


<b><i>HEALTH AND SAFETY MANUAL</i></b>		
Title: Access to Exposure and Medical Records		
Approved by: Greg Savoy		Rev. 1/1/08

1 Purpose/Scope:

The purpose of this program is to ensure employees have access to their own exposure and medical records and to describe the means for an employee to access those personal exposure and medical records kept by the Company by regulatory requirement. Medical records are records that concern the health status of employees and are made and maintained by the Company medical clinic.

This program covers all the Company employees. Employee exposure records include either environmental and/or biological monitoring.

2 Definitions/Responsibilities:

2.1 Definitions:

2.1.1 Exposure records – includes results of audiograms, medical clearance testing records and personal monitoring/sampling documentation for hazards in the workplace

2.1.2 Medical records – include results and opinions of work related physical examinations, occupation/injury medical reports and first aid reports. Medical records do not include physical specimens, records concerning health insurance claims, Employee Assistance Program records, and records created in preparation for litigation.

2.2 Responsibilities:

2.2.1 Managers/Supervisors – shall provide timely notification to Human Resources when an employee requests to see their exposure and/or medical records.

2.2.2 Managers and Supervisors – shall ensure that initial and annual refresher training regarding access to exposure and medical records is provided to employees.

2.2.3 Employees – shall follow established process to view their personal exposure and/or medical records.

### 3 Requirements:

#### 3.1 Access to records:

- 3.1.1 The Company shall provide access in a reasonable time, place and manner, but no later than 15-days following the request. If the record will take longer than 15-days to produce, the employee must be given the reason for the delay and the expected time the record will be produced sometime during the 15-day window.
- 3.1.2 If the employee requests a copy of the record, the employee shall receive the copy at no cost for all initial record requests. NOTE: Personal identifiers (name, address, social security number, payroll, etc.) are removed from records before access is granted.
- 3.1.3 The employee's request to view their exposure and medical records may be verbal or written. The request must be made to their Supervisor, Operational Manager, or Department head.
- 3.1.4 When a request is made:
  - Contact Human Resources to inform them of the request.
  - Human Resources will arrange and coordinate the most efficient method to provide access to the employee.

#### 3.2 Retention of Records:

- 3.2.1 Medical Records:
  - Must be retained for a period of employment plus 30-years.
- 3.2.2 Exposure Records:
  - Must be preserved and maintained for a period of 30-years.
- 3.2.3 Should the Company cease to do business, transfer of records shall be made to medical provider.

#### 3.3 Training:

- 3.3.1 Initial and annual refresher training shall be provided to each employee.
- 3.3.2 The content of training must cover:
  - Where and how the employee can view a copy of 29 CFR 1910.1020 Access to Employee Exposure and Medical Records.
  - The existence, location and availability of any exposure and medical records concerning the employee's occupation.
  - The person responsible for maintaining and providing access to these records.
  - Human Resources shall maintain and provide access to medical and exposure records.
  - Each employee's right to access their exposure and medical records.

4      References:

29 CFR 1910.1020 (Access to Employee Exposure and Medical Records)

5      Exhibits: None.