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# MISSOURI HOSPITAL ASSOCIATION

## FAX TRANSMITTAL SHEET

**TO:** NIOSH Docket Office **DATE:** July 1, 2008  
**FAX #:** 513/533-8285 **PAGES:** 3  
**FROM:** Daniel Landon  
**SUBJECT:** NIOSH Docket Number 135, Notice of Public Meeting and Availability for Public Comment

**COMMENTS:**

Please accept the attached comments from the Missouri Hospital Association.



June 30, 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 our 151 member hospitals and health systems, the Missouri Hospital Association submits the following comments and concerns about the National Institute for Occupational Safety and Health's (NIOSH) proposed national survey of health care workers' safety and employer safety and health practices. Although we agree with the overall objective of this project, we have the following specific concerns about length, format and collection methodology of the surveys.

We believe using labor unions and professional associations to identify respondents promotes sampling bias because of the inability of workers and facilities who are not members of these organizations to participate in the survey. If NIOSH intends to use organized labor and professional groups to market the survey, these organizations should be required to use standardized text in any communication used to solicit participation in the survey. Without this standardization, these organizations could knowingly or unknowingly influence responses. To protect the integrity of the survey results, we also believe that these organizations should only have access to the survey responses data or results that is provided to the public. We also are concerned that there is no way to verify that the workers completing the survey are actually employed in health care. We also oppose the convenience sampling approach NIOSH is proposing for the worker survey because it may result in sampling bias and skewed data. To preserve the quality of the data, we strongly feel NIOSH must ensure the surveys are administered and conducted according to the highest research standards and procedures, and we recommend using a random sampling approach.

In regards to the health care worker survey, we are concerned about the survey's length. A staff member, who is a registered nurse, took the survey to assess the ease of completion and clarity. She found the survey was far too long, and it was impossible to complete the core survey questions in NIOSH's estimated time frame of 20 minutes. We also believe that workers with limited English proficiency would have difficulty understanding and appropriately answering the questions. Many of the questions are not written at the reading comprehension level of some workers in support staff positions. The lack of clear definitions and examples also could affect responses. In addition, offering payment for survey completion also could affect the validity of the responses. There also is no category under "Job Description" to describe middle management positions such as directors, managers and supervisors.

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In regards to the management survey, we believe NIOSH has grossly underestimated the time required for completing the survey. This survey would require input from personnel in different departments, satellite locations, offices and contracted services. Many of the questions would not be applicable to all health care settings. Compiling the number of different doses of antineoplastic drugs would require a significant amount of time. Rather than addressing each of these drugs individually, we recommend that only the total number of antineoplastic doses be recorded. Although some of the drugs listed also are available in oral form, the instructions for completing this section do not differentiate between oral and intravenous doses. Yet, the questions related to preparation and administration appear to only refer to intravenous agent preparation and administration.

We appreciate the opportunity to comment and hope they are useful in supporting NIOSH's efforts to ensure workplace safety. If you have questions, please contact me at 573/893-3700, ext. 1349 or [dlandon@mail.mhanet.com](mailto:dlandon@mail.mhanet.com) or Sharon Burnett, vice president of licensure, regulation and accreditation, at ext. 1304 or [sburnett@mail.mhanet.com](mailto:sburnett@mail.mhanet.com).

Sincerely,

A handwritten signature in black ink, appearing to read "D. Landon", with a long horizontal flourish extending to the right.

Daniel Landon  
Senior Vice President of Governmental Relations

dl/cml