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:** On July 30, 2018, OSHA published a Notice of Proposed Rulemaking (NPRM), which rescinds the agency’s previous requirement for establishments with 250 or more employees to electronically submit Forms 300 and 301. On January 24, 2019 OSHA confirmed on their website that they would NOT accept electronic submissions of 300 and 301 data.

**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?**

Starting in 2019, organizations were required to submit the required data to OSHA electronically on an annual basis due by March 2 for data collected in the previous calendar year.

Submission deadlines for 2020 and 2021 are provided in the table below.

<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>2019</td>
<td>2018</td>
<td>Form 300A - <em>Per Final Rule</em></td>
<td>Form 300A</td>
<td>Mar. 2, 2019</td>
</tr>
<tr>
<td>2020</td>
<td>2019</td>
<td>Form 300A</td>
<td>Form 300A</td>
<td>Mar. 2, 2020</td>
</tr>
<tr>
<td>2021</td>
<td>2020</td>
<td>Form 300A</td>
<td>Form 300A</td>
<td>Mar. 2, 2021</td>
</tr>
</tbody>
</table>

**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, a Vector Solutions brand, 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 has updated its 300A report generator, allowing you to create a CSV file of your OSHA 300A data which you can 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@industrysafe.com.

**Additional Resources**

More information about OSHA Recordkeeping and the OSHA Final Rule are available from the following sources:
Complying with the OSHA Final Rule
“Improve Tracking of Workplace Injuries and Illness”

An IndustrySafe White Paper

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

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

Everything You Need to Know Before Using OSHA’s Injury Tracking Application (ITA) - https://www.industrysafe.com/blog/everything-you-need-to-know-before-using-oshas-ita


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


The Ultimate Guide to OSHA Recordkeeping - https://www.industrysafe.com/blog/osha_recordkeeping_guide_ultimate


About Vector Solutions

Vector Solutions, a leader in eLearning and performance support, provides award-winning SaaS solutions for the architecture, engineering, construction (AEC), industrial, facilities management, public safety, IT and education industries.

Its brands, RedVector-Convergence Training, TargetSolutions, and SafeSchools, deliver continuing education (CE), training, technology and performance management solutions using the latest innovations in learning and technology to create safer, more capable, more compliant organizations.

Its extensive online and mobile learning library offers over 9,000 courses written by over 280 subject matter experts and reaches more than 10 million professionals worldwide. The company was founded in 1999 and is headquartered in Tampa, Florida.

For more information, visit vectorsolutions.com.
Complying with the OSHA Final Rule
“Improve Tracking of Workplace Injuries and Illness”

An IndustrySafe White Paper

About IndustrySafe Software

A Vector Solutions brand, IndustrySafe is a cost-effective, web-based (SaaS) safety management software, developed 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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