Frequently Asked Questions (FAQs) about GRS 2.7, Employee Health and Safety Records

1. What is the purpose of GRS 2.7?

This schedule provides disposition authority for records Federal agencies create in the course of addressing occupational and non-occupational health and safety concerns. It applies to health records of Federal civilian employees, contractors, students, and interns. Administrative records addressed include clinic scheduling.

2. Whom do I contact for further information about this schedule?

Please contact NARA’s General Records Schedules Team at GRS_Team@nara.gov with questions about this schedule.

CHANGES FROM THE OLD GRS

3. How does GRS 2.7 differ from the old GRS?

We added seven new items to this schedule:

- Occupational health and safety training records (item 030)
- OSHA-regulated substance monitoring and exposure records (item 040)
- Occupational noise monitoring and exposure records (item 041)
- Lead, coke oven emissions, Dibromochloropropane, Acrylonitrile, and inorganic arsenic monitoring and exposure records (item 042)
- Workplace environmental monitoring and exposure records. Background data (item 043).
- Safety Data Sheets (item 050)
- Employee Assistance Program (EAP) counseling records. Records related to employee performance or conduct (item 090).

4. Which old items are you removing from the GRS? Why did you remove them?

GRS 1, item 21a(1) served as a filing/handling instruction and never had an associated NARA disposition authority. It was a filing instruction for the Employee Medical Folder (EMF) – Long-term records of transferred employees. This filing instruction now appears as a note in item 060.

We rescinded GRS 1, item 22, Statistical Summaries, relating to employee health. This item covered agency reports submitted to generate health estimates. The Department of Labor (DOL), Bureau of Labor Statistics, confirmed that it no longer needs the reports. DOL’s Occupational Safety and Health Administration also confirmed it did not have a need for this item.

QUESTION RELATED TO ITEM 020

5. Why did you increase the retention period from 5 to 6 years for occupational injury and illness program records (item 020)?
We increased the retention period because 29 CFR Part 1960.69 and 29 CFR Part 1904.33(a) require agencies to save their copies for five years after the end of the calendar year that the records cover. The sixth year is the calendar year covered by the records themselves.

QUESTIONS RELATED TO ITEM 030

6. Why did you add an item 030 for occupational health and safety training records?

We added a specific item to the GRS for occupational health and safety training records because they are specialized training records which are excluded from GRS 2.6, Employee Training Records. We excluded specialized training records from GRS 2.6 because they are not administrative training records and document an agency’s program objectives or illustrate program operations. In this instance, there is a requirement to retain hazardous waste program training (HAZWOPER) records for a minimum of five years after the date an individual participated (29 CFR Part 1910.120 Appendix E(9)).

QUESTION RELATED TO ITEM 043

7. What is the purpose of the note added to this item?

The note reminds agencies that using this item requires that the agency retains the sampling results, the collection methodology (sampling plan), a description of the analytical and mathematical methods used, and a summary of other background data relevant to interpretation of the results obtained, for at least thirty (30) years.

QUESTIONS RELATED TO ITEM 050

8. How do I interpret the instruction to destroy when business use ceases?

Agencies retain Safety Data Sheets (SDS) to provide instructions to staff on safe handling practices and are kept in the workplace while the materials are in use. The retention period of the SDS hinges on what the agency considers an employee exposure record under 29 CFR Part 1910.1020(c)(5) and whether the information is kept by the agency in some other manner than an SDS. 29 CFR Part 1910.1020(d)(1)(ii) requires that employee exposure records “be preserved and maintained for at least thirty (30) years.”

QUESTIONS RELATED TO ITEMS 060 and 061

9. Whose records does this item cover?

These items apply to employee, contractor, and intern occupational individual medical case files.

QUESTION RELATED TO ITEMS 130 and 131

10. Positive drug test results of applicants not accepted for employment used to be found under GRS 1, item 36e(1)(b). Where can I find this disposition authority now that this item has been reworked?

Drug test results of applicants for employment are now covered, as job-related test records, by GRS 2.1, Employee Acquisition Records, items 050 and 051.