



Safety Bulletin

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OSHA Electronic Recordkeeping Deadline

March 02, 2019

Employers are reminded that the March 02, 2019 deadline is approaching for covered employers to electronically submit their 2018 injury & illness 300A summary data.

Who Must Submit Data

Marine Terminal establishments with 20 or more employees are required to electronically submit their 2018 300A data. All establishments with NAICS code 4883, support activities for water transportation, are included in this data submission.

Employers with establishments not listed as marine terminals (NAICS 4883) and not listed in Appendix A <https://www.osha.gov/recordkeeping/NAICScodesforelectronicsubmission.html> need only submit data to OSHA if the establishment had over 250 employees last year.

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>

What Data to Submit

For covered establishments, this is the 300A data that is currently posted in paper form at your terminal. It is not required to be updated since you posted it a month ago. The rule also requires Employers to submit their Employer Identification Number. This is a new addition since last year.

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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](#)]

State Plan vs. FedOSHA

Several Employers have noted their State Plan has not adopted the FedOSHA final rule. In practicality for the vast majority of Employers, this issue is moot. Since marine terminals have FedOSHA coverage (for the vessel side of the operation) and since it is nearly impossible to separate your FedOSHA 300A data from your State Plan 300A data, it is simply easier to go ahead and submit your 300A establishment data.

OSHA 300A Summary Data is Not Required to be Updated

This data submission to OSHA is the 2018 300A Summary Form data. This is the signed form that is required to be posted from Feb 1 to April 30, 2019. Employers are not required to update this form prior to submission to OSHA, although you may choose to do so.

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.

For Employers that Did Not Save a Copy of their 2018 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 2018 and click submit before downloading the correct form (as the current 2019 year is the default).

Review of the Regulation

On January 25, 2019, OSHA published a Final Rule to amend its recordkeeping regulation to remove the requirement to electronically submit to OSHA information from the OSHA Form 300 (Log of Work-Related Injuries and Illnesses) and OSHA Form 301 (Injury and Illness Incident Report) for establishments with 250 or more employees that are required to routinely keep injury and illness records.

Covered establishments are only required to electronically submit information from the OSHA Form 300A (Summary of Work-Related Injuries and Illnesses).

The requirement to keep and maintain OSHA Forms 300, 300A, and 301 for five years is not changed by this Final Rule.