



Safety Bulletin

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OSHA Electronic Recordkeeping Deadline—New Requirements

March 02, 2024

Employers are advised that the March 02, 2024 deadline is approaching for covered employers to electronically submit their 2023 injury & illness data to FedOSHA.

New requirements for Employer establishments under NAICS Code 4883 [Support Activities for Water Transportation / Marine Cargo Handling].

On July 21, 2023, FedOSHA published the updated final rule on [Improve Tracking of Workplace Injuries and Illnesses](#) (effective January 01, 2024).

With the new final rule, FedOSHA incorporated [Appendix B](#) to Subpart E - *Designated Industries for § 1904.41(a)(2) Annual Electronic Submission of Information from OSHA Form 300 Log of Work-Related Injuries and Illnesses and OSHA Form 301 Injury and Illness Incident Report by Establishments With 100 or More Employees in Designated Industries*.

Establishments with 20 to 249 employees in certain industries [488320] will continue to be required to electronically submit information from their OSHA 300A annual summary to OSHA once a year.

Establishments with 100 or more employees in designated high-hazard industries [488320] are now also required to submit Form 300 and Form 301 data. FedOSHA now requires detailed information about each recordable injury and illness entered on their previous calendar year's OSHA Form 300 Log and Form 301 Incident Report (29 CFR 1904.41). This includes the date, physical location, and severity of the injury or illness; details about the worker who was injured; and details about how the injury or illness occurred.

Establishments will be required to include their company name when making electronic submissions to OSHA. OSHA intends to post some of the data from the annual electronic submissions on a public website after identifying and removing information that could reasonably be expected to identify individuals directly, such as individuals' names and contact information.

OSHA considers each individual person, regardless of time worked, to be an employee. For example, a casual worker employed for only one shift over the year is one employee, while a yearly steady operator is also considered to be a single employee. Each individual person, including management and non-ILWU, is a covered employee. This applies to each employer establishment — not necessarily the entire company, but every single establishment location where the company provides services employment — with at least 20 employees.

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The federal OSHA docket on
*Improve Tracking of Workplace
Injuries and Illnesses* can be
found here. [[Docket ID: OSHA-
2021-0006](#)]

New Procedure to Create an ITA Account

In 2023, OSHA transitioned its login procedure to the public's one account access to government applications, [Login.gov](https://login.gov).

You must have both an ITA account and a Login.gov account with the same email address to access ITA.

First: If not already created during previous submissions, you will need to create an ITA Account. [Create Account](#).

Second: New this year. Create a [Login.gov](https://login.gov) account, then enter or upload data.

How to Obtain PMA Accident Prevention / OSHA Records

PMA Members are reminded that safety managers can access the PMA Accident Prevention [MemberNet](#) to retrieve a copy of their OSHA records.

It is important to change the year to 2023 and click submit before downloading the correct form (as the current year is the default).

How to Submit Data

The data must be electronically submitted through OSHA's [Injury Tracking Application \(ITA\)](#).

There are 3 ways to submit the data: (1) manual entry webform on the ITA, (2) submission of a csv file to the ITA, or (3) use of an application programming interface (API) feed.

This submission requirement is annual, and the deadline for timely submission of the previous year's injury and illness data will be on March 2 of each year.

Create an account and enter the required data at the Injury Tracking Application Login:

<https://www.osha.gov/injuryreporting/ita/>

PMA 300A Data Reminder

PMA employee count and man-hours reports only include ILWU data. Employers are reminded to add all other employee hours and injury data, such as management, OCU, IAM, etc. to their summary reports before submitting the data to OSHA.

Guidance and Additional Information from FedOSHA

[OSHA Fact Sheet— Electronic Submission OSHA Form 300 and 301 Data](#)

[FedOSHA Injury Tracking Application—Frequently Asked Questions](#)

[How to Enter Data—Instructional Videos and Guidance](#)