Dragon, Karen E.

From:

Jrosen@pef.org

Sent:

Thursday, March 02, 2006 3:47 PM

To:

NIOSH Docket Office

Cc:

Doyle, Glenn; Chen, Jihong [Jane]

Subject:

072 - Patient Handling Comments

Name

Jonathan Rosen

Organization

NYS Public Employees Federation

Email

Jrosen@pef.org

Address

1168-70 Troy-Schenectady Rd

Latham, NY 12110 United States

Comments

The program is almost completely directed at individual nurse practice. It does not cover the role of the employing organization in terms of a process for implimenting patient lifting ergonomics. This is a major omission. It should cover the basic elements: management committment, employee invovlement, risk assessment, etc... It should encourages nurses and individuals to advocate for their organizations to committ resources to the develoopment of these programs. The reality of workplace power relations is that individual nurses will not be able to impliment much of what is in the program without organizational support. Since the target audience is nursing students, they could also consider whether future employers have an ergo program and process in place. So that makes educating them about this issue very important.