# OSHA Injury and Illness Tracking Rule

What Employers Need to Know

## Electronic Submission Requirements Remain in Effect

**Annual Reporting Due Annually on March 2**

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| **BRIEF AT A GLANCE** | OSHA's 2023 final rule took effect January 1, 2024, and expanded the injury and illness information that certain establishments must submit electronically. The rule is still in effect. Depending on establishment size and industry, employers may need to submit Form 300A data, or more detailed case-specific information from Forms 300 and 301, through OSHA's Injury Tracking Application (ITA). |

What the Rule Requires

OSHA's electronic submission rule creates three primary reporting groups:

- **20-249 Team Members in Designated Industries:** Submit Form 300A summary information annually.
- **250 or More Team Members in Establishments Required to Keep OSHA Records:** Submit Form 300A summary information annually.
- **100 or More Team Members in Designated Appendix B Industries:** Submit Form 300A plus case-specific information from Forms 300 and 301 annually.

Covered establishments must also provide the Employer Identification Number (EIN) used by the establishment. The requirements apply in Federal OSHA states and State Plan states.

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| **WHAT TO KNOW** | The annual electronic reporting deadline is March 2 for the previous calendar year. That means 2026 injury and illness data will be due March 2, 2027, for establishments required to submit. OSHA's ITA is the required submission system, and employers can use OSHA's coverage tools to confirm which forms apply to each establishment. |

## Why This Matters

OSHA's designated industry lists are used for electronic submission. However, the exact reporting obligation depends on the establishment's NAICS classification and peak employment during the previous calendar year. For multi-location organizations, the analysis is made at the establishment level, not simply the company-wide headcount.



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## Preparing for the Annual Submission

**Confirm Coverage –** Review each establishment's NAICS code and peak employment from the previous year to determine whether Form 300A only or Forms 300/301 data must be submitted.

**Review Records for Accuracy –** Before submission, confirm that OSHA 300 Logs, 301 Incident Reports and the 300A summary are complete and internally consistent.

**Protect Personally Identifiable Information –** The rule requires case-specific information for certain establishments, but OSHA excludes specific fields such as employee names from electronic submission.

**Use the ITA —** Submit through OSHA's Injury Tracking Application. OSHA allows webform, CSV upload and API submission methods.

**Do Not Confuse Annual Submission with Severe-Injury Reporting –** Separate OSHA rules still require employers to report a work-related fatality within 8 hours and certain in-patient hospitalizations, amputations and losses of an eye within 24 hours.

## The Holt Group Perspective

Electronic filing should be the final step in a year-round recordkeeping process, not a once-a-year compliance exercise. Accurate injury records help leadership understand where injuries are occurring, identify trends, support corrective action and make better decisions about prevention, training and work-injury management.

## Sources

- Occupational Safety and Health Administration (OSHA), 29 CFR 1904.41 - Electronic submission of injury and illness records.
- OSHA, Final Rule to Improve Tracking of Workplace Injuries and Illnesses.
- OSHA, Injury Tracking Application (ITA) Frequently Asked Questions.
- OSHA, Appendix A and Appendix B to Subpart E of Part 1904.



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