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Sent:

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To:

NIOSH Docket Office (CDC)

Cc:

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Subject:

135 - HCWorker Comments

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Comments

I commend you on your efforts to discover best practices in OHS for healthcare. Our clients will benefit greatly. A few comments:

1) Since Musculoskeletal Disorders (MSD) are the most common injury in healthcare I think more effort should be placed in determining best practicies. I see that you cover ergonomics issues in the core module and management questionnaires but not in hazard module J.

2) Perhaps an entire "hazard module" could be devoted to MSD or ergonomics.

3) In the management questionnaire, under 'ergonomcis' I recommend that you ask: Has a formal ergonomics risk assessment been conducted on high risk jobs? This is different than ques A39- Job Analysis. Perhaps you can ask them to list the name of the MSD risk assessment tools that they used. 4)In the management questionnaire, under 'ergonomics' question A41- Back Belts. I wonder why this question is asked. It suggests that back belts are a "best practice". But they are definitely NOT a best practice to reduce MSD. It's also mentioned in ques 54 of the core module questionnaire.

I look forward to seeing the results. Jeff Pajot, CCPE (Canadian Certified Professional Ergonomist)