



# Safety Bulletin

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## **OSHA Electronic Recordkeeping Deadline**

**December 01, 2017**

**Employers are reminded that the December 01, 2017 deadline is approaching for covered employers to electronically submit their 2016 injury & illness 300A summary data.**

*OSHA intends to issue a new proposal to reconsider, or remove provisions of this electronic recordkeeping regulation that was adopted during the prior administration. As of November 14, OSHA has not yet published their proposal, and this current requirement is still in effect.*

*PMA will continue to monitor the recordkeeping regulations and will advise PMA Members when OSHA issues updated provisions.*

### **Who Must Submit Data**

Marine Terminal establishments with 20 or more employees are required to electronically submit their 2016 300A data. Additional data submissions will be phased in over time.

All establishments with NAICS code 4883, *support activities for water transportation*, are included in this initial data submission.

OSHA considers each individual person, regardless of time worked, to be an employee. For example, a casual worker employed for only one shift over the year is one employee, while a yearly steady operator is also considered to be a single employee. Each individual person, including management and non-ILWU, is a covered employee.

This applies to each employer establishment — not necessarily the entire company, but every single establishment location where the company provides services employment — with at least 20 employees.

### **How to Submit Data**

The data submission process involves four steps:

- ⇒ Creating an establishment
- ⇒ Adding 300A summary data
- ⇒ Submitting the data to OSHA via their website
- ⇒ Reviewing the confirmation email for accuracy

Create an account and enter the required data at the Injury Tracking Application Login here:

<https://www.osha.gov/injuryreporting/ita/>

FAQ & ITA Submission Job Aids:

<https://www.osha.gov/injuryreporting/index.html>

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The federal OSHA docket on *Improve Tracking of Workplace Injuries and Illnesses* can be found here. [[Docket ID: OSHA-2013-0023](#)]

### OSHA Fact Sheet is Available



**Final Rule to Improve Tracking of Workplace Injuries and Illnesses**

Each year, millions of workers suffer serious injuries and illnesses on the job. Under the Federal Occupational Safety and Health Act, employers must provide their workers with workplaces free of recognized serious hazards. In order to help prevent work-related injuries and illnesses, the Occupational Safety and Health Administration (OSHA) has for decades required employers to keep track of their workers' injuries and illnesses by recording them in what is often called an "OSHA log."

Under a final rule that becomes effective January 1, 2017, OSHA will revise its requirements for recording and submitting records of workplace injuries and illnesses to require that some of this recorded information be submitted to OSHA electronically for posting to the OSHA website.

We are taking information that employers are already required to collect and using these data to help keep workers safer and make employers, the public, and the government better informed about workplace hazards. Releasing the data in standard, open formats will:

- Encourage employers to increase their efforts to prevent worker injuries and illnesses, and, compelled by their competitive spirit, to race to the top in terms of worker safety; and
- Enable researchers to examine these data in innovative ways that may help employers make their workplaces safer and healthier and may also help to identify new workplace safety hazards before they become widespread.

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.

OSHA expects this new rule will help improve workplace safety through expanded access to timely, establishment-specific injury and illness information for OSHA, employers, employees, employee representatives, potential employers, customers, potential customers, and public health researchers.

The rule will also provide OSHA with data to assist the agency in improving allocation of compliance assistance — help OSHA provide to employers who want to improve their safety standards — and enforcement resources, expanding the Agency's ability to identify, target and remove safety and health hazards, thereby preventing workplace injuries, illnesses and deaths. It will also enable OSHA to conduct more rigorous evaluations of the impact of government injury prevention activities.

In addition, behavioral science suggests that public disclosure of the data will "nudge" employers to reduce work-related injuries and illnesses in order to demonstrate to investors, job seekers, customers, and the broader public that their workplaces provide safe and healthy work environments for their employees. Currently, employers cannot compare their injury experience with other businesses in their industry; they can only compare their experience with their industry as a whole. Access to establishment-specific data will enable employers to benchmark their safety and health performance against industry leaders, encouraging them to improve their safety programs.

Finally, public access to very large sets of workplace injury and illness data will provide public health researchers with unprecedented opportunities to advance the fields of injury and illness causation and prevention research.

**Background**  
In 2013, OSHA issued a proposed rule to improve tracking of workplace injuries and illnesses through the electronic collection of establishment-specific injury and illness data

### Important information for business establishments completely covered under California or Washington state plans

Currently, both Washington & California state have not adopted the federal data submission requirement. Employers with establishment locations that only have landside employment, with absolutely no vessel work or federal coverage, do not have to electronically submit data at this time.

### PMA 300A Data Reminder

PMA employee count and man-hours reports only include ILWU data. Employers are reminded to add all other employee hours and injury data, such as management, OCU, IAM, etc. to their summary reports before submitting the data to OSHA.

### OSHA 300A Summary Data is Not Required to be Updated

This initial data submission to OSHA is the 2016 300A Summary Form data. This is the signed form that was required to be posted from Feb 1 to April 30, 2016. Employers are not required to update this form prior to submission to OSHA, although you may choose to do so.

### For Employers that Did Not Save a Copy of their 2016 300A Form

PMA Members are reminded that safety managers can access the PMA Accident Prevention [MemberNet](#) to retrieve a copy of their OSHA records. It is important to change the year to 2016 and click submit before downloading the correct form (as the current 2017 year is the default).

## Review of the Regulation

The OSHA final rule, [Improve Tracking of Workplace Injuries and Illness](#), was published in May 2016. Employers had a phased in compliance deadline for the electronic submission of recordkeeping forms. For 2017, employers with establishments with 250 or more employees and establishments with less than 250 employees but 20 or more in certain high-risk industries were required to electronically submit their 2016 Form 300A by July 1, 2017 [*Now delayed to December 01*].

Employers are advised that marine cargo handling operations are included in the OSHA establishment list for certain high risk industries and would be subject to the regulation. NAICS 488320—Support Activities for Water Transportation.

OSHA intends to use this data to create a public searchable website that would contain your companies' injury and illness records that could be used by the general public.