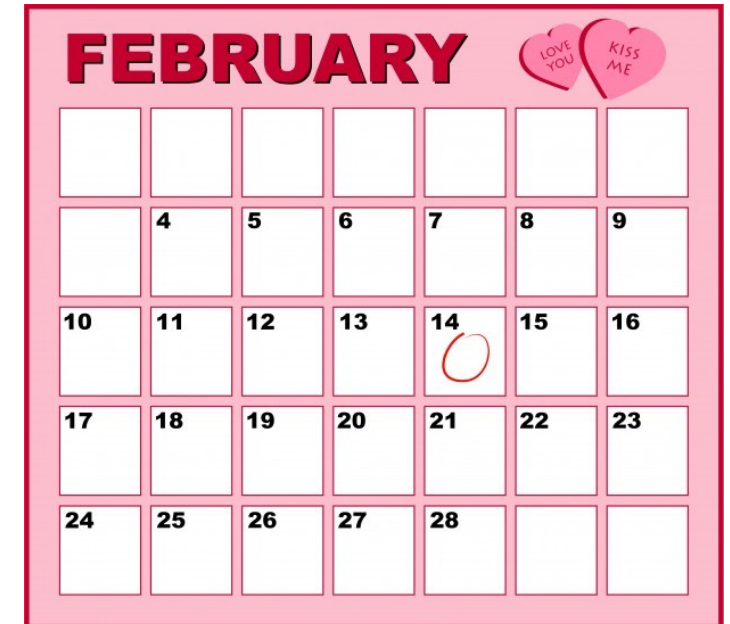


OSHA Roundtable

Brief Recordkeeping (RK) review and new ITA

February 2024

- Recording injuries and illnesses
- Reporting of severe injuries and deaths
- Electronic Submission of Records - Injury Tracking Application (ITA)



Presented by Region 1 EPTS: Lisa Sullivan and Maria-Lisa Abundo,
February 2024

1904 Recordkeeping: Review

- What is recordkeeping?
- What is my NAICS? <https://www.census.gov/naics/>
- Where do I start? <https://www.osha.gov/recordkeeping>
- Where do I get forms? <https://www.osha.gov/recordkeeping/forms>
- Is this recordable? Decision tree <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.4> (also slide 8)

1904 Recordkeeping Electronic Submission (ITA) Introduction

- What is Electronic Submission?
- Do I have to submit them? [ITA Coverage Application](#)
- When are they due? January 2 to March 2.
- We missed the deadline. Submissions accepted until Dec 31.
- Not sure if we submitted. Anyone can check [OSHA's public database](#).
- What about Personally Identifiable Information (PII)? See [OSHA PII Fact Sheet](#) AND [1904.41](#)
- Technical issues with ITA application: [Help Request Form](#)

OSHA RECORDABILITY AND WORKERS' COMPENSATION

REMINDER: DO NOT MIX

- Workers' Compensation determinations do NOT impact OSHA recordability.
 - Some cases may be OSHA recordable and compensable.
 - Some cases may be compensable, but not OSHA recordable.
 - Some cases may be OSHA recordable, but not compensable.

OSHA Recordkeeping Forms

OSHA Form 300 Log

- Employee name, job title, date
- Event location
- Incident description
- Case classification

OSHA Form 301 Incident Report

- Employee demographics
- Time and date
- Treatment location
- Incident details

OSHA Form 300A Annual Summary

- Establishment name, address
- NAICS
- Total number of cases, employees, hours worked

