

Background on the memo on exposures after 1995:

For the most part, the February 2015 memo *is* our explanation for how we developed the circular (15-06) on this issue. See the link here: https://www.dol.gov/owcp/energy/regs/compliance/PolicyandProcedures/ExposureLevels_Memo.pdf

As to why we created the distinction between pre-1995 and post-1995 exposures, we thought this would allow us to cut out the IH referrals on certain cases, which at that time were slowing down the process. This didn't mean that the cases would not undergo a medical review, but at least we could make an assumption that for cases in which the employee worked only after 1995, the exposures would have been within regulatory standards and guidelines. We could then send that statement directly to the treating physician for an opinion on causation.