



MEDICAL SURVEILLANCE PROGRAM

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WEST VIRGINIA UNIVERSITY
OFFICE of ENVIRONMENTAL HEALTH AND SAFETY
MEDICAL SURVEILLANCE PROGRAM

TABLE of CONTENTS

1.0 Purpose.....	4
2.0 Scope.....	4
3.0 Definitions.....	5
4.0 Roles and Responsibilities	8
4.1 West Virginia University Administration	8
4.2 Medical Surveillance and Software Executive Committee.....	8
4.3 Medical Director	9
4.4 Medical Surveillance and Software Management Team	9
4.5 Environmental Health and Safety (EHS).....	10
4.6 WVU Human Resources	12
4.7 WVU Finance Division-Expert Business Office (EBO) and Employee Processing.....	13
4.8 WVU Occupational Medicine.....	14
4.9 Departmental Administrators	15
4.10 Supervisors.....	15
4.11 Employees.....	16
4.12 Select Committees: Research and Compliance, Academic Research	17
5.0 Training.....	19
6.0 Procedures.....	19
6.1 Employee Medical Surveillance Program: Examination Process Chart	20
6.2 Hiring Process.....	21
6.3 Human Resources and the Expert Business office and Employee Processing	21
6.4 EHS Staff reviews the Job Task Assessment forms to determine if any items are	21
6.5 Employee lists provided to Medical Surveillance Operational Committee	21
6.6 Medical Surveillance Employee lists for medical surveillance removal, employee or.....	21

6.7 EHS staff performs written risk assessments in areas where the Job Task Assessment	21
6.8 EHS staff may recommend further exposure surveillance as outlined in EHS.....	22
6.9 EHS staff in consultation with the department supervisor has the department medical	22
6.10 EHS staff may require baseline medical surveillance for employees that participate	22
6.11 Occupational Medicine - issues “Employer Notification of Medical Examination”	22
6.12 Departments, Supervisors and Employees - follow all requirements as outlined in.....	22
7.0 Recordkeeping	22
8.0 References.....	23
9.0 Program Review.....	23
10.0 Program Revisions	23
11.0 Appendices.....	24
Appendix A - Employee Medical Surveillance Program: Examination Process Chart	
Appendix B - EHS Supervisor's Job Checklist for Medical Surveillance	
Appendix C- Medical Surveillance by Exposure	
Appendix D - Sample copy of Employee Notification of Medical Examination	
Appendix E - Employee Medical Surveillance Medical Examinations Matrix	

1.0 Purpose

The Medical Surveillance Program is designed to complement the continual efforts to provide a safe and healthy work environment for WVU employees. This program supports the requirements needed to meet WVU HR 28 Medical Management Policy. This program is intended to protect workers from hazards which can be reasonable anticipated, but are not specifically covered by federal regulations. The program is also to complement the Occupational Safety and Health Administration's (OSHA) medical surveillance requirements. (See the WVU Employee's Handbook pages 26 and 27). The medical surveillance program seeks to maintain continuing efforts to provide safe job placement of employees; to satisfactorily maintain employee health; to ascertain the effectiveness of hazard control methods and to assist in identifying any "reasonable accommodation" considerations which may be imposed by the Rehabilitation Act of 1973. The Medical Surveillance Program responsibilities are as follows:

1.1 To ensure that employees appointed to specific positions and responsibilities receive appropriate medical examinations and exposure surveillance in a timely manner.

1.2 To monitor the employee's medical status in the following situations: prior to employment; during the performance of the duties and responsibilities of their designated position; and at the exit of their employment.

1.3 To comply with medical surveillance examinations that are mandated by federal and state laws. Failure or refusal of an employee to undergo required medical testing, as determined by this program, shall constitute a refusal to perform the normal and reasonable duties of the position. In such event, administration has the authority to commence appropriate disciplinary action up to and including termination of employment.

2.0 Scope

This procedure is used for the identification of required medical surveillance for new and existing WVU employees. The medical surveillance program provides the methods and the means to detect and counsel employees regarding potential and actual work-related adverse health complications. These physiological changes can include but are not limited to: exposures from hazardous levels of physical, chemical, or radioactive stresses that the employee may experience on the job.

2.1 The Medical Surveillance program applies to West Virginia University employees and student employees that may come into contact with hazardous materials or chemicals; contact with physical hazards such as noise and radiation or biological/animal contact etc.

2.2 Medical surveillance shall apply to job classifications that require "fitness-for duty" examinations such as positions or work duties that impact public safety or require safety sensitive duties.

2.3 Medical surveillance of employees is also used to measure the effectiveness of engineering and administrative controls. Medical surveillance testing may involve biological surveillance as indicated by the WVU Occupational Medicine.

3.0 Definitions

Action Level A concentration designated in 29 CFR part 1910 for a specific substance, calculated as an 8 hour time-weighted average, which initiates certain required activities such as exposure surveillance or medical surveillance.

Animal Allergy is an allergic response to contact with animals. A condition that can be immediate or develop with prolonged contact. Generally, species specific; it can be prevented by limiting the intensity and time of exposure to animals.

