

SAFETY COMMUNICATION

2023 Cal/OSHA Record Keeping



This Safety Communication is designed to assist our clients with understanding and complying with the requirements in Cal/OSHA Regulation 14300, Employer Records of Occupational Injury and Illness. The entire regulation can be viewed at <https://www.dir.ca.gov/t8/ch7sb1a2.html>.

RECORDABLE REQUIREMENTS

All recordable injuries and illnesses must be recorded on your 300 log within seven days of finding out about the injury or illness. A work-related injury or illness must be recorded if it results in one or more of the following:

- Death
- Days away from work
- Restricted work or transfer to another job
- Medical treatment beyond first aid
- Loss of consciousness
- A significant injury or illness diagnosed by a physician or other licensed health care professional

POSTING REQUIREMENTS

Employers are required to post the Cal/OSHA 300A Summary in the workplace for the previous year from February 1 through April 30. The summary should be posted in a conspicuous place where notices to employees are customarily posted.

Additional Cal/OSHA Resources

- [Cal/OSHA Record-Keeping Requirements](#)
- [Cal/OSHA 300 Forms](#)

ELECTRONIC REPORTING REQUIREMENTS FOR SELECTED EMPLOYERS

Federal OSHA has updated its injury and illness reporting requirements in its Recordkeeping Standard. The new requirements went into effect on January 1, 2024. **Depending on your establishment size and industry sector, you may be required to electronically submit information from your Form 300A, 300, and 301 (or equivalent forms) once per year to OSHA.** The information below will help you understand and comply with the electronic reporting rule.

HOW DO YOU KNOW IF YOUR AGENCY IS A "SELECTED" EMPLOYER?

Selected employers are required to electronically submit their information by **March 2, 2024**. We've developed a step-by-step guide below to help determine if your entity is required to comply and if so, how to submit the required information.

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ELECTRONIC REPORTING REQUIREMENTS FOR
*SELECTED EMPLOYERS***STEP 1 - Identify your entity's NAICS Code**

The determination on which employers are required to comply is based on the employer's business establishment's industry classification (NAICS code). The first step is to identify your NAICS code. If you do not know your code, go to <https://www.census.gov/naics/>

TIP:**Common Public Entity NAICS Codes:**

- City & Town Councils - 921120
- Executive & Legislative, Combined - 911140
- Vector Districts - 926140
- Housing Authorities - 925110
- Public Schools (Elementary & Secondary) - 611110
- Fire Protection – 922160
- Urban Transit Systems – 4851
- Interurban and Rural Bus - 4852

STEP 2 – Determine your entity's number of establishment(s)

Once you know your NAICS code, you then need to determine the number of “establishments” you have within your entity. This is an important step in determining if you're required to comply.

To assist with determining if your entity has one or more establishments, refer to Cal/OSHA's definition at https://www.dir.ca.gov/t8/14300_46.html.

TIP:

The number of Cal/OSHA 300A Summary forms your entity completes may be a good indicator of the number of establishments your entity has decided on.

STEP 3 – Determine if your entity is required to comply

Now that you know your NAICS code and the number of establishments within your entity, you are ready to determine if you need to comply with the electronic submission requirements.

The determination depends on the number of total employees you had for the applicable year. This includes all FT, PT, seasonal, and other paid employees.

The flow chart on the following page will help guide you.

