

1.1 PURPOSE

- 1.1.1 The purpose of this policy is to acknowledge the importance of an effective recordkeeping policy for recognizing, identifying, and reviewing trends and deficiencies. TERRY R PITT CONSTRUCTION recognizes the importance of recordkeeping in tracking the performance of duties and responsibilities for employees under the program. TERRY R PITT CONSTRUCTION is committed to implementing and maintaining an active, up-to-date, recordkeeping policy and providing employees access to this information.

1.2 RESPONSIBILITIES

1.2.1 Supervisor

1.2.1.1 Ensure job related injuries and illness are reported promptly to safety department

1.2.1.2 Responsible for seeing notifications to employees are accomplished

1.2.2 Employee

1.2.2.1 Promptly report any actual or suspected job-related injury or illness

1.2.3 Safety Department

1.2.3.1 Ensure all job-related injuries and illness are recorded properly in accordance with OSHA requirements

1.2.3.2 Ensure required postings are conducted in accordance with recordkeeping guidelines

1.2.3.3 Maintain all required records

1.2.3.4 Determine proper classification of job-related injuries or illnesses based on OSHA recordkeeping guidelines

1.3 REPORTING SYSTEM

1.3.1 Employee reports of injuries and illnesses are taken seriously by TERRY R PITT CONSTRUCTION.

1.3.2 Our reporting system ensures that the safety department receives the report. The safety department has examined our existing reporting policies and practices to ensure that they encourage and do not discourage reporting and participation in our program.

1.3.3 Each recordable injury or illness must be entered on an *OSHA 300 Log* and *301 Incident Report* or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

1.3.4 TERRY R PITT CONSTRUCTION does not discriminate against employees who file a work-related injury or illness or any other safety and health complaint.

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- 1.3.4.1 A company executive must certify that he or she has examined the *OSHA 300 Log* and that he or she reasonably believes based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.
- 1.3.5 Documentation is necessary to demonstrate that facility managers are fulfilling company and regulatory activities. All facilities are expected to establish a filing system that enables rapid review of documentation and the safety department is responsible for creating and maintaining the filing system. The filing system used may be electronic and/or paper based.
- 1.3.6 A copy of the annual summary will be posted where notices to employees are ordinarily posted. The posted annual summary must not be altered, defaced, or covered by other material.
 - 1.3.6.1 The annual summary will be posted no later than February 1st of the year following the year covered by the records and the posting will be kept in place until April 30th.
- 1.3.7 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 will be obtained.
- 1.3.8 Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (ex. 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, will be obtained.
- 1.3.9 Safety data sheets will be maintained that indicate the material may pose a hazard to human health or in the absence, a chemical inventory or any other record that reveals where and when used and the identity (ex. chemical, common, or trade name) of a toxic substance or harmful physical agent.
- 1.3.10 A toxic substance or harmful physical agent is defined as any chemical substance, biological agent, or physical stress (noise, heat, cold, vibration, repetitive motion, ionizing, and non-ionizing radiation, etc.).

1.4 RECORDKEEPING

- 1.4.1 TERRY R PITT CONSTRUCTION is required to keep records of fatalities, injuries, and illnesses and must record each fatality, injury, and illness that:
 - 1.4.1.1 Is work related
 - 1.4.1.2 Is a new case
 - 1.4.1.3 Meets one or more of the general recording criteria
- 1.4.2 The supervisor will ensure the maintenance of all safety policy records, including:

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New Employee Safety Orientation forms	Length of Employment
Disciplinary actions for safety	1 year
Safety inspections	2 years
Safety meeting reports	2 years
Incident investigations	5 years
OSHA log of injuries	5 years
Inventory of hazardous materials (if any)	forever
Employee exposure or medical records	forever

1.4.3 Personnel files will include only job-related information pertinent to employment.

1.4.4 Personnel files are open only to authorized company personnel on a business related, need to know basis unless the company is legally required to release them by court order or subpoena.

1.4.5 Employees must give written permission before there will be external disclosure of their personal information with the exception of the following information:

1.4.5.1 Verification of dates of employment and positions held.

1.4.5.2 Personal information that the company is legally required to reveal by court order or subpoena. In the latter case, the employee will be informed before the disclosure if reasonably possible.

1.4.6 Employees and in some cases, members of the public, have the right to review certain documents upon request. All requests by employees, contractors, regulatory agencies, or members of the public who want to view documents that are not commonly available to employees should be directed to the supervisor.

1.4.7 Any document that is considered confidential should be stored in a locked file cabinet. Access to confidential documents will be restricted to personnel with a need to know status. TERRY R PITT CONSTRUCTION will determine who has a need to know. Confidential and non-confidential documents are records that will be maintained in separate files.

