

GRS 2.7: Employee Health and Safety Records

This file contains two documents. The Draft Schedule contains the proposed text of the new GRS in publication format. The Draft Appraisal Memorandum provides additional background explanation and includes the appraiser's justification for the retention decisions proposed in the schedule.

THE SCHEDULE IS NOT APPROVED FOR USE.

National Archives and Records Administration
Office of the Chief Records Officer
GRS Team
March 19, 2026

GENERAL RECORDS SCHEDULE 2.7: Employee Health and Safety Records

This schedule covers records about employee health and safety functions within federal agencies.

Conditions and Exclusions

The following conditions and exclusions apply to all disposition authorities in this schedule.

1. Agencies must offer any records created prior to January 1, 1921, to the National Archives and Records Administration (NARA) before applying disposition instructions in this schedule.
2. This schedule does not apply to mission-related federal research, monitoring, standard-setting and enforcement activities to ensure environmental protection, occupational safety, and public health. Such records are covered by agency-specific schedules.
3. The terms “non-occupational” and “patient” are used in this schedule to refer to nonwork-required health services and to health conditions not causally connected to the employee’s work or workplace. The terms “workplace” and “safety” refer to occupational records.

NOTE: agencies are reminded to review the [tailoring the GRS](#) section of NARA’s website. Proper implementation of this GRS includes updating agency manuals, files plans, and directives to define "final action" (when applicable) as well as the length of time records should be maintained to meet your agency's business needs when an open retention (such as "longer retention is authorized") is included for certain items.

Item	Records Description	Disposition Instruction	Disposition Authority
010 - 050	No change		
060	SUPERSEDED (Occupational individual medical case files: Long-term records) [DAA-GRS-2017-0010-0009 will be superseded by GRS 2.7, item 140]		
061	SUPERSEDED (Occupational individual medical case files: Short-term records) [DAA-GRS-2017-0010-0010 will be superseded by GRS 2.7, item 143]		
062	SUPERSEDED (Occupational individual medical case files: Individual employee health case files created prior to establishment of the Employee Medical File system in 1986) [DAA-GRS-2017-0010-0011 will be superseded by GRS 2.7, item 140]		
063- 132	No change		

Item	Records Description	Disposition Instruction	Disposition Authority	
140	<p>Employee Medical Files These records are also referred to as Employee Medical Folders (EMFs), Occupational Safety and Health Administration (OSHA) medical records, and medical surveillance records. Includes records and files on employees related to their federal employment, including occupational health histories and employee-specific occupational exposure records.</p> <p>Note: For those entities subject to OPM's requirements, OPM determines which of these records are long-term and which are short-term records. For guidance on which records qualify for this category, follow OPM guidance, including the OPM <i>Guide to Personnel Recordkeeping</i>. Other entities should follow agency policy.</p>	<p>Long-term records, transferred to NPRC December 31, 2010 and earlier, analog only</p> <p>Includes individual employee health case files created prior to establishment of the Employee Medical File system in 1986.</p> <p>Not media neutral. Applies to analog records only. See item 142 for electronic versions.</p> <p><i>Supersedes:</i></p> <p><i>DAA-GRS-2017-0010-0009 (GRS 2.7, item 060) – changes disposition to allow for blocking of disposition and removes linkage to the OPFs. Item is split into 3 items to account for year of transfer to the NPRC, and electronic versions.</i></p> <p><i>DAA-GRS-2017-0010-0011 (GRS 2.7, item 062) – retention lowered to align all similar records, and item merged in with related records.</i></p>	<p>Temporary. Destroy 30 years after employee separation or in 2041, whichever is sooner. Longer retention is authorized if needed for business use.</p>	<p>DAA-GRS-2026-XXXX-0001</p>
141	<p>Legal Citations: 5 CFR Part 293.511(b), 29 CFR 1910.1020(d)(1)(i), and 29 CFR Part 1910.95(m)(3)(ii).</p>	<p>Long-term records, including those transferred to NPRC January 1, 2011 and later, analog only</p> <p>Not media neutral. Applies to analog records only. See item 142 for electronic versions.</p>	<p>Temporary. Destroy 30 years after employee separation or 30 years after transfer to the NPRC, whichever is sooner. Longer retention is authorized if needed for business use.</p>	<p>DAA-GRS-2026-XXXX-0002</p>

