



ASSOCIATION
OF OCCUPATIONAL
HEALTH PROFESSIONALS
IN HEALTHCARE

Dedicated to the health and safety of healthcare workers

August 3, 2010

OSHA
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Re: Occupational Injury and Illness Prevention

To Whom It May Concern:

I am writing on behalf of the Association of Occupational Health Professionals in Healthcare (AOHP). It is our understanding that the Occupational Safety and Health Administration plans to consider developing a rule related to Occupational Injury and Illness Prevention Programs.

AOHP supports the idea of the 1989 Guideline for Injury and Illness Prevention becoming a rule. AOHP recognizes that this guideline appears to be current and could be implemented as a rule without significant changes. It is utilized by our members in their work settings. They find that the guide is thorough in providing clear, concise information in order for them to develop and maintain the Safety and Health programs for their institutions and to have a successful Injury and Illness Prevention Program. We also recommend that this guideline become a rule since it is very broad and all inclusive for musculoskeletal diseases, infectious diseases, chemical exposures, and all other hazards. We are including a sample of a program that one of our members developed in order that you can see what is being accomplished with this guideline and the value that it has to employers.

Regarding ANSI/AIHA Z9.10-2005, we do agree with most of this document including the OHSMS cycle. AOHP would expect that the goal would be that employers always be in compliance versus being compliant most of the time. We also see a need to condense this document and simplify it to some degree if it were to be the guide for rulemaking. AOHP has also reviewed the OHSAS 18001 document. The primary comment we have, if this were to be utilized in developing a future document, is that some of the comments and definitions would be helpful and to be considered for inclusion.

With respect to the Scope and Application of a Rule, the main question is if a rule or standard is needed in addition to the General Duty Clause. If it would be, AOHP recommends that it should apply to industries and employers that are covered under the General Duty Clause related to size and to employers regardless of their injury rates.

In addressing the Organization of a Rule, AOHP recommends the following:

- There should be broad categories as in the 1989 Guideline for Injury and Illness Prevention
- The rule should refer to the General Duty Clause to set-up a program
- Regulatory text be as clear and concise as possible



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- Mandatory or voluntary appendices. That there be a mix depending on what the context of each one is. It is always quite helpful for employers to have access to templates, clear guidance on what elements are needed and expectations for each one.

AOHP's comments related to Economic Impact:

- The foreseeable costs would be the resources needed to develop policies, evaluate the work place, develop any additional programs, measurement tools and systems if unmet with the employers' current resources.
- Approaches to minimize cost. Including the avoidance of duplication with other rules, standards and evaluating what is in place in other governmental organizations.
- Effectiveness. Recommend need for clear guidelines with tools, technology that is readily available and that most, if not all employers have access to or that they have already procured. The data collection should be systematized and be consistent with other laws, regulations, and requirements.

Other comments include:

- As OSHA explores the possibility of rule making for Occupational Injury and Illness Prevention and for Exposure to Infectious Diseases in the Healthcare Setting, AOHP recommends that if additional rules are to be developed that the more broad rule be the one developed related to the Injury and Illness Prevention versus for Exposure to Infectious Diseases. The issues for infectious diseases could be included in a more general rule such as one related to injury and illness prevention.

Thank you for the opportunity to provide comments on this topic. AOHP is available to assist with any of the processes that may be needed regarding these issues. Please contact MaryAnn Gruden, our Association Community Liaison, if additional information or questions arise. She can be reached at 412/578-6792 or by email at magaohp@yahoo.com.

AOHP is a national organization of occupational health professionals who work in healthcare settings, primarily hospitals. AOHP's vision is to be the defining resource and leading advocate for occupational health and safety in healthcare. Our mission is dedicated to promoting the health and safety of workers in healthcare. This is accomplished through:

- **A**dvocating for employee health and safety
- **O**ccupational health education and networking opportunities
- **H**ealth and safety advancement through best practice and research
- **P**artnering with employers, regulatory agencies and related associations.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Sandra Domeracki', is written in black ink.

Sandra Domeracki, RN, FNP, COHN-S
AOHP, Executive President