Audiogram - A chart, graph or table resulting from a hearing test showing an individual's hearing sensitivity as a function of frequency.

Audiometric Testing - Environmental Health and Safety (EHS) has established a Hearing Conservation Program where audiometric testing is made available to all employees whose noise exposures equal or exceed an 8-hour time-weighted average of 85 decibels on the A- Scale. Employee audiograms will be maintained, on file, at WVU Occupational Medicine.

Contractors - Those not fully supported by WVU Med Surveillance Program funding -i.e. West Virginia University Research Corporation, that are paid to participation with WVU research.

EHS - Environmental Health and Safety

Employee Medical Record - A record concerning the health status of an employee which is made or maintained by WVU Occupational Medicine.

Exit Examination- Is a final medical examination provided to medical surveillance participating employees who have worked with OSHA regulated materials and/or carcinogens, which is performed by WVU Occupational Medicine.

Exposure- Occupational - Accidental, past incidents or “reasonably anticipated” exposures where an employee has been subjected to toxic chemicals, biological agents or harmful physical agents such as noise and radiation, in the course his work duties. Exposures can occur through: inhalation, ingestion, skin contact or absorption, past exposure.

Employee Exposure Measurements - For chemical hazards or physical hazards that are measured for the employee that include:

- Air Contaminants exposure measurements are employee breathing zone measurements during an employee's normal workday and other working conditions as well.
- Audiogram is a hearing test performed on the ears that uses a chart, graph, or table resulting from an audiometric test showing an individual's hearing threshold levels as a function of frequency.

- Dosimetry Noise Measurements measure or monitor the actual noise levels in the workplace or noise exposure or "dose" received by employees during the workday.
- Biological measurement - The measurement of tissue levels of toxic contaminants or metabolites. Biological surveillance is performed by WVU Occupational Medicine.

Employee Exposure Record - Environmental (workplace) surveillance or measuring of a toxic substance or harmful physical agent to include personal air sample, area air sample, grab, wipe, or other form of sampling.

Employer Notification of Medical Examination - A medical surveillance examination report given to the employer, after the employee included in the medical surveillance program and has been examined per the medical surveillance requirements. This report determines if an employee is able to perform essential job functions and/or wear a respirator. A copy will be forwarded to the immediate supervisor, Human Resources Medical Management and EHS staff.

Job Hazards - Include air contaminants, chemical, biological, ergonomic or physical hazards that can cause harm or adverse health effects to employees in the workplace.

Job: Pre-Employment/Post Offer and Fitness for Duty from WVU Occupational Medicine - A pre-placement medical evaluation “requested prior to employment” by the employer to determine if a current employee is able to perform safety essential job functions. Fitness for Duty exams can be performed for return to work after a medical absence or reasonable suspicion. Post-employment exams are offered at the end of employment

Job Task Assessment (JTA) Checklist - A checklist from Environmental Health and Safety which assesses job tasks/hazards that may require special work practices, engineering controls, personal protection and respiratory protection. (See link to JTA for Supervisor link <http://ehs.wvu.edu/health/medical-surveillance>. Click on “Job Task Assessment”).

Job Task Assessment “Medical Surveillance-New Hire Requisition” - A checklist that WVU Human Resources to determine if an employee requires medical surveillance. (See Link at <http://ehs.wvu.edu/health/medical-surveillance>. Click on “Medical Surveillance –New Hire Requisition”)

(WVU) Occupational Medicine - The group that performs WVU Medical Surveillance. Medical Surveillance is the collection and analysis of health information on individuals or workers potentially exposed to harmful agents; for the purpose of identifying health effects at an early and hopefully reversible stage. WVU Occupational Medicine is the medical provider for the medical surveillance program for work-related injuries, Fit-for-Duty examinations, exit examinations and work-related exposures.

Medical Surveillance and Software Executive Committee - An appointed committee comprised of senior level vice presidents, executive directors, medical directors and other senior leadership that provides organizational direction for WVU and the Medical Surveillance program. The committee is responsible for overseeing the implementation and maintenance of all

medical surveillance. This committee is responsible for the software that manages medical surveillance. Their responsibility is to implement and maintain the software that supports and manages health and safety programs. The committee meets frequently to discuss the management of the medical surveillance program.

Medical Surveillance and Software Management Team - Is composed with members from Institutional Technology (IT), Environmental Health and Safety, Human Resources and WVU Occupational Medicine that manages the working elements of the medical surveillance program. The Team is responsible for the management and support of the working elements of the Health and safety software.

OSHA Medical Surveillance - Occupational Safety and Health Administration (OSHA medical examinations- for regulated chemicals –which is outlined in 29 Code of Federal Regulations Part 1910-Subpart Z. Regulating certain hazardous chemicals serves the purpose of detecting adverse health effects, which could possibly be related to workplace exposures. Early detection of disease will result in earlier treatment and will also allow for cessation of additional exposures that could aggravate a potentially serious medical condition.