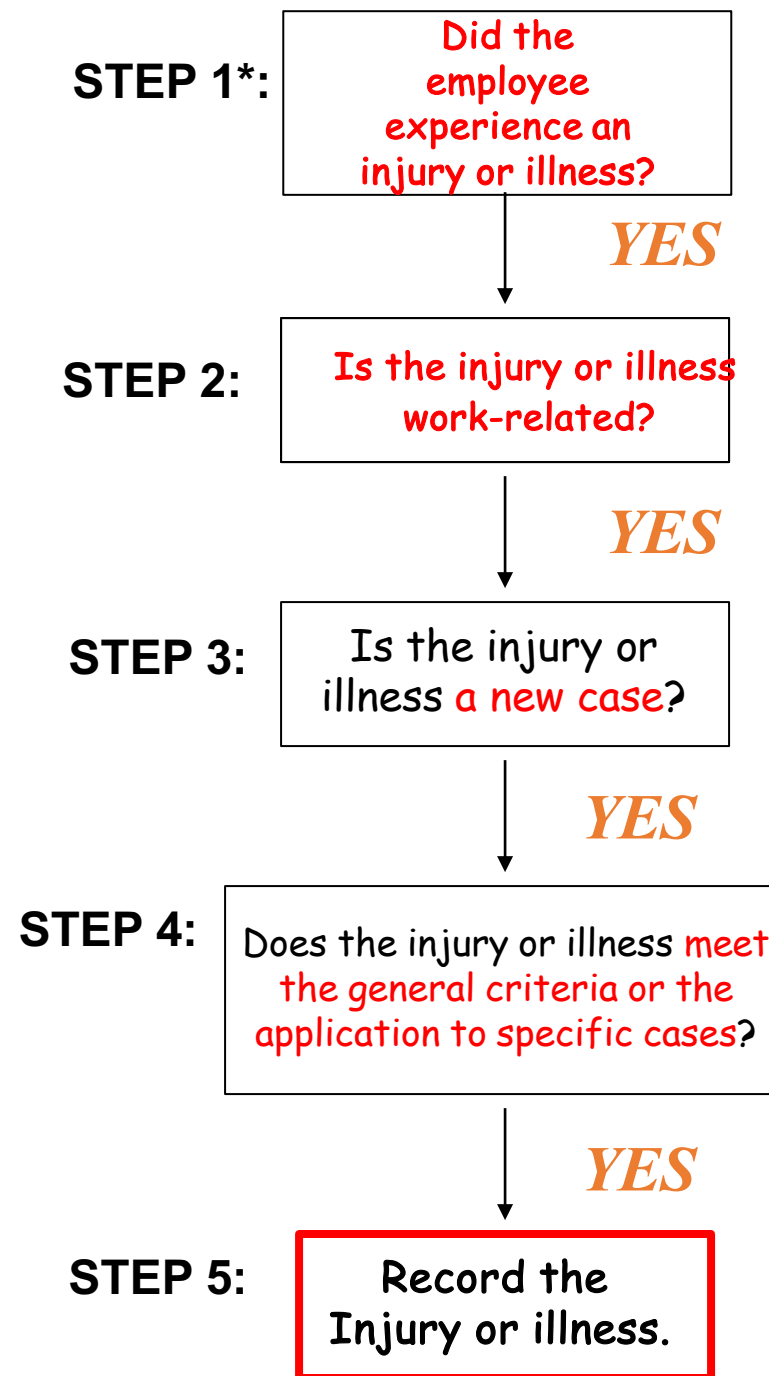
1904.4 – Recording Criteria

- Covered employers are determined by NAICS and size of company/firm as a whole.
- Covered employers must record each fatality, injury or illness that:
 - is work-related, and
 - is a new case, and
 - meets one or more of the criteria contained in sections 1904.7 through 1904.11.

1904.7 General Recording Criteria

- Death
- Loss of consciousness
- Lost workdays
- Restricted work or transfer
- Medical Treatment beyond first aid
- Significant injury or illness diagnosis
- Additional recording criteria (1904.8 to 1904.11)

* Reminder – before you start, is employer covered by part 1904?



Decision Tree

<https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.4>

Reporting Fatalities and Severe Injuries

- All employers – regardless of NAICS or size
- All employers are required to notify OSHA within 8 hours after the death of an employee on the job or within 24 hours for **hospitalization, amputation, or loss of an eye** as a result of a work-related incident.
- Employer must still record event on OSHA log if required to keep logs and criteria are met.



To Make a Report

- Call the nearest [OSHA office](#).
- Call the OSHA 24-hour hotline at [1-800-321-6742](tel:1-800-321-6742) (OSHA).
- [Report online](#)

Reporting Fatalities and Severe Injuries

- Yes, must report work-related fatality or in-patient hospitalizations caused by a heart-attack.
- Not **reportable**:
 - Work-related MVA-related event on public street or highway (if in construction work-zones, then reportable).
 - Work-related event on commercial or public transportation system (ie. airplane, train, subway).
 - Event may still be **recordable** if employer is required to keep logs and criteria are met.



To Make a Report

- Call the nearest [OSHA office](#).
- Call the OSHA 24-hour hotline at [1-800-321-6742](#) (OSHA).
- [Report online](#)

Electronic Submission of records – ITA review

- If exempt from RK, then no ITA requirements.
- Not everyone who has to keep OSHA logs has to do ITA electronic submission.

