

## OSHA Delays July 1 Electronic Reporting Requirement

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Authored by [Don Lawless](#), [Mark Kittaka](#) and [Patricia Ogden](#) Last week, the federal [Occupational Safety and Health Administration \(OSHA\)](#) announced that it “is not accepting electronic submissions of injury and illness logs at this time, and intends to propose extending the July 1, 2017 date by which certain employers are required to submit the information from their completed 2016 Form 300A electronically.” No additional detail or explanation was provided. OSHA states that additional updates will be posted to the agency’s recordkeeping website when they become publicly available. The rule requires certain employers to electronically submit injury and illness data to OSHA. The agency intends to analyze the data for enforcement purposes and post some of it publicly (naming employers) to its website. Establishments with 250 or more employees in industries covered by the recordkeeping regulation faced the now postponed July 1 deadline. Establishments with [20-249 employees in certain high-risk industries](#) faced the July 1 deadline also. The 22 states or territories with their own [occupational safety and health programs](#) generally are using the federal OSHA electronic submission platform and similarly will be delayed. Litigation brought by the National Association of Home Builders and the U.S. Chamber of Commerce challenging this aspect of the recordkeeping rules continues in the federal trial court in the Western District of Oklahoma. This postponement does not impact the other aspects of the new recordkeeping rule including its anti-retaliation provisions, employer injury reporting, and worker notice requirements.

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