

Mid-America – Moore Norman TC/ OSHA / Nursing Homes

STRATEGIC PARTNERSHIP FOR WORKER SAFETY AND HEALTH

BACKGROUND

Mid-America and Moore Norman Technology Centers, approached the Oklahoma City Area Office of OSHA in November of 2001 with an interest in forming a partnership to eliminate or effectively reduce work-related musculoskeletal injuries / disorders in nursing homes and those recognized workplace risk factors contributing to their occurrence. This is expected to be accomplished through a nursing home training and education program developed by Mid-America Technology Center's Health Science Technology staff for managers, supervisors and healthcare providers. The Nursing Home Association of Oklahoma recognizes the focus of the program to be critical to a significant and successful injury prevention program.

The partnership will focus on immediate program goals and objectives related to the institution of effective training and education programs directed toward the reduction of musculoskeletal injuries / disorders and broader program goal and objectives related to the development and implementation of effective safety and health programs in nursing homes. **Such programs will incorporate applicable program management, worksite analysis and hazard control recommendations detailed in current and/or future "Industry and Task Specific Ergonomic Guidelines" developed by OSHA for the Nursing Home Industry.**

Partnership goals and objectives are expected to be accomplished by program participants over a 3 year period. The number of initial nursing home participants and subsequent participants integrated into the program will be determined by the Mid-America / Moore Norman Technology Centers (MAMNTC) Project Team based on program resources.

PARTNERS

The partnership is between the Oklahoma City Area Office of OSHA, Mid-America Technology Center, Moore Norman Technology Center and participating Employers. The partnership may include additional stakeholders when such participation is beneficial to the advancement of the partnership program goals.

OVERVIEW

Today's nursing home facilities employ approximately 1.7 million workers at 21,000 worksites nationwide. By the year 2005, employment levels will rise to an estimated 2.4 million workers. According to the Bureau of Labor Statistics in 1998 nursing home

facilities reported 203,300 non-fatal occupational injuries and illnesses, a rate for non-fatal injury and illnesses of 14.2 cases per 100 full time workers. Fifty-eight percent of the injuries are strains and sprains with back injuries accounting for 42% of all injuries. In Oklahoma, there are approximately 460 nursing homes employing approximately 27,200 workers. According to the 2000 Bureau of Labor Statistics the rate of nonfatal injury and illness cases in Oklahoma al injuries and illnesses for nursing homes was 13.2 per 100 full time workers compared to a private sector average of 6.6.

This initiative represents a Limited Scope OSHA Strategic Partnership designed to:

- a. Encourage conscientious employers, through enforcement incentives and compliance assistance to institute an industry recognized training and education program designed to eliminate or effectively reduce work-related musculoskeletal injuries / disorders. (Participating employers will be provided assistance in the development and implementation of effective safety and health programs) .
- b. Provide a vehicle for addressing ergonomic hazards and related issues in the workplace which is not currently, effectively provided through regulatory intervention.
- c. Provide for the better use of OSHA resources by focusing those resources on work sites where workers are at a greater risk of harm.

Central to the partnership is the collection, reporting and evaluation of program data; the provision of training and education, technical and program development assistance from stakeholders to the partnership and compliance assistance from OSHA.

The partnership supports the Agency's Strategic Plan by focusing resources on the nursing home industry, a high hazard industry; promoting industry specific employee hazard awareness training and education; promoting the development of effective safety and health programs; developing partnerships and the leveraging of external resources.

The effectiveness of the training and education program in eliminating or reducing musculoskeletal injuries / disorders and workplace risk factors and progress of participants in developing and implementing effective safety and health programs will be verified through:

- a. MAMNTC Project Team quarterly onsite monitoring visits.
- b. MAMNTC Project Team quarterly statistics and program evaluation reviews.
- c. OSHA's attendance at MAMNTC Project Team quarterly reviews and participation in quarterly monitoring visits.
- d. OSHA's review of quarterly and annual summary reports prepared by the MAMNTC Project Team.
- e. OSHA verification inspections.

