

**Administrative Procedures**

**HMIS-PRO-SP-11058**

**Occupational Medical Qualification and Monitoring using  
EJTA**

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## **Change Summary**

### **Description of Change**

Editorial change to clarify Health Advocate title/role related to EJTA dispute process for HAMTC employees.

Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Table of Contents

1.0 PURPOSE .....2
2.0 SCOPE .....2
3.0 RESPONSIBILITIES .....2
3.1 Line Management or Delegate .....2
3.2 Buyer’s Technical Representative .....2
3.3 Employee .....2
3.4 Safety and Health Professional .....3
4.0 INSTRUCTIONS .....3
4.1 Development and Revision of EJTA .....4
4.1.1 Creation of EJTA through the workflow in the EJTA Application .....5
4.1.2 Dispute Resolution Process .....8
4.1.3 After Completion of EJTA .....9
4.2 Process for Subcontractor EJTA .....11
4.2.1 Completing Subcontractor EJTA .....13
4.2.2 Reviewing and Revising Subcontractor EJTA .....15
5.0 RECORD IDENTIFICATION .....15
6.0 SOURCES .....15
6.1 Source Requirements .....15
6.2 References .....15

List of Tables

Table 1. Records Capture Table .....15

**Occupational Medical Qualification and Monitoring Using EJTA**

Published Date: 03/24/2026

Effective Date: 03/24/2026

**1.0 PURPOSE**

This procedure defines the requirements for utilizing the Hanford Site automated Employee Job Task Analysis (EJTA). Work-specific input is provided to the EJTA by the employee, the manager, and the company Safety & Health (S&H) professional, to define the work activities and associated, anticipated hazards (physical, chemical, biological, ergonomic) to which the worker is potentially subjected or exposed. Use of the EJTA allows the collection of data by the Site Occupational Medical Contractor (SOMC) that is necessary for a risk-based approach to establish medical qualifications and required monitoring.

**2.0 SCOPE**

Entering pertinent information into the EJTA achieves compliance with Title 10, Code of Federal Regulations (CFR), Part 851, Worker Safety and Health Program (10 CFR 851), Appendix A, Section 8, Occupational Medicine, which requires employees' job task and hazard analysis information be provided to the medical contractor. The EJTA facilitates medical program enrollment to meet qualifications for various Occupational Safety and Health requirements.

This Level 1 Administrative procedure provides information for using an EJTA to monitor occupational hazards and facilitate enrollment into an appropriate medical program. The EJTA process applies to all employees, including subcontractors, who work on the Hanford Site for more than 30 days in any 12-month period or who need to be enrolled in a medical monitoring program while performing work at the Hanford Site. No employee shall be exposed to work-related Hanford Site hazards without a current and approved EJTA.

**3.0 RESPONSIBILITIES****3.1 Line Management or Delegate**

- Initiates the EJTA process for new employees or those recently assigned.

**3.2 Buyer's Technical Representative**

- Reviews the subcontractor EJTA's and provide input for revision as necessary.

**3.3 Employee**

- Reviews and approves EJTA if agree with contents of EJTA.
- If disagree with contents, sends back for changes.

**Occupational Medical Qualification and Monitoring Using EJTA**

Published Date: 03/24/2026

Effective Date: 03/24/2026

**3.4 Safety and Health Professional**

- Reviews and approves EJTA as requested in the EJTA system.
- If hard copy information is received, reviews the information and enters it into ETJA system.

**4.0 INSTRUCTIONS**

The EJTA is a web application where any user with access to the Hanford Local Area Network (HLAN) can access the application on a site-supported browser to view their own EJTA to perform review actions.

The EJTA is intended to:

- Document and communicate to the SOMC the anticipated, potential exposures for planned work.
- Document and communicate to the SOMC the employee's essential job functions and physical job demands.
- Document and communicate to the SOMC the employee's medical qualification requirements.
- Trigger the employee's medical program enrollment and associated exams.
- Provide necessary documentation for use by the SOMC during the employee's medical evaluations, including:
  - New hire evaluations
  - Return to work evaluations
  - Work Suitability evaluations
  - Work capacity evaluations
  - Work Restriction determinations
  - Ergonomic evaluations

The EJTA is not intended to:

- Document the employee's historical exposures.
- Document unexpected, unplanned potential exposures to the employee.
- Document the employee's training requirements.
- Trigger the employee's training classes.

Past exposures are not captured on the EJTA, but may be documented on the [DOE Historic Health Exposure Questionnaire](#) and submitted to the SOMC for incorporation into the medical exam.

