CAL/OSHA’S EMERGENCY REGULATION REQUIRES ELECTRONIC REPORTING OF 300A LOGS

Cal/OSHA has adopted an emergency regulation that requires certain California employers to electronically submit their Cal/OSHA 300A annual summaries to a website managed by the U.S. Department of Labor. The stated purpose of the emergency regulation is to conform Cal/OSHA’s record keeping regulation to federal OSHA’s parallel regulation. Federal law requires that states who administer their own OSHA regulations at a minimum meet all federal OSHA requirements.

WHICH EMPLOYERS ARE REQUIRED TO ELECTRONICALLY SUBMIT 300A FORMS?
All employers with 250 or more employees at any time during the calendar year are covered by the emergency regulation. Also covered by the emergency regulation are construction employers with 20 – 249 employees at any time during the calendar year.

WHAT IS THE REPORTING DEADLINE?
Cal/OSHA 300A forms for the 2017 calendar year must be electronically submitted by no later than December 31, 2018. Cal/OSHA 300A forms for the 2018 calendar year must be electronically submitted by no later than March 2, 2019. (submissions in ensuing years will be due on March 2)

HOW DO COVERED EMPLOYERS REPORT THE 300A DATA?
Employers described above that are now required to submit their 300A summaries online each year should follow the instructions on federal OSHA’s Injury Tracking Page. https://www.osha.gov/injuryreporting/index.html