Occupational Exposure to Hazardous Chemicals in Laboratories Medical 29 code of Federal Regulations 1910.1450 Medical Surveillance - A medical examination specifically for laboratory employees that work in the laboratory and are exposed to hazardous chemicals. An employee or lab worker can receive a medical examination if any of the 3 following conditions have occurred:

- Employee is involved in a significant laboratory spill of a hazardous chemical and an overexposure may have occurred.
- EHS determines that an employee has been exposed to a hazardous chemical over the Action Level or Permissible Exposure Level (EHS must include exposure surveillance data).
- Employee begins showing signs and symptoms of an overexposure to a chemical that was used in laboratory research.

Permissible Exposure Limit (PEL) – Occupational Safety and Health Administration Government codes that establishes maximum airborne concentrations levels to certain hazardous agents that a worker is allowed to receive in an eight-hour workday, forty-hour workweek.

Pre-employment Examinations - These examinations are arranged through Human Resources and WVU Occupational Medicine for WVU job positions that have been identified by regulating agencies for safety sensitive jobs. (i.e., University Police Department, Commercial Driver's License etc.)

Post-employment examination - A final medical examination provided to medical surveillance participating employees who have worked with OSHA regulated materials and/or carcinogens, which is performed by WVU Occupational Medicine.

Positive-Pressure Respirator - A respirator in which the pressure inside the respiratory inlet covering exceeds the ambient air pressure outside the respirator.

Powered Air-Purifying Respirator (PAPR) - An air-purifying respirator that uses a blower to force the ambient air through air-purifying elements to the inlet covering.

Records Retention OSHA 20 CFR 1019.1020 Access to Employee Exposure and Medical Records - "Access" to employee medical records where the employee's right and opportunity to examine and copy medical records and exposure surveillance are provided with written request.

Special Emergency Examination - The employee may be required to undergo an emergency medical examination due to the actual or potential for exposure to specific substances. Special emergency exams may be the result of a one-time exposure, continual exposure or chronic exposures not previously reported. Special exam exposures may require the employee to be included in the medical surveillance annual exam schedule or to be periodically monitored.

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.

4.0 Roles and Responsibilities

Provides support and resources for the Medical Surveillance Program

4.1 West Virginia University Administration

4.1.A Vice President of Finance and Administration provides the support and resources for the Medical Surveillance Program for main WVU campuses and to include: WVU Divisional Campuses, Health Sciences Campuses, Farms and any other entities. Provides directives of the program as stated in WVU HR Policy 28.

4.1.B Provost provides support and resources for the Medical Surveillance Program and as a representative of departments under his/her administration. Support is provided to Human Resources and Environmental Health and Safety to meet the employee requirements for medical surveillance and the WVU personnel participation required by the program. Provides directives of the program as stated in WVU HR Policy 28.

4.2 Medical Surveillance and Software Executive Committee

4.2.A Provides administrative direction and oversight of the medical surveillance program for West Virginia University.

4.2.B Executes decisions for WVU HR 28 policy, human resource directives, and methods for overall WVU campus compliance for the medical surveillance program.

4.2.C Advises the medical surveillance management team on directives to assure the implementation and continuation of the medical surveillance program and related activities.

4.2.D Provides periodic communications to the medical surveillance management team and related departments to determine program status and compliance of the program to regulations and WVU policy.

4.2.E Provides direct leadership and support of the software contract and related negotiations to support WVU Health and safety programs impacted by the software.

4.2.F Provides needed resources for continual maintenance and use of the software.

4.2.G Periodically reviews software status needs, changes, and use and impacts to WVU health and safety programs and with the software operations team.

4.3 Medical Director

4.3.A Oversees the Medical Surveillance program for WVU employees. The Medical Director works in conjunction with EH&S to identify the hazardous health exposures and place the employee into the appropriate surveillance program. Medical Director will oversee the Drug and Alcohol screening program for all WVU employees, also serves as the Medical Review Officer. They will make all medical decisions with-in the surveillance program.

4.4 Medical Surveillance and Software Management Team

4.4.A Executes the procedures and requirements of the program to assure compliance and employee care related to the program.

4.4.B Meets periodically as a collaborative group to review and revise procedures and program directives.

4.4.C Evaluates program for needed changes for improvements, regulatory changes, and WVU policy changes.

4.4.D Periodically communicates with the Administrative Advisory Committee on program elements, program status, support requests or needs for program success.

4.4.E Participants (as assigned) also serve on the Health and Safety Software (HSS) operations team.

4.4.E.1 Configures and creates the software program elements in conjunction with software vendor program manager.

4.4.E.2 Determines needs, changes, and timelines for software functions and implementation as they relate to WVU health and safety programs.

4.4.E.3 Meets and or communicates on a continual basis to assure program implementation of the software and related updates.

4.4.E.4 Periodically meets and or communicates with the Executive Software Committee to provide updates and needs related to the software as it is utilized for WVU health and safety programs.

4.5 Environmental Health and Safety (EHS)

4.5.A The executive director of EHS, in conjunction with WVU Occupational Medicine, will select the Medical Surveillance and Software Executive Committee. The committee and EHS will ensure program implementation to impacted WVU departments.

4.5.B Job positions to be covered by the Medical Surveillance Program will be identified by EHS in accordance with state and federal standards.

4.5.C EHS activities include the following:

4.5.C.1 Provides occupational safety and health services to the WVU community, especially as they pertain to positions that require medical surveillance.