**Occupational Medical Qualification and Monitoring Using EJTA**

Published Date: 03/24/2026

Effective Date: 03/24/2026

The EJTA also:

- Satisfies specific Americans with Disabilities Act (ADA) and Fitness For Duty data needs.
- Identifies the need for additional employee exposure assessment and monitoring data.
- Aids in determining the necessary health and safety training for the employee.

ADDITIONAL TRAINING MATERIALS ARE AVAILABLE AT THE EJTA SHAREPOINT SITE: [REDACTED]

- Employees reviewing EJTA's, should refer to the EJTA Quick Start Guide.
- Managers and Users performing preparation and review actions should refer to the process in the EJTA Manage Guide.

More information may be obtained from the Occupational Health Services EJTA website: [REDACTED]

For assistance with questions or problems, users are encouraged to review the EJTA User Guide directly from inside the EJTA application located at the end of your EJTA screen or contact their project S&H professional.

For HMIS EJTA user capabilities, requests, or issues with access to the application, contact the HMIS EJTA POC at [SH@rl.gov](mailto:SH@rl.gov) (^Safety & Health HMIS).

#### **4.1 Development and Revision of EJTA**

The utilization of Hanford PeopleCORE is how the manager uniquely identifies the employee in the EJTA and is used to complete the Employee Information section of the EJTA.

The Essential Functions Section of the EJTA communicate to the SOMC a description of the employee's general list of duties, in a broad sense, to represent the fundamental job duties of the employment position that the individual holds. It is not intended to include every duty listed, nor is it intended that related duties cannot be required of the employee. Additional details on the work demands and anticipated hazards to which the employee may be exposed are provided in the sections of the EJTA that follow the essential functions section.

Utilize the following to create applicable essential function information:

- Appendix A "Job Descriptions" of the Collective Bargaining Agreement for HAMTC Employees.
- Applicable requirements from the HGU Collective Bargaining Agreement and 10 CFR1046, which also incorporates, by reference, to the essential task list for each of the respective contractor security police officer positions.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

- Construction tasks as described per the SOW activities for Building and Construction Trades Craft.
- Technical and support services based on duties described in the SOW.
- Exempt and other non-bargaining unit personnel based upon essential duties and other assigned tasks as agreed upon with their manager.

The Comments Section of the essential functions shall be reserved for identifying temporary job assignments or task descriptions not captured in other areas of the EJTA as agreed upon by the employee, manager, and S&H professional.

HMIS employees supporting Tank Farm activities (i.e., loaned or matrixed labor) as well as performing other HMIS scope of work in, around, and adjacent to Tank Farms, tank head sources, ventilation stacks, and the 242A Evaporator, shall have the following Chemical Vapor Technical Basis statement added to the comment section of their EJTA:

*"The "Industrial Hygiene Chemical Vapor Technical Basis," RPP-22491, Latest Revision provides the technical basis used in development of the Tank Vapor Information Sheets (TVIS). The Tank Vapor Information Sheets provide the area specific basis used to identify the chemicals within area specific Tank Farms waste vapor sources (e.g., tank head sources, ventilation stacks, 242A Evaporator, etc.) that are potentially hazardous and could be potentially released into the worker breathing zone."*

The Physical Job Demand Section of the EJTA further describes the anticipated work scope and activities of the employee. Additional sections are utilized to estimate exposure frequency (e.g., less than or greater than 30 days per year) and exposure level (e.g., above or below an identified exposure criterion), which are based on a combination of qualitative judgment and quantitative exposure assessment data. This data is not expected to be an exhaustive or exacting list of every possible exposure to a hazard regardless of its significance; nor is it an exact measure of the frequency of exposure. Rather, it is intended to be an estimate based on informed professional and supervisory judgment that provides information on hazards and significant exposures.

