



ILA-USMX JOINT SAFETY COMMITTEE

OSH ALERT 2017-05 [27 June 2017]

OSHA To Delay Electronic Reporting Of Employer's Injury-Illness Records Final Rule

In tomorrow's **FEDERAL REGISTER**, the Occupational Safety & Health Administration is expected to publish its intention to extend the initial date of compliance with the "Electronic Reporting" Final Rule from 01 July 2017 (this Saturday) until 01 December 2017.

We provide a link to the advance copy of that notice: [OSHA FR Notice of 28 June 2017](#)

Within tomorrow's notice, the agency takes the time to indicate that in addition to extending by five months the effective "drop dead" date for initial electronic submission of OSHA Forms 300A, that *"...OSHA also intends to issue a separate proposal to reconsider, revise, or remove other provisions of the prior final rule. OSHA will seek comment on those provisions in that separate proposal."*

While not expressly saying so, OSHA will likely revisit and reverse the agency's former position with regard to employer retaliation against employee accident reporting, which provided, amongst other things, that blanket post accident drug/alcohol testing could, in some cases, be considered retaliatory for the circumspect employee reporting of accidents. We'll await publication of that proposal and, through other means, monitor that notice's development.

OSHA's Form 300A (Rev. 01/2004)

Summary of Work-Related Injuries and Illnesses

Year 20 _____
 U.S. Department of Labor
 Occupational Safety and Health Administration
 Form approved OSHA 300-1024-020

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.
 Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."
 Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases			
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
(a) _____	(b) _____	(c) _____	(d) _____

Number of Days	
Total number of days away from work	Total number of days of job transfer or restriction
(e) _____	(f) _____

Injury and Illness Types			
Total number of ...			
(1) Injuries _____	(5) Poisonings _____	(2) Skin disorders _____	(6) Hearing loss _____
(3) Respiratory conditions _____	(7) All other illnesses _____		

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

This reporting burden is the collection of information that is required to average 30 minutes per response, including time to review the instructions, search existing data sources, gather the data needed, and complete and review the collection of information. Send comments regarding this burden estimate or any aspect of this collection of information, including suggestions for reducing this burden, to Washington, DC 20503. Do not send the completed forms to this office.

Establishment information

Your establishment name _____

Street _____ City _____ State _____ ZIP _____

Industry description (e.g., Manufacturer of metal rock waders) _____

Standard Industrial Classification (SIC), if known (e.g., 9711) _____

NAICS _____

North American Industrial Classification (NAICS), if known (e.g., 330212) _____

Employment information (If you don't have these figures, or the information is not on this page, estimate.)

Annual average number of employees _____

Total hours worked by all employees last year _____

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Signature _____ Title _____

Date _____

Got a question about this particular subject? Write to the JSC at: blueoceana@optonline.net

Working Together For The Benefit Of All

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