

# A Snapshot in Safety and Risk

## OSHA Reporting, Recordkeeping, and Posting: Deadline Approaching

The Bureau of Labor Statistics (BLS) reported that the United States experienced 2.8 million injury and illness cases, and 5,486 fatal work injuries, in 2022. This represents a 7.5% increase in reported injuries and illnesses and a 5.7% increase for reported fatalities as compared to the 2021 calendar year.

The Federal Occupational Safety and Health Administration (OSHA) requires all employers to report serious injuries, illnesses, and fatalities as well as maintain and post injury and illness records. Some low-risk industries are exempt from maintaining and posting injury and illness records.

The information that follows outlines Federal OSHA requirements relative to each of the areas listed above. Failure to comply with any of these requirements may result in significant citations and fines. State-run OSHA program (<https://www.osha.gov/stateplans>) requirements may vary slightly. State and Federal-OSHA consultation offices can be an effective resource and answer specific questions related to all areas of OSHA compliance. Requesting information or questions in any area of OSHA compliance will not trigger inspections or action on OSHA's part.

### Reporting Serious Accidents and Fatalities

Federal and State OSHA plans require that all serious accidents and fatalities be reported to OSHA.

- Serious accidents are classified as in-patient hospitalization, amputation, or loss of an eye and must be reported within 24 hours of the incident.
- Employee on-the-job fatalities must be reported within (8) hours.

State-run programs have reporting requirements, but they may vary slightly. Employers under state-run programs should check with their local OSHA consultation office to confirm parameters as failure to report within specified time periods can result in costly fines and citations. Other agencies, such as medical providers, are also required to report serious accidents, hospitalizations, and fatalities to OSHA but their reporting does not qualify as the employer report.

\*Accidents that are required to be reported to OSHA will likely trigger a visit and inspection from OSHA compliance.

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## Recordkeeping

What are the requirements for maintaining injury and illness records (OSHA 300 Log)? All employers, with more than 10 employees, are required to maintain the OSHA 300 Log for all work-related injuries and illnesses.

*There are two exemptions to this rule:*

1. The establishment is classified as [a partially exempt industry](#) (there are over 80)
2. There are 10 or fewer employees at all times during the previous calendar year.

Injuries and illnesses must be logged within seven (7) calendar days of receiving information about the case. Employers should not rely on third-party resources, such as insurance carrier's claims management systems to produce their 300 Log. The log should be managed by the employer.

For more details on recordkeeping, please refer to the OSHA Fact Sheet: <https://www.osha.gov/sites/default/files/publications/OSHA3746.pdf>

## Posting of Annual Summary

At the end of the calendar year, review the OSHA 300 Log and verify the entries are complete and accurate. After corrections are made:

1. *Create an annual summary* (OSHA 300A) of injuries and illnesses recorded on the OSHA 300 Log in 2023.
2. *Certify the summary* – company executive must certify that he or she has examined the OSHA 300 Log and that he/she reasonably believes the annual summary is correct and complete
3. *Post a copy of the 300A* in each establishment in a conspicuous place or where notices to employees are customarily posted, from February 1 until April 30, 2024.

The majority of data listed on the OSHA 300 may be transferred to the OSHA 300A summary. Additional information that is required includes:

- Total number of job-related injuries and illnesses that occurred
- Annual average number of covered employees
- Total hours employees worked during the calendar year

***Even if you had no recordable injuries or illnesses for 2023, you must post the OSHA Form 300A listing zeros (0) on the total line.*** Records must be kept for a period of 5 years.

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*NOTE: There are 22 states and U.S. territories that have their own OSHA-approved occupational safety and health programs, referred to as [State Plans](#). All State Plans have recordkeeping and reporting requirements in place.*

*Employers under State Plans should check their state OSHA website to determine if recordkeeping and reporting parameters differ from Federal OSHA requirements. See link below “State Plan Adoption of OSHA’s Revised Reporting Requirements (as of 2/21/18).”*

## Electronic Submission

Employers must also electronically submit 2023 injury and illness data from OSHA Form 300A by March 2, 2024, if they have:

- Establishments with 20-249 employees classified in [certain industries \(with historically high rates of occupational injuries and illnesses\)](#)
- 250 or more employees and are required to keep OSHA injury and illness records

## New for 2024

Establishments with 100 or more employees in [high-hazard industries](#) must electronically submit detailed information about each recordable injury and illness (Forms 300 and 301) by March 2, 2024. This is in addition to the existing requirement for these employers to submit information for OSHA Form 300A Annual Summary.

For more information on this new requirement, visit:

[https://www.osha.gov/sites/default/files/publications/OSHA\\_FS-4272\\_ITA\\_07-2023.pdf](https://www.osha.gov/sites/default/files/publications/OSHA_FS-4272_ITA_07-2023.pdf)

To access the Injury Tracking Application launch page, visit:

<https://www.osha.gov/injuryreporting/index.html> and click on *Launch the Injury Tracking Application*.

This standard applies to all employers, including ones located in state-plan states.

## **RESOURCES AND LINKS**

State Plan Adoption of OSHA’s Revised Reporting Requirements (as of 2/21/18):

<https://www.osha.gov/recordkeeping/2014/state-adoption-table>

Employers not required to keep OSHA injury and illness records:

<https://www.osha.gov/recordkeeping/presentations/exempttable>

Newly Covered Industries (2015):

<https://www.osha.gov/recordkeeping/2014/reporting-industries>

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Industries Covered by Recordkeeping Rule:

<https://www.osha.gov/recordkeeping/presentations/covered>

FAQs about the ITA:

<https://www.osha.gov/injuryreporting>

Tutorial on Completing the Recordkeeping Forms:

<https://www.osha.gov/recordkeeping/tutorial>

Covered Employees:

<https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.31>

Detailed Guidance for OSHA's Injury and Illness Recordkeeping Rule:

<https://www.osha.gov/recordkeeping/entry-faq>

Reporting a Fatality or Severe Injury:

<https://www.osha.gov/report>

For additional information contact:

Tribal First Risk Control Solution Center at [riskcontrol@tribalfirst.com](mailto:riskcontrol@tribalfirst.com) or the Toll Free Help Line: 888 737 4752.