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# Sample Framework for a Recordkeeping Management Program\*

*(Name of Company)*  
*(Date)*

## Purpose

The purpose of the Recordkeeping Management Program is to establish a procedure to ensure the maintenance and safekeeping of all safety and health records.

## Responsibility

The *(name of position)* is responsible for coordination, implementation and maintenance of the safety and health recordkeeping management program. This includes storage, security, access, retention and disposal of the records.

## Location/Storage of Records

All storage locations shall be:

- ∪ Accessible
- ∪ Dry and free from vermin
- ∪ Secured in such a manner as to eliminate unauthorized access

Safety and health records for the current year and permanent storage are maintained *(name of location)*.

## Security

Medical and exposure records (e.g., noise, air monitoring results) shall be accessible to **authorized personnel only**. The following method has been developed to ensure security of

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\*This is intended as a sample program only. It is designed to serve as a reference tool as you develop your own company program.

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these records (*describe how it will be addressed at your organization or company*). All medical and exposure records are confidential and maintained as such.

The following personnel shall be considered “**authorized**” for the purpose of this program (*list names*).

## Record Request

Medical and exposure records may be accessed by the employees and/or their designated representatives upon presenting an authorization form signed by the subject employee or governmental officials in accordance with the federal recordkeeping regulations. The environmental safety and health position is responsible for coordinating and maintaining record access procedures and training.

## Training

Employees shall be informed **annually** on the following topics concerning records access:

- ∪ Existence, location and availability of medical and exposure records
- ∪ Persons responsible for providing access to records
- ∪ Employee rights to access records
- ∪ Employee rights to have access to a copy of the applicable standard (e.g.: OSHA Standard on *Access to Employee Exposure and Medical Records*, 29 CFR 1910.20).

Posting will be used to inform the employees of the availability of their medical and exposure records.

- ∪ All employee record requests shall be submitted on the Medical and/or Exposure Request Form (Appendix A).
- ∪ All requests from the employee’s designated representative shall be submitted in writing for the release of records to a designated representative.
- ∪ Requests for exposure and medical records shall be provided to the employee or designated representative within 15 working days. If access cannot be provided within 15 working days from date of receipt, the access coordinator shall inform the person requesting of the reason for delay and the earliest date when the records will be made available.
- ∪ Exposure and medical records shall be released for review on the premises or copied at the request of the employee. Access to X-rays shall be restricted to on-site examination, or

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suitable loan arrangement may be made. Documentation will be placed in the employee medical file concerning any loan arrangements.

Documentation of requested records shall be maintained in accordance with the *Guide to Record Retention* (Appendix B). These requests will be filed by year in the medical record file cabinet.

## Medical Opinions and Employer Actions

Whenever access to employee medical records is requested, a physician representing (*company name*) may recommend the employee or designated representative:

- ∪ Consult with the physician for the purpose of reviewing/discussing the records requested.
- ∪ Accept a summary of medical facts and opinions in lieu of the records requested.
- ∪ Release the requested records only to a physician or other designated representative.

If a physician representing (*company name*) believes direct access to the information regarding a specific diagnosis of a terminal illness or a psychiatric condition could be detrimental to the employee's health:

- ∪ (*Designee of the company*) may deny the employee's request for direct access to the specific information. The employee will be informed that access will only be provided to a designated representative who has specific written consent.

When a designated representative, with specific written consent, requests access to information so withheld:

- ∪ (*Designee of the company*) shall assure access to this information to the designated representative even when it is known that the designated representative will give the information to the employee.

## Confidential Sources

A physician, nurse or other responsible health care provider maintaining medical records may delete from the requested medical records the identity of a family member, personal friend, or fellow employee who has provided confidential information concerning an employee's health status.

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## OSHA Access of Employee Medical Records

Requests made by governmental officials to obtain access to records in order to examine or copy personally identifiable employee medical information must be accompanied by an OSHA written access order and/or specific written consent from the employee.

Access orders and/or written consent is not required when OSHA compliance personnel conduct an examination of employee medical records solely to verify employer compliance with medical surveillance recordkeeping requirements (e.g., blood lead level analysis, respirator use, clearance information). This record examination shall be performed on-site and under the observation of the recordkeeper.

