

New Year, New OSHA Logs

As we welcome the new year, it's a time for fresh starts and new beginnings. For those tasked with OSHA recordkeeping, this includes certifying, posting, and uploading the 2024 OSHA Injury and Illness Logs while also initiating new 300 forms that, hopefully remain empty. In this installment brought to you by the [Illinois On-Site Safety and Health Consultation Program](#), we'll outline responsibilities in accordance with the OSHA's Part 1904 that covers recordkeeping, we'll discuss partial exceptions, and we will also cover the Injury Tracking Application (ITA). Along the way, we will also provide an overview of essential documents and reporting requirements.

Partially Exempt

Eighty percent of private sector employers are exempt from maintaining OSHA forms 300, 300A and 301, collectively referred to as OSHA Injury and Illness Logs. OSHA has set minimum employee thresholds to reduce the compliance burden on smaller businesses and has specific exemptions for low-hazard industries. Employers who did not exceed a company-wide peak of 11 employees at any time during 2024 are not required to maintain these logs. Sectors, such as retail, professional services, restaurants, and bars, may be exempt due to being classified as low-hazard industries. A comprehensive list of exempt industries based on NAICS codes can be found on the [OSHA.gov recordkeeping section¹](#). Regardless of exemptions, all employers must still *report* work-related fatalities and severe injuries to OSHA.

Report a Fatality or Severe Injury

All work-related fatalities must be reported to OSHA within 8 hours, while in-patient hospitalizations, amputations, or loss of an eye must be reported within 24 hours. Reports can be submitted via phone to an OSHA area office or through the hotline at 1-800-312-OSHA (6742). Additionally, there is an option to file a report online (not via email) at <https://www.osha.gov/ords/ser/serform.html>. When reporting serious incidents, be prepared to provide contact and business information along with a brief incident description. An employer representative should make the report. Common inquiries about reporting injuries often revolve around the definitions of in-patient hospitalization and work-relatedness. Detailed discussions on these topics are too extensive for this article, but know that emergency room visits where the employee is "treated and released" are not considered in-patient hospitalizations. Motor vehicle accidents that result in death or injury on highways, public streets, or while traveling on commercial transportation are not reportable unless these are the employee's place of business (i.e., construction workers, flight attendants). All reportable incidents must be *recorded*, while most recordable incidents are not *reported*.



OSHA Forms for Recording Work-Related Injuries and Illnesses

Work-related deaths, injuries, and illnesses must be captured on the compilation of OSHA forms: 300, 300A and 301. Notably, workers' compensation and OSHA injury and illness recordkeeping are distinct from one another. The [suite of OSHA recording forms²](#) and instructions can be found on OSHA's website. The **OSHA Form 301** or equivalent must be completed within seven calendar days of becoming aware of any work-related incident and be retained for five years. The Illinois Workers' Compensation Commission **Form 45: Employer's First Report of Injury** is recognized as equivalent to OSHA Form 301. **OSHA Form 300** includes sensitive information related to employee health and must be managed to protect employee confidentiality. This form records details of all work-related incidents that involve loss of

consciousness, restricted work activity, job transfers, days away from work, or medical treatment beyond first aid. Significant work-related injuries and illnesses diagnosed by a healthcare professional are also documented in Form 300. **OSHA Form 300A**, which summarizes the data from Form 300, requires certification by an executive official and be posted for employee access between February 1 and April 30, regardless of whether any work-related injuries or illnesses occurred during the previous year. For some employers, recordkeeping data needs to be submitted electronically to OSHA.



Not all businesses are required to submit captured data to the [Injury Tracking Application \(ITA\)](#)³. The application is a secure website where employers can upload or manually enter OSHA 300 log data. The upload requirement is tied to

the number of employees and the NAICS industry classification. OSHA has developed a [web application tool](#)⁴ to help employers determine if they are required to upload data into the ITA.



The Illinois On-Site Safety and Health Consultation Program can be an invaluable resource for employers who notice their OSHA 300 is too full for comfort. While the Illinois Department of Labor cannot help you fill out the forms nor provide assistance with your ITA

account, we do offer free and confidential safety and health assistance to small and medium-sized businesses. Consultation services include on-site visits, air sampling, program assistance, and training, all of which can contribute to creating a safer and healthier work environment while also potentially lowering your worker's compensation insurance. This program, brought to you at no cost by the State of Illinois, can provide the support and guidance you need to identify hazards, develop a hierarchy of controls for those hazards, and create an enduring safety and health program. Visit <https://worksafe.illinois.gov/> or contact Harry (Hap) Hileman with the Illinois Department of Labor at 217-993-2111 for more information.



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

2 <https://www.osha.gov/sites/default/files/OSHA-RK-Forms-Package.pdf>

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

4 <https://www.osha.gov/itareportapp>