

## EMPLOYMENT SERVICES ALERT

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### OSHA Proposes to Extend July 1 Deadline for Injury and Illness Summaries

By ***Douglas M. Kennedy***, Partner

The Occupational Safety and Health Administration (OSHA) had previously set a deadline of July 1, 2017 for certain employers to electronically submit Form 300A, Annual Injury and Illness Summaries. In a proposed rule included in the June 28, 2017 Federal Register, the agency gave notice that it wants to extend this deadline until December 1, 2017. The proposed rule also included a reference to reconsidering, revising or removing other provisions of the new injury and tracking rule, which included some anti-retaliation requirements that OSHA wanted to tie to post-injury drug testing.

Until June 28, 2017, the rule now subject to these revisions was to have employers with at least 250 employees submit their OSHA 300 Logs, 301 Incident Reports, and 300A Annual Summaries to OSHA through a new website which would permit the public to view the information. Smaller employers, with at least 20 employees who were in industries with high injury and illness rates were to submit the information from the 300A Annual Summaries to this new website each year. Prior to the proposed extension, both the large and small employers were to have filed at least the 300A Forms by this Saturday.

The proposed rule indicates that OSHA will take written comments until July 13, 2017 on the proposal to delay the filing for 5 months. The proposal also mentioned that the new electronic reporting system will not be available until at least August 1, 2017.

Should any additional information be issued by OSHA after the time for filing comments, we will certainly let you know. As always, if you have any questions about these reporting requirements, please contact any of the listed Roetzel attorneys.

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