

DATE:	September 27, 2023
TO:	PRR, OSH Forum
FROM:	Helen Cleary
RE:	FedOSHA Injury and Illness Data / ITA Submission Updates

The U.S. Department of Labor's (DOL) Occupational Safety and Health Administration (OSHA/FedOSHA) recently published instructions and templates to support the new requirements for some establishments to upload Form 300 and 301 data to the Agency's Injury Tracking Application (ITA) system.

In addition, the login requirements to the ITA have also been updated.

PRR recommends members required to electronically submit their injury and illness data to FedOSHA proactively review and prepare for 2023 submission of their 2022 data.

OSHA's Updated ITA Login Procedures

OSHA's ITA has changed its login procedures. To access ITA for the 2023 collection of 2022 data, current and new account holders *must connect their ITA accounts to a Login.gov account using the same email address*. Organizations must have both an ITA account and a Login.gov account to access the OSHA Injury Tracking Application (ITA).

- Step 1: <u>How to Create an ITA Account</u>; webpage to <u>create an ITA account</u> (Note: establishments required to electronically submit Form 300A should already have an ITA account)
- Step 2: <u>How to Set up a Login.gov Account</u>; webpage to <u>create and login to Login.gov</u> Using the same email used with the ITA account organizations need to set up a Login.gov account in advance of submission deadlines
- Video: <u>ITA Account Creation and Login Procedures</u>
- ITA <u>FAQs</u>

Submission of Forms 300 and 301

OSHA's ITA allows for three ways to submit required data: 1) manually entering the data; 2) CSV file upload; 3) API integration. To support establishments, the Agency has developed the following tools:

<u>DOL OSHA ITA Case Data CSV Specifications</u> – Explains the structure of the CSV file format



- <u>CSV File Template for Form 300 and 301 Data</u> Downloadable Excel CSV template for Form 300 and 301
- <u>Sample CSV File for 300 and 301 Data</u> Downloadable Excel CSV file that includes sample injury and illness data
- <u>API Technical Specifications</u> Explains the technical requirements for API integration to submit Form 300 and 301 data
- Form 300 and 301 FAQs List of Q&As about the new submission requirements

The process and <u>CSV format</u> to submit form 300A data remains the same.

For employers submitting data for just one or a small number of establishments, the Agency recommends manually entering the data using the web forms instead of uploading a CSV file.

Establishments Required to Submit Injury and Illness Data

In July of 2023, FedOSHA published its final rule (<u>Improve Tracking of Workplace Injuries and</u> <u>Illnesses</u>) that included updated electronic recordkeeping requirements. Changes require some establishments to submit data from Forms 300 and 301, in addition to current requirements to submit Form 300A.

In addition to submitting Form 300A, establishments with **100 or more employees in designated industries (<u>Appendix B</u>)** will be required to electronically submit their 2023 OSHA Forms 300 and 301 data by March 2, 2024.

OSHA has developed an online tool to help establishments determine if they are required to submit data from Forms 300 and 301: <u>ITA Coverage Application</u>.

As a reminder, establishments under State Plan state OSHA plans (i.e. Cal/OSHA) are required to submit their data via FedOSHA's ITA.

Establishments subject to the electronic recordkeeping requirements may submit injury and illness data beginning January 2, 2024; the deadline to submit is March 2, 2024.

Additional Information and Resources

- New Requirements for Electronic Submission Fact Sheet
- Reporting Requirements <u>FAQs</u>
- FedOSHA's Injury Tracking Application, <u>ITA webpage</u>
- FedOSHA's <u>ITA Login webpage</u>