OSHA compliance personnel may not record and/or take off-site any other information from these medical records other than the documentation of compliance or non-compliance.

OSHA compliance personnel may examine injury/illness logs (Form 200) and supplementary reports of injury (Form 101).

## Trade Secret Information

If employees are exposed to substances that are regarded as trade secrets (Appendix C), the trade secret information may be deleted from the records only if:

- ∪ The requesting party is informed of the trade secret status.
- ∪ Information on the properties and effects of the substance is disclosed.

## Retention

All records shall be maintained for a period in accordance with the *Guide to Record Retention* (Appendix B) or state/local regulations, whichever is longer.

## Disposal

All record containers shall be marked with the following information:

- ∪ Contents and year (e.g., Acetone exposure data 1989–1993)
- ∪ Month and year of disposal (e.g., Disposal date — January 2024)

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Records shall be disposed of only after the appropriate retention time has been met and in such a manner that preserves confidentiality.

## **Transfer of Records**

If the facility ceases to do business, the successor employer shall receive all records (exposure, medical files, equipment maintenance, etc.) which require additional retention time. It shall then become the successor's responsibility to maintain these records.

If the facility ceases to do business and there is no successor, all safety and health records shall no longer be maintained.

## **Program Evaluation**

The environmental safety and health position shall be responsible for the evaluation of the written program at a frequency of at least every two years.

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**Appendix A**  
**Medical and/or Exposure**  
**Records Request Form**

Date of Request: \_\_\_\_\_

Full Name: \_\_\_\_\_  
*(Please print full name.)*

Full Name of Employee on Record: \_\_\_\_\_

Employee Identification Number: \_\_\_\_\_

Please check one:     Employee             Designated Representative

Starting Date of Employment: \_\_\_\_\_ Ending Date of Employment: \_\_\_\_\_

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*List all requested records and locations.*

Records:	Locations:
_____	_____
_____	_____
_____	_____
_____	_____

Location of employment during time period of record: \_\_\_\_\_

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I understand that additional information may be requested by the employer solely for the purpose of locating the above named records. An authorization letter is required for the release of records to a designated representative.

Authorization Letter Presented:     Yes             No             Other

\_\_\_\_\_  
(Requester's Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Employer's Signature)

\_\_\_\_\_  
(Date)

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## Appendix A(i)

# Employee Notice

## Access to Your Medical and Exposure Records

All (*company name*) employees shall be granted access to their medical and exposure records in accordance with the federal and local regulations.

### Employee's Right of Access

Each employee or an employee's designated representative shall have the right to examine their personal exposure records (workplace monitoring) or their medical records (health status information).

In the event that personal exposure data does not exist, the employee shall be granted access to the results of area or other monitoring data related to their job, task or the conditions of work.

### Records Coordinator

Name of person coordinating records access: \_\_\_\_\_

Title/position of above named person: \_\_\_\_\_

### Records Location

Employee **medical** records/locations listed below:

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Employee **exposure** records/locations listed below:

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### Regulation and Program Information

Complete copies of the federal/state regulation applicable to this standard are available to all employees upon request. Contact the Department of Consumer and Industry Services.

### Access Procedures

1. Contact (designee of the company) for the appropriate forms.
2. Submit written request using appropriate forms provided by the (*designee of the company*).
3. Records will be provided to you within a reasonable time, manner and place.
4. Records will be released for review on the premises or copies may be requested.

## Appendix B

# Sample Framework for a Guide to Record Retention

*(This guide is not complete because of the variety of clients we serve;  
contact your Loss Prevention Consultant for additional help.)*

