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What are the OSHA requirements for electronic record reporting

The **Occupational Safety and Health Administration (OSHA)** has specific requirements for **electronic recordkeeping** and reporting workplace injuries and illnesses. These requirements are designed to improve transparency, streamline data collection, and provide OSHA with accurate data to track safety performance across industries. Below are the key aspects of OSHA's requirements for electronic record reporting:

1. Who Must Submit Electronic Reports?

Employers in certain industries are required to submit their injury and illness data electronically to OSHA. The specific industries are determined based on the number of employees and the type of industry, with higher-risk industries being prioritized for electronic reporting.

Larger Employers [250 or More Employees]: Employers with 250 or more employees at any time during the previous calendar year in industries covered by the OSHA recordkeeping regulation.

High-Hazard Industries: Certain employers in industries with 100 or more employees at any time during the previous calendar year in certain high hazard industries must generally submit their records electronically.

[The full list of industries deemed high hazard for purposes of this requirement can be found here: <https://www.federalregister.gov/documents/2023/07/21/2023-15091/improve-tracking-of-workplace-injuries-and-illnesses#p-amd-7>.]

Smaller Employers (20-249 Employees): Employers in certain high-risk industries (such as construction, agriculture, and manufacturing) with 20 or more employees but fewer than 250 at any time during the previous calendar year are also required to submit electronic reports. [The full list can be found here: <https://www.osha.gov/recordkeeping/naics-codes-electronic-submission> .]

Exceptions: Employers with 10 or fewer employees are exempt from the electronic reporting requirements unless they are in an industry that OSHA deems particularly hazardous.

2. Which Forms Must Be Submitted Electronically?

Employers subject to the electronic reporting requirements must submit the following forms electronically to OSHA:

- **OSHA Form 300:** This is the **Log of Work-Related Injuries and Illnesses**, where employers record each work-related injury or illness. It includes details such as the nature of the injury or illness, the date it occurred, and the affected body part.
- **OSHA Form 301:** This is the **Injury and Illness Incident Report**, which provides more detailed information about each individual incident, such as a description of the event and the treatment provided to the worker.
- **OSHA Form 300A:** This is the **Summary of Work-Related Injuries and Illnesses**, a year-end summary that includes the total number of injuries and illnesses, days away from work, and other key metrics from the OSHA 300 log. This form must be posted in the workplace each year but also needs to be submitted electronically to OSHA.

3. Submission Deadlines

- **Annual Submission:** Employers must submit their **Form 300A** (Summary) electronically to OSHA by **March 2** of the year following the reporting year.

4. Injury Tracking Application (ITA)

OSHA provides an **Injury Tracking Application (ITA)** for employers to submit their injury and illness data electronically. The ITA is an online portal available through OSHA's website, where employers can input data directly or upload it in a CSV (Comma-Separated Values) file format.

- **How to Submit Data:** Employers can submit their data either by entering it manually into the ITA or by uploading a CSV file with the necessary information.
- **Required Data:** The data submission process includes entering key metrics from the OSHA 300A summary form and ensuring that all information is accurate and up-to-date.

The ITA can be accessed on the OSHA website, and employers will need an OSHA account to submit their reports electronically.

5. Employer Responsibilities for Accuracy and Timeliness

- **Accuracy of Data:** Employers are responsible for ensuring that the information submitted to OSHA is accurate and reflects the true nature of workplace injuries and illnesses.
- **Timely Submission:** Employers must submit their electronic reports on time, typically by **March 2** each year for the annual summary (Form 300A), and failure to do so may result in penalties.

Recordkeeping for Smaller Employers

While employers with fewer than 10 employees are generally exempt from submitting electronic reports, they must still maintain accurate injury and illness records. In the event of an OSHA inspection or investigation, employers are required to provide records as requested.