SUBJECT: Exposure and Medical Records: Storage & Retention


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EFFECTIVE DATE: This directive is effective immediately and will remain in effect until cancelled or superseded.