

## Electronic Submission of Injury Data

On January 1, 2017 OSHA's electronic recordkeeping standard took effect. The standard includes a requirement for establishments with over 250 employees and establishments in certain industries that are considered high-risk by OSHA with between 20 and 249 employees to submit their injury data electronically. The due date for electronic submission of the 2016 OSHA 300A data is December 1, 2017. As of October 31, 2017 the state plan states of CA, MD, MN, SC, UT, WA and WY have not adopted this standard and employers in these states are not required to submit data. State and local government establishments in IL, ME, NJ and NY are also not currently required to submit their data.

High-risk employers are classified by their NAICS code. Industries included in the list of high-risk establishments include construction, manufacturing, senior care, grocery stores, amusement parks and arcades and hotels/motels among others. A complete list of NAICS codes of establishments with between 20 and 249 employees who must submit their OSHA injury data electronically is attached. If an establishment knows their SIC code but not their NAICS a crosswalk tool has been developed by NAICS and can be found at <https://www.naics.com/sic-naics-crosswalk-search-results>. If uncertain about the SIC or NAICS, an insured can contact their insurance agent to determine their associated code. NAICS codes for a specific industry is 6 digits, but the OSHA list may only use the first two digits or the NAICS code to broadly define an entire industry. For example the NAICS code for Plumbing, Heating and Air Conditioning Contractors is 238220. OSHA requires all construction contractors in the NAICS code 23 with 20 or more employees to file their OSHA 300A information online which would include this category of contractors.

The electronic reporting requirements are based on the size of the establishment, not the firm. OSHA injury and illness records are maintained at the establishment level. An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed. A firm may be comprised of one or more establishments. To determine if you need to provide OSHA with the required data for an establishment, you need to determine the establishment's peak employment during the last calendar year. Each individual employed in the establishment at any time during the calendar year counts as one employee, including full-time, part-time, seasonal, and temporary workers. For construction and similar operations where employees do not work at a single location, the establishment is typically the main or branch office, a terminal, or similar location. To calculate the average number of employees add the number of employees the establishment paid every pay period during the calendar year including full-time, part-time, seasonal and temporary workers and divide the sum by the number of pay periods. If a firm has multiple establishments, then it must submit electronic data for each establishment of 250 employees or more or 20-249 employees in OSHA defined high-risk industries.

For this submission all employers are required to submit their 300A data. In 2018 establishments with over 250 employees must submit their 300A, 300 and 301 logs by July 1, 2018, and beginning in 2019 and every year thereafter, the 300A, 300, and 301 data must be submitted by March 2<sup>nd</sup>. Establishments of 20-249 employees in high-risk industries will only be required to submit their 300A data with deadlines of December 1, 2017 for the 2016 calendar year, July 1, 2018 for 2017 calendar year data and starting 2019 onward data will be due on March 2<sup>nd</sup> for the previous calendar year.

*It must not be assumed that every unsafe condition or procedure has been covered in our visit. Our visits are intended to assist management. They do not include the identification of every possible loss potential, violation of law, code, statute or regulation, and are not a substitute for the establishment of risk management programs by your management.*

## Data Submission

OSHA has established a secure web site for data submission which is:

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

Since this is the first year of the web site everyone will be required to set up an account and create their establishments. Setting up an account should be a one time activity, and unless changes are made to the number of establishments that require reporting, creating establishments should also be a one time activity. A single account can be used to report all establishments operated by a firm. It is suggested that several trusted employees have record of the login information created for the account, however OSHA has created a method to retrieve log-in information.

OSHA has established three options for data entry. Data can be input manually into a web form. Second, users will be able to upload a CSV file to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (application programming interface). OSHA will provide status updates on the data entry options and related information as it becomes available on their web site.

OSHA has set up a web page to assist employers with setting up an account, creating establishments and adding data. Links for the steps for the data entry are below. To get additional information on electronic recordkeeping the OSHA web page address is:

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

Setting up an account:

<https://www.osha.gov/injuryreporting/jobaids/setting-up-ita-acct.pdf>

Creating an account:

[https://www.osha.gov/injuryreporting/jobaids/create\\_an\\_establishment.pdf](https://www.osha.gov/injuryreporting/jobaids/create_an_establishment.pdf)

Add 300A data:

[https://www.osha.gov/injuryreporting/jobaids/add\\_300a\\_summary\\_data.pdf](https://www.osha.gov/injuryreporting/jobaids/add_300a_summary_data.pdf)

Submit establishment data:

[https://www.osha.gov/injuryreporting/jobaids/submit\\_establishments.pdf](https://www.osha.gov/injuryreporting/jobaids/submit_establishments.pdf)

Uploading a file:

[https://www.osha.gov/injuryreporting/jobaids/upload\\_a\\_file.pdf](https://www.osha.gov/injuryreporting/jobaids/upload_a_file.pdf)

Information on other activities on the OSHA web site such as viewing the API token, viewing or editing the establishment, editing the 300A summary data, editing the account or resetting the password can be found at this link:

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

If you have questions regarding injury recording, OSHA recordkeeping or this standard please don't hesitate to contact your Eastern Alliance Risk Management Consultant. Attached is information on severe injury reporting and injury recording and information on injury classifications for injury recording.

