

## 300A Annual Summary Form Must Be Posted February 1

On February 1, employers must post the OSHA 300-A Annual Summary Form at each establishment or facility. This form, which totals the injuries and illnesses occurring at the establishment during the previous calendar year, must be certified by (1) an owner of a sole proprietorship or partnership, (2) an officer of a corporation, or (3) the highest ranking official working at the establishment or 4) that official's immediate supervisor. By certifying the form, the company executive is stating that he or she believes that the information on the OSHA 300-A form is "true, accurate, and complete." The Annual Summary must be posted from February 1 through April 30 "in a conspicuous place or places where notices to employees are customarily posted."

## OSHA Interpretation Letter on Keeping Written Programs in an Electronic Format

OSHA has issued an interpretation letter clarifying that it is acceptable for employers to keep required written programs in an electronic-only format, as long as the program meets all other requirements of the standard. For those programs that are required to be available to employees, such as bloodborne pathogens, hazard communication and permit-required confined spaces, employers must ensure that employees know how to access the document and that there are "no barriers" to employee access.