EMPLOYER RESPONSIBILITIES UNDER THE MEDICAL SUPERVISION PROGRAM

What is the Medical Supervision Program?

California’s medical supervision program is required to protect agricultural workers who mix, load, or apply organophosphate or N-methyl carbamate pesticides with the signal word “DANGER” or “WARNING” on the label. If an employee works with such pesticides for more than six days in a consecutive 30-day period, blood levels of an important enzyme called cholinesterase must be monitored by a physician. If cholinesterase drops below certain levels, employers are required to take specific actions to prevent employee illness and injury.

What is cholinesterase and why monitor it?

Cholinesterase is important for normal function of the nervous system. Exposure to certain pesticides can inhibit this enzyme and cause illness. Common signs of overexposure include slow heart rate, difficulty breathing, salivation, tearing, sweating, abdominal pain, diarrhea, and confusion. Sometimes exposed individuals show no signs of illness. Monitoring serves to identify depressions in cholinesterase levels before an illness occurs.

How do I know which pesticides to look for?

Look for pesticides used to produce an agricultural commodity containing organophosphates or N-methyl carbamates with the signal word “DANGER” or “WARNING”. Employers can identify these pesticides by looking at the “Precautionary Statements” and the “First Aid” sections on the product label.

When do I need an agreement with a physician?

You must have a physician monitor blood cholinesterase levels of employees who:

- mix, load or apply pesticides described here; and
- “regularly handle” such pesticides for more than six days in a consecutive 30-day period.

How do I find a physician to provide medical supervision?

Physicians must be registered with California’s Office of Environmental Health Hazard Assessment to provide medical supervision. For a list of registered physicians see: https://oehha.ca.gov/pesticides/general-info/list-registered-medical-supervisors
How do I ensure my employees have a medical supervisor?

Employers must have a written agreement with a registered physician that:

• states the names and addresses of both the physician and the employer responsible for the employees;
• states the physician will provide medical supervision;
• states the physician is aware of and possesses a copy of the document "Medical Supervision of Pesticide Workers – Guidelines for Physicians" (available from the Office of Environmental Health Hazard Assessment website: goo.gl/DMLurG); and
• is signed by the physician.

This agreement must be filed by the employer with the county agricultural commissioner.

How often should my covered employees get blood cholinesterase levels tested?

Employees must get a baseline level established for both red blood cell cholinesterase and plasma cholinesterase. These are used to compare with subsequent cholinesterase tests and must be verified every two years.

Employees must have cholinesterase tests within 30 days of a job change or after three tests at 30-day qualifying periods, further monitoring is at intervals specified by the medical supervisor. If no written recommendation is given, the testing interval shall be 60 days.

Who will inform me of the cholinesterase test results and what do I do if they decline?

Your medical supervisor will notify you and your employee of the cholinesterase test results within 14 days of receiving them. Employers are required to investigate the work practices of any employee whose red blood cell or plasma cholinesterase levels drop below 80% of baseline values. The investigation shall include review of the safety equipment used and its condition; and review of the employees sanitation, handling procedures, and equipment usage.

If cholinesterase levels fall to 70% or less of red blood cell baseline or 60% or less of plasma baseline, an employer must remove the employee from further exposure to organophosphate or carbamate pesticides until cholinesterase levels return to 80% or more of their respective baseline values.

What records must I keep under the medical supervision program?

• pesticide use records that identify the employee, name of the pesticide, and date of use;
• the written agreement with the medical supervisor;
• all recommendations received from the medical supervisor;
• all cholinesterase test results received from the medical supervisor;
• a written record of the work place investigation, findings, any changes made, and any recommendations given to the employee; and
• dates of employee removal and return to exposure, if employee is removed from exposure.

All records must be kept for three years.