

OSHA 300 Log Preparation Checklist

Instructions & How-To-Use Guide

Purpose

This checklist guides EHS managers through the annual OSHA 300 Log preparation and certification process. It covers all 29 CFR Part 1904 requirements in sequence with the correct deadlines, helping ensure nothing is missed before the February 1 certification, the March 2 electronic submission, and the April 30 end of the posting period.

Who Should Use This

- EHS Managers and Safety Directors responsible for OSHA recordkeeping
- HR managers who handle injury/illness tracking
- Operations managers at each covered establishment
- Third-party safety consultants preparing records for clients

How to Use This Checklist

1. Complete the header — Fill in the establishment name, NAICS code, calendar year, and preparer name at the top of the checklist before working through the steps.
2. Work through each step in order (Steps 1–9) — The steps follow the regulatory sequence from determining your obligation through year-end completion.
3. Check off each item as you verify or complete it — A checked item is your documented evidence that the requirement was addressed.
4. Gold-star items are the most common audit failures — Prioritize these if you are short on time. They are marked with a gold dot next to the checkbox.
5. Items with CFR references in the right column — These link directly to the specific regulation — use them to verify requirements against the current standard.
6. Deadline pills on each section header — Show when that step must be completed. Match these against your calendar.
7. Sign off at the bottom of the checklist — Retain the completed checklist with your OSHA records as evidence of your annual review process.

Key Deadlines Summary

| Deadline | Requirement |
|-----------------|---|
| 7 calendar days | Record each new case on Form 300 and complete Form 301 |
| February 1 | Certify Form 300A with executive signature and begin posting |
| March 2 | Electronic submission via OSHA ITA (if required) |
| April 30 | End of mandatory posting period — do NOT remove 300A before this date |
| 8 hours | Report any work-related fatality to OSHA |
| 24 hours | Report hospitalization, amputation, or eye loss |
| 5 years | Retain all Forms 300, 300A, and 301 |

Additional Guidance on Complex Items

Recordability Decisions (Step 2)

A case is OSHA recordable if it is work-related AND results in one of: death, days away from work (DAFW), restricted work or job transfer, medical treatment beyond first aid, loss of consciousness, or a significant injury/illness diagnosed by a physician. Workers' comp cases are NOT automatically recordable — each must be evaluated independently. First aid treatment (non-prescription medications, tetanus shots, wound cleaning, elastic bandages, hot/cold therapy) does NOT make a case recordable.

Counting Days Away From Work (DAFW)

Count calendar days, not working days. Begin counting the day after the injury/illness — the day of the incident is NOT counted. Cap at 180 days. If the employee transfers to restricted duty rather than staying away entirely, count as restricted work days, not DAFW.

Privacy Concern Cases (Steps 2–3)

Certain cases must be recorded without the employee's name on the Form 300 log. These include: injuries/illnesses to the intimate body parts or reproductive system, sexual assaults, HIV/hepatitis/tuberculosis infections, mental illnesses, and needlestick injuries or cuts from sharp objects contaminated with blood.

Instead, enter "Privacy Case" on the 300 log and maintain a separate confidential list linking the case number to the employee's identity.

Electronic Submission / ITA (Step 6)

OSHA's Injury Tracking Application (ITA) at osha.gov/itareportapp is the portal for electronic submission. Whether you must submit depends on your establishment size AND your NAICS code:

- 250+ employees in non-exempt industries: submit Form 300A data.
- 20–249 employees in designated high-hazard industries: submit Form 300A data.
- 100+ employees in certain designated industries: submit full 300, 300A, AND 301 case detail data.

Always save your ITA confirmation receipt.

What Counts as an "Establishment" (Step 1)

An establishment is a single physical location where business is conducted or where services/operations are performed. Each establishment must maintain its own separate set of Forms 300, 300A, and 301. Do NOT combine multiple locations onto one set of forms.

For construction: a long-term job site (expected to last one year or more) is treated as an establishment; shorter projects are typically tracked under the company's home office records.

Record Retention

All forms must be retained for 5 years following the end of the calendar year they cover (e.g., 2025 records through December 31, 2030). During that period, OSHA, employees, and former employees may request access. Have a documented retention policy and a secure storage method.

