

## OSHA's Final Rule to Improve Tracking of Workplace Injuries and Illnesses

[The new rule](#), which takes effect January 1, 2017, requires certain employers to electronically submit injury and illness data that they are already required to record on their onsite OSHA Injury and Illness forms. Analysis of this data will enable OSHA to use its enforcement and compliance assistance resources more efficiently. Some of the data will also be posted to the OSHA website. OSHA believes that public disclosure will encourage employers to improve workplace safety and provide valuable information to workers, job seekers, customers, researchers and the general public. The amount of data submitted will vary depending on the size of company and type of industry.

The new reporting requirements will be phased in over two years:

- Establishments with 250 or more employees in industries covered by the recordkeeping regulation must submit information from their 2016 Form 300A by July 1, 2017. These same employers will be required to 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.
- Establishments with 20-249 employees in certain high-risk industries must submit information from their 2016 Form 300A by July 1, 2017, and their 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, the information must be submitted by March 2.

The electronic reporting requirements are based on the size of the establishment, not the firm. The OSHA injury and illness records are maintained at the establishment level. **An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed.** A firm may be comprised of one or more establishments.

The list of the **high-risk industries** includes, but are not limited to: *agriculture, construction, manufacturing, warehousing and storage, waste collection, and waste treatment and disposal, etc.* A complete list of the facilities with their NAICS codes that are fall into a high-risk category, is available via the following link <https://www.osha.gov/>.

OSHA will provide a secure website that offers three options for data submission. The site is scheduled to go live in February 2017. OSHA will announce the availability of the website prominently on their home page when it becomes operational. These are the **three options** to submit data electronically:

- 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. A CSV template, CVS sample file as well as instructions, are available online at the OSHA website, and can be accessed via the following link <https://www.osha.gov/>.
- Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (Application Programming Interface).

The electronic submission requirements do not change an employer's obligation to complete and retain injury and illness records.

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.**