Dragon, Karen E. (CDC/NIOSH/EID)

From: Michael_McNally@UHS.ORG

Sent: Friday, June 13, 2008 5:09 PM

To: NIOSH Docket Office (CDC)

Subject: NIOSH's Proposed Survey on Health Care Safety

I have reviewed this survey with my colleagues here at United Health Services Hospitals and we believe this survey should NOT be used. The reasons for our concerns are as follows:

 Workers will be paid \$10 to complete the survey and NIOSH plans to use organized labor groups like Service Employees International Union and professional groups to market the survey to health care workers. With NIOSH reaching out to other groups to market the survey, there is concern about NIOSH's ability to ensure that the survey process is not used to advance other advocacy or political agendas.

Both the management and the employee surveys are lengthy and will take far longer than NIOSH
estimates to complete. Completing the management survey is more complicated a task than
completing the worker survey. The survey should be user-friendly to managers as well as to workers to

ensure the best possible response rate.

• The worker survey is largely based on workers' perception (subjective) while the management survey is based on concrete management practices (objective). The worker survey contains several "factual" statements that the worker is asked either to agree or disagree with. Some of the statements may not have a solid scientific basis and, in fact, may directly contradict agency recommendations. While NIOSH intends to "validate" the management survey through site-visits of either a sample or all of the responding hospitals, there is no intention to "validate" the workers' survey results.

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