4.5.C.2 Formulates and maintains Medical Surveillance and Software Executive Committee via EHS executive director mandates by:

4.5.C.2.i Chairing monthly meetings

4.5.C.2.ii Developing hazard determination strategies

4.5.C.2.iii Issuing the final determination medical surveillance decisions.

4.5.C.2.iv Identifying medical surveillance job classifications for human resources.

4.5.C.2.v Conducting yearly audits

4.5.D Conducts Job Task Risk Assessment surveys for job classifications to determine the extent of hazard and controls or provisions for personal protection equipment (See link to request <http://ehs.wvu.edu/health/medical-surveillance> click on “Job Task Assessment Checklist”).

4.5.E Conducts worker exposure assessments to identify harmful agents. Industrial hygiene staff provides the employee(s) with a copy of their occupational exposure surveillance results. (See link to: <http://ehs.wvu.edu/health/industrial-hygiene>)

4.5.F Conducts noise surveillance, using EHS Service Request Form for Industrial Hygiene services, to identify employees in areas or operations requiring

inclusion in a hearing conservation program. (<http://ehs.wvu.edu/request-for-service> see link to request a noise survey or exposure survey)

4.5.G Confers with WVU Occupational Medicine as needed on medical advisement for work related exposures and needed medical surveillance.

4.5.H Issues the final employee medical surveillance determinations for program: entry, exiting, removal and job transferal with advice from EHS executive director.

4.5.I In the event of conflict involving medical surveillance decisions, the EHS executive director shall determine the employee's program participation by administering the Medical Surveillance Operational Committee's majority recommendations.

4.5.J Provides supporting data to Occupational Medicine regarding Job Task Assessments and Exposure Surveillance.

4.5.K Provides Occupational Medicine with a list of job tasks and associated hazards which qualify participants into medical surveillance.

4.5.L Communicates with Human Resources regarding the list of job classification codes related to medical surveillance by integrating the Job Task Assessment Checklist into WV-Hire process.

4.5.M Assists Expert Business Offices (EBOs) to determine which employee classifications are subject to medical surveillance by attaching the Job Task Assessment forms for final Employee Processing Services.

4.5.N Provides the EHS biosafety officer with medical surveillance participants that perform research with Animal Care and Use Committee (ACUC) and Institutional Biosafety Committees (IBC) supervision.

4.5.O Confers, monthly, with Human Resources to review new hires notice of inclusion into the medical surveillance program.

4.5.P Reviews the monthly listing with WVU Human Resources and Expert Business Office (EBO) of the names of WVU employees that are exiting, transferring or requesting release from the medical surveillance program.

4.5.Q Develops and implements related health safety programs to support the medical surveillance program. Programs may include:

4.5.Q.1 Hearing Conservation

4.5.Q.2 Hazardous Materials

4.5.Q.3 Emergency Response

4.5.Q.4 Respiratory Protection, etc.

4.5.R Provides training, as requested or required, to staff (i.e. blood borne pathogen medical surveillance, respiratory protection, etc.)

4.5.S Coordinates with departments to designate a Medical Surveillance Contact (MMC) from departments or colleges to: identify medical surveillance participants with departments; to review needed employee's medical exam and location for services as needed. The MMC will be the point of contact for WVU Occupational Medicine scheduling.

4.5.T Requires "Special Emergency Exams for employees as needed"-Special testing may be required due to the potential for exposure to specific substances. Special emergency exams may be the result of a one-time exposure or a chronic exposure not previously reported. Special exam exposures may require the employee to be included in the annual exam schedule or to be periodically monitored.

4.5.U Audits the Medical Surveillance Program effectiveness. EHS may require departments to submit the necessary records for such periodic audits. These records will not include confidential employee medical examinations.

4.5.V Evaluate and revise the Medical surveillance Program with Medical Surveillance Management Team.

4.6 WVU Human Resources

Communicate with specified applicants, upon hiring, that medical surveillance by Occupational Medicine is a condition of their employment. Human Resources activities include:

4.6.A Employment Services:

4.6.A.1 Ensures that job classification codes for medical surveillance are added to the job description by using the "Medical Surveillance – New Hire Requisition" (see <http://ehs.wvu.edu/health/medical-surveillance> and click on "Medical Surveillance-New Hiring Requisition").

4.6.A.2 Informs EHS when new-hired employees require medical surveillance; within two weeks of hiring notification from WVU Hire.

4.6.A.3 Provides the Medical Surveillance-New Hire Requisition to newly hired employee and all transitioning employees and their supervisors.

4.6.A.4 Informs EHS, Weekly, of any new position or change to existing position not already reviewed for medical surveillance applicability upon revising of job classifications.

4.6.B Classification and Compensation:

4.6.B.1 Ensures that Medical Surveillance categories and Job Task Assessment form remains with each employee’s job classification; until employee leaves the university. This questionnaire may be made electronically available.

4.6.B.2 Reviews a monthly-list of new and retiring or exiting employees, which required medical surveillance to Environmental Health and Safety for processing.

