

Miller, Diane M. (CDC/NIOSH/EID)

From: Mary Ann Gruden [magruden@wpahs.org]
Sent: Tuesday, July 01, 2008 7:09 AM
To: NIOSH Docket Office (CDC)
Subject: 135 - NIOSH Healthcare Workers Survey
Attachments: surveys - public comment 6.08.doc

To Whom It May Concern:

Please see the attached comments from the Association of Occupational Health Professionals in Healthcare (AOHP). Thank you.

MaryAnn Gruden
AOHP Association Community Liaison

MaryAnn

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ASSOCIATION
OF OCCUPATIONAL
HEALTH PROFESSIONALS
IN HEALTHCARE

Dedicated to the health and safety of healthcare workers

June 18, 2008

NIOSH
Robert A. Taft Lab.
4676 Columbia Parkway
Cincinnati, Ohio 45226

Re: Healthcare Worker & Management Safety Surveys

To Whom It May Concern:

AOHP welcomes the opportunity to comment on the proposed healthcare worker and management safety surveys. We support NIOSH's efforts to research both front line and management in this high hazard industry. In addition we are ready to partner with NIOSH as an association in the conduct of the surveys. Denise Knoblach was our representative at the meeting in Cincinnati where she and other stakeholders had the opportunity to discuss the survey and share comments about the content and conduct of the survey.

Both surveys are comprehensive and it is clear that it was a significant effort to develop them. As a result the surveys are lengthy and require considerable time to complete. The front-line healthcare worker (HCW) survey:

- would be difficult to administer to employees who are not represented by an association. For example, there would most likely only be one AOHP member at a healthcare facility who may or may not be the contact person for employee safety. Nurses may be represented by a variety of nursing associations based on their specialty.
- does not address groups of workers such as environmental service workers and dietary workers who usually do not belong to professional associations. It would be important to gather data from these groups of workers. The question then becomes, how do we engage these employees participation?
- requires completing the main module of the survey and then a second module which would require additional time. The estimated time of 30 minutes to complete this survey is a considerable time commitment for facilities with scarce resources and demands to maintain productivity.

With regard to the content of the survey:

- question #38 in the core module states "universal precautions" rather than "standard precautions" which is now used by infection control practitioners when training staff.
- the demographics section does not include an age breakdown. Age information would be valuable in determining safety behaviors based on age. One example is that in the literature there has been some data suggesting that younger nurses have not report sharps injuries. The ability to make this type of correlation can lead to changes in education, training methods and ultimately improved safety for the employee but more specific data is needed.

The management survey would require input from various individuals within the organization - human resources, safety, occupational health, risk management, pharmacy, etc. It would require a team effort and many hours to complete the 50 page survey. As a result the survey return may not be as high as anticipated. It may be worthwhile to reconsider the conducting the survey in modules sent out at certain time intervals and focusing on one or two hazards.



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Given the time commitment for both frontline staff and management, employers would want to know up front, "what is in it for them?" to participate in both surveys. The benefits of participation including the return on investment in participating in the survey would need to be clearly stated to obtain "buy-in" from senior management. Senior management support would increase the likelihood of optimal participation in the survey process.

AOHP is a national organization with over 1100 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:

- **Advocating for employee health and safety**
- **Occupational health education and networking opportunities**
- **Health and safety advancement through best practice and research**
- **Partnering 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, which appears to read "Sandra Domeracki Prickitt".

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