



Dedicated to the health and safety of healthcare workers

March 8, 2010

OSHA Docket Office
Docket Number OSHA-2009-0044
U.S. Department of Labor
Room N-2625
200 Constitution Avenue, NW
Washington, DC 20210

Re: Occupational Injury and Illness Recording and Reporting Requirements

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to comment on the proposed revision of the Occupational Injury and Illness Recording and Reporting (Recordkeeping) regulation. AOHP supports the inclusion of a musculoskeletal disorder (MSD) column on the OSHA 300 and 300A recordkeeping forms. We also agree with OSHA's rationale for the inclusion of this column to enable improved data collection and analysis by industry (example: healthcare) by the Bureau of Labor Statistics (BLS). It is important to know how many MSDs cause restricted duty as well as lost time days. In addition, having MSDs meet the same recordability requirements as other injuries puts these events on the same level as other recordable injuries/illnesses. We do not believe that MSDs should be treated any differently than other occupational injuries and illnesses when analyzing recordability.

An area of concern is the definition of a MSD. The definition of MSDs that will be recorded should be the same as the BLS definition for accurate data analysis. The requirement for OSHA recordability includes new symptoms. Some of the MSD examples described in the OSHA definition may have symptoms that are gradual in onset. An example would be carpal tunnel which may have symptoms that gradually appear over months to years. This type of example may lead to confusion. This is a difficult yet extremely important discussion. As shared in the Federal Register, NIOSH, the American National Standards Institute and BLS all have a slightly different definition of a MSD. The definition needs to be broad, give guidance to the record keeper and enable accurate data analysis. Including examples may be well intended but not every example can be included and may lead to omissions in recording MSDs.

Other comments include:

- MSDs should not be considered privacy cases.
- An electronic version of the OSHA log would be welcomed and would be a great time saver if it had the capability to calculate days away from work, restricted duty days and year-end calculations. It would also need to have the capability to print the log in format acceptable to OSHA. Many vendor software programs already have this capability and it is a great time saver.
- A start up date of January 1, 2011 is reasonable for accurate data collection and analysis to commence.

AOHP is a national organization of 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:

- **A**dvocating for employee health and safety
- **O**ccupational health education and networking opportunities
- **H**ealth and safety advancement through best practice and research
- **P**artnering 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 maqaohp@yahoo.com.

Sincerely,

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