### 4.1.1 Creation of EJTA through the workflow in the EJTA Application

Actionee	Step #	Action
Line management or delegate	1.	ENSURE that an initial EJTA is completed upon hire (if not completed previously) for each employee in accordance with the EJTA User Guide. The initial EJTA is utilized to facilitate employment and shall be updated as soon as feasible after the employee becomes available for review.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
		<p><b>NOTE 1:</b> As used in this document, line management refers to the employee's immediate manager whether the employee is a line or functional group employee.</p> <p><b>NOTE 2:</b> Access to the automated EJTA can be obtained by contacting the Hanford Mission Integration Solutions (HMIS) Safety and Health organization's EJTA Point of Contact (POC).</p>
Line management or delegate	2.	ENSURE that the EJTA is revised when employees' essential job functions, physical job requirements, or the needed medical qualifications are altered as a result of job transfer or fundamental change in job requirements or hazards encountered.
	3.	ENSURE that all employees' EJTA's are updated <u>annually</u> .
		<b>NOTE:</b> The EJTA system will identify any EJTA that is over 1 year old as "EXPIRED".
S&H Professional	4.	<u>WHEN</u> directed by Human Resources (HR), <u>THEN SELECT</u> "Agree" on behalf for the employee and "ACTIVATE" the EJTA for the purpose of pre-employment medical qualification scheduling of Patrol and Fire Department personnel
	5.	REVIEW and CONCUR with the preparation of the EJTA and provide input to the Potential Exposure Hazards section.
		<b>NOTE 1:</b> As used in this document, S&H Professional refers to the facility/project/functional group safety and health professional who is familiar with employee exposures to potential hazards.
		<b>NOTE 2:</b> Exposures for <u>non-routine</u> tasks which were not predictable and were therefore not captured in the Potential Exposure Hazard portion of the EJTA are addressed via the job hazard/safety analysis (See <a href="#">HMIS-PRO-SP-079</a> , Job Hazard Analysis), when employee exposures are greater than the established exposure criteria.
Employee	6.	REVIEW the EJTA.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
Employee	7.	<u>IF</u> the ETJA content meets the requirement, <u>THEN</u> SELECT Agree.
	8.	<u>IF</u> the ETJA content does not meet requirements, <u>THEN</u> SELECT Disagree and GO TO Step 9.
Employee or S&H professional	9.	SELECT "Request Correction" button in the EJTA which places the application into rework until all parties reach an agreement on the content of the EJTA.
Supervisor	10.	After agreement by the employee, COMPLETE the EJTA within the EJTA system.
Employee	11.	ACCESS the respective EJTA through the application controlled by their HLAN log-in credentials.
	12.	REVIEW contents of EJTA
	13.	SELECT Agree button to indicate contents of the EJTA have been reviewed with the understanding it: <ul style="list-style-type: none"> <li>• Constitutes a reasonable estimation for the coming year of the essential job functions</li> <li>• Physical demands</li> <li>• Potential hazards associated with the anticipated work assignments of the stated position.</li> </ul> <p><b>NOTE:</b> <i>The EJTA record will include all pages of the EJTA. Electronic evidence of user actions incorporated by the application shall be placed, as part of the EJTA, into IDMS as an electronic record.</i></p>
S&H professional	14.	Review EJTA and approve the contents by selecting the ACTIVATE button. <p><b>NOTE 1:</b> <i>Once the EJTA is activated, it will be sent electronically to the SOMC who will proceed with scheduling the appropriate medical exams based on the content of the EJTA.</i></p>

**Occupational Medical Qualification and Monitoring Using EJTA**

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
<p><b>NOTE 2:</b> <i>SOMC must receive an approved and current EJTA at least 3 days prior to a scheduled medical exam. Exam will be canceled. if the EJTA is not approved and sent to medical prior to a scheduled exam.</i></p>		

**4.1.2 Dispute Resolution Process**

Actionee	Step #	Action
Supervisor	1.	<p><u>IF</u> employee, management, and safety and health professionals cannot come to agreement as to the appropriate contents of an employee’s EJTA, <u>THEN INITIATE</u> the following resolution process, without fear of retaliation, reprisal, or penalty to the employee as follows:</p> <ul style="list-style-type: none"> <li>• For Bargaining Unit employees, FACILITATE a meeting with the appropriate Bargaining Unit representative (HAMTC Safety, HAMTC Health Advocate, CWB&amp;CTC or Hanford Guards Union), Safety and Health Professional, EJTA Interpretive Authority (IA), and the employee in an attempt to come to an agreement.</li> </ul> <p><b>NOTE:</b> <i>In those instances where agreement cannot be made, the issue will be handled in accordance with the terms of the Collective Bargaining Agreement (CBA).</i></p> <ul style="list-style-type: none"> <li>• For all other employees, FACILITATE a meeting with the HMIS EJTA Interpretive Authority (IA), S&amp;H professional, upper-level management, a health advocate or the Employee Concerns program.</li> </ul> <p><b>NOTE:</b> <i>In those instances where agreement cannot be reached, the issue will be determined by a member of the Senior Management Team (SMT).</i></p>
Employee	3.	<p>ACCESS the respective EJTA through the application controlled by their HLAN log-in credentials.</p>

