Compliance Overview

Avoiding Common OSHA Reporting and Recordkeeping Mistakes

Many employers struggle to consistently adhere to OSHA's recordkeeping and reporting rules, particularly when employers have limited resources dedicated to workplace health and safety or responsibilities are divided among multiple individuals, departments or facilities.

These challenges often result in common compliance issues, including misclassifying recordable injuries, failing to timely report severe incidents, maintaining incomplete OSHA logs, overlooking Form 300A posting or electronic submission requirements, failing to protect employee privacy, or improperly retaining records. Although these errors are often unintentional, they may expose employers to OSHA citations, increase scrutiny during inspections, and undermine the effectiveness of workplace safety and compliance programs.

This Compliance Overview examines common errors employers make in OSHA reporting and recordkeeping and explains how employers can prevent them.

Key Requirements

Immediate Reporting of Severe Injuries and Fatalities

- Employers must report fatalities **within eight hours**.
- Serious injuries, such as inpatient hospitalizations, amputations or loss of an eye, must be reported **within 24 hours**.

Annual OSHA Form Posting

- Employers are required to post OSHA Form 300A in a visible workplace location from **Feb. 1 through April 30** each year.
- This summary provides employees with a snapshot of workplace injuries and illnesses from the previous year.

Electronic Submission Deadline

- Certain employers must electronically submit their OSHA Form 300A data through OSHA's ITA by **March 2** each year.
- This requirement depends on company size and industry classification.

Links and Resources

- OSHA Recordkeeping Requirements
- OSHA's Reporting a Fatality or Severe Injury
- Recordkeeping Recording Requirements
- Electronic Submission Injury Tracking Application (ITA)

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Common OSHA Reporting and Recordkeeping Mistakes

Mistake #1: Misclassifying Recordable or Nonrecordable Injuries or Illnesses

Employers covered by OSHA's recordkeeping requirements (29 CFR Part 1904) must record work-related injuries and illnesses that result in:

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

First aid refers to medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer. Under OSHA recordkeeping regulations, first aid is limited to specific treatments listed in 29 CFR 1904.7(b)(5)(ii). Treatments beyond those specifically identified by OSHA are generally considered medical treatment beyond first aid and may make the case recordable.

Confusion can arise when employers attempt to distinguish between first aid treatment and medical treatment. For example, a worker goes to the first-aid room and has a dressing applied to a minor cut by a registered nurse. Although the registered nurse is a healthcare professional, the employer does not have to record the incident because the worker simply received first aid. As a result, employers may mistakenly record injuries that do not meet OSHA recordkeeping requirements.

Conversely, employers may mistakenly fail to record injuries that meet OSHA recordkeeping criteria because the employee did not miss work or the case was incorrectly classified as first aid only. For example, an employee twists their knee while stepping off a forklift and reports soreness to their supervisor. The employee visits an urgent care clinic, where the provider recommends over-the-counter pain medication and limits the employee to seated work for three days. Because the employee continues coming to work and does not miss any full shifts, the employer assumes the injury is not recordable and does not enter it on the OSHA 300 log. However, the temporary job restrictions make the case OSHA recordable as a restricted work injury. As a result, the employer may unintentionally fail to record injuries that meet OSHA recordkeeping requirements.

Employers can reduce the likelihood of these errors by establishing a more structured recordkeeping review process, such as developing internal checklists or incident review protocols for each injury or illness. This can help decision-makers evaluate each case using OSHA's recordkeeping criteria before determining whether it must be recorded. Employers should also ensure that recordable injuries and illnesses are entered on the OSHA 300 log and OSHA 301 Incident Report within seven calendar days of learning that a recordable incident occurred, as required by OSHA's recordkeeping regulations.

Employers could find it helpful to designate specific individuals or departments responsible for making final recordability determinations rather than leaving those decisions solely to frontline supervisors. In addition, regular training for supervisors, HR personnel and safety staff can also help ensure everyone understands OSHA's definitions for recordable cases, medical treatment, restricted work and first aid.

Mistake #2: Failing to Report Severe Injuries Within Required Time Frames

Under OSHA's reporting requirements, employers must report work-related fatalities within eight hours of learning about the fatality. Employers must also report inpatient hospitalizations, amputations and loss of an eye within 24 hours of learning of the incident. It should be noted that some states with OSHA-approved State Plans enforce stricter time frames or distinct reporting rules.

Many reporting violations occur not because employers intentionally avoid reporting, but because of delays in internal communication or uncertainty about whether an incident meets OSHA's reporting threshold. For example, employers sometimes delay reporting while gathering facts, waiting for medical confirmation or determining whether an injury is work-related. In other situations, managers may incorrectly assume another department or a third party is responsible for contacting OSHA.

Employers can reduce the likelihood of missed reporting deadlines by establishing a clear internal incident escalation process and ensuring supervisors understand which incidents may trigger OSHA reporting obligations. Written procedures should identify who:

- Must be notified when a serious injury occurs;
- Is responsible for evaluating whether OSHA reporting is required; and
- Has the authority to make the report to OSHA.