Customization Note

This checklist covers the federal OSHA recordkeeping standards under 29 CFR Part 1904. Some states operate their own OSHA-approved State Plans with additional or different requirements. Check with your state program if you operate in a State Plan state.

| | | | |
|--------------------|------------|---------------|------------------------|
| Establishment Name | NAICS Code | Calendar Year | Preparer / EHS Manager |
|--------------------|------------|---------------|------------------------|

KEY DEADLINES:

- Feb 1** Certify & post Form 300A
- Mar 2** Electronic ITA submission deadline
- Apr 30** Remove 300A from posting
- 7 days** Record each case on Form 300 & 301
- 8 hrs** Report fatality to OSHA
- 24 hrs** Report hosp. / amp. / eye loss

Gold star items are the most common audit failures — prioritize these if you're short on time.

STEP 1 — CONFIRM RECORDKEEPING OBLIGATION 29 CFR 1904.1-3 **Jan 1 – Dec 31**

- Verify your establishment has 10 or more employees at any time during this calendar year (include full-time, part-time, seasonal, temp) 1904.1
- Confirm your industry NAICS code is not on the partial-exemption list (Appendix A to Subpart B of 29 CFR Part 1904) 1904.2
Low-hazard industries such as retail, finance, real estate may be exempt
- If partially exempt: confirm you still must report severe incidents (fatalities, hospitalizations, amputations, eye loss) to OSHA 1904.1
- Confirm each physical location (establishment) has its own separate Forms 300, 300A, and 301 — do not combine multiple locations 1904.30

STEP 2 — REVIEW AND COMPLETE FORM 300 (THE LOG) 29 CFR 1904.7-9 **Certify by Feb 1**

- Pull all incident reports and workers' comp claims from the calendar year — cross-check against 300 log entries 1904.7
Workers' comp cases are NOT automatically OSHA recordable — verify each
- For each incident, confirm the recordability decision was made correctly: work-related AND one of: fatality, DAFW, restricted work, medical treatment beyond first aid, loss of consciousness, significant diagnosis 1904.7
- Confirm each recordable case was entered within 7 calendar days of learning of the incident — note any late entries 1904.29
Late entry is a separate violation from the underlying recordability
- Verify each 300 log entry includes all required fields: employee name, job title, date of injury/illness, where it occurred, description, injury/illness type, and affected body part 1904.29
- Check for DAFW (Days Away From Work) cases: confirm the correct number of actual calendar days away is logged, not working days 1904.7
Cap at 180 days. Count from the day after the incident.
- Verify no first-aid-only cases were inadvertently included on the log 1904.7(a)
First aid: non-rx meds, tetanus immunization, cleaning wounds, elastic bandage, hot/cold therapy — these are NOT recordable
- Confirm a company executive has reviewed and will certify the log by Feb 1 1904.32
Certification must be by highest-ranking company official at establishment

STEP 3 — COMPLETE / VERIFY FORM 301 (INCIDENT REPORTS) 29 CFR 1904.29 **Within 7 days of each case**

- Confirm a completed Form 301 (or equivalent workers' comp form) exists for every entry on the Form 300 log 1904.29(b)(4)
A workers' comp first report of injury may substitute if it captures all required Form 301 fields
- Verify each 301 was completed within 7 calendar days of learning of the recordable case 1904.29(b)(2)
- Confirm employee name, address, date of birth, date hired, gender, and case details are complete and accurate 1904.29
- For privacy cases: a separate confidential list must exist with employee names for privacy case entries 1904.29(b)(7)

STEP 4 — COMPLETE FORM 300A (ANNUAL SUMMARY) 29 CFR 1904.32 **Certify & post by Feb 1**

- Transfer total annual case counts from Form 300 to Form 300A: total recordable cases, DAFW cases, restricted/transfer cases, other recordable cases, total DAFW days, and total restricted days 1904.32
- Complete the average number of employees section: divide total employee-hours worked during the year by 2,000 to get FTE count 1904.32
Use actual hours worked — not hours paid. Exclude vacation/sick leave.
- Complete the company information section: establishment name, street, city, state, zip, industry description, SIC/NAICS code 1904.32
- Certify the Form 300A with the signature of the highest-ranking company official at the establishment (owner, officer, or senior executive) 1904.32(b)
The certifying official must be an officer or owner — not just any manager
- Confirm the Form 300A is complete even if your establishment had ZERO recordable incidents — this is required regardless 1904.32(a)(2)

