

# Northwestern

Guidelines for Accessing  
Employee Exposure  
and Medical Records

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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. Regulatory Authority

29 Code of Regulations (CFR) Part 1910.1020, Access to employee exposure and medical records

## IV. 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.

## V. Responsibilities

### A. Risk Management

- 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 Risk Management 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.

## VI. Procedures for Accessing Exposure Records

Employee exposure records can be obtained according to the following:

- i. Complete the Exposure Records Release Authorization Form (Appendix I) and submit to Risk Management (Section IX: Contact Information).
- ii. Records will be made available for pick up at the Risk Management office, and a signature will be required upon receipt.
- iii. 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.

## VII. 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 \(NUCASLL\)](#)

## VIII. Recordkeeping

Exposure Records and Medical Records will be maintained as follows:

- A. **Exposure Records:** Risk Management 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.

## IX. Contact Information

General questions and Exposure Records:

### **Risk Management**

Gwen Butler, Director, Environmental, Health and Safety

[gwen.butler@northwestern.edu](mailto:gwen.butler@northwestern.edu) or 847.491.4936

2020 Ridge Ave, Suite 240, Evanston, IL 60208-4335

Radiation Exposure Records:

### **Office for Research Safety (ORS)**

Radiation Safety

[radiation-safety@northwestern.edu](mailto:radiation-safety@northwestern.edu)

Medical Records:

Chicago: **Northwestern Medicine Corporate Health**, 312.926.8282

676 N St Clair St, Suite 900, Chicago, IL 60611

Evanston: **NorthShore OMEGA**, 847.657.1700

2650 Ridge Ave, 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 ORS at [radiation-safety@northwestern.edu](mailto: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 – describe \_\_\_\_\_

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

Signature \_\_\_\_\_ Employee ID # \_\_\_\_\_

**To be completed if 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 individual receiving the record:**

I have received the record specified above.

Signature: \_\_\_\_\_ Date Received: \_\_\_\_\_

Submit form to Risk Management Services: Gwen Butler, Director, Environmental, Health and Safety  
[gwen.butler@northwestern.edu](mailto:gwen.butler@northwestern.edu) or 847.491.4936

You will be contacted when documents are ready to be picked up. Records can be picked up at:  
Risk Management Services, 2020 Ridge Ave, Suite 240, Evanston, IL 60208

Risk Management will provide the requested records as quickly as possible. If we cannot provide access to records within 15 working days (per OSHA regulations), you will be notified of the reason for delay and the earliest date the records will be available.