

February 28, 2014

OSHA Docket-2013-0023
RIN 1218-AC49
US Department of Labor
Room N-2625
200 Constitution Avenue NW
Washington, DC 20210

Dear Sir or Madam:

The Association of Occupational Health Professional in Healthcare (AOHP) appreciates the opportunity to comment on the proposed rule change for OSHA recordkeeping. AOHP supports OSHA's rationale for the proposed change especially the need to have more "real time" data on injury and illnesses especially in high risk industries.

However, AOHP has a number of areas we would like to offer comments:

- It is not clear that there has been an interface between the Bureau of Labor Statistics (BLS) and OSHA with the sharing of injury data as it is currently submitted. Would this new reporting process replace the BLS reports?
- Clarification is needed as to whether or not the quarterly reports would need to be signed off by the organization's Executive.
- For organizations that have multiple sites, would each site need to report on a quarterly basis? An example in healthcare would be that many health systems have acute care facilities and off-site locations such as clinics, surgery centers, physician practices. These off-site locations may be a few to over 50 or more.
- The need to double enter the data is a significant concern. Double data entry was a significant concern when NIOSH was proposing the Occupational Safety Health Network (OHSN). NIOSH considered this concern and was able to create an interface to eliminate double data entry into this national database. Double data entry is costly in terms of time and the use of scarce human resources to manage these record keeping requirements. Would days away, restricted, transfer days and lost time days need to be entered and then updated with each quarterly report?
- Consideration should be given to a pilot to test the functioning of the website and the ease with which the data can be entered and submitted.
- OSHA has explored a number of alternatives and approaches to implementing the changes. In order to decrease confusion, if the recordkeeping requirements were to change, a consistent approach should be established with all employers required to report at the time the new requirements were implemented.
- AOHP views the sharing of aggregate data very important while maintaining the confidentiality of the injured worker.

- Electronic reporting of the data would enable OSHA to analyze the data in a more timely way. OSHA estimates that more than 95% of small businesses have access to the internet to facilitate data submission. AOHP would support electronic data submission being a requirement.

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 has become the defining resource and leading advocate for occupational health and safety in healthcare, 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.

If you are in need of additional information, please contact MaryAnn Gruden, Association Community Liaison at 412-578-6792 or by email at magaohp@yahoo.com. Thank you again for the opportunity to comment on this proposed rulemaking.

Sincerely,



Dee Tyler, RN COHN-S FAAOHN
Executive President