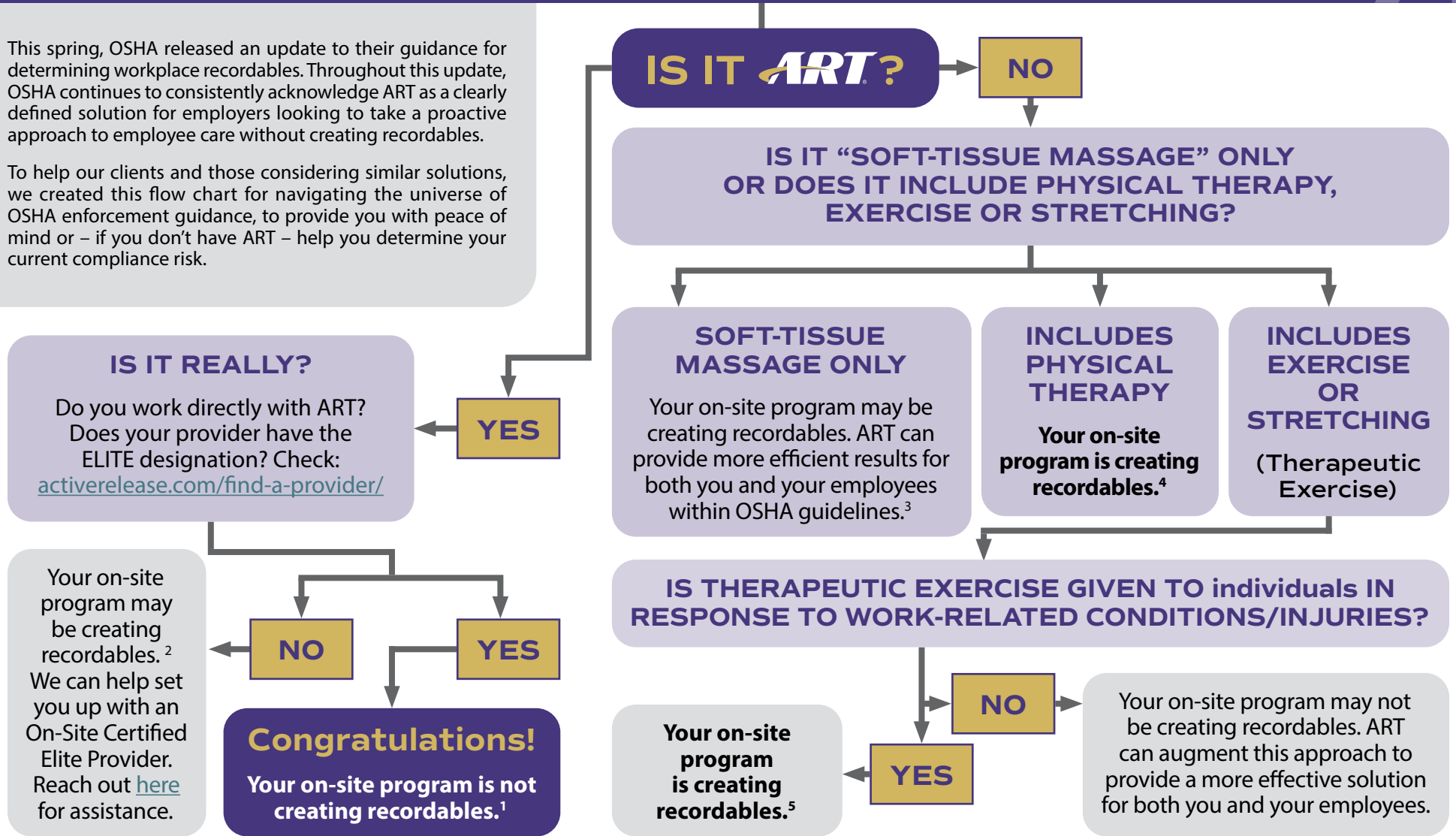


IS **YOUR** THERAPY/EXERCISE/STRETCHING PROGRAM CREATING **RECORDABLES**?



This spring, OSHA released an update to their guidance for determining workplace recordables. Throughout this update, OSHA continues to consistently acknowledge ART as a clearly defined solution for employers looking to take a proactive approach to employee care without creating recordables.

To help our clients and those considering similar solutions, we created this flow chart for navigating the universe of OSHA enforcement guidance, to provide you with peace of mind or – if you don't have ART – help you determine your current compliance risk.



¹See [osha.gov/laws-regs/standardinterpretations/2006-07-24-0](https://www.osha-slc.gov/laws-regs/standardinterpretations/2006-07-24-0) ("ART is considered first aid for injury and illness recordkeeping purposes").

²See [osha.gov/laws-regs/standardinterpretations/2024-05-02](https://www.osha-slc.gov/laws-regs/standardinterpretations/2024-05-02) ("a special designation is required for practitioners that perform ART in the workplace").

³See [osha.gov/laws-regs/standardinterpretations/2019-05-23](https://www.osha-slc.gov/laws-regs/standardinterpretations/2019-05-23) (finding that "soft tissue massage is first aid for recordkeeping purposes" but without defining "soft-tissue massage" or specifying any "soft-tissue massage" technique except ART). ART is the only type of "soft-tissue massage" that is *definitively* first aid.

⁴See [osha.gov/laws-regs/standardinterpretations/2024-05-02](https://www.osha-slc.gov/laws-regs/standardinterpretations/2024-05-02) ("physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes").

⁵See [osha.gov/laws-regs/standardinterpretations/2024-05-02](https://www.osha-slc.gov/laws-regs/standardinterpretations/2024-05-02) ("The use of exercise or stretching (i.e., therapeutic exercise) is not included on the list of first aid treatments in section 1904.7(b)(5)(ii). Such therapeutic exercise is considered medical treatment when it is designed and administered to treat a particular work-related injury or illness"). OSHA does not distinguish between virtual or in person design or administration of therapeutic exercise. Both constitute medical treatment.