

**Justification of the Non-Substantive Change  
for Recordkeeping and Reporting Occupational Injuries and Illnesses (29 CFR Part 1904),  
OMB Control Number 1218-0176**

The agency is adding the capability for the Injury Tracking Application (ITA) for users to upload their PDF of the OSHA Recordkeeping Forms. This additional option will make submitting injury and illness data from their establishment's OSHA Recordkeeping Forms easier and faster than the other three options currently available: manually entering data via the ITA web form; creating a compatible CSV file in the required format; uploading via an API through a third-party service. This addition does not change the burden.