STEP 5 — POST FORM 300A IN THE WORKPLACE

29 CFR 1904.32(b)(6)

Feb 1 – Apr 30

- Post the completed and certified Form 300A in a conspicuous location where worker notices are typically posted (break room, bulletin board, etc.) 1904.32(b)(6)
- Confirm the posting is visible and accessible to all employees at the establishment during the posting period 1904.32(b)(6)
- Post by February 1 and maintain posting through April 30 — removing it before April 30 is a separate violation 1904.32(b)(6)
- If your establishment had zero recordable incidents, post the 300A with all zeros — zero incidents does not exempt you from posting 1904.32(a)(2)
- For multi-location employers: post at each covered establishment — one central posting is not sufficient 1904.30

STEP 6 — DETERMINE ELECTRONIC SUBMISSION REQUIREMENTS (ITA)

29 CFR 1904.41

Submit by Mar 2

- Check your electronic submission obligation at osha.gov/itareportapp — enter NAICS code and establishment employee count to confirm requirements 1904.41
- 250+ employees (not in exempt industry): submit Form 300A summary data via OSHA's Injury Tracking Application (ITA) by March 2 1904.41(a)(1)
- 20–249 employees in designated high-hazard industry (Appendix A to Subpart E): submit Form 300A data by March 2 1904.41(a)(1)(i)
Construction, manufacturing, warehousing, agriculture are among designated industries
- 100+ employees in designated high-hazard industry (Appendix B to Subpart E): submit Forms 300A + 300 + 301 case detail data by March 2 1904.41(a)(2)
- After submission, save the ITA confirmation/receipt for your records 1904.41
Submission without confirmation is not verified compliance

STEP 7 — ONGOING: SEVERE INCIDENT REPORTING

29 CFR 1904.39

8 hrs / 24 hrs

- Fatality: report any work-related fatality to OSHA within 8 hours of learning of the death — regardless of employer size or industry 1904.39(a)(1)
Report to: nearest OSHA area office, 1-800-321-OSHA, or osha.gov/report
- In-patient hospitalization: report any work-related in-patient hospitalization (formal admission, not just ER visit) within 24 hours 1904.39(a)(2)
- Amputation: report any work-related amputation within 24 hours — includes tip-of-finger, does not require complete loss 1904.39(a)(2)
- Eye loss: report any work-related loss of an eye within 24 hours 1904.39(a)(2)
- Confirm your incident response protocol includes immediate notification to the person responsible for calling OSHA 1904.39
Clock starts when employer learns of the event — not when it occurred

STEP 8 — RETENTION AND EMPLOYEE ACCESS

29 CFR 1904.33–35

5-year retention

- Retain Forms 300, 300A, and 301 for 5 years following the end of the calendar year to which they relate 1904.33
e.g., 2025 records retained through December 31, 2030
- Current employees can view the Form 300 log by end of the next business day — have a process in place to fulfill this request 1904.35(b)(1)
- Former employees and personal representatives can access their own case records; provide copies within 7 business days of written request for Form 301 1904.35(b)(2)
- Copies must be provided free of charge to employees 1904.35(b)

STEP 9 — ANTI-RETALIATION AND ACCURATE REPORTING

29 CFR 1904.35–36

Ongoing

- Confirm your safety incentive program does not discourage workers from reporting injuries and illnesses 1904.35(b)(1)(iv)
Incentive programs based on low injury rates can discourage reporting and create recordkeeping violations
- Confirm workers are informed of their right to report injuries and illnesses without fear of retaliation 1904.35(b)(2)
This information must be communicated — it is part of the required 300A posting notification

COMPLETION & SIGN-OFF

Prepared By (Name & Title) _____ Signature _____ Date Completed _____ Reviewed By (EHS / Supervisor) _____

QUICK REFERENCE — KEY DEADLINES & RETENTION

| | | | |
|------------------------------|-----------------|------------------|----------------|
| Report fatalities | 8 hours | Post 300A | Feb 1 – Apr 30 |
| Report hosp/amp/eye | 24 hours | ITA submission | March 2 |
| Record on 300 & complete 301 | 7 calendar days | Retain all forms | 5 years |
| Certify 300A | February 1 | | |