

Electronic Submission of Injury and Illness Records to OSHA

Starting last year, OSHA began requiring certain employers electronically submit injury and illness data through OSHA's webpage. In December of 2017, employers submitted 2016 calendar year information. Companies should take note that 2017 injury and illness data will be due earlier this year – **by July 1, 2018**. Furthermore, the 2018 injury and illness data will be due March 2nd of 2019 (and will be OSHA's anticipated annual due date going forward).

OSHA has provided a secure website that offers three options for data submission. First, users are able to manually enter data into a webform. Second, users are 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). The Injury Tracking Application (ITA) is accessible from the ITA launch page, where you are able to provide the Agency your 2017 OSHA Form 300A, 300 and 301 information.

Who Must Report?

- Establishments with 20-249 employees in <u>certain high-risk industries</u> must submit information from their 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2.
- Establishments with 250 or more employees in industries covered by the recordkeeping regulation must submit information from all 2017 forms (300A, 300, and 301) by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2. However, OSHA recently made an announcement regarding submitting on Form 300 and 301 information for covered establishments with 250 or more employees. All covered establishments with 250 or more employees are only required to provide their 2017 Form 300A summary data by July 1, 2018. OSHA is not accepting Form 300 and 301 information at this time. OSHA announced that it will issue a notice of proposed rulemaking (NPRM) to reconsider, revise, or remove provisions of the "Improve Tracking of Workplace Injuries and Illnesses" final rule, including the collection of the Forms 300/301 data. The Agency is currently drafting that NPRM and will seek comment on those provisions.

Affinity Consultants can assist with electronic submission of OSHA Injury and Illness forms. If you have any related questions, or any other safety or environmental needs, please contact *Tim Schwendeman at 330-854-9066 x12*.