



HR-Alert: OSHA Expands Electronic Reporting Requirements

Effective January 1, 2024, the Occupational Safety and Health Administration (OSHA) will require certain employers to submit their OSHA 300 Log and 301 Incident Forms electronically through an Injury Tracking Application (ITA). OSHA previously required many employers to maintain illness and injury logs, as well as post a summary each year in their place of work between February 1 and April 30. The new rule clarifies impacted employers, revises certain OSHA forms and appendixes, and notes that this information will be made available to the public.

Impacted Employers

- Establishments with 100 or more employees in high-hazard industries outlined in [Appendix B](#) will be required to submit information electronically
- The rule does not impact the previous requirement for establishments with 20 to 249 employees in certain industries outlined in [Appendix A](#) to electronically submit their information annually
- Additionally, the rule maintains the requirement for employers with 250 or more employees to annually submit their information
- Establishments can submit an [ITA Coverage Application](#) to confirm whether they are required to submit their information electronically

Form and Appendix Updates

- [Forms 300 and 301](#): OSHA will not require employee names or addresses, names of health care professionals, or names and addresses of facilities when treatment is provided away from the worksite
- [Appendix A](#): OSHA will be updating NAICS codes used in Appendix A that designates the industries required to submit their Form 300A data
- [Appendix B](#): OSHA is adding an appendix B, to designate the industries required to submit Form 300 and Form 301 data

Additional Updates

Establishments will be required to include their legal company name when making electronic submissions to OSHA. Establishments may begin submitting their 2023 injury and illness data on January 2, 2024, and must complete by the March 2, 2024, deadline. Establishments may choose to submit their data to the ITA portal via webform, csv file, or an application programming interface (API) feed.

OSHA intends to publish the data on a public website after redacting information that could identify individuals such as:

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- Workers names and addresses
- Using birth dates to convert to age, then removing birth dates altogether
- Withholding age, gender, hire date, and whether the worker was treated in an emergency room and/or hospitalized overnight as an in-patient
- Utilizing automated information technology to remove any further information that may identify workers
- Reminding employers to not submit information that could directly identify workers (names, addresses, telephone numbers, etc.)

Employer Next Steps

- Employers may review the [ITA Coverage Application](#) to confirm whether they are required to electronically submit their injury and illness information to OSHA
- Impacted employers should begin or continue tracking injury and illness data and prepare their submission no later than March 2, 2024, and annually thereafter
- Employers may review OSHA's [Job Aids](#) or "How-to" on the Injury Tracking Application portal

If you have any questions regarding this HR-Alert, please [email us](#).