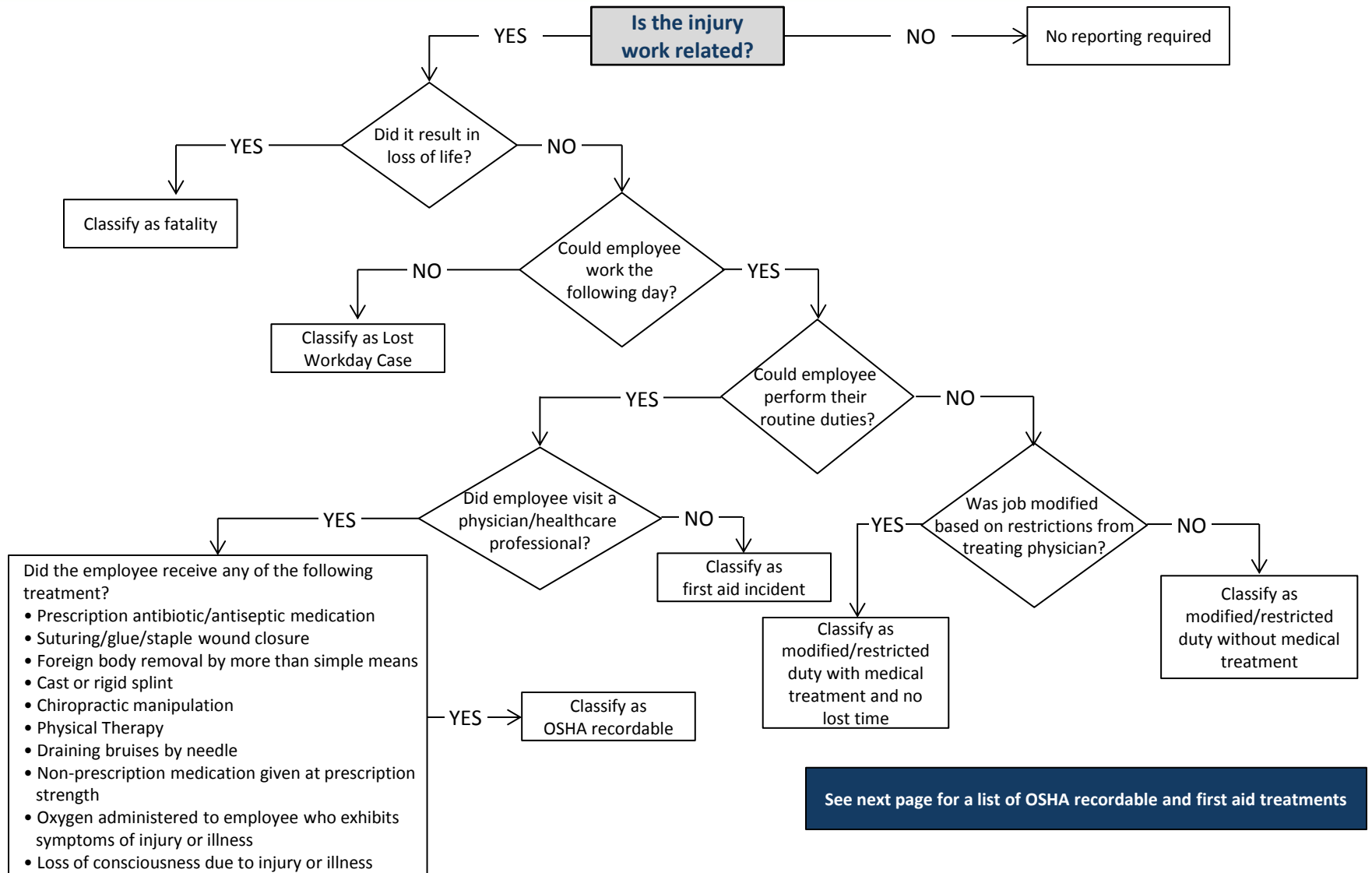
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**Establishments in the following industries with 20 to 249 employees must submit injury and illness summary (Form 300A) data to OSHA electronically**

