

OSHA AND PERRP RECORDKEEPING

As we enter 2026, it's time to prepare your OSHA (for private employers) and PERRP (for public employers) recordkeeping logs, summaries, and online reports. These records should be updated throughout the year as injuries occur. OSHA and PERRP both require employers to review each injury and determine whether it must be recorded within **7 days** of notification. Below is a reminder of the key recordkeeping deadlines:

- 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.

First determine if you are exempt from keeping records.

EXEMPTIONS

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

- 1) 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.
- 2) 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.

RECORDKEEPING LOGS AND SUMMARY FORM

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 OSHA 300A Summary OR THE PERRP 300AP 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 information online, new users must first create a secure account through OSHA's Injury Tracking Application at <https://www.osha.gov/injuryreporting/ita>. After setting up your account, you can submit your OSHA Log, OSHA 300A Summary or OSHA 301 Injury Information. For those only required to submit the OSHA 300A Summary, the process is straightforward—just ensure your NAICS code, average number of employees and total work hours are accurately entered on the 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 have had no recordable injuries in the calendar year. PERRP 300AP Summary form information is submitted through the Ohio BWC link found here: <https://info.bwc.ohio.gov/forms-and-publications/summary-of-work-related-injuries-and-illnesses-300-ap>.

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!

If you have any questions regarding your PERRP or OSHA Log or online submission, please contact Andy Sawan, Risk Services Specialist at Sedgwick at andrew.sawan@sedgwick.com or 330-819-4728.