



Charting Course: Navigating OSHA's ITA Recordkeeping Requirement

In the ever-evolving landscape of workplace safety, the waves of change often bring new challenges and opportunities. Enter the latest swell of transformation: the Occupational Safety and Health Administration's (OSHA) Injury Tracking Application (ITA), designed to enhance the efficiency and accuracy of reporting procedures for certain employers across various industries.

Before we jump into the sea of details, it's important to note that **not every employer must set sail into this new digital abyss**. Some employers will navigate the digital landscape, while others may remain on familiar shores.



Rest Easy on the Shore

- You're not currently required to maintain OSHA logs.
- You have less than 20 employees.
- Your NAICS code is in a [partially exempt industry](#).

If you're unsure if you should grab a beach towel or a life vest, you can answer some basic questions here - <https://www.osha.gov/itareportapp> - to find out if your company is required to comply.

For those organizations who can anchor their ships in the shores of ITA exemption, you must still adhere to [OSHA's general recordkeeping requirements](#) which applies to many employers with more than 10 employees.



Get Ready to Set Sail

- Establishments with 250 or more employees and your NAICS code is not in an industry on the [partially exempt list](#).
- Establishments with 20 to 249 employees and your NAICS code is in a [high-risk industry](#).

****Note:** An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed. For activities where employees do not work at a single physical location, such as construction; transportation; communications, electric, gas and sanitary services; and similar operations, the establishment is represented by the main or branch offices, terminals, stations, etc. that either supervise such activities or are the base from which personnel carry out these activities.

For those organizations who must comply with reporting via the ITA, join us as we unravel the nuances of these new requirements, ensuring you stay afloat in the sea of workplace safety regulations.

DO PART-TIME, SEASONAL, OR TEMPORARY WORKERS COUNT AS EMPLOYEES IN THE NUMBER OF EMPLOYEES?

Yes, each person employed in the establishment at any time during the calendar year counts as one employee including full-time, part-time, seasonal, and temporary workers. This number also includes temporary workers leased through a third-party agency.



WHEN IS REPORTING DUE? WHAT HAPPENS IF I MISS THE DEADLINE?

The submission requirement is annual and must be submitted by March 2nd of each year for the previous year's injury and illness data. As such, reporting of your 2023 data is due by **March 2, 2024**.

Even if late, employers are required to submit the data in the ITA. The system is open until Dec 31st.

WHAT AM I REQUIRED TO SUBMIT?

Establishments that meet the criteria must submit information from your Form 300A Annual Summary.

Establishments with 100 or more employees with an NAICS code in a [designated industry](#) must also submit OSHA 300 and 301 Form data.

DO I HAVE TO SUBMIT INFORMATION IF I AM LOCATED IN A STATE PLAN STATE?

Yes, the federal OSHA requirements apply to employers located in State Plan states. Some states may also have additional reporting requirements or variations in deadlines. As such, employers should consult their [state's OSHA program](#) for specific guidance.

For establishments in North Carolina, even though NC is a State Plan state, the criteria for ITA reporting is the same as those of the federal OSHA. You can find the details [here](#).

WHAT HAPPENS TO THE DATA?

Once submitted, the injury and illness data entered in the ITA becomes accessible to the public on OSHA's website. This transparency fosters accountability and allows stakeholders to assess the safety records of different establishments.

WHERE CAN I FIND MORE INFORMATION ABOUT THIS REQUIREMENT?

For more information and resources on OSHA compliance and workplace safety, visit the OSHA website at www.osha.gov/injuryreporting.

Understanding the nuances of OSHA's ITA requirements is not merely about compliance; it's about fostering a culture of safety and accountability in the workplace. Whether you find yourself navigating the digital waters of electronic reporting or anchored in the harbor of exemption, remember that the ultimate destination is the well-being of your workforce.

Sending you best wishes for smooth sailing ahead.