OSHA CHANGES & NEW REPORTING REQUIREMENTS - EFFECTIVE ON JANUARY 1, 2015

New OSHA Reporting Rules

All employers are now required to contact OSHA within 24 hours following an occurrence of <u>any in-patient</u> <u>hospitalizations</u>, <u>amputations</u>, <u>or loss of an eye</u>, as well as the current requirement to contact OSHA within eight hours following a fatality. For reporting compliance, employers have three options when contacting OSHA: 1) call the nearest area office; 2) call OSHA's 24-hour hotline 1-800-321-OSHA(6742); or 3) report online.

New Recordkeeping And Posting Requirements

New categories of employers must now maintain and post OSHA injury and illness records going forward. Employers who were already covered must complete and post their 2014 annual summary by February 1, 2015 and keep it posted until April 30, 2015. Employers must utilize the annual summary form (form 300A) to comply with the posting requirements. The form is available for download from OSHA at http://www.osha.gov. Even if you have no recordable injury or illness, you must still complete your 300 logs and post the 300A summary. Some misunderstood or forgotten requirements:

Executive Certification

OSHA's recordkeeping standard <u>requires</u> a certification of the 300A summary <u>by a company executive</u>. Four specific management officials may be considered "company executives" for purposes of certifying the 300A summary: 1) an owner of the company; 2) an officer of the corporation; 3) the highest-ranking company official working at the location; or 4) the immediate supervisor of the highest-ranking company official working at the location. This official must certify that he or she has reviewed the OSHA 300 logs and related records, and reasonably believes, based on knowledge of the process underlying the development of the data, that the posted summary is accurate and complete.

Number Of Employees And Hours Worked

The annual summary requires employers to include a calculation of the annual average number of employees covered by the log and the total hours worked by all covered employees. The purpose of this requirement is to help employers compare the relative frequency of significant occupational injuries and illnesses at their workplace as compared to other establishments.