

OSHA & PERRP Recordkeeping

The beginning of 2025 is here and that means your OSHA (private employers) and PERRP (public employers) Recordkeeping logs, summary and online reporting will be due. Throughout the year you should be updating your OSHA and PERRP Logs as injuries occur. OSHA requires employers to evaluate injuries and determine if they need to be recorded on the log within 7 days of being notified of the injury. PERRP requires injuries to be recorded within 6 days of being notified. Here is a reminder of the due dates for recordkeeping:

1. OSHA and PERRP Summary forms must be completed and posted by February 1st.
2. The PERRP online reporting is due February 1st.
3. The OSHA online reporting is due March 2nd.

If you are unsure whether you need to complete the logs or online reporting, you will first need to determine if you are required.

Exemptions

OSHA - There are two exemptions from keeping the OSHA 300 Log.

- Companies with 10 or fewer employees at all times during the calendar year. The only exception to this is if you are specifically requested by OSHA, the Bureau of Labor Statistics (BLS) or another agency to keep a log. If you receive a request, do not ignore it.
- The other exemption is for establishments classified in certain low-hazard industries. You will need your NAICS number and check it against the list of “Partially Exempt Industries” at: <https://www.osha.gov/recordkeeping/presentations/exempttable>.

PERRP - There are no exemptions for public employers for keeping and maintaining the PERRP Log. All public employers are required to keep the Log.

*Remember whether you are a private or public employer you must report to OSHA or PERRP, as applicable, any workplace incident that results in a fatality, in-patient hospitalization, amputation or loss of an eye.

Recordkeeping Logs and Summary Forms

OSHA - If you are required to keep the log, download the Recordkeeping Forms and instructions by clicking on the link: <https://www.osha.gov/sites/default/files/OSHA-RK-Forms-Package.pdf>.

PERRP – Download the recordkeeping instructions by clicking on the link: <https://dam.assets.ohio.gov/image/upload/info.bwc.ohio.gov/forms/PERRPrecordkeepingforms.pdf>. The logs in Excel format can be downloaded from: <https://info.bwc.ohio.gov/for-employers/safety-services/consultations-and-programs/perrp/injury-and-illness-recordkeeping> under “Forms and Instructions” on the right side of the page.

When you complete your PERRP or OSHA log, be sure to have the summary form signed and posted in a conspicuous place for employees to see. Summaries must be posted from February 1st through April 30th.

*Remember only post the PERRP 300AP Summary or the OSHA 300A Summary and not the injury log.

Online Submission

The final step in the process is to determine if you must file online.

OSHA - To determine if your organization is required to do so, enter the following information for your facility at the following link <https://www.osha.gov/itareportapp>:

1. "State" in which your facility is located,
2. "Peak Employment from the previous year" – be sure include temporary and seasonal workers,
3. "Is the establishment a government facility" and
4. Your "NAICS Code".

Once the information is entered, click the "Submit" button and it will identify what, if any, information your facility needs to submit online. There will be one of four replies:

1. You are exempt from completing the OSHA Log and not required to submit online.
2. You will not be required to submit anything online.
3. You will be required to submit information from your OSHA 300A form.
4. You will be required to submit information from your OSHA 300, 300A and 301 Forms.

If your establishment is required to submit online, then you must create a secure account on OSHA's Injury Tracking Application found here: <https://www.osha.gov/injuryreporting/ita> if you are a new user. Once you have successfully set up an account, then you can submit your OSHA Log, OSHA 300A Summary or OSHA 301 Injury Information. If you are only required to submit your OSHA 300A Summary information, the process is a fairly straight forward, just be sure to have your NAICS number, average number of employees and total work hours entered on your OSHA 300A Summary report.

If you are required to submit your OSHA 300 and OSHA 301 information you have two options. You can either choose to input each recordable injury individually or perform a batch upload. The batch upload can save time for establishments with numerous recordable injuries.

PERRP –All public employers are required to submit to the BWC except those with five or fewer employees and that also have had no recordable injuries in the calendar year. PERRP 300AP Summary form information is submitted through the Ohio BWC link found here:

<https://www.bwc.ohio.gov/employer/forms/InjuryIllnessSummary/default.aspx>.

One final note, even if you have not completed your logs or online reporting in past years, it is still a good idea to get these completed as soon as possible. Both OSHA and PERRP recommend creating your logs and submitting your data, if possible, even if you are past the due date – remember better late than never!

For more information, please contact Sedgwick's Andy Sawan at 330.819.4728 or andrew.sawan@sedgwick.com.