Injury Tracking Application (ITA)

New injury and illness information submission requirements for *some* establishments will begin January 1, 2024.

[Learn more](#)

Electronic Submission of records – ITA review

- Targets specific high hazard industries
- Assists OSHA in targeting inspections
- [OSHA ITA website](#)
- [1904.41](#)

Injury Tracking Application (ITA)

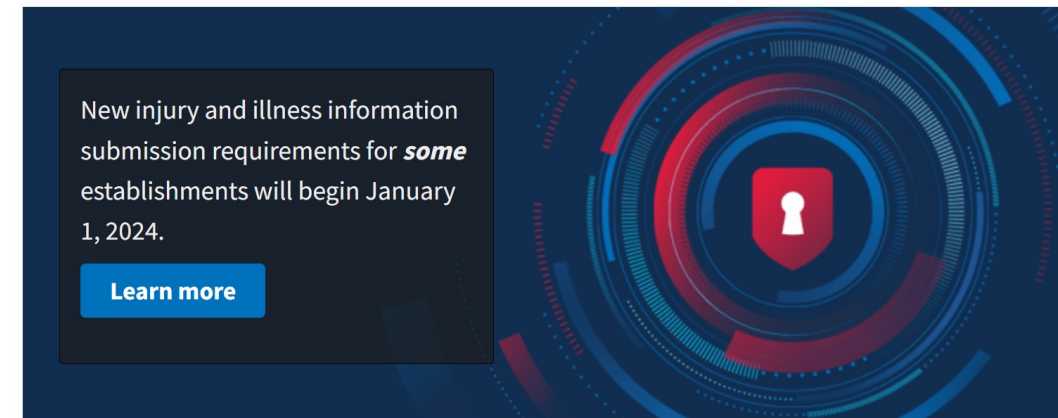
New injury and illness information submission requirements for *some* establishments will begin January 1, 2024.

[Learn more](#)

Electronic Submission of records – ITA review

- **ITA coverage is determined by size of establishment and NAICS.**
- **Peak number of employees, previous CY**
- **Covered employers must submit OSHA RK information annually.**
- **Submit from Jan. 2 to March 2.**
- **Even if late, employers are required to submit ITA – access is open until Dec 31**

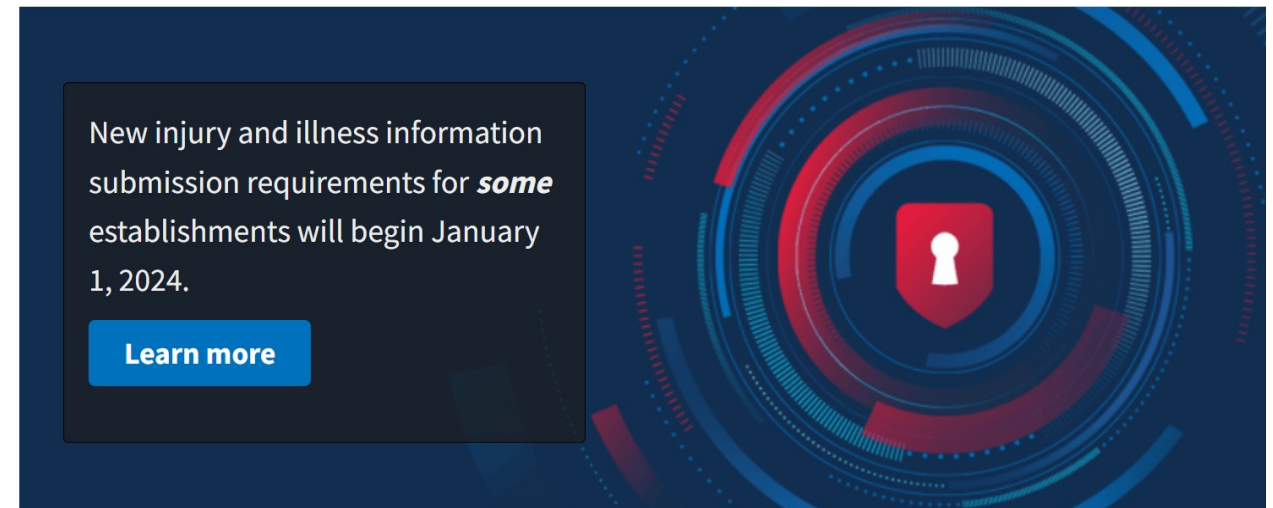
Injury Tracking Application (ITA)



Electronic Submission of records - ITA

- Employers need an ITA account.
- Employer will get a confirmation email when upload is complete.
- Anyone can check [OSHA's public database](#).
- Technical issues with ITA application: [Help Request Form](#) for employers.

