

OSHA Recordkeeping: 2017 Changes on Electronic Data Reporting

Effective **January 1, 2017**, OSHA will revise its requirements for recording and submitting records of workplace injuries and illnesses. These revisions will require that some recorded information be submitted to OSHA electronically. OSHA will publish much of that information publically on their website.

Electronic Submission Requirements

The final rule requires certain employers to electronically submit the injury and illness information they are already required to keep under existing OSHA regulations. The requirement applies to the following:

- Establishments with 250 or more employees that are currently required to keep OSHA injury and illness records 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.
- Establishments with 20-249 employees that are classified in certain industries with historically high rates of occupational injuries and illnesses must electronically submit information from OSHA Form 300A. These industries include, but are not limited to, construction, manufacturing, stores, bus transportation, warehousing, most healthcare, residential group homes, building services, real estate, hotels and waste collection. (View complete list here: <http://www.osha.gov/recordkeeping/NAICScodesforelectronicsubmission.pdf>)



The electronic submission requirements do not change an employer's obligation to complete and retain injury and illness records. Data submission requirements will be phased in as follows:

Submission Year	Establishments with 250+ Employees	Establishments with 20-249 Employees	Submission Deadline
2017	Form 300A	Form 300A	July 1, 2017
2018	Form 300A, 300 and 301	Form 300A	July 1, 2018

Beginning in 2019, the submission deadline will be changed from July 1st to March 2nd. Timeliness of the data collected is important for surveillance and intervention activities. The earlier a workplace hazard can be identified, the earlier it can be removed, reducing the chances of another worker being injured or becoming ill.

OSHA will post the establishment-specific injury and illness data it collects under this recordkeeping rule on its website (www.osha.gov). Personally identifiable information will be removed before the data are released to the public. The final rule retains the provision that allows OSHA to collect information from employers that are not otherwise required to keep logs on a routine basis. These employers would only be required to submit the data requested upon written notification from OSHA or OSHA's designee. States that operate their own job safety and health programs, also called OSHA State Plan states, must adopt requirements that are substantially identical to the requirements in this rule within six months after publication of the final rule.

Key Risk Resources

Webinars specific to the 2017 change are scheduled for December 2016 and January 2017. In addition, a basic OSHA Recordkeeping webinar is scheduled for January 2017. Registration is now open. Please visit www.KeyRisk.com to register.

Additional SafetyConnections available include:

- OSHA Recordkeeping Resource Sheet
- Occupational Safety and Health Administration: Key Facts

To access the additional SafetyConnections, please visit MasterKey Connects to download or submit a request to riskmanagement@keyrisk.com.

Additional Information

<https://www.osha.gov/recordkeeping/finalrule/index.html>

https://www.osha.gov/recordkeeping/finalrule/finalrule_faq.html

Source: OSHA Fact Sheet 3862 – Final Rule to Improve Tracking of Workplace Injuries and Illnesses.

SafetyConnection: OSHA's Final Rule on Electronic Tracking of Workplace Injuries and Illnesses

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