

## Update on OSHA Musculoskeletal Disorder First-aid Guidance

*This Fact Sheet features WorkCare's response to an Occupational Safety and Health Administration (OSHA) enforcement memorandum that applies to the use of non-recordable, first-aid-level care to relieve work-related musculoskeletal conditions.*

### About the Guidance

On May 2, 2024, OSHA sent regional administrators and state agency designees the memorandum: [Enforcement Guidance Under OSHA's Recordkeeping Regulation When First Aid, Active Release Techniques \(ART\), and Exercise/Stretching are Used to Treat Musculoskeletal Injuries and Illnesses](#). The memorandum is directed to federal and state agency regulators to help them determine whether a work-related musculoskeletal condition is recordable under [29 CFR 1904 – Recording and Reporting Occupational Injuries and Illnesses](#). The guidance refers specifically to first aid, ART, exercise and stretching as non-recordable modalities.

### WorkCare's Position

WorkCare has carefully reviewed the memorandum and re-affirmed that our virtual and onsite clinicians comply with OSHA's standards, including the following:

- All WorkCare health professionals may deliver non-recordable first aid in the occupational setting.
- First-aid guidance may be provided virtually by WorkCare's Incident Intervention telehealth triage nurses, physicians and industrial injury prevention specialists, and in person by our onsite providers.
- WorkCare's licensed health care professionals may use OSHA-approved first-aid methods such as:
  - Cleaning, flushing or soaking wounds on skin surfaces
  - Offering fluids to help prevent heat stress
  - Application of hot or cold interventions
  - Application of massage
  - Using wound coverings, e.g., bandages, gauze pads, butterfly bandages or sterilized strips
  - Preexisting Warmup and Stretch & Flex instructions

OSHA encourages employers to provide workforce well-being resources. WorkCare supports workplace activities to help reduce injury risk, such as warmup, stretching and cool down. We also offer health education on topics such as sleep hygiene, nutrition and stress management. Our clinicians do not prescribe specific stretches for the treatment of an individual employee's musculoskeletal condition.

At WorkCare, we strive to provide the right care, at the right time, in the right setting to improve quality of life for employees and enhance business results for employers.

### Did You Know?

*Work-related musculoskeletal injuries and illnesses are generally not recordable when managed with first aid.*

*Follow-up consultation with a WorkCare's Incident Intervention telehealth triage clinician during recovery does not cause a musculoskeletal case to become a recordable injury.*

*OSHA encourages employers to rely on licensed health care professionals to provide an appropriate care plan for injured or ill employees.*

*A recordability determination depends on the type of care that is provided, not the number of injury care visits an employee has with a health care provider.*