Nov 29, 2017

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OSHA Electronic Submission Deadline Extended

The agency's 2016 "Improve Tracking of Workplace Injuries and Illnesses Rule" requires certain employers to electronically file their Form 300A summary data with OSHA. The original deadline for this submission was July 1, 2017, which the agency extended to December 1, 2017. Employers have now been granted an extra two-week extension to file.

Covered Employers

OSHA's 2016 Rule, codified at 29 C.F.R. § 1904.41, requires two categories of employers to electronically submit certain recordkeeping forms to the agency. First, employers that are required to keep OSHA injury records and that employed 250 or more employees at any time during the previous year at a single establishment are covered. Second, employers that had 20 or more employees at any time at a single location *and* that are engaged in certain industries designated by OSHA as "high-risk" are also covered. You can find the list of high-risk industries here. Any employer that meets the criteria of either of these categories must upload their 2016 Form 300A annual summaries by December 15, 2017.

What and How to File

For the upcoming December 15 submission deadline, covered employers are only required to submit their 2016 Form 300A Annual Summary records to OSHA. Beginning in 2018, however, employers that are covered by the regulation because they employed 250 or more employees at a single establishment will be required to submit information for all completed 2017 forms (Forms 300, 301, and 300A), and the deadline for that submission will be July 1, 2018. Employers that are covered because they employ 20 or more employees and are engaged in designated high-risk industries will only be required to submit their Form 300A Annual Summaries by July 1, 2018.

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Employers required to submit records to OSHA must do so through OSHA's website. OSHA has created an Injury Tracking Application (ITA) that covered employers must access and with which they must register an account in order to upload their injury records. The web address for the ITA is https://www.osha.gov/injuryreporting/.

Please contact any of the Frost Brown Todd attorneys who practice in the OSHA area if you have questions about whether you are covered, the requirements of the new rule, or any other matter related to OSHA compliance.

View the original article posted as a Frost Brown Todd Legal Update: OSHA Electronic Submission Deadline Extended

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