**Note:** \*\* denotes Accident Fund recommendation.

<b>Guide to Record Retention</b>		
<b>Records</b>	<b>Retention Period</b>	<b>Reference/Comments</b>
<b>General Safety and Health Provisions</b>		
Written Safety and Health Program	Until updated**	Reviews/revisions should be taking place at least every 2 years.
Employee medical records of the health status made or maintained by a physician, nurse, health care personnel or technician (e.g., medical and employment questionnaires or histories; examination results and laboratory tests; medical opinions, diagnoses, progress notes or recommendations; descriptions of treatments or prescriptions; and employee medical complaints).	Duration of employment, plus 30 years	29CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets  <i><b>Exception:</b></i> Medical records of employees who have worked less than one (1) year, as long as these records are supplied to the employee upon termination of employment and this transaction is documented.
First aid records of conditions resulting in restriction of work, motion, or transfer to another job.	Duration of employment, plus 30 years	29CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets
First aid records of one-time treatment and subsequent observation of minor scratches, cuts, burns, etc., not involving medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job if recorded on-site by a non-physician.	1 year**	29CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets  Recommended retention is one (1) year for use in injury/illness trend analysis.
Log of all recordable occupational injuries and illnesses (e.g., OSHA 200 or equivalent).	5 years	29CFR1904.6 MIOSHA Part 11, Recordkeeping of Occupational Injuries and Illnesses
Supplementary report of occupational injury or illness for all recordable cases (e.g., OSHA 101 or equivalent).	5 years	29CFR1904.6 MIOSHA Part 11, Recordkeeping of Occupational Injuries and Illnesses



**Guide to Record Retention** *(continued)*

<b>Records</b>	<b>Retention Period</b>	<b>Reference/Comments</b>
Annual summary of occupational injuries and illnesses (e.g., OSHA 102 or equivalent).	5 years	29CFR1904.6 MIOSHA Part 11, Recordkeeping of Occupational Injuries and Illnesses
Analysis using employee exposure or medical records (e.g., epidemiological studies).	30 years	29CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets
Employee exposure records. (Workplace monitoring data/results; related collection or analytical methodologies, calculations or information relative to data interpretation; and biological monitoring results.)	30 years	29CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets <b>Exception:</b> Some OSHA Substance Specific Standards requiring a longer retention period. (See Substance Specific section.)
Background data to workplace monitoring or measuring, such as laboratory reports and worksheets.	1 year — as long as the content requirements of “employee exposure records” is met	20CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets
Material Safety Data Sheets	For the life of the facility, plus 30 years**	29CFR1910.20 and 1910.1200 MIOSHA Employee Medical Records and Trade Secrets
Industrial Hygiene/Safety sampling equipment calibration records. (Noise dosimeters, pumps, data loggers, etc.)	30 years	29CFR1910.20 MIOSHA Employee Medical Records and Trade Secrets Maintain with exposure records or IH reports.
Documentation of training (including attendance, name of the instructor, date of training, topic and content of training).	3 years**	
Self-inspection Records	4 years**	
Accident Reports and Investigation Records	5 years**	
<b>Welding, Cutting and Brazing</b>		
Periodic maintenance inspection records of resistance welders including date of inspection, signature of inspector, identifier # of equipment inspected.	Until updated	29CFR1910.255(e) MIOSHA Part 12-G.I., Welding and Cutting

**Guide to Record Retention** *(continued)*

<b>Records</b>	<b>Retention Period</b>	<b>Reference/Comments</b>
<b>Walking/Working Surfaces</b>		
Powered platform inspection and test records including inspections for new installations, alterations and annual inspections.	1 year	29CFR1910.66 MIOSHA Part 5-G.I., Scaffolding
Operator and Inspector Training	Duration of employment	29CFR1910.66 MIOSHA Part 5-G.I., Scaffolding
Manlift inspection records including general inspections monthly and limit switch inspections weekly.	1 year**	29CFR1910.68 MIOSHA Part 25-G.I., Manlifts
Ladder Inspections	1 year**	29CFR1910.26 May be included in housekeeping or other self-inspections, which require four (4) years retention.
<b>Hearing Conservation</b>		
Employee audiometric test records.	Duration of employment, plus 30 years**	29CFR1910.95 and 1910.20
Audiometric booth calibration records (in-house testing facilities only)	Duration of employment	29CFR1910.95 MIOSHA Rule 325.601, Hearing Conservation Maintain with audiometric testing data.
Noise Maps/Noise Exposure	2 years, or when updated, whichever is longer**	MIOSHA Rule 325.601, Hearing Conservation
Employee exposure records (results of noise dosimetry).	30 years	29CFR1910.95 and 29CFR1910.20 MIOSHA Rule 325.601, Hearing Conservation
Training	3 years	See General Provisions
<b>Respiratory Protection</b>		
Respirator fit testing records, including name and Social Security number, method of testing, respirator type, manufacturer, respirator model # and size, results of test (pass/fail).	Until updated	20CFR1910.134 MIOSHA Respirator Rule 3502

