

DOL Corrects Implementation of 'Improve Tracking of Workplace Injuries and Illnesses' Regulation

June 29, 2018 Matthew Deffebach, Mini Kapoor

PRACTICES OSHA, Labor and Employment

In May 2016, OSHA published its final rule requiring employers with more than 250 employees and employers with 20-249 employees in industries that historically have high rates of occupational injuries and illnesses to electronically submit the OSHA 300A Log. In a correction to its initial implementation of the rule, OSHA has determined that the regulation requires all effected employers to submit injury and illness data even if the employer is covered by a state plan that has not completed adoption of a state rule. There will not be a retroactive requirement for employers in covered state plans that have not adopted a state rule to submit data for 2016.

Employers are required to submit their 2017 300A Log by July 1, 2018. Beginning in 2019, the due date for 300A Logs will be March 2. Notably, OSHA has clarified from the original rule that employers will no longer be required to submit the separate OSHA 300 or 301 log data.