

**Interoffice
Communication**

TO: Distribution

FROM: Tom Grumbles; Dr. Drumwright

DATE: March 14, 1985

SUBJ: MEDICAL STATUS DETERMINATION FOR RESPIRATOR USERS

VISTA

Although it has been several months since the first draft of the subject proposed policy went to you for review and comments, we are still pursuing implementation of the policy. Legal has completed their review (memo attached) and recommended we implement the policy. A revised policy is attached for your review. Changes (which are underlined) were made to clarify some aspects of the policy and improve the questionnaire. Other questions relating to the proposed policy are addressed below.

Please carefully review the policy and return comments to us by April 24.

1. Does the policy require annual physicals? This policy does not require an annual physical. Each person that is designated as a respirator user must have at least a baseline exam (one that meets the minimum requirement) on file. For some employees this may mean at least one mandatory physical due to no exams on record or records on file that are too old to allow a proper review by the VISTA Medical Manager. After the baseline exam is on file the questionnaire can be used for an annual review of those employees not going through the van.
2. How does the HEI van exam fit into this policy?
The basic HEI exam panel with "hands-on" exceeds the minimum requirements of the policy. Personnel who chose to go through the van to obtain their baseline exam, where needed, may waive all but the minimum requirements if they so choose.
3. What if a person chooses a personal physician to perform the base-line exam? Employees choosing a personal physician will be given appropriate protocols to take with them to assure that the exam meets the minimum requirements. Private medical exams/opinions will be closely reviewed by the VISTA Medical Manager.
4. How does the policy apply to temporaries or contractors? For temporary employees who may have to use respirators that are not given a standard pre-employment physical, the questionnaire should be administered as an interim step until being hired on a permanent basis. At that time, the minimum exam requirements must be met.

If contractors will be wearing respirators supplied by us, then an attempt should be made to cover the medical fitness of those employees "up-front" in the contract before those people

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are in-plant. If this cannot be done or is not done, then the questionnaire should be administered when respirator training is done.

5. What if an employee does not meet the minimum requirements for certification? If an employee fails to meet the minimum requirements advised for medical certification, he/she will be reevaluated by VISTA Medical Division. Each case will be evaluated on an individual basis. Generally, repeat tests performed under appropriately supervised conditions will resolve any problems. Should restrictions, from a medical standpoint, be required after reevaluation, they will be recommended by the VISTA Medical Division in the same manner as when any other medical problem of an employee is identified.

A review of recent HEI exam reports failed to "uncover" any VISTA employee, participating in the exam program during the past three (3) years, who would not qualify as "medically approved" to wear an approved respirator.

Proper observation of an employee using a respirator is a basic part of this program. An active employee who routinely uses a respirator as part of his/her "normal" work at the present time and who has successfully completed an appropriate training program - including fit testing - should be able to "meet the minimal requirements for medical approval."

6. If an individual does not provide adequate information, through ignorance or deliberately, what is our legal position? The responses which an employee provides to questions asked on any questionnaire must be as accurate as possible to assure validity. If an individual employee "elects" to provide an invalid response to any question, the same guidelines deemed appropriate for dealing with purposeful falsification of any "legitimate" company document should be followed. These questions are general enough in scope, hopefully, to discourage an invalid response. When this questionnaire is administered as part of the respirator training program (including fit testing, etc.) experience at other companies has been quite favorable, e.g. Continental Carbon Company (ConCarb).
7. Adequacy of Questionnaire for Annual Evaluation. An annual, comprehensive examination (including the "hands-on" portion) remains the best available means of obtaining the medical status of our employees.

According to existing company policy, these examinations are not deemed "mandatory" nor must an employee "participate" as a "condition of employment."

O.S.H.A. "dictates" that the company offer and provide a specific medical examination to certain employees, but

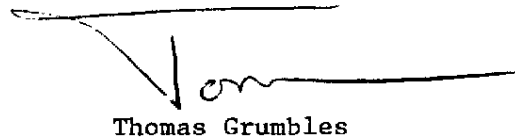
apparently gives the affected employee the "right" to waive this examination. Therefore, participation rates vary widely from plant to plant, as do signed waivers from employees "declining" all or part of the multiphasic screening examination.

Irrespective of how many "diagnostic aids" a physician has to review, he/she must still rely on the most important means of acquiring information upon which to render an opinion - history.

History can be obtained by direct questioning or by reviewing data obtained from an appropriate questionnaire. Signs, symptoms and complaints are all obtained by this process. Questionnaires are simple, inexpensive to administer, and are usually "acceptable" by the worker. (One major weakness recognized is that a worker may choose not to report certain symptoms for various reasons - fear of losing his/her job, etc.) Generally, the less detailed a questionnaire, the better the response by the worker.



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