GUEST COLUMN: OSHA Updates ITA Reporting Requirements

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As of Jan. 1, 2024, certain "high hazard" industries employing more than 100 employees will now be required to submit **OSHA 300, 300A, & 301** logs. In previous years, most employers who were required to report injury and illness data to the ITA only had to submit OSHA 300A logs. With these new standards, employers will be required to submit significantly more information to OSHA by the **reporting deadline of March 2, 2024**.

What is the OSHA ITA?

The OSHA Injury Tracking Application, often referred to as the "OSHA ITA", is an online tool developed by OSHA, and implemented in 2017. The ITA is designed to facilitate the electronic submission of injury and illness data that is required under OSHA's 1904 recordkeeping standards.

The OSHA ITA serves as a platform for covered employers to electronically submit their injury and illness data, specifically the information collected on OSHA Form 300A, which summarizes workplace injuries and illnesses for a given year.

OSHA has stated that they "*will publish some of the data collected on its website to allow employers, employees, potential employees, employee representatives, current and potential customers, researchers and the general public to use information about a company's workplace safety and health record to make informed decisions. OSHA believes that providing public access to the data will ultimately reduce occupational injuries and illnesses*" ([U.S Department of Labor](#)).

Parker Feely

Who Is Affected by This Update?

Not everyone will be impacted by this update. OSHA is specifically targeting "high-hazard industries" with 100 or more employees. Companies that fall into these criteria will now be required to submit both the OSHA 300 & 301 forms, in addition to the 300A form, electronically using OSHA's online injury tracking application (ITA).

OSHA determined which industries are considered "high hazard" by evaluating loss data using the North American Industry Classification System codes, commonly referred to as a company's "NAICS Code." Each NAICS code below was determined to be "high hazard," thus requiring increased reporting requirements with the goal of decreasing the frequency and severity of workplace injuries.

1121	Cattle Ranching and Farming
1133	Logging
1141	Fishing
2213	Water, Sewage and Other Systems
2381	Foundation, Structure, and Building Exterior Contractors
3115	Dairy Product Manufacturing
3116	Animal Slaughtering and Processing
3117	Seafood Product Preparation and Packaging
3118	Bakeries and Tortilla Manufacturing
3119	Other Food Manufacturing

3261	Plastics Product Manufacturing
3312	Steel Product Manufacturing from Purchased Steel
3314	Nonferrous Metal (except Aluminum) Production and Processing
3323	Architectural and Structural Metals Manufacturing
3325	Hardware Manufacturing
3327	Machine Shops; Turned Product; and Screw, Nut, and Bolt Manufacturing
4244	Grocery and Related Product Merchant Wholesalers
4413	Automotive Parts, Accessories, and Tire Stores
4441	Building Material and Supplies Dealers
4451	Grocery Stores
4522	Department Stores
4841	General Freight Trucking
4859	Other Transit and Ground Passenger Transportation
4921	Couriers and Express Delivery Services
4931	Warehousing and Storage
5621	Waste Collection
6219	**Other Ambulatory Health Care Services**
6221	**General Medical and Surgical Hospitals**
6243	Vocational Rehabilitation Services
7112	Spectator Sports
7131	Amusement Parks and Arcades
7211	Traveler Accommodation

How do I find my NAICS code?

If you are unaware of what your specific NAICS code is, the easiest way to find it is to do a quick search on the U.S. Census Bureau's site:

- Enter what your business does into the "2022 NAICS Search" box, then click "Go."
  - If you searched something too specific, no results would show up, so try something broader.
- Click the code of the result that most closely matches your business.
- Verify that the description and information are correct and reflect what your business does.
- That's your primary NAICS code.

An organization will typically have a primary NAICS code, but companies might also have multiple NAICS codes for different branches or divisions. This will depend on the breadth of the products or services that the business provides. Another important note is to periodically check your NAICS code(s), as they are updated every five years (with the next one being in 2027) to maintain accurate alignment with the economy.

How do I upload my OSHA 300 & 301 logs?

To properly upload all required injury reporting documents, all files must be uploaded in a .csv format into the ITA. If you or your company have previously uploaded OSHA 300A form data into the ITA, the same process now extends to Forms 300 and 301 for the upcoming reporting period.

Going forward, a second file specification will be provided to upload and validate form 300 and 301 data. Please feel free to use the .csv template OSHA has provided on their website. Additionally, OSHA provides specific guidance for users unfamiliar with this process, detailing correct procedures when uploading the newly required injury data. It is highly recommended employers review these steps on how to upload injury data, as incorrectly reporting data can lead to incorrect reporting or accidental under/over reporting incidents.

Reminder: Please do not include any personally identifiable information (PII) pertaining to worker(s) involved in the incident (e.g., no names, phone numbers, or SSNs) in the narrative fields.

Key Takeaways:

- Effective Jan. 1, 2024, OSHA will require certain high hazard industries employing more than 100 individuals to report certain information from 300 & 301 forms to the Injury Tracking Application (ITA).
  - The rule will apply to this current reporting year, requiring employers who fall in this category to report 2023 injury data to the ITA.
- The rule applies to industries classified with a certain NAICS code. To see what NAICS codes will be affected see above.
- OSHA has outlined specific requirements on how to electronically report 300 & 301 forms. Please review these steps on how to upload injury data into the ITA.
- As a reminder, please do not include any personally identifiable information (PII) pertaining to worker(s) involved in the incident (e.g., no names, phone numbers, or SSNs) in the narrative fields.

Reach out to your M3 team with any questions you may have about OSHA reporting requirements, or what this update could mean for your organization.

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