

The Safety & Health Advisor

January 2019



OSHA Recordkeeping Reminder

OSHA 300A Summary Posting Due February 1st.

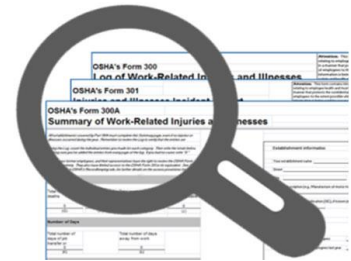
After completing and validating the information on your OSHA 300 log for calendar year 2018, the next step is to complete the OSHA 300A Summary form during the month of January.

By **February 1, 2019**, employers must post their OSHA 300A Summary form for 2018. All establishment summaries must be certified by a company executive. The form is to be displayed wherever "official" notices to employees are usually posted.

Employers are required to post only the Summary (OSHA Form 300A) **from February 1, 2019 to April 30, 2019**. They must retain logs and summaries for at least 5 calendar years.

The Summary must list the total number of work-related injury and illness cases that occurred in 2018 and were logged on the OSHA 300 form. Company information about annual average number of employees and total hours worked during the calendar year is also required to assist in calculating incidence rates.

Temporary employee injuries and work hours should also be included when those employees were directly supervised* by the company. *Companies with no recordable cases in 2018 must still post the form with zeros on the total lines.*



*OSHA's injury and illness recordkeeping regulation at 29 CFR 1904.31(a) requires employers to record the recordable injuries and illnesses of employees they supervise on a day-to-day basis, even if these workers are not carried on the employer's payroll. Section 1904.31(b)(2) further clarifies that the host employer must record the injuries and illnesses of temporary workers it supervises on a day-to-day basis.

Employers with ten (10) or fewer employees and employers in certain industry groups are normally exempt from federal OSHA injury and illness recordkeeping and posting requirements. A complete list of exempt industries in the retail, services, finance and real estate is posted on OSHA's website at: <http://www.osha.gov/recordkeeping/ppt1/RK1exemtable.html>. However, if your organization is selected to participate in the annual OSHA survey, the exemption does not apply.

Various state Department of Labor organizations and other federal entities (for example the Bureau of Labor Statistics) may also request the same information and you must comply with those requests.

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By **March 2, 2019***, organizations should electronically submit their OSHA 300A Summary information to OSHA's Injury Tracking Application (ITA) at: <https://www.osha.gov/injuryreporting/> clicking on the **Launch ITA** button on the top right of the screen. You should use the same Username and Password that you had previously created for the application.



Should changes occur to your 300 log due to open cases where days away, restricted or transferred were still being counted by the submission date (or other change) you cannot edit the information online, but must make corrections to the paper copy of the log and summary forms and keep on file for any OSHA inspection.

SUBMISSION DEADLINE CHANGES!

* The OSHA 300A electronic submission date to OSHA's ITA has **now changed** to **March 2, 2019** (previously July) and will continue to be March 2 onward.

JANUARY 2019: Complete OSHA 300 Log and 300A Summary forms

FEBRUARY 1, 2019: Post 300A Summary

MARCH 2, 2019: Submit OSHA 300A to the Injury Tracking Application (ITA)