Item	Records Description		Disposition Instruction	Disposition Authority
142	<p>Long-term records, electronic only</p> <p>Not media neutral. Applies to electronic records only. See items 140 and 141 for analog records.</p>		<p>Temporary. Destroy 30 years after employee separation. Longer retention is authorized if needed for business use.</p>	<p>DAA-GRS-2026-XXXX-0003</p>
143	<p>Short-term records</p> <p><i>Supersedes:</i></p> <p><i>DAA-GRS-2017-0010-0010 (GRS 2.7, item 061) – no change in disposition other than allowing for longer retention. Item renumbered.</i></p>		<p>Temporary. Destroy 1 year after employee separation or transfer. Longer retention is authorized if needed for business use.</p>	<p>DAA-GRS-2026-XXXX-0004</p>



Office of the Chief
Records Officer for the
U.S. Government

Date: March 6, 2026
Appraiser: ACRS
Agency: General Records Schedules (GRS)
Subject: DAA-GRS-2026-XXXX

DRAFT

INTRODUCTION

Schedule Subject

GRS 2.7, Employee Health and Safety Records

Additional Background Information

The Office of Personnel Management (OPM) contacted the National Archives and Records Administration (NARA) in September of 2025 to discuss the current retentions of official personnel folders (OPFs) covered under GRS 2.2, and employee medical folders (EMFs) covered under GRS 2.7.

Long-term EMFs currently have a retention of 30 years after employee separation, with a caveat that ties the retention to that of the OPF of the same employee. The current language reads “[d]estroy 30 years after employee separation or when the Official Personnel Folder (OPF) is destroyed, whichever is longer.” (current GRS 2.7, item 060). This has proven difficult for NARA and agencies to implement.

The proposal from OPM is to remove the OPF caveat, and revise the retention to a more implementable 30 years after employee separation. This is in conjunction with a proposal to reduce the retention of the OPF records to 65 years, which is being proposed under a different schedule to revise GRS 2.2.

NARA’s Records Management Operations (ACR) established an internal working group to discuss the OPM proposals. This included staff from ACR, the National Personnel Records Center (NPRC), and the NARA General Counsel’s Office. The Acting Chief Records Officer (CRO) was heavily involved. Senior management within NARA was favorable to the proposed changes from OPM.

The NARA working group met with staff from the OPM Office of General Counsel (which includes both the agency SAO-RM and Agency Records Officer) on multiple occasions. The primary concern from NARA was implementation, specifically related to those health records transferred to the NPRC prior to 2012. Through these working groups and conversations, the following plan was adopted:

- To remove the language tying retention to the OPF records from the long-term EMF records, and revise the language to establish a 30 year retention tied to employee separation. At the same time, create items that support successful implementation: an item for pre-2012 records within the NPRC, an item for 2012 and forward records, and an item for all electronic versions of the records. This schedule represents these revisions.
- To reduce the retention of all long-term personnel records to 65 years. This is how the retention stood for decades prior to the approval of the 129 years in 2017. This is proposed in another schedule to revise GRS 2.2.

NOTE: the publication version of the following items will be updated to reflect changes in the file codes referred to in their item descriptions. No action is required in terms of re-scheduling.

GRS 2.7, item 030, Occupational health and safety training records (DAA-GRS-2017-0010-0003). Changing the referral to item 060 and 061 to match the new file codes.

GRS 2.7, item 040, OSHA-regulated substance monitoring and exposure records. (DAA-GRS-2017-0010-0004). Changing the referral to item 060 to match the new file code.

GRS 2.7, item 041, Occupational noise monitoring and exposure records. (DAA-GRS-2017-0010-0005). Changing the referral to item 060 to match the new file code.

GRS 2.7, item 042, Lead (Pb), Coke Oven emissions, Dibromochloropropane (DBCP), Acrylonitrile, and Inorganic Arsenic monitoring and exposure records. (DAA-GRS-2017-0010-0006). Changing the referral to item 060 to match the new file code.

GRS 2.7, item 050, Background data (DAA-GRS-2017-0010-0008). Changing the referral to item 060 to match the new file code.