Employers should also train supervisors, managers, and HR personnel to promptly escalate incidents involving fatalities, inpatient hospitalizations, amputations, eye injuries or other potentially serious outcomes. In many cases, reporting delays occur during off-hours or weekends, so employers should ensure reporting procedures include after-hours contact information and backup personnel when key decision-makers are unavailable.

Maintaining open communication between safety personnel, operations management, medical providers and legal counsel can further improve response times and help employers make timely and accurate reporting decisions.

Mistake #3: Incomplete or Inaccurate OSHA Logs (Forms 300, 300A, 301)

OSHA's recordkeeping regulations require covered employers to maintain accurate injury and illness records using OSHA Forms 300, 300A, and 301 (or equivalent forms if they contain the same information and are as readable and understandable as OSHA's forms). Each form serves a different purpose. The OSHA 300 log is used to classify and track recordable injuries and illnesses throughout the year, the OSHA 301 form captures additional incident details for each recordable case, and the OSHA 300A form summarizes annual injury and illness data.

Despite these requirements, many employers struggle to maintain complete and accurate OSHA logs.

Common mistakes include:

- Failing to record all recordable cases;
- Inaccurately counting days away from work or restricted duty days;
- Misclassifying injuries and illnesses; and
- Failing to update logs after receiving new medical information or revised work restrictions.

These errors often result from inconsistent reporting practices, decentralized recordkeeping responsibilities, or poor communication between departments involved in the incident review process. For example, safety personnel may not receive updated medical information from HR or workers' compensation administrators, leading to incorrect entries or incomplete records. Similarly, managers may misunderstand how to count restricted workdays or when to update a case after an employee's condition changes.

Employers can improve recordkeeping accuracy by establishing consistent procedures for documenting, reviewing and updating OSHA records. Many employers designate a specific individual or team to oversee OSHA recordkeeping and verify that all required forms are completed accurately and consistently.

Employers should also establish procedures for sharing information among safety personnel, HR, supervisors, on-site medical staff and workers' compensation administrators so that recordable cases are tracked and updated as needed.

Regular internal audits can also help identify errors before an OSHA inspection occurs. During these reviews, employers should compare OSHA logs against incident reports, workers' compensation claims, leave records and medical documentation to ensure cases have been properly classified and updated. Employers should also periodically review how restricted-duty days and days away from work are counted to ensure consistency with OSHA's recordkeeping requirements.

Supervisors and managers responsible for incident reporting should understand when incidents are recordable, how to document work restrictions, and when to update OSHA logs when new information becomes available. When questions arise regarding complex cases or recordkeeping obligations, employers should consult OSHA guidance or experienced counsel before finalizing their logs.

Mistake #4: Not Posting OSHA Form 300A Properly

OSHA's recordkeeping regulations require many employers to complete and post OSHA Form 300A annually. Employers that are required to maintain OSHA injury and illness records generally must post the completed Form 300A in a conspicuous location where employee notices are customarily placed from Feb. 1 through April 30 of the following year. The form summarizes the total number of recordable workplace injuries and illnesses from the prior calendar year and must be certified by a company executive before it is posted.

Despite the relatively straightforward nature of these requirements, employers frequently overlook Form 300A obligations. Common mistakes include:

- Failing to post the form during the required time frame;
- Removing the posting too early;
- Posting an incomplete or uncertified form;
- Failing to maintain separate OSHA records for each establishment expected to operate for one year or longer; or
- Failing to submit required data electronically.

Some employers also mistakenly assume they are exempt from the requirement because they had no recordable injuries during the year. However, covered employers must still complete and post the form even if no recordable injuries or illnesses occurred.

Employers can reduce the risk of OSHA Form 300A violations by implementing a formal and centralized recordkeeping process that clearly assigns responsibility for completing, certifying, posting, maintaining and electronically submitting required OSHA records and forms.

Organizations should establish annual compliance calendars with reminders for the Feb. 1 posting deadline and the April 30 posting removal date to help ensure forms are posted during the required time frame and not removed too early.

Employers should also use standardized checklists and review procedures to verify that OSHA Form 300A is complete, accurately reflects OSHA 300 log information and has been properly certified by a company executive before posting.

For employers with multiple locations, maintaining separate OSHA records for each establishment expected to operate for one year or longer, and conducting periodic internal audits, can help ensure consistency and prevent confusion about which location or department is responsible for compliance obligations.

Employers can also provide regular training for supervisors, HR personnel, and safety staff on OSHA recordkeeping and reporting requirements, further reducing misunderstandings.

Mistake #5: Failing to Properly Submit Form 300, 300A and/or 301 Data Electronically

Certain employers, depending on establishment size and North American Industry Classification System (NAICS) industry classifications, are required to electronically submit OSHA injury and illness data to OSHA through the ITA by March 2 each year. Electronic submission requirements apply to establishments with 250 or more employees that are required to keep OSHA records, certain establishments with 20 to 249 employees in designated high-hazard industries that must submit OSHA Form 300A data, and certain establishments with 100 or more employees in designated high-hazard industries that must electronically submit information from OSHA Forms 300, 300A, and 301. Although many employers are familiar with the requirement to complete and post Form 300A internally, electronic submission obligations are frequently overlooked or misunderstood. Common mistakes include:

- Failing to submit the required data by OSHA's deadline;
- Submitting information for the wrong establishment;
- Entering incomplete or inaccurate data; or
- Assuming a third-party administrator or payroll provider handled the submission process.