1.5 INSPECTION REPORTS

1.5.1 All equipment, facilities, and vehicle inspection reports will be maintained in files. Only inspection forms approved by TERRY R PITT CONSTRUCTION will be used. TERRY R PITT CONSTRUCTION also reserves the right to alter, change, and/or modify inspection reports to

best suit its needs. Supervisors are ultimately responsible for ensuring workers, as designated, turn in inspection reports, with noted corrective action taken in a timely fashion.

1.6 SAFETY MEETINGS

- 1.6.1 A file of safety meetings held will be maintained by the safety department. When safety meetings are used as or in conjunction with training activities, it will be noted on the safety meeting form. The individual conducting the safety meeting is responsible for providing a copy of the safety meeting to the safety department for record maintenance.

1.7 INCIDENT INVESTIGATION REPORTS

- 1.7.1 Incident investigation reports will be maintained by the safety department to ensure all investigation reports are turned in for each reported incident. The safety department will maintain a file of all accident investigation reports. Incident investigations will be conducted to document the facts and finding of all incidents as well as to determine the root cause so preventative measures can be taken.

1.8 DRUG AND ALCOHOL TESTING RESULTS

- 1.8.1 Drug and alcohol testing results, both positive and negative, are confidential and will be stored in a locked filing cabinet. Representatives of the HR department, the safety department, and the supervisor are authorized to view drug and alcohol testing.

1.9 MEDICAL AND EXPOSURE RECORDS

- 1.9.1 Employee medical record means a record concerning the health status of an employee that is made or maintained by a physician, nurse, or other health care personnel or technician.
- 1.9.2 Employee medical and exposure records will be preserved for at least 30 years past the termination date of the employee with whom they are associated and will include environmental (workplace) monitoring or measuring of a toxic substance(s) or harmful physical agent(s) including personal, area, grab, wipe, as well as associated collection and analytical methodologies, computations, and other relevant data; biological monitoring (level of absorption of toxic substances or harmful physical agents by systems in the body, including chemicals in the blood, urine, hair, breath, fingernails, etc.); and SDSs. The results of biological monitoring that assess an employee's drug and alcohol use will not be required. The records may be preserved at TERRY R PITT CONSTRUCTION facilities or at the facility of a 3rd party medical care provider.
- 1.9.2.1 If records are preserved at a third-party facility, the facility must be notified in writing that TERRY R PITT CONSTRUCTION expects the records to be maintained indefinitely and that no records should be destroyed or transferred without the consent of TERRY R PITT CONSTRUCTION.
- 1.9.2.2 Should TERRY R PITT CONSTRUCTION sell to another company, TERRY R PITT CONSTRUCTION will transfer all required medical and exposure records subject to the

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OSHA regulation that are required to be preserved for at least thirty (30) years, to the new company.

1.9.2.3 If TERRY R PITT CONSTRUCTION is ceasing to do business and there is no successor employer to receive and maintain the records, TERRY R PITT CONSTRUCTION intends to dispose of any records required to be preserved for at least 30 years, and TERRY R PITT CONSTRUCTION will notify affected current employees of their rights of access to records at least 3 months prior to the cessation of business.

1.9.3 Employees and their designated representatives will be allowed access to employee exposure and medical records as per OSHA 29 CFR 1910.1020 and at no cost to the employee or the employee representative. Personal identifiers, such as name, address, social security number, payroll number, etc. that could reasonably be used to directly or indirectly identify specific employees, will be removed from the medical and exposure records before access is granted to conduct an analysis of employee medical records. Direct identifiers including exact age, height, weight, race, sex, date of initial employment, job title, and the like must be removed and protected. Employees are to be notified of this policy upon initial assignment and annually thereafter.

1.9.3.1 Access should be provided in a reasonable time, place, and manner.

1.9.3.2 Access to employee records shall be provided no later than 15 days after the request for access is made. If the records cannot be reasonably provided within 15 working days, then the employee or designated representative should be provided with the reason for the delay and the earliest date when the record can be made available. Records or copies shall be provided at no cost to the employee.

1.10 TRAINING RECORDS

1.10.1 Upon first entering employment and at least annually thereafter, employees shall be informed via a bulletin board posting and/or annual training of the following:

1.10.1.1 The existence, location, and availability of employee records for exposure to toxic substances or harmful physical agents.

1.10.1.2 The person responsible for maintaining and providing access to the records. Contact your supervisor to initiate this request.

1.10.1.3 The employee right of access to those records.

1.10.2 A file of all training sessions, verbal and written, will be maintained by the safety department. Annual safety training requirements will be monitored by the safety department.

1.10.3 All training requirements by OSHA and other regulatory agencies are considered base minimum guidelines. These training requirements will be conducted in accordance to time requirements. Regulatory recordkeeping requirements will be followed.

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- 1.10.4 Specialized training, where necessary, concerning specific equipment, policies, or procedures will be conducted and documented in accordance with the proper regulatory guidelines.
- 1.10.5 A record will be maintained by the safety department to ensure new hire safety orientations are conducted. The safety department is responsible for conducting new employee safety orientation.