Overall Recommendation

Approval of the attached schedule is recommended based on NARA Directive 1441 Appraisal Policy of the National Archives and Records Administration, appraisal site visits where appropriate, and the representations made by the agency regarding these records.

APPRAISAL

Item 0001: Employee Medical Folders: Long-term records, transferred to NPRC December 31, 2010 and earlier, analog only

Item 0002: Employee Medical Folders: Long-term records, including those transferred to NPRC January 1, 2011 and later, analog only

Media Neutrality: Not Approved; records are analog only

Superseded items:

- DAA-GRS-2017-0010-0009 (items 0001 and 0002), Occupational individual medical case files: Long-term records. Superseded in part: applies to analog records only.
- DAA-GRS-2017-0010-0011 (item 0002), Occupational individual medical case files: Individual employee health case files created prior to establishment of the Employee Medical File system in 1986.

Reason for rescheduling: to revise the retention to 30 years after employee separation, while creating an item for records transferred to the NPRC prior to 2011. This splits the item to account for implementation issues related to pre-2011 records in the NPRC. The revisions also remove any linkage to the disposition of the related employee OPF, and updates the item description language to be more consistent with OPM and federal government terminology.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate.

Appraisal Justification:

- Records document legal rights or obligations that will expire. The value of these records ceases once an individual separates from service.
- Records have been previously appraised as temporary.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. This new schedule proposes one substantial change: to remove any linkage to the OPF of the same employee in terms of retention. This has been difficult to implement, and both OPM and NARA are in agreement that the 30 years after separation adequately protects the rights and interests of both the employee, and the federal government. Decades of managing these records has proven the 30 years after separation to be sufficient to meet all agency and employee needs. Additionally, two items had to be created to support implementation: item 0001 is specifically for records transferred to the NPRC prior to 2011, and allows for all records to be disposed of in one block (when the oldest of all the records is 30 years old) if necessary. This is due to the mixed nature of the records, and the inability to easily apply disposition based on employee separation date. The records also include files for agencies that are and are not subject to OPM recordkeeping requirements. For example, one box of records could include files for people who separated over a span of 15 years, and from agencies who are and are not subject to OPM recordkeeping requirements. Item 0002 applies to records 2011 and forward, and allows implementation based on separation date; it also allows implementation based on the date of transfer to the NPRC, as there are still difficulties with implementing disposition based on separate date for the post 2011 records. .

Item 0003: Employee Medical Folders: Long-term records, electronic only

Media Neutrality: Not Approved; records are digital only

Superseded items:

- DAA-GRS-2017-0010-0009, Occupational individual medical case files: Long-term records. Superseded in part: applies to digital records only.

Reason for rescheduling: This particular item will cover all electronic versions of these records, regardless of who maintains physical custody. The revisions also update the language to be more consistent with OPM and federal government terminology.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate.

Appraisal Justification:

- Records document legal rights or obligations that will expire. The value of these records ceases once an individual separates from service.
- Records have been previously appraised as temporary.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. This new schedule proposes one substantial change: to remove any linkage to the OPF of the same employee in terms of retention. This has been difficult to implement, and both

OPM and NARA are in agreement that the 30 years after separation adequately protects the rights and interests of both the employee, and the federal government. Decades of managing these records has proven the 30 years after separation to be sufficient to meet all agency and employee needs.

Item 0004:Employee Medical Folders: Short-term records

Media Neutrality: Approved

Superseded items:

- DAA-GRS-2017-0010-0010, Occupational individual medical case files: Short-term records

Reason for rescheduling: This item is being revised to align it with the long-term records (item numbering) and to add the caveat to the retention that the records may be kept longer if needed for agency business. The revisions also update the item description language to be more consistent, and to align with terminology more commonly used by OPM and the federal government.

Proposed Disposition: Temporary

Appropriateness of Proposed Disposition: Appropriate.

Appraisal Justification:

- Records document legal rights or obligations that will expire. Short-term records are defined by OPM as those records having little value in terms of protecting the rights and interests of federal employees. It is similar to the short-term records item for the OPFs.
- Records have been previously appraised as temporary.

Adequacy of Proposed Retention Period: Adequate from the standpoint of legal rights and accountability. This new schedule is only proposing minor changes to align item numbering, to allow for longer retention if needed, and to modernize the item description language.