Confusion often arises for employers with multiple locations, changing workforce sizes or operations spanning different industry classifications. Employers may mistakenly believe that maintaining OSHA logs alone satisfies the requirement, unaware that separate electronic reporting obligations may also apply. Employers may also fail to recognize that electronic submission requirements are determined at the establishment level rather than at the company level.

Employers can reduce the likelihood of these issues by establishing a formal process to determine, on an annual basis, whether electronic submission requirements apply to each establishment. This review should include confirming employee headcount, NAICS industry classifications, and whether the establishment is otherwise exempt from OSHA recordkeeping requirements.

Many employers also benefit from assigning responsibility for electronic submissions to a specific individual or department and maintaining written procedures for gathering, reviewing, and submitting OSHA data through the ITA system. Employers should verify that the submitted information matches their OSHA 300A summaries and underlying OSHA logs before submission.

For employers with multiple locations, maintaining a centralized tracking system can help ensure all covered establishments complete required filings. Compliance calendars, automated reminders, and periodic internal audits can further reduce the risk of missed deadlines or reporting errors. Employers should also retain confirmation records showing when submissions were completed in the event OSHA later requests documentation or questions compliance efforts.

Mistake #6: Failing to Protect Employee Privacy

OSHA's recordkeeping regulations require employers to protect employee privacy when documenting certain types of workplace injuries and illnesses. Under OSHA's privacy case rules, employers must avoid including employee names on the OSHA 300 log for specific sensitive incidents, including cases involving:

- Sexual assault;

- Mental illness;
- Infectious diseases (HIV, hepatitis or tuberculosis);
- Needlestick injuries involving contaminated sharps; and
- Certain injuries to intimate body parts or reproductive systems.

Instead, employers must classify these incidents as “privacy concern cases” and maintain separate confidential information where necessary.

Privacy-related recordkeeping mistakes often occur because employers are unfamiliar with OSHA’s privacy case requirements or fail to recognize when an incident qualifies for confidential treatment.

In some cases, employers inadvertently include employee names or sensitive medical information in OSHA logs accessible to managers, employees or third parties who should not have access to it. These issues are more likely when multiple departments are involved in the incident reporting process or when recordkeeping responsibilities are inconsistently handled across locations.

Employers can reduce the likelihood of these issues by implementing clear procedures for identifying and handling OSHA privacy concern cases. Employers can improve compliance with OSHA confidentiality requirements by ensuring personnel responsible for maintaining OSHA logs understand when employee names must be withheld and how confidential information should be appropriately safeguarded and, where necessary, maintained separately from standard injury and illness records.

Employers should also review who has access to OSHA records and establish safeguards to prevent unnecessary disclosure of sensitive information. Electronic recordkeeping systems should include appropriate access controls, and physical records containing confidential information should be securely maintained. Periodic audits of OSHA logs and related records can further help identify privacy concerns before they become larger compliance issues. When questions arise regarding whether a case qualifies as a privacy concern case or how information should be maintained, employers should consult OSHA guidance or legal counsel before finalizing their records.

Mistake #7: Forgetting About OSHA’s 5-year Record Retention Rule

OSHA’s recordkeeping regulations require covered employers to retain certain injury and illness records for at least five years following the end of the calendar year that the records cover. This retention requirement generally applies to OSHA Forms 300, 300A and 301. During the retention period, employers are also required to update stored OSHA 300 logs to reflect newly discovered recordable injuries or illnesses, as well as changes in previously recorded cases, such as revised work restrictions or additional days away from work.

Many employers focus on creating OSHA logs each year but overlook their continuing obligation to maintain and update those records after the reporting year ends. Common mistakes include:

- Discarding records too early;
- Failing to maintain organized files;
- Neglecting to update logs when new information becomes available; or
- Assuming closed cases no longer require review.

These issues are especially common when recordkeeping responsibilities change hands or when employers rely on decentralized record storage systems across multiple locations.

Employers can reduce the likelihood of these issues by implementing formal record retention procedures that clearly identify which OSHA records must be retained, how long they must be maintained and who is responsible for preserving them. Many employers benefit from maintaining centralized electronic recordkeeping systems that allow records to be securely stored, updated and accessed when needed.

Employer Takeaway

Employers can strengthen compliance by implementing structured procedures, clearly defining roles and responsibilities, and investing in ongoing training for supervisors and recordkeepers. Regular internal audits and proactive use of OSHA guidance materials further reinforce accuracy and accountability. Ultimately, effective recordkeeping and reporting are not just a compliance exercise; they are critical tools for identifying risks and improving workplace safety.