



Insights: Alerts

OSHA Sets December 15 Deadline to Electronically Submit Workplace Injury and Illness Reports

November 27, 2017

Written by John W. Alden,

After much uncertainty and delay, the Occupational Safety and Health Administration confirmed that the deadline for employers to electronically submit injury and illness data from their 2016 OSHA Form 300A is **December 15, 2017**. The annual electronic reporting requirement in the Final Rule Issued to Improve Tracking of Workplace Injuries and Illnesses went into effect on January 1, 2017. [The original compliance deadline of July 1, 2017 previously was extended to December 1, 2017 to allow the new administration time to review the electronic reporting requirement prior to its implementation.](#)

- In the first year, all covered employers must submit information from their 2016 Form 300A by **December 15, 2017**.
- In the second year, establishments with 250 or more employees will be required to submit information from all completed 2017 OSHA Forms (Forms 300A, 300, and 301) by **July 1, 2018**. Establishments with fewer than 250 employees will only be required to submit information from their Form 300A by the **July 1, 2018** deadline.
- Beginning in 2019, the deadline to submit injury and illness data from the prior year will fall on March 2 of each year.

Workplace injury and illness data must be submitted through the OSHA Injury Tracking Application on the OSHA website. The Injury Tracking Application and additional information regarding the electronic reporting requirement are available at <https://www.osha.gov/injuryreporting/>.

The electronic reporting requirement is just one facet of the Final Rule, one of the last workplace safety rules issued by the Obama administration. The Final Rule also contains anti-retaliation provisions that could be interpreted to prohibit safety incentive programs and post-accident drug-testing policies, causing many employers to reexamine their safety incentive and drug testing practices. The anti-retaliation provisions remain under review by the current administration.

For assistance with navigating the electronic reporting and anti-retaliation provisions of the Final Rule, please contact Kilpatrick Townsend's OSHA Litigation Team:

Noelle A. Abastillas

nabastillas@kilpatricktownsend.com

Office: 404.815.6056

John Alden

jalden@kilpatricktownsend.com

Office: 404.815.6058

Randy Avram

ravram@kilpatricktownsend.com

Office: 919.420.1812

Related People



John W. Alden

t 404.815.6058

jalden@ktslaw.com