4.6.C Human Resources Employee Relations:

4.6.C.1 Provides supervisors with the basic process for progressive discipline should employees refuse to attend medical surveillance scheduled appointments or EHS safety recommendations. (See statement below)

***Violation or non-compliance of this standard will be addressed in accordance with established university disciplinary policies and procedures, as issued and enforced by the appropriate authorities. Failure to comply with this or other related standards might result in disciplinary action up to and including termination of one’s employment or studies. ***

4.6.D Human Resources Medical Management

4.6.D.1 Processes all reported employee claims relating to occupational injuries and diseases. Distributes the “Job Task Assessment Checklist” annually through Occupational Health Manager (OHM) software questionnaire.

4.6.D.2 Informs EHS with injuries and illnesses pertaining to medical surveillance program guidelines.

4.6.D.3 Communicates with the Dean/Director or Supervisor, in consultation with Medical Management, if employee’s job-duty needs modified in accordance with medical surveillance processes. Job modifications may include: altering the employees: work practices, limiting work time in certain hazardous areas; or modifying job duties of safety and health concern.

4.7 WVU Finance Division-Expert Business Office (EBO) and Employee Processing Services (EPS) responsibilities.

4.7.A Implements the “New-Hire Job Requisition” as a medical surveillance job-tracking mechanism for each job category: classified, non-classified and temporary, students and Faculty via the Expert Business Office.

4.7.B Provides Payroll and Employee Processing Services (EPS) with the “New-Hire Job Requisition” form to implement the medical surveillance program for new employee hiring and exiting employees processing.

4.7.C Provides EHS with “New-Hire Job Requisition” lists of employees that need to be entered into the Occupational Health Manager program for medical surveillance.

4.8 WVU Occupational Medicine

4.8.A The Medical Director: will oversee the Medical Surveillance program for WVU employees. They will work in conjunction with EH&S to identify the hazard and place the employee into the appropriate surveillance program. They will oversee the Drug and Alcohol screening program for all WVU employees, also serves as the Medical Review Officer. They will make all medical decisions with-in the surveillance program. The Medical Director will ensure that WVU Occupational Medicine will:

4.8.A.1 Provides medical services necessary to implement the medical aspects of the WVU Medical Surveillance Program including but not limited to: preplacement, annual surveillance, FFD, Drug and Alcohol screening, etc.

4.8.A.2 Reports all pertinent findings to the employee. Requiring medical additional testing, within the parameters of the program, shall be conducted with the employee’s departmental approval and knowledge of workplace exposure.

4.8.A.3 Provides medical advice to employees’ exposures regarding chemical, biological and physical hazards associated with their workplace.

4.8.A.4 Informs EHS and employee’s supervisor of hazards that requires immediate corrective action and employee protection.

4.8.A.5 Notifies the employee that medical surveillance examination are: “at no charge or fee” to the employee.

4.8.A.6 Makes recommendations for medical removal from regular job tasks, if necessary, per applicable OSHA regulations. Recommendations are to be communicated to employee, medical management, employee’s supervisor and EHS.

4.8.A.7 Provides medical consultation to the applicant/employee by which to contact his/her personal physician, when further advisement and treatment seem indicated.

4.8.A.8 Provides medical records to be made available to employee upon written request.

4.8.A.9 Provides EHS and Human Resources with an “Employer Notification of Medical Examination” letter stating that the employee’s work status to conduct job tasks. Such work status recommendations may include: wearing respirators; provisional work practices; or

recommendations for additional medical testing to the employee's primary care physician.

4.8.A.10 Provides to EHS, Employee Supervisor, and Human Resources the employer notification when the employee is a "no show" does not attend scheduled medical surveillance appointment.

4.9 Departmental Administrators

Deans/Directors or Directors /Supervisors will consult with EHS, that meet criteria for implementing provisions of the Employee Medical Surveillance Program. Department's responsibilities include:

4.9.A Notifies employees for Pre-hiring if medical surveillance is required and notifies employees for post medical exit examination.

4.9.B Provides Environmental Health and Safety with an updated list any time there is change in personnel or a change in job duties that may affect health and safety of the employee or human resources representative for job duty alteration during employee's pre-employment and exiting process.

4.9.C Requires employees to participate in the medical surveillance program as indicated.

4.9.D Appoints a Medical Surveillance Contact (MMC) within their Department to communicate with EHS and WVU Occupational Medicine on scheduled medical examinations and modified job duties, when applicable.

4.9.E Initiates necessary disciplinary action to ensure that employees participate with the medical surveillance program requirements.

4.9.F Requires the Dean, Director or Supervisor, in consultation with Human Resources, to make employability decisions based upon such medical determinations of WVU Occupational Medicine's Employer Notification.

4.9.G Accommodates Human Resources, in consultation with Medical Management, with the affected employee's Job-duty accommodation plans. Safety and Health Accommodated work plans may be based upon medical determinations of the WVU Occupational Medicine.

4.9.H Collaborates with EHS to implement suggested engineering and administrative controls and work practices for WVU medical surveillance program.

4.10 Supervisors

Supervisor's responsibility include:

4.10.A Verifies that employees are included into the Medical Surveillance program by job description, hiring process and completion of Job Task Assessment forms.