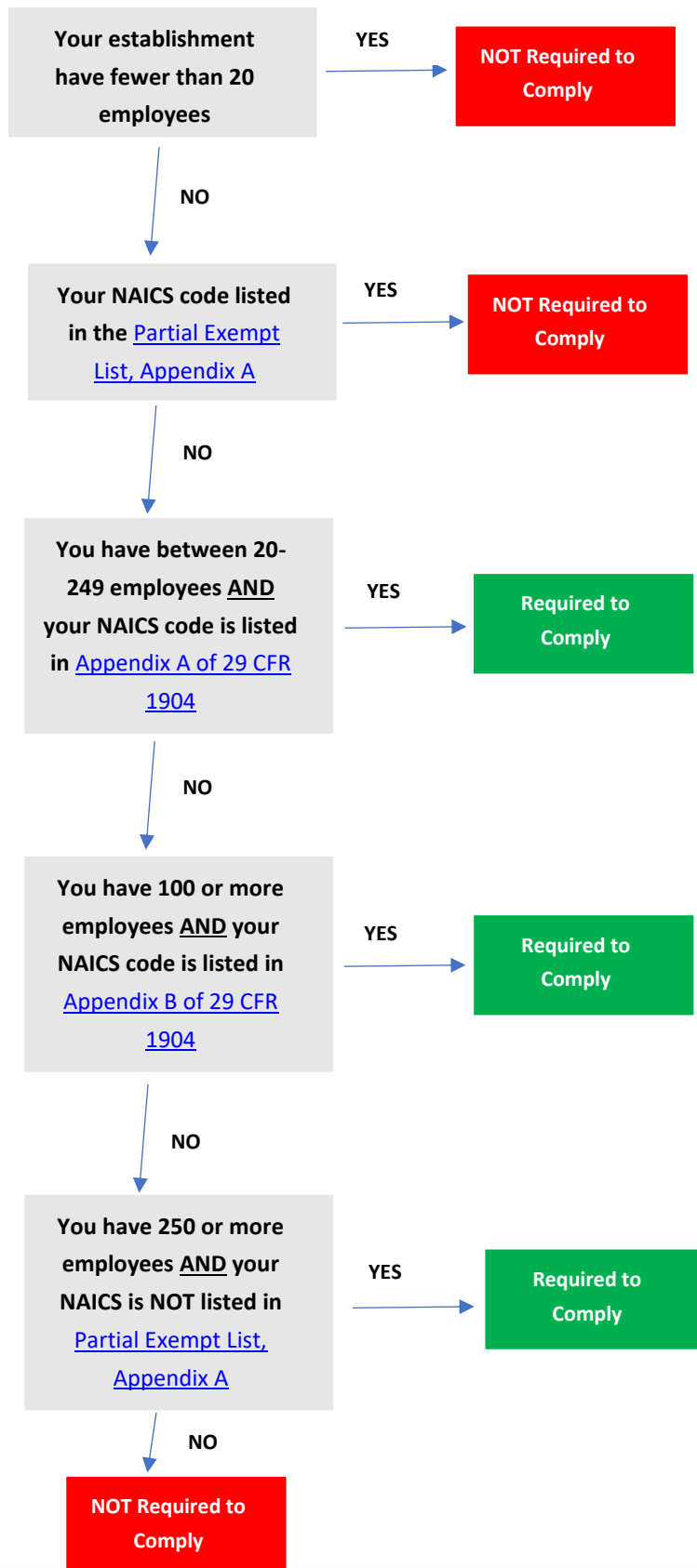
- If your NAICS code is listed in the [Partial Exempt List, Appendix A](#), you do not need to participate in this requirement no matter the number of employees.
- If your NAICS code is not listed in the Partial Exempt list **AND** your establishment(s) had 250 or more employees at any time during the applicable calendar year, you must electronically submit the 300A Summary information.
- If your establishment(s) had between 20-249 employees anytime during the applicable calendar year **AND** your NAICS code is listed in [Appendix A of 29 CFR 1904](#), you must electronically submit the 300A Summary data.
- If your establishment(s) had 100 employees or more anytime during the applicable calendar year **AND** your NAICS code is listed in [Appendix B of 29 CFR 1904](#), you must electronically submit the 300 Log, 300A Summary, and 301 data.

STEP 4 – How to electronically submit the 300A data to OSHA

The database is user friendly, and the process takes about 20 minutes. The OSHA Injury Tracking Application (ITA) website link below provides detailed instructions, job aids, and FAQs. It also links you to the database to get you started.



The screenshot shows the header of the OSHA website. On the left is the United States Department of Labor logo. On the right are social media icons for Facebook, Twitter, Instagram, LinkedIn, and Email. Below the header, there are two main links: "OSHA Injury Tracking Application (ITA)" with the URL <https://www.osha.gov/injuryreporting/> and "OSHA Help Request Form" with the URL <https://www.osha.gov/injuryreporting/ita/>.



TIP:

If you are in doubt, we recommend complying with the requirements and submitting your 300A summary information.

If you need any assistance, reach us at answers@Sedgwick.com