Comply with the OSHA Final Rule
“Improve Tracking of Workplace Injuries and Illness”
In May of 2016, the Occupational Safety and Health Administration (OSHA) issued a final rule “Improve Tracking of Workplace Injuries and Illnesses” to revise its recording and reporting occupational injuries and illnesses regulation. The final rule requires employers in certain industries to electronically submit to OSHA injury and illness recordkeeping data.

In addition, the final rule includes provisions that encourage workers to report work-related injuries or illnesses to their employers and prohibit employers from retaliating against workers for making those reports.

**What data does my organization have to submit electronically to OSHA?**

Establishments with **20-249** employees in high risk industries will have to submit all data fields currently contained in the OSHA form 300A.

Establishments with **250** or more employees will have to submit data contained in OSHA forms 300A, 300, and 301 with exceptions for fields with personally identifiable information.

**UPDATE:** In November of 2017, 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 Form 300 and Form 301 data. The Agency is currently drafting that NPRM and will seek comment on those provisions.

**What will OSHA do with this data?**

OSHA plans to make the data readily available to the public in standard open formats on osha.gov. Interested parties will be able to search and download the data.
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OSHA’s goals include encouraging employers to increase their efforts to prevent worker injuries and illnesses, and enabling researchers (and other groups) to examine these data in innovative ways that may help employers make their workplaces safer and healthier. The data will also enable OSHA to use its enforcement and compliance assistance resources more efficiently.

When does my organization have to submit this data to OSHA?

The reporting requirements of the final rule will be phased in over two years. Submission deadlines for 2018 and 2019 are provided in the table below. Starting in 2019, organizations will have to submit the required data to OSHA electronically on an annual basis due by March 2 for data collected in the previous calendar year.

<table>
<thead>
<tr>
<th>Submission Year</th>
<th>Data Collected in Calendar Year</th>
<th>Establishments with 250 or more employees</th>
<th>Establishments with 20-249 employees</th>
<th>Submission Deadline</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>2016</td>
<td>Form 300A</td>
<td>Form 300A</td>
<td>Dec. 1, 2017</td>
</tr>
<tr>
<td>2018</td>
<td>2017</td>
<td>Form 300A</td>
<td>Form 300A</td>
<td>Jul. 1, 2018</td>
</tr>
<tr>
<td>2019</td>
<td>2018</td>
<td>Form 300A</td>
<td>Form 300A</td>
<td>Mar. 2, 2019</td>
</tr>
</tbody>
</table>

How will OSHA protect the privacy of information?

Organizations will exclude the following key Personably Identifiable Information (PII) in their electronic data submittals from the 300 and 301 forms:

<table>
<thead>
<tr>
<th>Data Element</th>
<th>Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee Name</td>
<td>OSHA 300</td>
</tr>
<tr>
<td>Employee Name</td>
<td>OSHA 301</td>
</tr>
<tr>
<td>Employee Address</td>
<td>OSHA 301</td>
</tr>
<tr>
<td>Name of physician or other healthcare professional</td>
<td>OSHA 301</td>
</tr>
<tr>
<td>Treatment facility name</td>
<td>OSHA 301</td>
</tr>
<tr>
<td>Treatment facility address</td>
<td>OSHA 301</td>
</tr>
</tbody>
</table>
Complying with the OSHA Final Rule
"Improve Tracking of Workplace Injuries and Illness"

An IndustrySafe White Paper

OSHA also intends to scrub all of the case specific narrative information in employer reports for PII using software that will search for, and de-identify, personally identifiable information before the data are posted.

How can my organization electronically submit this data to OSHA?

On August 1, 2017, OSHA launched its Injury Tracking Application (ITA), a secure web site for the electronic submission of OSHA recordkeeping information. Using this application, corporate or enterprise offices for organizations with control over multiple establishments can submit 300A data electronically for all the establishments under their control.

It’s simple and easy for anyone to create an ITA account. However, to avoid setting up duplicate accounts for your company (and to avoid the duplication of data submissions), we recommend that you coordinate with you team and clearly designate which safety professional(s) will be responsible for using the ITA and creating an account for your organization.

You can choose between two methods to submit your recordkeeping data, manually or through a batch submission process.

For manual submissions, you first need to add your establishments to the application by creating profiles for them. Once you have set up your establishments, you can then enter and submit OSHA 300A data for each one via a web form.

For a quicker and simpler submission process, the ITA also offers the option to upload a CSV file containing 300A data for many establishments at once. This method is ideal for organizations that need to submit data for multiple establishments.

In addition, the application also features an Application Programming Interface (API) to enable users of current OSHA recordkeeping systems to submit data electronically.

How can IndustrySafe help my organization with data submittal?

IndustrySafe Safety Software is a web-based safety data management solution developed by IndustrySafe, Inc. so organizations can track, manage, and comply with environmental, health, and safety regulations.
IndustrySafe's Incident Module allows organizations to track and report on environmental, health and safety incidents including employee injuries and illness. The software assists users in determining OSHA recordable (and reportable) incidents and automatically generates the OSHA 300A, 300 and 301 forms.

Based on OSHA's technical specifications, IndustrySafe, Inc. has updated its 300A report generator, allowing you to create a CSV file of your OSHA 300A data which you can upload to OSHA's ITA. IndustrySafe will also notify you automatically if your data does not meet OSHA's data validation criteria, allowing you to catch any errors or missing information that your file contains before you submit your data to OSHA.

For more information on IndustrySafe and electronic submittal to OSHA, please contact us at sales@industry-safe.com.

**Additional Resources**

More information about OSHA Recordkeeping and the OSHA Final Rule are available from the following sources:

**Final Rule** - https://federalregister.gov/a/2016-10443

**OSHA Injury Tracking Application (ITA)** - https://www.osha.gov/injuryreporting/ita


**OSHA Recordkeeping Forms** - https://www.osha.gov/recordkeeping/RKforms.html

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About IndustrySafe Software

IndustrySafe, Inc. (formerly TRA, Inc.), a Philadelphia based company founded in 1990, provides IndustrySafe, cost-effective, web-based (SaaS) safety management software, so that organizations can track, manage, and comply with environmental, health, and safety regulations.

IndustrySafe Safety Software enables our clients, leaders in construction, manufacturing, government, energy, and transportation to report and analyze data for incidents, inspections, OSHA reporting, observations, training and more.

Our mission is to provide the most user friendly and cost effective environmental, health, and safety software for our clients.

IndustrySafe’s Incidents Module enables organizations to record, track, and analyze a variety of incidents, including near misses, vehicle incidents, employee and non-employee injuries, environmental, and security incidents. With this module, users can also perform root cause analysis and generate accurate regulatory reports, including OSHA 300, 300A, and 301 logs, and DOT Vehicle Accident Registers.

Over 300 clients trust us with OSHA recordkeeping

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