

OSHA Narrows Electronic Recordkeeping Rule

Last month, OSHA published its final rule revising the electronic recordkeeping requirements. The final rule rescinds the requirement for establishments with 250 or more employees to electronically file information from OSHA Forms 300 and 301. A welcome relief for businesses, although they must still electronically file the 300A Form. The compliance date for the 2018 300A electronic submissions is no later than March 2, 2019. OSHA cited privacy concerns for information on Forms 300 and 301 as justification for the final rule. It is important to note that the final rule does not otherwise alter an employer's current obligation to complete and maintain injury and illness records including an employer's obligation to post Form 300A, which lists a summary of the total number of job-related injuries and illnesses that occurred in the prior year. The 2018 300A must be posted between February 1 and April 30 this year.

Furthermore, the final rule now requires that covered employers submit their Employer Identification Number (EIN) electronically as part of their submission. The compliance date for providing EIN's is March 2, 2020, so the 2018 300A electronic submission does not require this information.

OSHA's link for electronic submission can be found [here](#).

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