

February 2016

OSHA IS READY FOR THE FEBRUARY 1 RECORDKEEPING DEADLINE... ARE YOU?

The deadline for OSHA's recordkeeping requirement mandating that all covered employers post a summary (300A Summary) of its prior year's work-related injuries and illnesses is February 1. Per the mandate, this summary must be posted in a conspicuous location until April 30.

This requirement applies to all nonexempt employers with more than 10 employees. Exempted employers are those identified as operating in lower hazard industries. In 2014, OSHA announced that it would use the North American Industry Classification System (NAICS) instead of the Standard Industrial Classification (SIC) system to determine which industries and employers are exempt. Be sure to check with NAICS if you have questions about whether you are covered.

Even if an employer is in an exempt industry, it still must comply with the recordkeeping requirements if OSHA or the Bureau of Labor Statistics informed the employer that it is required to keep a log and post a summary despite its exempt status.

The 300A summary is derived from a company's OSHA 300 log (formally, the OSHA Log of Work-Related Injuries and Illnesses). Generally, only serious work-related injuries must be recorded on the log. These include injuries resulting in a fatality, loss of consciousness, days away from work, a restricted work schedule or job transfer, or a significant injury or illness diagnosis by a health care provider, or injuries/illnesses that require medical treatment beyond basic first aid. See notes to 29 CFR 1904.7 for additional recordable injuries/illnesses. Both the 300 log form and the 300A summary form can be downloaded at www.osha.gov.

One thing to remember: The 300A summary must be certified by a company executive. A human resources manager won't qualify unless he or she is also an officer of the company. This executive must certify that he or she has reviewed the related records and that the posted summary is accurate and complete, to the best of his or her knowledge.

Finally, OSHA implemented updates to its recordkeeping and reporting rules that were effective in January 2015. In light of these updates, and OSHA's recent focus on recordkeeping issues, the February 1 deadline is a good time for all covered employers to review their policies and procedures for complying with the recordkeeping and reporting regulations.

OSHA 300A SUMMARY

February 1, 2016

- Post a summary of the prior year's work-related injuries and illnesses until April 30, 2016

WHO HAS TO DO IT?

- All nonexempt employers with more than 10 employees

WHICH INDUSTRIES ARE EXEMPT?

- Employers in lower-hazard industries
- Determined by the NAICS system

WHERE CAN I FIND THE FORMS?

- www.osha.gov

WHAT ELSE DO I NEED TO KNOW?

- Your 300A summary has to be reviewed and certified by a company executive

FOR MORE INFORMATION:

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