



OSHA Eliminates Electronic Submittals for Annual Reporting of Workplace Injury & Illness—OSHA 300 Logs

The Occupational Safety & Health Administration (OSHA) has announced that it has issued a final rule eliminating the requirement for establishments with 250 or more employees to electronically submit information from the OSHA Form 300 (Log of Work-Related Injuries and Illnesses) and OSHA Form 301 (Injury and Illness Incident Report).

Those covered workplaces with 250 or more employees that are currently required to keep these records, and those workplaces with 20 to 249 employees in OSHA designated high-hazard industries—will still be required to submit information on the Form 300A (Summary of Work-Related Injuries and Illnesses) each year.

Covered workplaces are still required to maintain the OSHA 300, 300A and 301 logs just like before however, the electronic transfer to OSHA is no longer required.

New Employer Identification Number (EIN) Requirement: OSHA's rule also adds a requirement for all workplaces subject to the electronic recordkeeping requirements to include their Employer EIN with their Form 300A submissions.

The EIN requirement date is March 2, 2020. Therefore, the EIN will be required for those workplaces submitting their 300A data from 2019, but not for establishments submitting their 300A data from 2018.

WHY THE CHANGE?

OSHA has determined that the information provided is just too sensitive to be transmitted electronically. Moreover, OSHA is also avoiding the risk that this information could be published under the Freedom of Information Act.

DEADLINES FOR COMPLIANCE

Establishments currently required to submit recordkeeping information electronically are required to submit data from Form 300A covering calendar year 2018 by March 2, 2019. Form 300A must also be posted in the workplace in a prominent location for employee viewing from February 1 to April 30 each year.

ADDITIONAL INFORMATION

For more information on the Final Rule go to:

<https://s3.amazonaws.com/public-inspection.federalregister.gov/2019-00101.pdf>

TO DETERMINE IF YOU ARE OR ARE NOT REQUIRED TO MAINTAIN OSHA 300 LOGS

www.osha.gov/recordkeeping/ppt1/RK1exempttable.html

OSHA'S DEFINITION OF A WORKPLACE INJURY AND A FIRST AID INJURY

www.osha.gov/recordkeeping

REPORT A FATALITY OR SEVERE INJURY

www.osha.gov/report.html

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