

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

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**From:** Robin Vaughan [RVAUGHAN@NJHA.com]  
**Sent:** Tuesday, July 01, 2008 2:33 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Aline Holmes; Karen Ali  
**Subject:** 135 - NIOSH Healthcare Workers Survey  
**Importance:** High  
**Attachments:** NIOSH Comments 7\_1\_08.PDF

Please see attached comments to the proposed national surveys of healthcare workers' safety and employer safety and health practices.

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NEW JERSEY HOSPITAL ASSOCIATION

July 1, 2008

NIOSH Docket Office  
Robert A. Taft Laboratories  
MS-C34  
4676 Columbia Parkway  
Cincinnati, OH 45226

**RE: NIOSH Docket number 135, Notice of public meeting and availability for public comment (Vol. 73, No. 64), April 2, 2008**

To Whom It May Concern:

On behalf of all of our members, including hospitals, health systems, nursing homes and other healthcare organizations, the New Jersey Hospital Association (NJHA) appreciates the opportunity to comment on the National Institute for Occupational Safety and Health's (NIOSH) proposed national surveys of healthcare workers' safety and employer safety and health practices.

While we agree with the overall objective of the project to have current and accurate data on health and safety hazards and perceptions, work practices and use of exposure controls, NJHA has serious concerns with the methodology that NIOSH is proposing to use. The survey tools are very long and complex and we believe that NIOSH has significantly under-estimated the time and resources that will be needed by healthcare organizations to complete them. We concur with the American Hospital Association's comments that many of the statements in the survey suggest best practices which are not evidence-based, e.g., the use of back belts.

Of great concern is the proposed methodology to gather hazard surveillance data from healthcare workers by partnering with various labor unions and professional associations. As noted by NIOSH, this will result in a biased non-representative sample of employees, especially with the addition of a \$10 gift certificate. The use of labor unions to gather this information is problematic to many of our members who have employees who are organized. NJHA recommends that NIOSH develop a statistical sampling approach with a method of validating the results of the worker questionnaire to ensure that the results accurately reflect work practices and perceptions of our employees.

NJHA asks that NIOSH change the survey tools to make them shorter, less resource intensive and more objective, and change the methodology of collecting this data to one that is more statistically appropriate so that the results are more generalizable to the healthcare worker population.

If you have any questions regarding this letter, please do not hesitate to contact me at 609-275-4157, aholmes@njha.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Aline M. Holmes". The signature is written in a cursive style.

Aline M. Holmes  
Senior Vice President, Clinical Affairs