury" and "occupational disease," the study group sought an understandable title for each class.

Replacing accidental injury the group chose Occupational Injury defined as those which arise from work accidents. The term occupational illnesses was used as broader than "disease." "Occupational injury" was defined very briefly, but "occupational illness" is defined at length, divided into seven categories, and illustrated by examples for each of the categories. These measures are intended to encourage uniform and complete reporting in spite of varying inclusions in workmen's compensation laws and the lack of a general consciousness of the variety of occupational illnesses.

The combined class of occupational injuries and illnesses is defined very simply as "any disability or permanent impairment to an employee which results from any exposure in the work environment" and meets the extent criteria mentioned above. The study group recommends strongly against specific exceptions and exemptions such as those in 216.1, which are regarded as a serious fault of that Standard.

The conference that proposed the study group made reference to noise and hearing as well as occupational disease under the general heading of health. It is the finding of the study group that not all occupational noise-induced hearing loss problems are susceptible to measurement by the recording the reporting system proposed. Other techniques may be required to identify problems in this area.

Establishments to be Covered by Reporting System

The number of employers who will be subject to the legislation when enacted was not known. The number of farms and nonagricultural establishments is estimated to be 5 million, but this number includes an undetermined number of retail and service establishments counted on the basis of one per county. There are advantages to having separate records maintained for such establishments rather than having county-wide records. The number would be considerably reduced for survey purposes if the legislation or regulations exempted from reporting or record-keeping establishments with small number of employees.

The basic unit for which it is proposed that records be maintained and reports made is the "establishment" as defined in the Standard Industrial Classification of the Office of Management and Budget. Briefly, it is an economic unit which produces goods or services. Generally, it is at a single physical location and is engaged in only one, or predominantly one, type of economic activity for which an industry code is applicable. Separate economic activities at a single location are regarded as separate establishments when such activities are not ordinarily associated in a single location, the SIC does not have an industry description for such combinations, the employment in each activity is significant, and reports can be prepared on establishment type data.

Study Group
on a National System for Uniform Recording and
Reporting of Occupational Injuries and Illness

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