On behalf of the American Dental Association, I would like to take this opportunity to respond to the request published in the Federal Register (FR 17983 Notice) for public comments on National Survey of Healthcare Worker’s Safety and Health NIOSH Docket number 135.

The Association respectfully submits the following comments for your consideration, which we believe will make the survey more relevant to dental healthcare workers.

Employee Core Module

In general, the length of the employee core module may negatively affect the response rate. The survey could be shortened by tailoring the surveys to specific health services groups.

When respondents estimate their level of risk from workplace exposures, is this with or without proper protection?

Add a separate heading in the Health Services section for dental professionals that includes the following occupations:

General Dentist
Endodontist
Periodontist
Prosthodontist
Oral and Maxillofacial Radiologist
Oral and Maxillofacial Pathologist
Oral and Maxillofacial Surgeon
Orthodontist
Pediatric Dentist
Public Health Dentist
Dental Assistant
Dental Hygienist
Dental Technician

Add “Private practice” to the options for employment status.

Add “Device not effective or practical” to the reasons for not always using safe needle devices. Also, when referring to needlestick injuries consider that in dental practice most sharps injuries are the result of contact with dental burs.
Add “also known as standard precautions” after mention of “universal precautions” in question 38. Also delete “formally” in the first sentence.

Under the violence in the workplace section including “bitten” may result in positive responses from dental professionals that do not represent violent situations.

Module C

Delete “formal” in front of “training” in question 2. This may be interpreted differently among respondents.

Thank you for the opportunity to provide these comments on the healthcare worker survey. We also appreciated the opportunity to share other comments and discuss the survey with Mr. Jim Boiano and other NIOSH representatives at the April 30th meeting held at the Sheraton Cincinnati Airport Hotel. The ADA looks forward to participating in this project in the future.