

PROGRAM DIRECTIVE

Program Directive A-184
Issued April 1, 1981
Revised June 29, 2009

SUBJECT: Medical Surveillance Programs that Require Genetic Information

AFFECTED CODES/

DIRECTIVES: [29 CFR 1990.151](#) and [1910.1003, 13 Carcinogens](#)

PURPOSE: This directive provides an interpretation of health standards that require medical surveillance programs specifying a medical history with family and occupational background, including genetic and environmental factors.

SCOPE: This instruction applies to all of Oregon OSHA.

RULES

AFFECTED: This interpretation applies to all rules that require a medical surveillance program in which the medical examination must include a personal history of the employee or their family and occupational background, including genetic and environmental factors. These standards are:

- A. 1910.1003, 13 Carcinogens.
- B. The OSHA Cancer Policy, 29 CFR 1990.151, “model standard.”

BACKGROUND: In February 1980, the *New York Times* published a series of articles on genetic testing. The fourth and final installment of the series did not accurately describe OSHA policies on this issue. OSHA’s press release [USDL 80-107](#), dated February 20, 1980, clarified OSHA's policy. This instruction provides official guidance to field offices on this policy.

INTERPRETATION: The provisions of the standards listed in this directive must be interpreted as follows:

- A. These provisions do not require genetic testing of any employee.
- B. Taking an employee's medical history, including family history (e.g., inheritable disorders) and occupational history, must be considered a routine part of standard medical practice and is designed to identify factors important to the employee's general health status.

- C. These provisions do not require the exclusion of otherwise qualified employees from jobs on the basis of genetic testing.

EFFECTIVE DATE: This directive is effective immediately and will remain in effect until cancelled or superseded.