4.10.B Registers employees into the medical surveillance program by instance of exposures to harmful chemical or substances during the course of their work.

4.10.C Permits the employee to contact EHS or WVU Occupational Medicine for any reason if the employee job requirements identifies him/her to be in the medical surveillance program or employee suspects or knows that a work related exposure occurs.

4.10.D Documents employee's requests for medical surveillance counseling without retribution.

4.10.E Permits the employee to obtain the recommended level or types of medical diagnostics and treatment during their medical evaluation with Occupational Medicine or their personal physician. Medical recommendations are at the sole discretion of WVU OCCUPATIONAL MEDICINE.

4.10.F Will accommodate the employee with the help of Human Resources Medical Management to fulfill the conditions of employment if WVU Occupational Medicine has indicated such action is needed.

4.10.G Works with EHS to implement engineering and administrative controls and work practices as per EHS recommendations.

4.11 Employees

Employee's responsibility include:

4.11.A Participates in the medical surveillance by attending the scheduled medical examination and accurately completing all required documentation.

4.11.B Informs Environmental Health and Safety of situations that may require the employee to immediately submit to a medical examination in response to any incident where the employee may have been injured or exposed to an occupational hazard.

4.11.C Responds to WVU Occupational Medicine regarding appointment scheduling via phone at: 304.293.3693.

4.11.D Contacts EHS at 304.293.3792 for questions and information about medical surveillance or questions about scheduling a Medical Surveillance examination.

4.11.D.1 Medical Surveillance participating employees that undergo medical examinations authorized by this program must not assume responsibility for the cost of the diagnostic examinations. Contact EHS for rectification if the employee is charged via a WVU healthcare plan.

4.11.D.2 Discusses medical results with WVU Occupational Medicine upon receipt of the results of an examination, an employee may schedule a meeting with the provider to discuss the pertinent parts of the evaluation.

4.11.D.3 NOTE: It is the employee's responsibility to attend all scheduled medical- surveillance- related examinations. Failure to comply with scheduled examinations may result in the employee's departmental administration to contact Human Resources for further deliberation. Environmental Health and Safety reserves the right to discuss suspension of any job activities that may subject an employee to a hazardous condition.

4.12 Select Committees: Research and Compliance, Academic Research

4.12.A Institutional Animal Care and Use Committee (IACUC):

4.12.A.1 The IACUC will be responsible for overseeing the participation of individuals in the Medical Surveillance program for the WVU animal use program and community, which includes-but not limited to the following: OLAR- Office of Lab Animal Resources, Health Sciences Divisions, Davis College of Agriculture, which include farms and Veterinary Farms, College of Arts and Sciences and Statler College of Engineering.

4.12.A.2 The IACUC office will work with representatives of EHS (Biosafety Officer and EHS medical surveillance program administrator) to ensure compliance.

4.12.A.3 The IACUC's activities pertaining to employee protection against biological, chemical, and physical hazards associated with animal use and that fall under the medical surveillance program, are reviewed semi-annually as required by federal law and may be provided to EHS for confirmation of compliance with Federal, State, Local and WVU's safety guidelines.

4.12.B Academic Research Personnel, or Ag. Extension Personnel, Non-Paid Professors, Volunteers and Students:

4.12.B.1 It is the responsibility of the Principal Investigator (PI) or site supervisor to notify external researchers, visitors, trainees and other non-WVU employees about their responsibility to comply with WVU Medical Surveillance Program.

4.12.B.2 All Researchers and Students must complete Regulatory Trainings for Animal Use, every three years. In addition, anyone entering OLAR is now required to complete the Annual Occupational Health Questionnaire. (Failure to complete the questionnaire can result in "denial of access" to the animal facilities. (See links to training and Occupational Health questionnaire here: to <https://sole.hsc.wvu.edu/apps/animalsurvey/> <http://oric.research.wvu.edu/services/iacuc/animal-training>)

4.12.B.3 Unsupported personnel i.e. those who are not financially sponsored by a WVU, may wish to obtain the necessary coursework for laboratory access from their PI sponsor. Unsupported personnel will need to obtain “Medical Surveillance” from their host institution’s occupational medicine or their personal physician.

4.12.C Biohazard Safety Committee/Biohazard Safety Officer:

4.12.C.1 Biohazard Safety Committee shall provide the Department of Environmental Health and Safety’s Biosafety Officer with a list of IBC protocols that would pertain to employee medical surveillance. The biosafety will provide EHS and Occupational Medicine with a complete list of those persons performing biohazard research, which will include recommendations for Personal Protective Equipment and safe work practices.

4.12.C.2 The WVU Biohazard Safety Officer will implement the Blood-borne Pathogen Program and training for the selected personnel at Health Sciences and university facilities under the guidance of Human Resources and the Department of Environmental Health and Safety.

4.12.C.3 *WVU OCCUPATIONAL MEDICINE must have available a copy of the blood-borne pathogens standard (29 CFR 1910.1030) and must in return provide the employer with a written opinion stating whether the hepatitis B vaccination is indicated for an employee and to whether the employee has received such vaccination(s).