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
Employee	4.	REVIEW contents of EJTA.
	5.	<p>SELECT AGREE button to indicate contents of EJTA have been reviewed with the understanding it:</p> <ul style="list-style-type: none"> <li>• Constitutes a reasonable estimation for the coming year of the essential job functions</li> <li>• Physical demands</li> <li>• Potential hazards associated with the anticipated work assignments of the stated position</li> </ul>

**NOTE:** *The EJTA record will include all pages of the RTJA. Electronic evidence of user actions incorporated by the application shall be placed, as part of the EJTA, into IDMS as an electronic record.*

## 4.1.3 After Completion of EJTA

Actionee	Step #	Action
Line management or delegate	1.	ENSURE that employees report for medical qualification and monitoring examinations is scheduled by the SOMC.
	2.	ENSURE that employees receive the appropriate health and safety training as indicated by evaluation of the employee profile.
	3.	CONSULT with Supervisor to determine the necessary accommodations or actions if the SOMC determines an employee is not capable of performing the specified essential job functions and physical job requirements.
	4.	REVISE EJTA if any worker is removed from beryllium worker status by the SOMC.

**NOTE:** *EJTAs are for Job Positions while restrictions and accommodations are for individuals; documentation for accommodations of work restriction are made outside of the EJTA.*

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
S&H Professional	5.	ASSIST line management and interface with the SOMC in interpreting EJTA information to determine employee placement into medical qualification examinations and medical monitoring programs, and the need for additional workplace hazard controls.
	6.	USE Potential Exposure Hazard (PEH) portion of the EJTA to determine the need for, and aid in, prioritizing future exposure assessments and personal exposure monitoring.  <b>NOTE:</b> <i>Exposures rated 2 or higher on the PEH portion of the EJTA should have quantitative data collected to verify exposure levels.</i>
	7.	ASSIST line management with interpreting the medical monitoring results provided by the SOMC and in determining the need for additional workplace hazard controls.  <b>NOTE:</b> <i>S&amp;H professional may also assist line management in assessing non-occupational, non-work related restrictions and any additional hazard controls that may be needed to accommodate the worker.</i>
	8.	ASSIST line management in completing the employee training matrix based on the OSHA training requirements and the results of the EJTA.
HR	9.	USE the EJTA as a resource for conducting ADA accommodation and Fitness for Duty reviews.
SOMC	10.	SCHEDULE employees for medical qualification examinations and medical monitoring based on the data provided through the EJTA.  <b>NOTE:</b> <i>EXPIRED (older than 365 days since submitted to medical) are not required to have a scheduled examination.</i>
	11.	REMOVE employees from medical program placement when warranted, based on EJTA information, or issue a work restriction based on other relevant medical information.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
SOMC	12.	<p>REPORT results of medical examinations and monitoring to employees and line management, including the following:</p> <ul style="list-style-type: none"> <li>• Occupationally related information such as medical qualification, medical opinions, and other information regarding medical conditions that would place the employee's health at risk from working in the occupational environment.</li> <li>• Determinations regarding the employee's physical and mental health and their ability to perform the assigned job tasks and physical job requirements safely and reliably in accordance with the ADA of 1990 and Fitness for Duty</li> <li>• The adequacy of hazard control measures based on individual employee health data and population-based health data.</li> </ul>
	13.	MAINTAIN medical records in accordance with the applicable OSHA and DOE requirements.
Line management or delegate	14.	<p>NOTIFY SOMC of an employee's separation from the company by selecting the appropriate reason to inactivate the EJTA.</p> <p><b>NOTE:</b> <i>The SOMC will schedule any required medical closeout examination.</i></p>

#### 4.2 Process for Subcontractor EJTA

Subcontractor and its lower-tier Subcontractors shall be responsible to complete an Employee Job Task Analysis (EJTA) for any of the following situations:

1. For any Subcontractor employee who will be on the Hanford Site for more than 30 days in a rolling year from the start of the project.
2. For any Subcontractor employee who may potentially be exposed to hazards (e.g., radiological, beryllium, hazardous wastes, noise) while performing work in accordance with the subcontracted statement of work.
3. For any Subcontract employee enrolled in a medical or exposure monitoring program required by 10 CFR 851, and/or any other applicable federal, state or local regulation or other obligation.

**Occupational Medical Qualification and Monitoring Using EJTA**

Published Date: 03/24/2026

Effective Date: 03/24/2026

If any of the above conditions are met, the Subcontractor employee is to have a current approved EJTA prior to that employee beginning work on the Hanford Site.

