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To: NIOSH DOCKET OFFICE **From:** MaryAnn Gruden, CRNP, COHN-S/CM

Fax: 513-533-8285 **Pages:** 3

Phone: _____ **Date:** 10/30/09

Re: _____ **CC:** _____

Urgent For Review Please Comment Please Reply Please Recycle

● **Comments:**

Please see attached comments
on NIOSH goals.

Thank you
M. Gruden



ASSOCIATION
OF OCCUPATIONAL
HEALTH PROFESSIONALS
IN HEALTHCARE

Dedicated to the health and safety of healthcare workers

October 28, 2009

Docket Number NIOSH-138
NIOSH Mail Stop: C-34
Robert A. Taft Lab
4676 Columbia Parkway
Cincinnati, OH 45226

Dear Sir or Madam:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to comment on the NIOSH National Occupational Research Agenda strategic goals for the National Healthcare and Social Assistance Agenda developed by the Healthcare and Social Assistance Council. AOHP agrees with categorizing the major areas of concern for this sector into five goal categories and that a structured approach to research along the continuum of healthcare settings is needed.

Strategic Goal 1: Promote safe and healthy workplaces and optimize safety culture in healthcare organizations.

Ultimately, patients will greatly benefit by research proposed in this goal. It will be imperative to develop tools to make the business case for linking employee safety to patient safety and improved patient outcomes in the areas identified in the goal. AOHP has created a conceptual model linking employee and patient safety to the role of the occupational health professional. AOHP would be willing to share this conceptual model if it would be useful in this research effort.

Strategic Goal 2: Reduce the incidence and severity of musculoskeletal disorders (MSDs) among workers in the healthcare and social assistance (HCSA) sector.

Safe patient handling (SPH) research continues to be needed in the areas identified including the educational training of new healthcare workers (HCWs). Non-patient handling MSDs also need to be addressed as they are in Intermediate goal 2.4.

In addition, slip/trip/fall (STF) injuries are another major MSD injury among HCWs. All HCWs in a facility are at risk of these injuries. Further research is needed in this area as described in the *Executive Summary: State of the Sector/Healthcare and Social Assistance – Identification of Research Opportunities for the Next Decade of NORA* published in August, 2009. For some institutions these types of injuries may be more numerous than patient handling injuries and significant exposures to blood/body fluids. These injuries have the potential to be as debilitating as injuries from patient handling. With the aging HCW, prevention of these types of injuries is crucial to maintaining a healthy and productive workforce. Perhaps another intermediate goal related to STF injuries could be considered for this strategic goal.



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Strategic Goal 3: Reduce or eliminate exposure and adverse health effects caused by hazardous drugs and other chemicals

AOHP agrees with this draft goal as published

Strategic Goal 4: Reduce sharps injuries and their impacts among all healthcare personnel

AOHP agrees with this draft goal as published

Strategic Goal 5: Stop transmission of infectious diseases in healthcare and social assistance settings among workers, patients and visitors

The components identified in this goal address the numerous factors that impact the spread of infection and are supported by AOHP. Building scientific evidence-based support for the best methods and frequency of fit testing are essential to HCW safety. Continuing research in the area of respirator innovations including sensors is supported by AOHP.

AOHP is a national organization with over 1000 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.

AOHP applauds the efforts of the stakeholders involved with this comprehensive draft research agenda and is willing to assist in any way possible in the research efforts. Please contact MaryAnn Gruden, Association Community Liaison if AOHP can provide any assistance in these research efforts. We would welcome the opportunity to be involved. MaryAnn 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 over a horizontal line.

Sandra Prickitt,
AOHP Executive President