2017 SAFETY AND HEALTH BULLETIN

TO:	All SMACNA Members	**SB: 17-05**
FROM:	Michael A. McCullion, CSP, ARM Director of Market Sectors and Safety	
DATE:	August 1, 2017	
SUBJECT:	**OSHA Launches Portal for Submission of Injury and Illness Records**	

As the next step to requiring most companies to submit injury and illness data electronically, the Occupational Safety and Health Administration has launched the Injury Tracking Application (ITA). The Web-based form allows employers to electronically submit required injury and illness data from their completed 2016 OSHA Form 300A. The application is accessible from the ITA webpage.

Note that submitting 2016 injury and illness data is not required until December 1, 2017. OSHA recently published a notice of proposed rulemaking to extend the deadline for submitting the information from July 1 to December 1, 2017, to allow affected entities sufficient time to familiarize themselves with the electronic reporting system, and to provide the new administration an opportunity to review the new electronic reporting requirements prior to their implementation. On July 13, 2017, SMACNA signed onto a Coalition for Workplace Safety letter asking OSHA to substantially revise or rescind the regulation due to several issues including the posting of this information to the OSHA website for public review and concerns over the use of the portal for private information.

The data submission process involves four steps: (1) creating an establishment; (2) adding 300A summary data; (3) submitting data to OSHA; and (4) reviewing the confirmation email. The secure website offers three options for data submission. One option will enable users to manually enter data into a web form and will likely work best for small companies. Another option will give users the ability to upload a CSV file to process single or multiple establishments at the same time. A third option will allow users of automated recordkeeping systems to transmit data electronically via an application programming interface.

The ITA webpage also includes information on reporting requirements, a list of frequently asked questions and a link to request assistance with completing the form. SMACNA members with further questions on the reporting requirements can contact Mike McCullion, SMACNA's director of market sectors and safety, at 703-995-4027 or mmccullion@smacna.org.