



MONTHLY SAFETY BRIEF: ACCESS TO EMPLOYEE EXPOSURE, MEDICAL RECORDS AND OSHA LOGS

As introduced in our January 2018 Safety Brief, we added a few new safety policies and substantially changed some others, such as Access to Employee Exposure, Medical Records and OSHA Logs – Policy 3.6 (below). Understanding and being involved with your medical surveillance, exposure monitoring and knowing our OSHA recordable history is a part of your safety development and training at Hygieneering.

All field staff annually at a minimum get a respiratory physical, drug tested, and depending on your job tasks possibly lead or other contaminant specific testing. You also participate in personal exposure monitoring on occasion. This policy basically spells out the details of this process and lets you know you have access rights to these records. As part of the program, we have cover this initial training and remind you of this annually. So, this is it! Let me know if you have any questions.

3.6 ACCESS TO EMPLOYEE EXPOSURE, MEDICAL RECORDS AND OSHA LOGS

Employees will be allowed copies at no cost of all present and past records pertaining to injuries, illnesses, or exposures. When requested in writing, copies of these reports will be made available to the employee within fifteen (15) days. "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician.

Whenever access is requested to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), personal identifiers must be removed before access is provided.

Medical records include Environmental and Biological Monitoring including:

- Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained;
- Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs.

Employees shall be made aware of their rights concerning Access to Medical Records in the initial orientation training during review of the employing training manual and annually thereafter in refresher training.

A copy of the OSHA annual summary of injuries and illnesses will be posted in the lunch room at Hygieneering Inc. It will be ensured that the posted annual summary is not altered, defaced or covered by other material.

The annual summary will be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.



If Hygieneering ceases to do business, it shall transfer all records subject to this section to the successor employer. If there is no successor employer to receive and maintain the records, or Hygieneering intends to dispose of any records required to be preserved for at least thirty (30) years, the employer shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the employer's business.

ACCESS TO EMPLOYEE EXPOSURE, MEDICAL RECORDS AND OSHA LOGS
SAFETY QUIZ

- 1) Examples of common employee medical records would be personal lab reports from blood tests and exposure monitoring data.
 True
 False
- 2) As an employee, you have the right to view the personal medical files of your co-workers, as long as they are work related files.
 True
 False
- 3) This Safety Brief is your initial orientation due to policy changes on this topic and will receive annual training here-after.
 True
 False
- 4) Hygieneering's OSHA logs are posted at the front desk.
 True
 False
- 5) If for some reason, you need to review your medical records, you should:
 - a. Make the request in writing to Hygieneering management.
 - b. Expect a response of a written request within 30 days.
 - c. Simply ask your supervisor.
 - d. All of the above

SCORE: PASS/FAIL

Employee Signature

Supervisor Signature

Date