



ASSOCIATION
OF OCCUPATIONAL
HEALTH PROFESSIONALS
IN HEALTHCARE

Dedicated to the health and safety of healthcare workers

June 17, 2010

OSHA Docket Office
Docket No. OSHA-2010-0024
U.S. Department of Labor
Room N-2625
200 Constitution Avenue, NW
Washington, DC 20210

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to comment on the modernization of the injury and illness data collection process. As we shared in our comments regarding adding a musculoskeletal disorder column to the OSHA log earlier this year, "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." The challenge is to identify which program will be used. Although a rarity, what will be the option if an employer does not have electronic capability?

Record keepers should only have to enter the data into one program to meet the requirements for the employer, workers' compensation and federal agencies including the Bureau of Labor Statistics. Often times the record keeper has limited resources including time to perform duplicate entry. In addition, the record keeper should be able to use the entered data to generate reports as aggregate data for the employer to analyze injury trends. Electronic data collection and analysis would also enable OSHA to analyze and disseminate the results of the data in a more timely way.

AOHP is currently engaged in a process with the National Institute of Occupational Safety and Health (NIOSH) to increase the use of the National Health and Safety Network by occupational health professionals in healthcare. The above concerns were shared with Dr. Ahmed Gomaa and his team. It was decided that the first step would be a survey of our membership to identify which electronic systems were used by our members. It would be ideal to be able to link these data collection systems.

AOHP recommends consideration of how the data will be used. If the true incidence of work-related injuries is the goal versus identifying trends, then all injuries should be recorded on the log. The current requirement to record "more significant" injuries has allowed OSHA to identify trends and areas of focus.

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.

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 black ink, appearing to read 'Sandra Domeracki', is written over a light blue horizontal line.

Sandra Domeracki
AOHP Executive President