**Guide to Record Retention** *(continued)*

<b>Records</b>	<b>Retention Period</b>	<b>Reference/Comments</b>
Respirator inspection records (for respirators maintained for emergency use) including date of inspection, name of inspector and findings.	1 year	29CFR1910.134 MIOSHA Respirator Rule 3502
Training	3 years	See General Provisions
<b>Emergency Response</b>		
Employee medical surveillance examinations including employee name, Social Security number, physician's comments or results, employee complaints and information provided to the physician.	Duration of employment, plus 30 years	29CFR1910.120
Emergency Response Training	3 years	29CFR1910.120 Train <i>annually</i> ; General Provisions.
Emergency Plan Drills	1 year**	
Emergency Exits	1 year**	
Emergency Lighting Inspections	1 year**	
<b>Fire Protection</b>		
Visual inspections of portable fire extinguishers.	Maintain inspection record through the close of the calendar year	20CFR1910.157 MIOSHA Part 8-G.I., Portable Fire Extinguishers Perform <i>monthly</i> .
Maintenance checks on all portable extinguishers, including maintenance date.	1 year following the last entry or the shelf life of the extinguisher, whichever is less.	29CFR1910.157 MIOSHA Part 8-G.I., Portable Fire Extinguishers
Hydrostatic testing of portable fire extinguishers, including maintenance date.	The period between tests, or until extinguisher is removed from service.	29CFR1910.157 MIOSHA Part 8-G.I., Portable Fire Extinguishers
Inspections of hydraulically designed systems (automatic sprinkler systems), include location and number of sprinklers in hydraulically designed section.	1 year** or until updated	29CFR1910.159 MIOSHA Part 9-G.I., Fixed Fire Equipment
Inspection and maintenance dates for fixed extinguishing systems other than sprinklers.	Until updated, or for the life of the container, whichever is less	29CFR1910.160 MIOSHA Part 9-G.I., Fixed Fire Equipment

**Guide to Record Retention** *(continued)*

<b>Records</b>	<b>Retention Period</b>	<b>Reference/Comments</b>
Semi-annual system check of fixed systems other than sprinklers.	Until updated or removed from service	20CFR1910.160 MIOSHA Part 9-G.I., Fixed Fire Equipment
<b>Material Handling</b>		
Inspection of hooks, chains and end connectors for overhead and gantry cranes including date of inspection, signature of inspector, item identifier	1 year**	20CFR1910.179 MIOSHA Part 18-G.I., Overhead and Gantry Cranes Connected daily or prior to each use.
Inspection of running or installed ropes for overhead and gantry cranes.	1 year**	29CFR1910.179 MIOSHA Part 18-G.I., Overhead and Gantry Cranes Perform <b>monthly</b> .
Inspection of slings.	1 year**	29CFR1910.184 MIOSHA Part 49-G.I., Slings Perform <b>daily</b> prior to use.
Powered industrial truck inspections.	1 year**	29CFR1910.178 MIOSHA Part 21-G.I., Powered Industrial Trucks Perform <b>daily</b> before being placed in service. When used at each shift, perform at the <b>beginning</b> of each shift.
<b>Machine Guarding</b>		
Inspection records of power press pull-out devices including date, signature of inspector, serial # or ID of press.	1 year**	29CFR1910.217 MIOSHA Part 23-G.I., Hydraulic Power Presses
Inspection records of power presses certifying all parts, auxiliary equipment, and safe guards are in safe operating condition and proper adjustment including date, signature of inspector, serial # or ID of press.	1 year**	29CFR1910.217 MIOSHA Part 23-G.I., Hydraulic Power Presses