Off-site activities are comprised of work performed outside of the Hanford Site, or DOE-owned, leased, or controlled locations. Workers that are on-site for 30 days or less in a rolling year from the start of the project are considered off-site workers for EJTA purposes.

Subcontractor Employees that do not have HLAN access or the ability to interact with the EJTA application directly shall utilize an EJTA form in hard copy or Adobe Acrobat Portable Document Format (PDF) to document the review and appropriate employee input incorporated into the EJTA. This EJTA form shall be controlled in accordance with HMIS-PRO-SC-16405, *Submittal Management System*, or equivalent.

When new or replacement subcontractor employees are identified during the execution of the Statement of Work (SOW) activities, the Buyer's Technical Representative (BTR) shall be notified in accordance with HMIS-PRO-SC-123, *Procurement of Subcontractor Services*.

HMIS is responsible for communicating any inherent hazards unique to the work location/scope of work to the subcontractor via the SOW. This is accomplished by the BTR working with HMIS S&H to verify that the job hazard information and the submittal requirements for the EJTA are in the SOW. The BTR shall incorporate requirements into the SOW for Subcontractor to review the contents of the EJTA with subcontractor employee(s) prior to work.

The Subcontractor will identify any hazards unique to their work method based on the SOW. S&H will review specific job hazards along with other hazards that are typical for the specific job classification and/or work group. All additional identified hazards or exposures shall be incorporated into the EJTA and communicated to the BTR through the SOW process. Subcontractor must notify the BTR if the employee is going to be working on more than one job site for the same prime contractor. If an employee is going to be working on more than one job site, the EJTA must be revised to capture the hazards of all the work areas. After completion of the revised EJTA, and prior to exposing the employee to any job hazards, the EJTA will be reviewed and signed by the employee(s).

If a Subcontractor employee already has a current Commercial Driver License/Department of Transportation (CDL/DOT) medical qualification and license, then the Subcontractor will not be required to have another exam performed by the SMOC. S&H Professional will review the medical qualification and enter the appropriate information into the EJTA system and then answer "NO" to the DOT medical question.

If there is a disagreement within the EJTA process, at any time during contracted duration, the Subcontractor shall offer the employee the option to proceed with the Dispute Resolution Process (see Section 4.1.2 for Dispute Resolution Process). S&H shall be made available for consultation during the EJTA process.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Upon “Activation” of the EJTA, the need for a physical exam by the SOMC will be determined. The results of the physical exam must be received prior to exposing the employee to any job hazards or exposures. The occupational medical process requires a minimum of three working days between receiving an EJTA and scheduling exams to permit the SOMC to schedule appropriate tests and prepare the chart. Should changes be made to the EJTA after the initial exam is scheduled, a second request must be submitted to SOMC scheduling to ensure updated exams are included.

The BTR/Subcontractor Company may contact the SOMC directly to reserve medical exam slots in advance and prior to activation of a subcontractor’s EJTA to properly plan for work on site. A subcontractor worker who needs hearing and/or respiratory clearance only can receive the testing and meet with a provider on the same day for clearance status determination when specific arrangement is made in advance with the SOMC scheduler.

The Subcontractor shall review and immediately revise the EJTA, including a new employee signature and updated EJTA to SOMC, when any of the following changes occur (regardless of the annual review date):

- Essential job functions
- Reporting organization/company/employer
- Work location
- Job scope
- Physical job requirements
- Work related hazards/exposures (chemical, physical, biological, or ergonomic)

### 4.2.1 Completing Subcontractor EJTA

Actionee	Step #	Action
BTR	1.	ENSURE subcontractor obtains a complete demographic record using PeopleCORE.
	2.	<u>IF</u> PeopleCORE is not used, <u>THEN CONTACT</u> a Contract Specialist for information to complete the <a href="#">Sub-Contractor New Hire Scheduling Form</a> .
	3.	ENSURE submittal of the new hire schedule form to the SOMC at <a href="mailto:OMC_Scheduler@rl.gov">OMC_Scheduler@rl.gov</a> .
	4.	INITIATE EJTA process by providing the blank EJTA form for completion, per the SOW subcontract employee job description/essential job functions and known hazards for the specific job classification and/or work group.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

