



ASSOCIATION
OF OCCUPATIONAL
HEALTH PROFESSIONALS
IN HEALTHCARE

Dedicated to the health and safety of healthcare workers

March 30, 2010

OSHA Docket Office
Docket Number OSHA -2010-0004
Technical Data Center, Room N-2625
U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to provide stakeholder comments on the key issues that are facing OSHA.

- In order to encourage and enhance employers to identify and address workplace hazards AOHP recommends that OSHA develop and provide tools that will help safety professionals demonstrate cost/benefit of addressing safety hazards and the benefits of being proactive. Employers want to see the bottom line benefit and such tools would assist in demonstrating the benefits of safety efforts.
- An important emerging unaddressed health and safety issue is the aging work force. Identification of industry-specific hazards for the aging workforce can help identify strategies that can be implemented to improve safety and decrease the risk of a work-related injury in the older worker. Identifying methods to engineer out the hazards would be very useful. An example is patient handling in healthcare. Healthcare workers have a high rate of musculoskeletal injuries related to patient handling, and at times, little support from administration to obtain patient handling equipment. As this particular group of workers age they remain at high risk of injury that may ultimately affect their later years. A second major issue facing healthcare is the requirement for annual respirator fit testing. It is imperative that OSHA partner with NIOSH with the research that is being conducted to build the science behind this requirement. OSHA should develop a plan to communicate these findings and, if appropriate, make changes in the respirator standard that would expedite implementing research findings into practice. The annual fit testing requirement is a significant burden on healthcare facilities and should be based on sound scientific evidence.
- Whenever possible, stakeholder meetings and comments should be gathered and evaluated. The input provided by experts in the field can assist OSHA in gaining a better understanding of the issues facing the targeted industry and front line workers. Our Alliance with OSHA has been a wonderful opportunity to address issues, provide input into OSHA efforts, and communicate information to our members on the front line of health and safety.
- Employers should be required to educate employees about the process to report hazards and include that there is a non-punitive reporting environment in the workplace. OSHA should educate employers about the benefits of having front line employees involved in their health and safety programs.
- OSHA should re-evaluate the current process to determine whether or not the timeline for standard making could be revised. Utilizing the electronic communication tools that are now available also enhances the agency's ability to access information and gain input from stakeholders. Perhaps there could be a regular timeline and an emergency/emergent/expedited time line for the establishment of a standard. An example of when an expedited timeline would be beneficial would be if research findings need to be implemented into practice such as changes in fit testing requirements.



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- The OSHA website is an excellent communication tool and resource. Utilizing You Tube for videos is a resource that the younger workers can readily access and very comfortable with its use. Printed materials still remain valuable and useful. OSHA should continue making tools available in multiple languages
- Analysis of injuries and illnesses is probably the most practical means OSHA can use to enhance resource targeting. Other opportunities may be identified from selected stakeholder groups.
- We believe that the Permissible Exposure Limits (PELs) for chemicals should be a priority for the agency as the majority of them have not been re-evaluated/revised since the early 1970's. More research on the effects of these chemicals is now available that can assist in the revision of the PELs.

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.

Again, thank you for the opportunity to provide comments on this document. 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.

Sincerely,

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

Sandra Prickitt,
AOHP Executive President