Injury Tracking Application (ITA)



New injury and illness information submission requirements for *some* establishments will begin January 1, 2024.

[Learn more](#)

Electronic Submission of records – ITA

New rule effective January 1, 2024

- <https://www.osha.gov/laws-regs/regulations/standardnumber/1904/1904.41>
- Covers CY2023 data
- Updated '[Appendix A to Subpart E](#)' to align with 2017 NAICS*
- Created '[Appendix B to Subpart E](#)' – high TCR/high fatality rate, subset of Appendix A.
- Establishments with 100 or more employees in App. B submit 300 and 301 in addition to 300A.

* previously used 2012 NAICS



Electronic submission of records ITA – Starting January 1, 2024 for CY2023 data

For CY2023 and beyond

- (no change) Based on establishment size (single physical location)
- (no change) 19 or fewer employees – No ITA responsibilities.
- (no change) 20 to 249 employees: 300A for employers with NAICS in Appendix A to subpart E.
- **NEW:** 100 or more employees in App. B (which is a subset of App. A): 300 and 301 in addition to 300A.
- (no change) Over 250 employees and required to keep records under 1904: submit 300A.
- **RESOURCE:** [ITA Coverage Application](#)

Construction NAICS Sector 23



- Based on establishment size (single physical location)
- 19 or less employees – No ITA responsibilities.
- 20 to 249 employees: Construction NAICS 23XXXX is in Appendix A to Subpart E: submit 300A.
- **NEW** 100 or more employees: Check if NAICS is in App. B (which is a subset of App. A): submit 300 and 301 in addition to 300A.
- Over 250 employees and required to keep records under 1904: submit 300A.
- **RESOURCE:** [ITA Coverage Application](#)



Short term establishments: All industries including Construction

- **If required to keep records by 1904 and site lasts less than a year, the site does not have to keep separate logs (see 1904.30) but must still keep records.**
 - **If records are sent to a central location, then they would electronically submit ITA for the central location if the central location meets the criteria for submission.**
 - **If you keep a separate log (even though you don't have to), but the job is finished so the establishment closed, then they don't have to electronically submit ITA.**

RESOURCE: [ITA Coverage Application](#)

ITA- Protection of Worker Privacy see 1904.41(b)(9)

- OSHA will not collect names and addresses of employees or healthcare providers.
- OSHA designed the data collection system to retain age instead of birthdate.
- OSHA will remind employers during the data submission process not to submit information that could directly identify workers, such as names, addresses, telephone numbers, etc.
- OSHA will not make public the data fields on worker age, gender, date hired, and whether the worker was treated in an emergency room and/or admitted to a hospital as an in-patient.
- OSHA uses automated information technology, as well as some manual review, to detect and remove any remaining information that could directly identify workers.
- **Personally Identifiable Information (PII) questions? See [OSHA PII Fact Sheet](#) AND [1904.41](#)**

ITA- State Plans see 1904.41(b)(7)

- *Do I have to submit information if I am located in a State Plan State?*

Yes, the requirements apply to employers located in State Plan States.