Actionee	Step #	Action
BTR	5.	FORWARD EJTA form to Project S&H for review at <a href="mailto:SubcontractorEJTA@rl.gov">SubcontractorEJTA@rl.gov</a> .
S&H Professional	6.	<p>REVIEW EJTA form information for subcontractor employees, enter information into the EJTA application, and act on behalf of the non-HLAN employee as follows:</p> <ul style="list-style-type: none"> <li>• COMMUNICATE changes to the BTR/Subcontractor for EJTA “rework” prior to activation of the EJTA.</li> <li>• Once information is agreed to, SELECT “Agree for Employee” and then ACTIVATE EJTA.</li> <li>• ENSURE subcontractor employee’s physical signature/electronic acknowledgement for the EJTA is submitted as part of the subcontractor submittal process.</li> <li>• <u>IF</u> a disagreement occurs that cannot be resolved, <u>THEN</u> follow Dispute Resolution process (see Section 4.1.2) before final EJTA activation.</li> </ul>
BTR	7.	NOTIFY Subcontractor to ensure that medical examination is scheduled.
S&H Professional	8.	REVIEW EJTA and appropriate verification documentation as received through the subcontractor submittal processes.
	9.	<p>VERIFY appropriate medical program enrollment by utilizing Hanford Site Worker Eligibility Tool (HSWET) or equivalent.</p> <p><b>NOTE:</b> Approval is obtained by S&amp;H signature/electronic concurrence on the HMIS Contractor Document Submittal Form (Form: A-6003-061) for construction only.</p>
BTR	10.	ENSURE all personnel on project have an approved EJTA prior to mobilization.

## Occupational Medical Qualification and Monitoring Using EJTA

Published Date: 03/24/2026

Effective Date: 03/24/2026

### 4.2.2 Reviewing and Revising Subcontractor EJTA

The EJTA will be in effect for either the duration of the contract or for 365 days; whichever comes first. For Construction, the EJTA review shall happen prior to February 1<sup>st</sup> of each calendar year. For all other subcontractors, revision shall be completed on a rolling year from the start of the project. The EJTA shall be reviewed and revised when hazards or contract change. At a minimum, the EJTA shall be reviewed annually, and if it is not, it will EXPIRE. Either the BTR or the employee's Manager/Supervisor shall initiate the annual review and revision of all employees' EJTA's. Reviews and revisions of the EJTA may be initiated by the BTR, employee's Manager/Supervisor, employee, or Project S&H at any time.

An employee's medical qualification and training determines the employee's eligibility to perform work.

### 5.0 RECORD IDENTIFICATION

All records are generated, processed, and maintained in accordance with HMIS-PRO-RM-10588, *Records Management Processes*, or HMIS-PRO-RM-32281, *Electronic Records Management*, as applicable.

**Table 1. Records Capture Table**

Name of Record	Submittal Responsibility	Retention Responsibility
Signed/Electronically Acknowledged EJTA	EJTA application process	EJTA/IDMS

### 6.0 SOURCES

#### 6.1 Source Requirements

10 CFR 851, *Worker Safety and Health Program*, as amended  
 29 CFR 1910, *OSHA Standards for General Industry*  
 29 CFR 1926, *Safety and Health Regulations for Construction*  
 42 CFR 126, *Americans with Disabilities Act of 1990 (ADA)*, (P.L. 101-325)  
 DOE-RL Letter, "Employee Job Task Analysis (EJTA) Expectations and Clarifications"  
 14-ESQ-0043 (HMESC) Contract No. 89303320DEM000031  
 DOE-RL Letter, "Statement to be added to Employee Job Task Analysis (EJTA) Forms"  
 14-AMSE-0017 (HMESC) Contract No. 88903320DEM000031

#### 6.2 References

[DOE-0342](#), *Hanford Site Chronic Beryllium Disease Prevention Program (CBDPP)*  
[HMIS-PRO-HR-021](#), *Staffing*  
[HMIS-PRO-RM-10588](#), *Records Management Processes*  
[HMIS-PRO-RM-32281](#), *Electronic Records Management*

**Occupational Medical Qualification and Monitoring Using EJTA**

Published Date: 03/24/2026

Effective Date: 03/24/2026

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[HMIS-PRO-SC-123](#), *Procurement of Subcontractor Services*

[HMIS-PRO-SC-16405](#), *Submittal Management System*

[HMIS-PRO-SP-079](#), *Job Hazard Analysis*

[HMIS-PRO-SP-48065](#), *Subcontractor Safety Process*

HPMC Occupational Medical Services [EJTA Website](#), to find additional information for EJTA RPP-22491 Latest Revision; *Industrial Hygiene Chemical Vapor Technical Basis*, and most recent Tank Vapor Information Sheets (TVIS) as found at the [Hanford Vapors Website](#)