Stanford University Environmental Health & Safety Policy on Training Records Retention

Dated: May, 2007

It is the policy of the Stanford University Environmental Health & Safety Department to comply with all required compliance training recordkeeping regulations.

Record Keeping options:

Departments have two options for maintaining compliance related training records.

- 1) Ensure that all training is documented in the Stanford Training And Registration System (STARS). STARS records will serve as the official record of training for compliance purposes. All departments should maintain the ability to review and report on STARS training records to demonstrate compliance during audits or inspections
- 2) Departments may choose to maintain a local copy of records in the department. If local records are maintained, the department is responsible for ensuring that the records are available for inspection upon request by authorized agencies.

Record retention requirements

In general, records of compliance training must be kept for a **minimum of one year** beyond the date of training.

Exceptions to the one-year rule.

Some specific regulations require that records of training be kept for periods longer than one year.

EHS-1000	Asbestos Worker Training	Asbestos- related training records, regardless of the specific type of training course, must retained for one year past the employee's last date of employment Medical records are kept employment +30 yrs.
EHS-1010	Asbestos Worker Training - Refresher	Asbestos- related training records, regardless of the specific type of training course, must retained for one year past the employee's last date of employment. Medical records employment +30 yrs
EHS-1100	Asbestos Awareness	Asbestos- related training records, regardless of the specific type of training course, must retained for one year past the employee's last date of employment Medical records employment +30 yrs

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EHS-1200	Asbestos Awareness for	Asbestos- related training records, regardless of the
	Custodians	specific type of training course, must retained for one
		year past the employee's last date of employment.
		Medical records employment +30 yrs.
EHS-1600	Bloodborne Pathogen Training	Training records shall be maintained for 3 years from
		the date on which the training occurred.
EHS-1700	CPR Training	Duration of certification varies, usually 2-3 years
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EHS-2600	DOT Dept. of Transportation	A record of current training, inclusive of the
	Shipping Hazardous Materials	preceding three years, in accordance with this section
		shall be created and retained by each hazmat
		employer for as long as that employee is employed by
		that employer as a hazmat employee and for 90 days
		thereafter.
EHS-2700	DOT: Dept. Transportation	A record of current training, inclusive of the
	Shipping Dangerous Biological	preceding three years, in accordance with this section
	Materials	shall be created and retained by each hazmat
		employer for as long as that employee is employed by
		that employer as a hazmat employee and for 90 days
		thereafter.
EHS-4600	Hazardous Materials Waste	Three Years after employee leaves the University
	Accumulation Areas (WAA)	
EHS-5250	Radiation Safety	Records must be retained until final disposition
	Rad/Chemicals	authorized by Department Of Energy. Departments
		may keep three years worth of records locally for all
		authorized individuals. Additional records are
		maintained by EH&S.
EHS-5260	Radiation Safety	3 yrs after termination of employment
	X-Ray	

If departments maintain local records, they are responsible for complying with the previously stated retention requirements. If records are maintained in STARS, the STARS system will serve as the official record of training and will ensure that record retention requirements are met.