

Northwestern

Guidelines for Accessing Employee Exposure and Medical Records

Environmental Health and Safety

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I. Program Goals and Objectives

Northwestern University is committed to maintaining a safe and healthy work environment. It is the goal of Northwestern to eliminate potential hazards in the workplace, and in order to do so various exposure monitoring and medical screenings may be required. This program establishes standard procedures for employees to access their work-related exposure and medical records.

II. Scope and Application

This program applies to all Northwestern University units and associated partners maintaining exposure and medical records. Employee exposure records include information on environmental and biological monitoring, along with chemical agents that may affect employee health, including Safety Data Sheets (SDSs). Employee medical records include work-related medical information held by a physician, nurse, or other healthcare personnel, or technician. This program outlines procedures for personnel to obtain access to these records.

III. Definitions

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 will be treated automatically as a designated representative without regard to written employee authorization.

Employee Exposure Record: A record containing any of the following kinds of information:

- i. Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, such as noise, chemicals, or radioactive materials;
- ii. Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.);
- iii. Safety data sheets (SDS) indicating the material may pose a hazard to human health.

Exposure or Exposed: An employee who is subjected to a toxic substance or harmful physical agent in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes past exposure and potential (e.g., accidental or possible) exposure.

Toxic Substance or Harmful Physical Agent: Any chemical substance, biological agent (bacteria, virus, fungus, etc.), or physical stress (noise, heat, cold, vibration, repetitive motion, ionizing and non-ionizing radiation, hypo- or hyperbaric pressure, etc.) which:

- i. Is listed in the latest printed edition of the National Institute for Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS) which is incorporated by reference as specified in Sec. 1910.6; or
- ii. Has yielded positive evidence of an acute or chronic health hazard in testing conducted by, or known to, the employer; or
- iii. Is the subject of a safety data sheet kept by or known to the employer indicating that the material may pose a hazard to human health.

IV. Responsibilities

A. Environmental Health and Safety (EHS)

- i. Administrative oversight of the Guidelines and Procedures for Access to Employee Exposure and Medical Records Program, including developing the written program and revising as necessary;
- ii. Maintain records of exposure measurements for a period of 30 years;
- iii. Provide exposure monitoring results to all employees monitored for exposure;
- iv. Release exposure records to employees or designated representatives upon request;
- v. In the absence of direct employee exposure records, provide anonymous records of comparable or similar exposures.

B. Supervisors/Departments

- i. Maintain Safety Data Sheets (SDSs) for materials used in department;
- ii. Provide SDSs to employees.

C. Employees

- i. Participate in exposure monitoring as necessary to maintain a safe and healthy work environment;
- ii. Contact Supervisor/Department head for access to SDSs;
- iii. Contact EHS for access to exposure monitoring results;
- iv. Contact appropriate occupational health partner for access to work-related medical records.

D. Occupational Health Partners

- i. Maintain employee medical records;
- ii. Release medical records to employees or designated representative upon request;
- iii. Retain employee medical records for a period of at least employment plus 30 years.

V. Procedures for Accessing Exposure Records

Employee exposure records can be obtained according to the following:

- A. Complete the Exposure Records Release Authorization Form (see Appendix 1) and submit to EHS (see Section IX Contact).
- B. Records will be made available for pick up at the EHS office, and a signature will be required upon receipt.
- C. Every attempt to provide the requested records as quickly as possible will be made. If access to records cannot be made within 15 working days, you will be notified of the reason for delay and the earliest date the record will be available.

VI. Procedures for Accessing Medical Records

Contact the appropriate occupational health partner office directly to access work-related medical records. Each office will have specific requirements for records to be released.

Chicago: [Northwestern Medicine Corporate Health](#)

Evanston: [NorthShore OMEGA](#)

[Northwestern Center for Audiology, Speech, Language, and Learning \(NUCASLL\)](#)

VII. Recordkeeping

Exposure Records and Medical Records will be maintained as follows:

- A. **Exposure Records:** EHS will retain all exposure monitoring reports. These reports will be retained for 30 years and made available to personnel upon request.
- B. **Medical Records:** Northwestern's Occupational Health Partners will retain all medical records. These records will be retained for the duration of employment plus 30 years.

VIII. Regulatory Authority

Northwestern and contractors will comply with the Occupational Safety and Health Administration's (OSHA) standards and any other applicable codes and standards, including:

29 CFR 1910.1020 – Access to Employee Exposure and Medical Records

IX. Contact

For general questions and Exposure Records, contact Environmental Health and Safety at ehs@northwestern.edu.

For questions regarding radiation exposure records, contact Research Safety at radiation-safety@northwestern.edu.

For questions regarding medical records, contact the following:

Chicago: **Northwestern Medicine Corporate Health**, (312) 926-8282
676 N St Clair Street, Suite 900, Chicago, IL 60611

Evanston: **NorthShore OMEGA**, (847) 657-1700
2650 Ridge Avenue, Suite 4225, Evanston, IL 60201

Northwestern University Center for Audiology, Speech, Language, and Learning (NUCASLL), (847) 491-3165
2315 Campus Drive, Evanston, IL 60208

Appendix 1 – Exposure Records Release Authorization Form

Name: _____ Date: _____

Department: _____ Job Title: _____

Email: _____ Phone number: _____

I request access to the exposure record(s)* for:

Air Contaminant (specify): _____ Noise Other (specify): _____

* Radiation exposure records must be requested from Research Safety at radiation-safety@northwestern.edu

Describe the exposure records requested (job task, job location, substance/agent, date/time period): _____

Purpose for requesting records: Personal use Other (specify): _____

To be completed if the employee is requesting to receive their own record:

Signature _____ Employee ID #: _____

To be completed if the employee designates a representative to receive the record:

I hereby authorize the release of the above specified record to the following:

Name/Organization: _____

Address: _____

Email: _____ Phone number: _____

This authorization form will expire one year from date unless otherwise specified by employee. Employee can revoke authorization in writing at any time.

Employee Signature: _____ Date: _____

To be completed by the individual receiving the record:

I have received the record specified above.

Signature: _____ Date Received: _____

Submit this form to Environmental Health and Safety (EHS) at ehs@northwestern.edu. You will be contacted when the documents are ready to be picked up from the Environmental Health and Safety office. EHS will provide the requested records as quickly as possible. If the records cannot be provided within 15 working days (per OSHA regulations), you will be notified of the reason for the delay and earliest date the records will be available.