



**DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INDUSTRIAL RELATIONS
OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION**

Date: November 24, 2025

To: Nevada Businesses

Re: Nevada OSHA Adoption – Part 1904 Recordkeeping Policies and Procedures Directive

Effective January 13, 2025, Federal OSHA released its [29 CFR Part 1904 Recordkeeping Policies and Procedures directive \(CPL 02-00-172\)](#), which provides enforcement guidance for OSHA's Occupational Injury and Illness Recording and Reporting regulation, 29 CFR 1904. On November 24, 2025, Nevada OSHA identically adopted the directive.

Business Requirements

Employers covered by OSHA's recordkeeping regulation (29 CFR Part 1904) must follow these core requirements to ensure accurate tracking and reporting of workplace injuries and illnesses:

- **Maintain Records**
 - Use OSHA Forms 300, 300A, and 301 (or equivalents) to log work-related fatalities, injuries, and illnesses.
 - Record each case within 7 calendar days of learning about it.
 - Retain records for 5 years and update as needed.
- **Post and Certify Annual Summary**
 - Complete and certify Form 300A by a company executive.
 - Post from Feb 1 to Apr 30, even if no injuries occurred.
- **Report Severe Incidents to Nevada OSHA**
 - Fatalities: Report within 8 hours.
 - In-patient hospitalizations, amputations, or eye loss: Report within 24 hours.
- **Submit Electronically via the [OSHA Injury Tracking Application](#) (if applicable)**
 - Establishments with:
 - 250+ employees: Submit Form 300A.

- 100+ employees in high-risk industries: Submit Forms 300, 301, and 300A.
- Deadline: March 2 annually.
- Protect Employee Rights
 - Inform employees of their right to report injuries without retaliation.
 - Use “privacy case” designation when required.

What Nevada OSHA Will Be Looking For During Inspections

During inspections, Compliance Safety and Health Officers (CSHOs) will evaluate whether employers are complying with recordkeeping rules and may issue citations for deficiencies. Key focus areas include:

- Recordkeeping Applicability
 - Is the employer required to keep records (based on size and NAICS code)?
- Accuracy & Timeliness
 - Are records complete, accurate, and entered within 7 days?
 - Are cases properly classified (e.g., days away, restricted work)?
- Electronic Submission Compliance
 - Was required data submitted via OSHA’s ITA by March 2?
- DART Rate & Trends
 - Are injury rates unusually low for the industry?
 - Are there patterns or underreporting concerns?
- Employee Interviews
 - Do employees understand how to report injuries?
 - Are there policies that discourage reporting (e.g., incentive programs, drug testing)?
- Access & Posting
 - Were records provided to OSHA within 4 hours?
 - Was Form 300A posted and certified properly?
- Citations May Be Issued For:
 - Failure to record, report, or retain records
 - Inaccurate or incomplete entries
 - Failure to post or certify summaries
 - Retaliation or policies that discourage reporting

How to File a Complaint

Employees who feel they have been exposed to a hazardous condition in the workplace, have the right to raise their concerns with their employer or to file a complaint with Nevada OSHA. Such a complaint may trigger an inspection of the workplace. An employee who raises concerns with their employer or files an OSHA complaint is protected against retaliation or discrimination for having done so by NRS 618.445 and section 11(c) of the federal Occupational Safety and Health Act, Pub. L. 91-596, 84 Stat. 1590. If an employee files a complaint with Nevada OSHA, their name and contact information will be held as confidential information pursuant to NRS 618.341(3)(a).

To file a complaint, please visit <https://www.osha.gov/workers/file-complaint> or call Nevada OSHA at (702) 486-9020 (southern Nevada) or (775) 688-3700 (northern Nevada).

Assistance Available from Nevada Safety Consultation and Training Section (SCATS)

SCATS is here to help. SCATS is focused on keeping Nevadans safe and healthy while on the job. SCATS offers resources for employers and employees alike, from training to consultation to safety program review. If your business has questions or needs onsite training or consultation, please submit a request by calling 877-472-3368 or submitting a consultation request at <https://www.4safenv.state.nv.us/contact/>.

References:

- [CPL 02-00-172 – Part 1904 Recordkeeping Policies and Procedures Directive](#)
- [29 CFR 1904 – Recording and Reporting Occupational Injuries and Illnesses](#)
- [OSHA Forms \(300, 300A, 301\)](#)
- [OSHA Injury Tracking Application \(ITA\)](#)