

REMINDER

Injury Tracking Application: Electronic Submission of Injury and Illness Records to OSHA
Reference: 29 CFR 1904

OSHA published a notice of proposed rulemaking to extend the date by which certain employers are required to submit the information from their completed 2016 Form 300A electronically from July 1, 2017 to **December 1, 2017**. **This will soon be here. Are you prepared?**

Who: Establishments with 250 or more employees that are currently required to keep OSHA injury and illness records, and establishments with 20-249 employees that are classified in certain industries with historically high rates of occupational injuries and illnesses. Note that the following OSHA-approved State Plans have not yet adopted the requirement to submit injury and illness reports electronically: CA, MD, MN, SC, UT, WA and WY. Establishments in these states are not currently required to submit their summary data through the ITA. Similarly, state and local government establishments in IL, ME, NJ, and NY are not currently required to submit their data through the ITA. Contact information for each of the State Plans can be found at <https://www.osha.gov/dcsp/osp/states.html>.

What: Covered establishments with 250 or more employees must electronically submit information from OSHA Forms 300 (Log of Work-Related Injuries and Illnesses), 300A (Summary of Work-Related Injuries and Illnesses), and 301 (Injury and Illness Incident Report). Covered establishments with 20-249 employees must electronically submit information from OSHA Form 300A.

When: The requirement becomes effective on January 1, 2017. The new reporting requirements will be phased in over two years. In 2017, all covered establishments must submit information from their completed 2016 Form 300A. In 2018, covered establishments with 250 or more employees must submit information from all completed 2017 forms (300A, 300, and 301) by July 1, 2018, and covered establishments with 20-249 employees must submit information from their completed 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, covered establishments must submit the information by March 2.

How: OSHA will provide a secure website that offers three options for data submission. First, users will be able to manually enter data into a web form. Second, users will be able to upload a CSV file to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (application programming interface). We will provide status updates and related information here as it becomes available.

Questions? Contact The Redstone Group at 617-763-5034 x7007 or jwilliams@redstonegrp.com