OSHA: New Electronic Reporting Requirements
Brought to you by BHS Insurance

January 2018

OVERVIEW

Federal OSHA now requires certain establishments to electronically report their OSHA injury log by December 15, 2017. Institutions with 250 employees or more at a single location are automatically required to electronically report their 2016 OSHA forms 300, 300A and 301. OSHA states your employee count includes peak employment during the calendar year and should include every individual that worked for you regardless if full-time, part-time, temporary or seasonal.

Furthermore, Public Gardens are assigned to NAICS code 712110 (North American Industry Classification System) which includes museums, historical sites & similar institutions. The 712110 classification requires electronic reporting of your OSHA log 300A if you have between 20 and 249 employees.

It is important to note that to date, the following States have not adopted the electronic filing requirement: California, Maryland, Minnesota, South Carolina, Utah, Washington, and Wyoming. Public employers in Illinois, Maine, New Jersey & New York are also exempt at this time.

Everything you need to know regarding Electronic Reporting can be found on OSHA's website.

ACTION STEPS

The first thing you will want to do is make sure your 2016 forms have been completed. This link contains the blank forms and instructions should you need as a reference. Next, visit OSHA's website to create an account, launch the Injury Tracking Application (ITA), and submit the information from your 2016 log.

OSHA estimates that it will take about twenty minutes to complete this process for establishments with 249 or less employees.
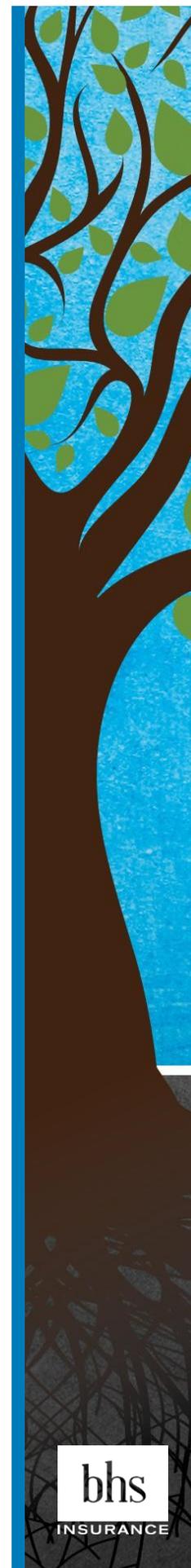
Here is a short YouTube video with a tutorial which you may find helpful.

SUBMITTING THE REPORT

The ITA is a secure website that OSHA created specifically for the data required by the electronic reporting rule. The ITA allows employers three options to submit their reports:

1. Manual entry;
2. Comma-separated value (CSV) file upload; and
3. Application programming interface (API) transmission.

The ITA offers affected employers instructions, sample files, and templates to help them complete the submission process.

OSHA-APPROVED STATE PLANS

The final rule required OSHA-approved State Plans to adopt the electronic rule or "substantially identical" requirements within six months of the final rule's publication date. The final rule was published on May 12, 2016. This means that OSHA-approved State Plans have the authority to adopt reporting requirements that go above and beyond what is required by the Federal rule. For this reason, employers located in OSHA approved State Plan jurisdictions should consult with their local OSHA offices to make sure they are satisfying all electronic reporting requirements.

MORE INFORMATION

For more information, please call Kim Slager or another member of the BHS Insurance Public Garden team at 800-350-7676.