



ASSOCIATION  
OF OCCUPATIONAL  
HEALTH PROFESSIONALS  
IN HEALTHCARE

*Dedicated to the health and safety of healthcare workers*

November 19, 2012

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) welcomes the opportunity to comment on the *Draft National Safe Patient Handling and Mobility Standards*. AOHP Executive Board member Mary Bliss has been excited by the work of the group. AOHP supports this effort and recognizes the need for national standards in this arena. Our comments on the draft guidelines are as follows:

- The draft standards are comprehensive and appear to be appropriate for the near and long term. We are glad to see both the employer and healthcare workers' accountabilities outlined.
- Under the definitions, it may be appropriate to consider adding occupational health to the "Ancillary/Support Staff" definition. Occupational Health Professionals may be the "champions" when these programs are initiated in facilities.
- Standard 6.2.4 may need to be more specific with regard to transfer to other facilities and being knowledgeable of patient handling practices of the receiving facility. This is based on new Center for Medicare/Medicaid Services requirements.
- Standard 7.2.2 may need a word inserted after "actively participate" ....

AOHP is a national association with more than 1,000 members who serve as leaders in championing the vital role of occupational health professionals in healthcare today. Through their active involvement at local, state and national levels, AOHP is committed to the health, safety and well-being of healthcare workers, representing tens of thousands of healthcare workers throughout the nation. AOHP promotes health and safety for healthcare workers through: advocacy; occupational health education and networking opportunities; health and safety advancement through best practice and research; and partnering with other invested stakeholders.

We look forward to our ongoing collaboration with the Safe Patient Handling and Mobility National Standards Working Group. Mary Bliss will continue to be the AOHP representative as the group continues its work.

Sincerely,

A handwritten signature in black ink that reads "Dee Tyler".

Dee Tyler, RN COHN-S FAAOHN

Executive President