- ITA Coverage Application at <https://www.osha.gov/itareportapp>

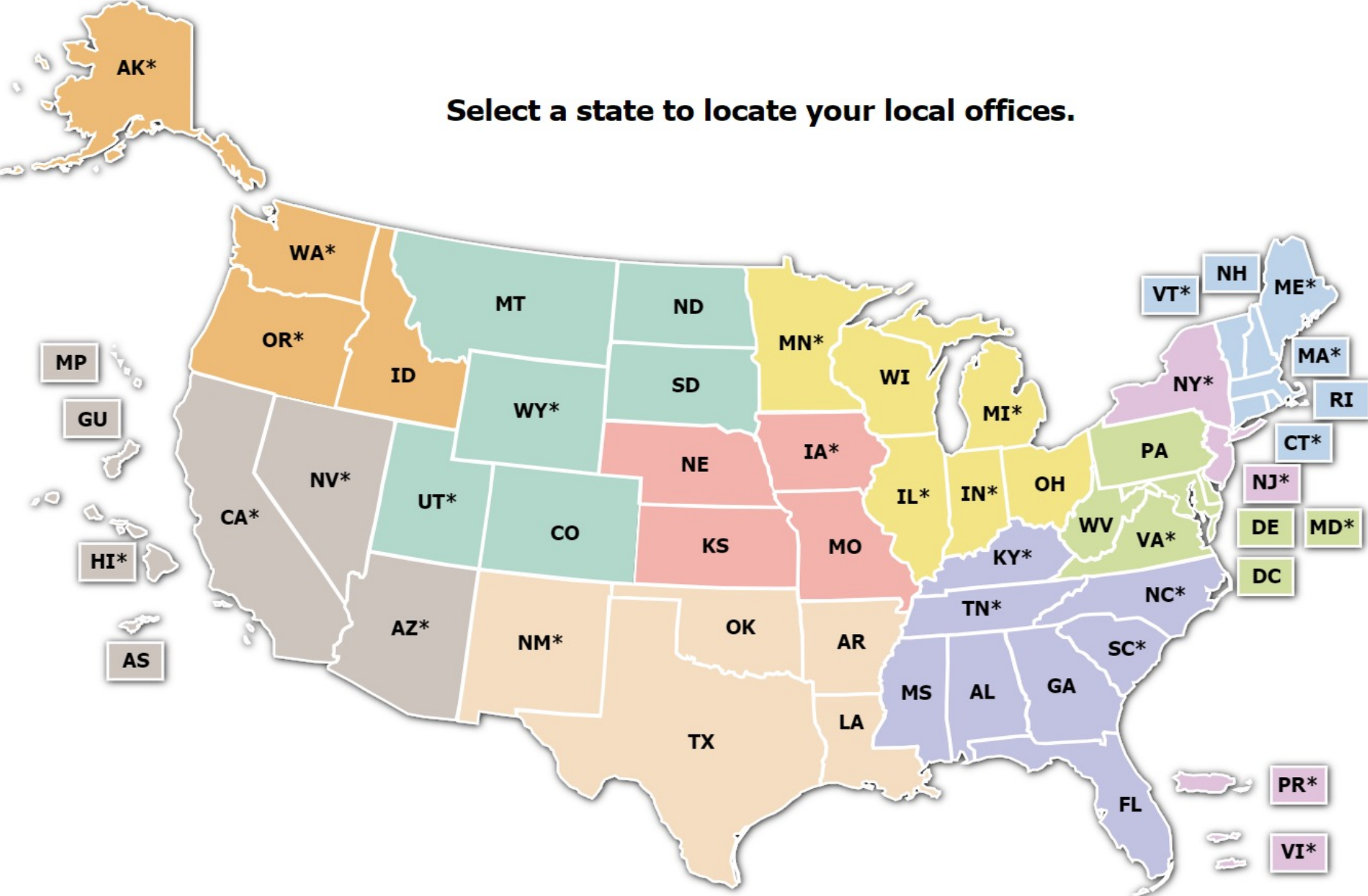
ITA Nuggets

- **Where to start– Are you required to keep OSHA logs? Based on size of company and/or NAICS. Then address ITA issues (which are based on size of establishment/single physical location).**
- **If not required to keep OSHA logs, then no ITA requirements.**
- **RK requirements based on size of company (firm) as a whole.**
- **Reporting requirements cover all employers regardless of size or NAICS.**
- **ITA requirements based on size of establishment (single location).**
- **Posting of OSHA Form 300A Annual Summary: February 1 to April 30**
- **ITA submission: January 2 to March 2 (open until Dec 31)**

ITA- Resources

- [OSHA ITA website](#)
- [ITA Coverage Application](#) (employers can use this 'app' to determine their ITA requirements)
- Federal Register Final Rule:
<https://www.federalregister.gov/documents/2023/07/21/2023-15091/improve-tracking-of-workplace-injuries-and-illnesses>
- ITA updates effective January 1, 2024.
- [ITA OSHA Fact Sheet](#)
- [Privacy Information OSHA Fact Sheet](#)
- **Demonstration:** [Injury Tracking Application \(ITA\) Demo - YouTube](#)

OSHA Offices by State



Select a state to locate your local offices.

Find Office By State

Select a State

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- [Worker Rights \(Complaints\)](#)
- [OSHA Office Directory](#)

OSHA Regional Offices

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- [Region 3: Philadelphia](#)
- [Region 4: Atlanta](#)
- [Region 5: Chicago](#)
- [Region 6: Dallas](#)
- [Region 7: Kansas City](#)
- [Region 8: Denver](#)
- [Region 9: San Francisco](#)
- [Region 10: Seattle](#)

Questions?