<b>Guide to Record Retention</b> <i>(continued)</i>		
<b>Records</b>	<b>Retention Period</b>	<b>Reference/Comments</b>
Inspections of clutch/brake mechanisms, anti-repeat features and single stroke mechanisms.	1 year**	29CFR1910.217 MIOSHA Part 23-G.I., Hydraulic Power Presses Conduct these <i>weekly</i> .
<b>Confined Spaces</b>		
Canceled permits.	1 year	29CFR1910.146 MIOSHA Part 90-G.I., Confined Space Entry
Certification of training.	3 years	29CFR1910.146 General Provisions
Certification of reclassification detailing the abatement of hazards and change of status from a permitted space to a non-permitted space.	5 years**	29CFR1910.146 MIOSHA Part 90-G.I., Confined Space Entry
<b>Substance Specific Standards</b>		
<b>Lead</b>		
Employee exposure and medical records related to lead	40 years, or duration of employment plus 20 years, whichever is longer	20CFR1910.1025 MIOSHA Rule 325.51901, Lead
Medical removal records relating to lead exposure.	Duration of employment	29CFR1910.1025 MIOSHA Rule 325.51901, Lead
Mechanical exhaust ventilation checks on operations using lead (e.g., manometer readings, velocity measurements).	1 year**	29CFR1910.1025 MIOSHA Rule 325.51901, Lead Checks are required at a frequency of at least <i>every 3 months</i> .
Lead Compliance Program	Review and updated at least every 6 months	29CFR1910.1025 MIOSHA Rule 325.51901, Lead Required when exposures exceed the Action Level of 30 mg/m <sup>3</sup> over 8 hours



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## Appendix C

### Definitions

**Access:** The right and opportunity to examine and copy records.

**Designated Representative:** Any individual or organization to whom an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

**Employee:** A current employee, a former employee or an employee being assigned or transferred to work where there will be exposure to toxic substances or harmful physical agents. In the case of a deceased or legally incapacitated employee, the employee's legal representative may directly exercise all the employee's rights of records access.

**Employee Exposure Records:** Records containing any of the following kinds of information: workplace monitoring including personal, area, grab or wipe sampling data (e.g., noise, chemical, heat stress); related collection or analytical methodologies, calculations or information relative to data interpretation; and biological monitoring results (e.g., blood lead level).

**Employee Medical Records:** Records concerning the health status of an employee which are made or maintained by a physician, nurse, health care personnel or technician including medical and employment questionnaires or histories; the results of medical examinations and laboratory tests; medical opinions, diagnoses, progress notes or recommendations; first aid records where the condition resulted in restriction of work, motion or transfer to another job; descriptions of treatments or prescriptions; employee medical complaints.

**First Aid Records:** Records of the one-time treatment and/or subsequent observation of minor injuries.

**Occupational Injury and Illness Records:** Records identifying recordable occupational injuries and illness and the supplementary first report of injury information.

**Personally Identifiable Employee Medical Information:** Employee medical information accompanied by either direct identifiers (name, address, social security number, payroll number, etc.) or by information which could reasonably be used indirectly to identify specific employees (e.g., exact age, height, weight, race, sex, date of initial employment, job title, etc.).

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**Record:** Any item, collection or grouping of information regardless of the form or process by which it is maintained.

**Retention Period:** The amount of time that a record must be retained and safeguarded as required for legal and/or operating purposes. All periods are stated in terms of full years after the end of the calendar year in which the item was generated.

**Safety and Health Records:** Records including but not limited to the following: medical records, exposure results, sampling results, injury and illness records, inspection records, safety and health survey reports, etc.

**Specific Written Consent:** A written authorization containing the following: name and signature of the employee authorizing the release of medical information, date of the written authorization, name of the individual or organization that is authorized to release the medical information, name of the designated representative (individual or organization) that is authorized to receive the released information, a general description of the medical information that is authorized to be released, a general description of the purpose for the release of the medical information, and a date or condition upon which the written authorization will expire (if less than one year).

**Trade Secret:** Any confidential formula, pattern, process, device or information or compilation of information that is used in an employer's business that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.