NAICS	Industry
11	Agriculture, forestry, fishing and hunting
22	Utilities
23	Construction
31-33	Manufacturing
42	Wholesale trade
4413	Automotive parts, accessories, and tire stores
4421	Furniture stores
4422	Home furnishings stores
4441	Building material and supplies dealers
4442	Lawn and garden equipment and supplies stores
4451	Grocery stores
4452	Specialty food stores
4521	Department stores
4529	Other general merchandise stores
4533	Used merchandise stores
4542	Vending machine operators
4543	Direct selling establishments
4811	Scheduled air transportation
4841	General freight trucking
4842	Specialized freight trucking
4851	Urban transit systems
4852	Interurban and rural bus transportation
4853	Taxi and limousine service
4854	School and employee bus transportation
4855	Charter bus industry
4859	Other transit and ground passenger transportation
4871	Scenic and sightseeing transportation, land
4881	Support activities for air transportation
4882	Support activities for rail transportation
4883	Support activities for water transportation
4884	Support activities for road transportation
4889	Other support activities for transportation
4911	Postal service
4921	Couriers and express delivery services
4922	Local messengers and local delivery
4931	Warehousing and storage
5152	Cable and other subscription programming
5311	Lessors of real estate

5321	Automotive equipment rental and leasing
5322	Consumer goods rental
5323	General rental centers
5617	Services to buildings and dwellings
5621	Waste collection
5622	Waste treatment and disposal
5629	Remediation and other waste management services
6219	Other ambulatory health care services
6221	General medical and surgical hospitals
6222	Psychiatric and substance abuse hospitals
6223	Specialty (except psychiatric and substance abuse) hospitals
6231	Nursing care facilities
6232	Residential mental retardation, mental health and substance abuse facilities
6233	Community care facilities for the elderly
6239	Other residential care facilities
6242	Community food and housing, and emergency and other relief services
6243	Vocational rehabilitation services
7111	Performing arts companies
7112	Spectator sports
7121	Museums, historical sites, and similar institutions
7131	Amusement parks and arcades
7132	Gambling industries
7211	Traveler accommodation
7212	RV (recreational vehicle) parks and recreational camps
7213	Rooming and boarding houses
7223	Special food services
8113	Commercial and industrial machinery and equipment (except automotive and electronic) repair and maintenance
8123	Dry-cleaning and laundry services

# OSHA Injury Classification Workflow



See next page for a list of OSHA recordable and first aid treatments

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# OSHA Recordable vs. First Aid

	Recordable	First Aid
<b>Medication</b>	Use of prescription medication (schedule 4 or 8 'prescription only' medication) or non-prescription at a prescription strength	Non-prescription medication at non-prescription strength
<b>Therapy</b>	Therapeutic (Physical Therapy or chiropractic) treatment	Soaking, application of hot-cold compresses
<b>Cuts Lacerations</b>	Stitches, sutures (including butterfly adhesive dressing in lieu of sutures), surgical glue, staples	Application of bandages (including elastic bandages) during a first visit to medical personnel
<b>Debridement</b>	Removal of dead tissue or skin (surgical debridement)	Cleaning, flushing or soaking wounds on the surface of the skin
<b>Infections</b>	Treatment of infection with prescription medications	Application of non-prescription antiseptics and application of ointments for abrasions to prevent drying or cracking
<b>Eye Injuries</b>	Removal of foreign objects embedded in an eye	Irrigation of eye injuries and removal of non-embedded objects using cotton swab
<b>Embedded Objects</b>	Removal of foreign objects embedded in a wound (not small splinters)	Removal of foreign bodies from a wound using tweezers or other simple first aid technique
<b>Oxygen</b>	Oxygen administered to an employee exposed to a substance who exhibits symptoms of an injury or illness	Oxygen administered purely as a precautionary measure to an employee who does not exhibit any symptoms of an injury or illness
<b>Burns</b>	Treatment of deep tissue (second or third degree) burns	Treatment of minor (first degree) burns
<b>Fractures</b>	Positive x-ray diagnosis of fractures, broken bones and etc, casts or rigid immobilization devices	Soaking, application of hot-cold compresses, and use of elastic bandage on sprains immediately after injury
<b>Inoculations</b>	Inoculations such as gamma globulin, rabies, etc. given to treat a specific injury or illness, or in response to workplace exposure	Tetanus immunizations or immunizations and inoculations that are provided for public health or where there is no work-related injury or illness
<b>Bruises</b>	Draining bruises by needle	Soaking therapy, hot or cold compresses

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