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**MARSHFIELD CLINIC.**

EMPLOYEE HEALTH AND SAFETY

APR 26 2010

OSHA Docket Office, Docket No. OSHA-2009-0043,
U.S. Department of Labor, Occupational Safety and Health
Administration, Room N-2625,
200 Constitution Avenue, NW., Washington

RE: Docket No. OSHA-2009-0043

We feel that OSHA could reduce the estimated hours with two changes to these regulations.

1. Allowing electronic signature for release of information:
2. Allow employees to ok the release of any information from their employee health file until they rescind it instead of having to do this annually.

Background for request.

We are a large medical complex and provide physicians and staff to a number of hospitals and other health care facilities around the State. Each of these facilities requires our staff to produce various medical documents, including Hepatitis B vaccination or declination documents, proof of vaccination, etc.

We use a nearly totally electronic system to send and collect data. Currently, we have to send out a request for release of information annually to the providers and staff to physically sign and send back to us. These are manually processed through our routing and mail system. We then collect these (3 to 4 thousand) and have to manually file them or scan them into our electronic system.

Allowing us to send these via electronic system and have the providers and staff sign them electronically would significantly reduce the amount of time we have to spend complying with the OSHA regulation.

If employees could opt to approve the release of information from their employee health record until they rescind it, it would significantly reduce the work time needed for compliance. Not just for our department, but for the employee also.

Yours truly,

Bruce E. Cunha RN MS COHN-S
Manager, Employee Health and Safety
Marshfield Clinic



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facsimile transmittal

To: OSHA Docket office Fax: (202) 693-1648.

From: Bruce E. Cunha

Date: 4/26/2010

Re: Docket No. OSHA-2009-0043

Pages

2 with cover sheet

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