

## PROGRAM DIRECTIVE

Program Directive A-91  
Issued August 1, 1980  
Revised June 29, 2000

**SUBJECT:** Exposure and Medical Records: Storage & Retention

**AFFECTED CODES/**

**DIRECTIVES:** Inorganic Arsenic, 1910.1018; Asbestos, 1910.1101; Carcinogens, 1910.1003 through 1910.1016; DBCP, 1910.1044; Lead, 1910.1025; Audiometric Occupational Noise Exposure, 1910.95; Employee Exposure and Medical Records, 1910.20(b)(3)

**PURPOSE:** To define and provide guidance as to the storage or retention location of required exposure or medical records.

**BACKGROUND:** Several questions have been posed concerning where required exposure and/or medical records are to be stored and maintained. Employers, at times, have the records retained by the physician or a consultant in lieu of the employer retaining the records.

**ACTION:**

- A. Medical and exposure records may be retained by the physician or consultant if:
  - 1. The records meet the specific code requirements.
  - 2. The employer provides the affected or examined employees with the required information concerning the results of the exams and/or sampling results in a timely manner.
- B. The inspecting compliance officer must review the records to verify compliance with the standard criteria and the effectiveness of the health control measures. This may require a visit to the physician's office. Access to records is guaranteed by 1910.20(e)(3)(i). In case any refusals to provide such information are encountered, the manager of enforcement shall be contacted immediately.

**EFFECTIVE  
DATE:**

This directive is effective immediately and will remain in effect until cancelled or superseded.