4.12.D Radiation Safety Committee

4.12.D.1 The Radiological Safety Committee’s participation in WVU’s Medical Surveillance Program will be reviewed for compliance with Federal, State, Local and WVU’s safety guidelines by the Medical Surveillance Management Team.

4.12.D.2 WVU Radiation Safety Department will be responsible for determining which individuals participate in the current Radiation Safety Program. Radiation Safety office will direct the employee surveillance program for the WVU community, which includes-but not limited to the following: College of Arts and Sciences, OLAR- Office of Lab Animal Resources, Health Sciences Divisions, Davis College of Agriculture- to include farms and Veterinary Farms, College of Arts and Sciences and Statler College of Engineering. (See link to Radiation Safety Department: <http://www.hsc.wvu.edu/rsafety/home/>).

4.12.D.3 The Radiation Safety Department, located at the Health Sciences Campus, shall maintain all information pertinent to radiation exposure/dose surveillance and provide Environmental Health and Safety

with information regarding exposure/dose assessment of individuals upon request.

4.12.D.4 Radiation Safety Office will strive to work in conjunction with WVU Environmental Health and Safety on events such as these within the scope of US Nuclear Regulatory Commission and WV RHP regulations, WVU Radiation Safety institutional policy and procedure and the WVU Medical Surveillance Program.

4.12.E WVU Clinical Associates

4.12.E.1 Employers are subject to OSHA's Blood-borne pathogen and training if they have employees whose jobs put them at reasonable risk of coming into contact with blood or other potentially infectious materials.

4.12.E.2 Employers subject to this standard must develop a written exposure control plan; provide training to exposed employees; provide medical evaluations to include vaccinations and comply with other requirements. All evaluations can be performed with the assistance of WVU Occupational Medicine.

5.0 Training

EHS and the Biosafety Office provides training for employees which are included in medical surveillance. Such training may include: asbestos awareness, hearing conservation, blood-borne pathogens, first-aid CPR, general health and safety, and respiratory protection. (See EHS Training website Phone: 304-293-6737 Email: EHSTrainingServices@mail.wvu.edu)

In addition, EHS will be requiring every employee to take the online “Medical Surveillance for WVU” training. This training will be required annually for all new employees, existing employees and exiting and sponsored research volunteers visiting WVU. Additional training modules will be available for the “Student introduction to Medical Surveillance Requirements” (*to be developed by WVU Academic Innovation*).

6.0 Procedures

6.1 Employee Medical Surveillance Program: Examination Process Chart

WVU Administration Representatives Duties for Medical Surveillance Implementation	Employee Duties for Medical Surveillance Implementation
WVU Hire and EHS will screen employees	<ol style="list-style-type: none"> 1. During hiring process using New Hire Job Task Assessment 2. Prior to employment for Safety Sensitive jobs and medical research 3. After hiring process using EHS Supervisor’s Job Task Assessment. 4. Within 1 month of certification for workers licensed to work with hazardous materials or OSHA Regulated Chemicals and Carcinogens.
<p>The Supervisor and Departmental Medical Surveillance Contact :</p> <p>To include each Supervisor, dean or director, research Principal investigator :</p> <p>Will identify the job classification requiring medical surveillance and schedules the completion of baseline, periodic/annual and exit examination.</p>	<p>The employee completes all applicable forms prior to the examination and observes all of the pre-examination instructions.</p> <p>The employee attends the medical examination</p>
<p>Occupational Medicine Provides the initial, annual, single exposure or emergency evaluation.</p> <p>Occupational Medicine will provide notice of annual re-occurring appointments.</p> <p>Occupational Medicine will provide a “Report of Medical Examination” stating that that employee has been medically evaluated to perform job functions.</p>	<p>Employee that have scheduled appointments will attend for hearing evaluation, exposure to regulated substances evaluation, respiratory protection examination or medical testing deemed necessary for safe job performance.</p> <p>Emergency appointments may be indicated in the event of a one-time or chronic chemical exposure where signs and symptoms of disease are indicated by the employee.</p>
<p>Environmental Health and Safety:</p> <p>Will provide Job Task Analysis</p> <p>Will document personal exposures</p> <p>Will provide training and OSHA mandated services for personal protective equipment and respiratory protection.</p>	<p>Employee may use EHS for resources relating to respirator selection and personal protective equipment validation.</p> <p>Employee may need to have personal exposure surveillance to verify levels of OSHA regulated Chemicals or detect physical hazards exposure levels.</p>
<p>Medical Management Human Resources:</p> <p>Will provide services to employees:</p>	<p>Employee may have a need to file for worker’s compensation and may need to be included in WVU medical surveillance due to a workplace incident/injury or exposures.</p>

6.2 Hiring Process When a supervisor initiates the hiring process for a new or existing job description, the supervisor must complete the JTA form and provides EHS and Human Resources with copies.

6.2.A For “transferring employees” the supervisor must complete a new Job Task Assessment form and copies EHS and Human Resources.

6.2.B For “exiting employees” the supervisor must contact the Expert Business Office regarding employment termination, provide the Job Task Assessment form to EHS - so that the employee can attend a medical exit examination, if required.

