

February 19, 2016

Docket #: OSHA 2015-0018

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to comment on the draft 2015 OSHA Safety and Health Program Management Guidelines. AOHP supports a proactive approach to employee safety in the work environment. The format and content of the revised guidelines address the major areas of focus for the employer who desires to implement a comprehensive safety and health program for workers. Further, AOHP supports health and safety programs for employers of all sizes. The following comments relate to the questions posed by OSHA.

Question #1 – Naming the program. The name for safety and health programs should be clear and concise. The title, Occupational Safety and Health Management Systems (OSHMS) is an example of an easily recognizable title and clear message about the purpose of the program. It clearly refers to employee safety with “occupational” in the title. This is important especially in the healthcare arena as formal patient safety programs are mandated by various regulatory agencies and do not necessarily address general employee safety. In healthcare, safety management systems for employees need to be routinely implemented due to the wide variety of hazards in healthcare.

Question #2 – Section on Program Evaluation. Content in this section clearly points out that program evaluation is an essential component to a successful program. Examples of “lagging” and “leading” indicators provides direction for the novice in program development and guidance for current program leaders as programs are monitored on a regular basis. It would be helpful to clearly point out that programs can be initiated on a small scale, perhaps addressing one or two areas of priority, and then expanded as success is demonstrated on the smaller scale. If the employer has limited resources this may be a more reasonable approach. An implementation plan should be developed and progress toward outcomes should be regularly monitored and strategies revised as needed to ensure progress in goal achievement. In addition, creating a three to five year plan prior to launching a formal program may assist in the overall success of the program.

Question #3 – Use of appropriate language. In our view, OSHA has achieved the goal of providing language that is easily understood for small and medium-business owners. In addition, the proposed tools in Appendix A would be of value in the development of a program.

Question #4 - Overlooked concepts. Major concepts for a successful program are included in the draft guidelines. The information on multiemployer worksites is important to include as maintaining the safety of the visiting worker can be a challenge for the host employer. In addition, to noting that resources need to be available for programs, consideration should also be given to identifying a program leader. In the case of small business, the leader could be the owner of the company who has communicated the importance of the safe working environment.

Question #5 – Case studies. OSHA’s Voluntary Protection Program (VPP) is an example of an effective safety and health management system approach. By achieving Star VPP designation in 2007, Lancaster General Hospital, Lancaster, PA, has impacted employee safety by significantly decreasing the OSHA injury rate. Since 2007, the injury rate has decreased to the current rate of 3.6, 46% below the national average for its NCAIS code.

Committed to the health, safety and well-being of healthcare workers

Question #7 – Implementation. Employers of all sizes should be able to implement these strategies using other methods of communication if technology is not available.

Question #9 - Multiemployer worksites. As noted above addressing multiemployer worksites is essential to the completeness of the guidelines.

Question #10 – Appendix A. The proposed checklist and self-evaluation tools would be a great asset for all leaders who are either starting a program or monitoring the effectiveness of the program.

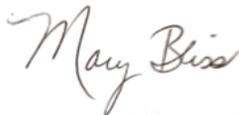
Question #11 – Appendix B. The table is a useful reference especially for those employers that are not as familiar with OSHA requirements

Question #12 – What stops small, medium-sized businesses. A number of factors, real and perceived, affect safety programs for employers of all sizes. These include and are not limited to: 1) not having time, 2) not having enough resources, 3) not understanding the relationship between employee safety and productivity, 4) not recognizing the need to evaluate current practices for effectiveness and 5) resistance to change. Company leaders identifying safety as a priority is the first step in a successful program

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.

Thank you again for the opportunity to comment on this important topic. If you have additional questions or comments, please contact MaryAnn Gruden, Association Community Liaison by email at magruden@wpahs.org or phone 412-359-6470.

Sincerely,



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