



Greater New York Hospital Association

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Kenneth E. Raske, President

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One
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NIOSH Docket Office
Robert A. Taft Laboratories
MS-C34
4676 Columbia Parkway
Cincinnati, OH 45226-1998

RE: Survey of Health Care Workers' Safety and Health and Survey of Health Care Employer Safety and Health Practices – Docket # NIOSH-135

To Whom It May Concern:

I am writing on behalf of the Greater New York Hospital Association (GNYHA) to provide comments on the National Institute for Occupational Safety and Health's (NIOSH's) proposed national surveys of health care workers' safety and health as well as management health and safety practices. In general, GNYHA strongly recommends that NIOSH revise the proposed approach to its survey process in order to ensure the collection of valid and meaningful information. As outlined below, GNYHA believes that the process should be more streamlined, the questions should be more evidence-based, and the methodology should result in a more nationally representative sample.

GNYHA represents approximately 250 hospitals and continuing care facilities, both voluntary and public, in New York State, as well as New Jersey, Connecticut, and Rhode Island. GNYHA members share a common mission to serve patients, support caregivers, and promote high-quality health care. To that end, the health care industry has long been committed to reducing work-related injuries as demonstrated by policies, programs, and resources designed to protect employees.

NIOSH states that the overall objective of this project is to "describe the prevalence and distribution of important health and safety hazards and perceptions, work practices, and use of exposure controls from a health care worker perspective, and to describe institution-based health and safety management policies, programs and resources of health care establishments, from the perspective of the person responsible for employee health and safety." Further, "information collected will be useful in identifying gaps relative to the use of best practices and define future research and intervention priorities."

GNYHA agrees that it is critical to have current and accurate data on the top health and safety issues facing caregivers. However, we have serious concerns about these surveys and the methodology that NIOSH proposes to use to obtain these data.

Length and Complexity of Survey Instruments

The health care worker and management surveys are extremely long, with many complex questions. GNYHA believes that the survey length and complexity will negatively affect the response rate and, ultimately, the results. In this regard, GNYHA believes NIOSH has significantly underestimated the length of time needed for both health care workers and management to complete their respective portions of the survey.

Health Care Worker Survey

Health care workers are required to complete a 25-page core survey that contains 79 questions. In addition, health care workers are required to complete hazard-specific modules that are up to 11 pages long and contain up to 42 questions. While NIOSH estimates it will take health care workers 20 minutes to complete the core module and an average of 7 minutes for the hazard-specific modules, GNYHA believes that health care workers will need significantly more time to accurately complete their sections of the survey.

Management Survey

The management portion of the survey is 50 pages long and contains 63 core questions in addition to 140 hazard-specific questions. NIOSH estimates it will take 45 to 50 minutes to complete the management section of the survey. In many institutions, multiple people will be responsible for questions based on subject matter. Again, GNYHA believes NIOSH has significantly underestimated the time needed to complete the management section of the survey.

GNYHA recommends NIOSH consider streamlining the surveys in regard to length and complexity.

Content of Survey Questions

NIOSH background materials related to the proposed surveys note that the questionnaires have already been pilot-tested in two large medical centers. The Agency states that "the content of the questionnaires has been fairly well-defined" and "minor revisions will be made...prior to use in this study." GNYHA has serious concerns about many of the questions in the survey and requests NIOSH to consider substantive changes to the surveys based on stakeholder feedback.

In particular, GNYHA has serious concerns related to statements, especially those to which the worker is asked to respond, that are presented as factual or imply a best practice, but that do not have solid supporting evidence. Additionally, we are concerned that many questions, especially those referring to the use of personal protective equipment, have inadequate response options. As a result, respondents cannot answer in a way that accurately describes their health and safety practices. Unless NIOSH ensures that its questions describe practices that are truly supported by scientific evidence and allow responses that reflect actual health and safety practices, the survey results will be misleading and will identify gaps that are not relevant to worker health and safety.

GNYHA has coordinated with the American Hospital Association (AHA) and other state hospital association representatives to construct comments that will be useful when revising the health care workers' safety and health and management health and safety practices surveys. To that end, I reference the AHA's attachment to its comment letter, which contains detailed comments and suggestions regarding the construct of certain questions. GNYHA concurs completely with concerns identified in the AHA's detailed comments (Attachment 1) and requests that NIOSH consider all of the recommended changes.

GNYHA recommends NIOSH consider substantive changes to the surveys based on stakeholder comments

Methodology for Conducting the Surveys

Health Care Worker Survey

NIOSH indicates that it will use a "population-based" approach to gather data from health care workers by partnering with labor unions and professional associations that will send survey information to their membership. These organizations will either directly e-mail their members with a link to the survey or promote the survey to members via various avenues of communication and direct them to a Web site where members can complete the survey. To maximize response rates, NIOSH proposes to award workers who complete the survey with a \$10 on-line gift certificate. GNYHA has serious concerns about this approach. As stated in NIOSH's background materials, the disadvantages associated with the use of this approach include the problem of a non-representative sample of the total population of workers and sampling bias.

Further, the health care worker survey modules request worker perceptions and opinions and are very subjective, in contrast to the management questionnaire, which is largely based on concrete management practices. In addition, there is no way to validate the results of the worker survey responses because there is no information linking a worker to his or her place of employment.

Management Survey

While NIOSH indicates that the sample of hospitals it will draw will be size-stratified by the number of employees (1-19; 20-449; 500+), GNYHA recommends that NIOSH use the more typical hospital research sampling framework that is based on bed size, geographic region, and type of facility.

Due to the length and complexity of the management questionnaire, we believe that there will be a low response rate, resulting in an inadequate and non-representative respondent population. Correspondingly, we also are concerned that a low response rate will make it appear that hospitals are indifferent to the health and safety of their workers.

GNYHA recommends that NIOSH reconsider its methodology for administering the surveys and develop a sampling approach that will result in nationally representative responses. In addition, NIOSH needs to consider how to validate workers' responses as management responses will be validated through random site visits.

GNYHA and its members are committed to employee safety and evidence-based employee safety and health programs. As a result, GNYHA respectfully requests that NIOSH consider GNYHA's recommendations for improving upon NIOSH's intended survey process and instruments. If you have any questions, please contact me or Alison Burke, Associate Vice President of Regulatory and Professional Affairs, at (212) 506-5526 or Aburke@gnyha.org.

Sincerely,



Kenneth E. Raske
President