



Complying with the OSHA Final Rule Improve Tracking of Workplace Injuries and Illness

An IndustrySafe White Paper
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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 included on the 300A, 300, and 301 forms.

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?

OSHA Forms

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.

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

OSHA 301

An incident summary describing the who, what, when, and where of each OSHA recordable incident.

OSHA 300

A log containing a line item for each OSHA recordable incident. Each location must have its own OSHA 300 log.

OSHA 300A

An annual summary of all OSHA recordable incidents at each location.

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. 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.



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

Submission Year	Data Collected in Calendar Year	Establishments with 250 or more employees	Establishments with 20-249 employees	Submission Deadline
2017	2016	Form 300A	Form 300A	July 1, 2017
2018	2017	Forms 300A, 300, 301	Form 300A	July 1, 2018
2019	2018	Forms 300A, 300, 301	Form 300A	March 2, 2019

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.

How will OSHA protect the privacy of information?

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

Data Element	Form
Employee Name	OSHA 300
Employee Name	OSHA 301
Employee Address	OSHA 301
Name of physician or other health care professional	OSHA 301
Treatment facility name	OSHA 301
Treatment facility address	OSHA 301

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?

According to the rule, OSHA will provide a secure web site for the electronic submission of OSHA recordkeeping information. The rule also provides that corporate or enterprise offices for organizations with control over multiple establishments will be able to submit electronically for all the establishments under their control.



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OSHA intends to provide a web form for organizations to submit this data electronically. In addition OSHA also intends to offer a file upload and an Application Programming Interface (API) and/or Electronic Data Interface (EDI) to enable users of current OSHA recordkeeping systems to submit data electronically.

OSHA intends to roll out the API and file upload the same time as the web form and to provide specifications for the API and file upload in advance of this submission deadline.

How can IndustrySafe help my organization with data submittal?

IndustrySafe Safety Software is a web-based safety data management solution developed by Transportation Resource Associates (TRA) 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, TRA plans to develop an interface so that our clients can submit data to OSHA using the file upload and/or the API. TRA's goal is that electronic submittal of injury and illness data to OSHA from the IndustrySafe software shall be as easy and seamless as possible.

For more information on IndustrySafe and electronic submittal to OSHA please contact us at sales@industrysafes.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 Fact Sheet - <https://www.osha.gov/Publications/OSHA3862.pdf>

Frequently Asked Questions - https://www.osha.gov/recordkeeping/finalrule/finalrule_faq.html

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

Completing OSHA Recordkeeping with the IndustrySafe Software - https://www.industrysafes.com/resources/industrysafes_oshas_guidance_document.pdf



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About IndustrySafe Software

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



Contact Us:

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