

# OSHA Announces New Electronic Recordkeeping Rules



## New Ruling

On May 11, 2016, the U.S. Department of Labor's Occupational Safety & Health Administration (OSHA) issued a new rule to modernize injury data collection to improve tracking of workplace injuries and illnesses. This new rule impacts the current Recording and Reporting Occupational Injuries and Illnesses Regulation.

This ruling requires certain employers to electronically submit data from their work-related injury and illness records to OSHA. The final rule also addresses employee anti-retaliation protections for reporting work-related injuries and illnesses.

- The final rule does not create additional recording requirements under the [Recording and Reporting Occupational Injuries and Illnesses Regulation](#) (29 CFR Part 1904). However, the rule specifies that specific personal identifying information must be removed from electronic submissions.
- Employers with between 20 and 249 employees must submit data from their OSHA Form 300A forms if they are classified in [certain industries](#) with historically high rates of occupational injuries and illnesses.

- Employers with 250 or more employees must submit data from their OSHA Forms 300 – *Log of Work-Related Injuries and Illnesses*, 300A – *Summary of Work-Related Injuries and Illnesses*, and 301 – *Injury and Illness Incident Report*.
- OSHA will collect information on injuries and illnesses to identify emerging hazards, characterize specific areas of concern, or target inspection and outreach initiatives under OSHA's emphasis program.
- Access to the data will enable employers to benchmark their safety and health performance against industry leaders, to improve their own safety programs.
- The rule reaffirms an employee's right to report injuries and illnesses without fear of retribution, and clarifies that an employer must have a practical procedure for reporting work-related injuries that does not deter employees from reporting.

## Significant Dates

The new requirements take effect on **November 1, 2016**, with phased-in data submissions beginning in 2017. Here are some key dates to take note of:

Submission Year	Companies with 250 or more employees	Companies with 20 to 249 employees	Submission Deadline
2017	Form 300 A	Form 300A	July 1, 2017
2018	Forms 300A, 300, 301	Form 300A	July 1, 2018

## **Actions to Take**

---

Impacted employers should consider taking the following actions as a result of the final rule:

- Become familiar with the requirements in the final rule.
- Review their recordkeeping and anti-retaliation policies and procedures to ensure they are in compliance with OSHA requirements.
- Consider changing their OSHA recordkeeping practices to an electronic format once details on how and where to submit electronic information to OSHA have been released.

## **Connect With Us**

---

For more information about how we can help guide your risk management program, contact your agent or broker, or visit us at [www.chubb.com](http://www.chubb.com).

**Chubb. Insured.<sup>SM</sup>**