6.3 Human Resources and the Expert Business office and Employee Processing Services Employee is hired, processes the employee using the Job Task Assessment form (JTA form) -which accompanies the PIQ.

6.4 EHS Staff reviews the Job Task Assessment forms to determine if any items are checked for medical surveillance for initial, previous participation, new position or transferred and exiting job, employee or supervisor request for medical surveillance removal or retirement.

6.5 Medical Surveillance Employee lists are provided to Medical Surveillance Operational Committee for submission to Occupational Medicine examination scheduling. Employee’s names will be entered in the **Occupational Health Manager Program**.

6.6 Medical Surveillance Employee lists for medical surveillance removal, employee or supervisor request for removal, exiting or retiring employees are provided to Medical Surveillance Operational committee for Human Resources – Job Classification and PIQ recommendations. Employee’s records will be archived in the **Occupational Health Manager Program**.

6.6.A EHS staff may recommend immediate referral to Occupational Medicine, within 1 month of employment when:

6.6.A.1 A risk assessment encompasses the elements of a “fitness-for-duty” medical surveillance evaluation with emphasis on identification of risks to human health and safety. Such examples of “fitness-for-duty” include: University Police, hazardous materials responders, animal laboratory workers and any job description that required previous medical surveillance participation.

6.7 EHS staff performs written risk assessments in areas where the Job Task Assessment forms indicate that employees may be exposed to a hazard for which medical surveillance may be required.

6.7.A EHS may require verification of any carcinogens used in the workplace obtained from: chemical inventories, Safety Data Sheets, Hazardous Materials inventories or previous undocumented exposure information. EHS will provide

interim control methods for employee work practices until medical examinations can be scheduled if documented carcinogens exist in the workplace.

6.8 EHS staff may recommend further exposure surveillance as outlined in EHS industrial hygiene surveillance program. (See link to industrial hygiene program <http://ehs.wvu.edu/health>).

6.8.A EHS staff will communicate with the department/work supervisor to schedule dates for area or personal exposure surveillance for chemical and physical hazards that were identified from risk assessments. All employee exposure and environmental surveillance will be performed in accordance to the applicable Federal and State standards.

6.8.B EHS industrial hygiene staff will provide written exposure surveillance reports to an employee, former employee or designated representative as outlined in EHS industrial hygiene program.

6.9 EHS staff in consultation with the department supervisor has the department medical surveillance contact schedule employee medical examinations with the Occupational Medicine.

6.10 EHS staff may require baseline medical surveillance for employees that participate in high risk job duties where carcinogens are used, when any court-ordered agreement applies or when previously documented job classifications were identified as medical surveillance job tasks.

6.11 Occupational Medicine - issues “Employer Notification of Medical Examination” stating that employee is qualified to perform the job function- to EHS and Medical Management – Human Resources.

6.12 Departments, Supervisors and Employees - follow all requirements as outlined in EHS programs for Respiratory Protection, Hearing Conservation, Asbestos Management and Medical Surveillance. (See links for EHS programs at <http://ehs.wvu.edu>)

7.0 Recordkeeping

Item	Records Location	Retention Period
Employee Exposure Records	EHS Office	30 years +
Employee Notification	Occupational Medicine, EHS and Human Resources	30 years +
Supervisors Job Checklist for Medical Surveillance	EHS	Until 30 + years upon termination
Job Task Risk Assessments		

Exposure Surveillance Results		
Employee Medical Records	Occupational Medicine	Until 30 + years upon termination

8.0 References

WVU HR 28 Medical Management Policy
 OSHA – 29CFR 1910:
 134 - Respiratory Protection
 95 - Occupational Noise
 1020 - Access to Employee Exposure and Medical Records.
 1200 - Hazard Communication Standard
 1030 - Blood-borne Pathogen Standard
 1101- Asbestos
 1450 - Occupational Exposure to Hazardous Chemical in the Laboratory
 1025 - Lead
 1026 - Hexavalent Chromium Standard
 OSHA regulated substances 29 CFR 1910-1001 to 1052

PESTICIDES

EPA 40 CFR 150-189

WVU Employee Handbook-Pages 6&7

9.0 Program Review

9.1 The Medical Surveillance Program will be reviewed as directed by the Medical Surveillance Program Executive Committee. Environmental Health and Safety, Human Resources Medical Management and Occupational Medicine will accept the responsibility for medical surveillance program auditing.

9.2 The program will be updated and changed as needed in response to concerns of management and employees, or changes to code regulations.

10.0 Program Revisions

10.1 Revisions to the Medical Surveillance program will be made to meet regulatory requirements, reduce WVU employee health risk, and will include an explanation for the change needed and how it will affect the current adopted program. Program revisions will be supplied to the Medical Surveillance Program Executive Committee for approval.

10.2 Changes to the current Medical Surveillance program will include the changes from the last revision.

11.0 Appendices

Appendix A - Employee Medical Surveillance Program: Examination Process Chart

Appendix B - EHS Supervisor's Job Checklist for Medical Surveillance

Appendix C - Medical Surveillance by Exposure

Appendix D - Sample copy of Employee Notification of Medical Examination

Appendix E - Employee Medical Surveillance Medical Examinations Matrix