GOALS

The success of the partnership expected to be reflected in accomplishment of the program goals:

1. Prevention of nursing home serious injuries and illnesses, reflected in:
 - a. A reduction in the incidence rate for or number of musculoskeletal injuries and disorders when compared to the establishment's experience. (A numerical goal will be established for each establishment following an analysis of the site-specific injury and illness data and assessment of the any injury prevention program currently in place.)
 - b. A reduction in lost work days cases due to musculoskeletal injuries / disorders.
 - c. A progressive reduction in incidence rate for cases involving days away; restriction and/or transfers, DART, for the establishment with the development and implementation or improvement of an effective safety and health program.

2. Improvement in workplace safety and health, reflected in:
 - a. The number of job tasks and activities evaluated for ergonomic risk factors that could lead to musculoskeletal disorders or injuries.
 - b. The number of job tasks, practices and patient handling equipment replaced, eliminated or modified as a result of screening surveys or injury investigations.
 - c. The development and implementation or improvement of a site-specific safety and health programs.
 - d. Level of employee training:
 1. All managers, supervisors and employees involved in direct patient care who have not received training equivalent to that provided by MAMNTCs' nursing home training and education orientation program (**Appendix A**) will have completed that program within 1 year of the effective date of the agreement.
 2. In addition to the MAMNTC orientation training, management and / or employees assigned safety and health responsibilities will have completed training within 1 year of the effective date of the agreement in:
 - a. The performance of screening surveys to identify and evaluate ergonomic risk factors associated with job tasks, patient handling equipment, practices and procedures and need for modification and preventive measures.
 - b. Accident / injury investigation.

3. Additional injury prevention education provided by the employer or MAMNTCs' staff..
- e. Meaningful employee involvement:
 1. Number of screening surveys, accident / injury investigations and/or self-inspections conducted with employee participation.
3. Effective utilization of Area Office compliance resources, reflected in:
 - a. The number of establishments and workers covered by the partnership.
 - b. The number of self-inspections conducted by the employer.
 - c. The number of training and education sessions provided by MAMNTCs' staff.
 - d. The number of program reviews and on-site monitoring visits conducted by the MAMNTC Project Team.

PROGRAM IMPLEMENTATION

The MAMNTC Project Team, comprised of the Industrial Coordinators for Mid-America and Moore Norman Technology Centers and staff, will be responsible for: the training and educational needs of participating employers; the review of employer injury / illness records, accident records, results of screening surveys and self-inspections , to identify injury trends or patterns, hazards, need for additional job task evaluations and/or modifications, training and other program improvements; the establishment of an action plan for the development and implementation or improvement of a site-specific safety and health program; and monitoring the progress of participating employers in accomplishing the goals of the partnership through program reviews conducted quarterly and on-site monitoring visits conducted quarterly.

In order to ensure the integrity of MAMNTCs' nursing home training and education program content and consistency of presentation, the competency of others to provide the training will be determined by the MAMNTC Project Team and staff.

Participating employers agree to: comply with the training and education requirements set forth in the partnership program goals; employee participation in accident / injury investigations, screening surveys and/or self-inspections; conduct screening surveys to identify and evaluate ergonomic risk factors associated with job tasks, practices and procedures, and patient handling equipment and need for modifications and preventive measures; conduct periodic (weekly) self-inspections to ensure job tasks continue to be performed in an ergonomically safe manner to establish abatement tracking and verification procedures to ensure needed modifications and preventive measures have been instituted; to participate in on site monitoring visits by members of the MAMNTC Project Team; to promptly abate any identified hazards; to the development and implementation of a comprehensive safety and health program that complies with OSHA's 1989 Voluntary Safety and Health Program Management Guidelines, the

equivalent Occupational Safety and Health Program developed by the Oklahoma Department of Career Technology and Education or the guidance set forth in OSHA publication, Framework for a Comprehensive Safety and Health Program in Nursing Homes.

DATA COLLECTION AND ANALYSIS

Employers agree to:

1. Provide injury /illness data (300 log, first report of injury / illness, accident records etc.) to the MAMNTC Project Team quarterly.
2. Provide the findings of screening surveys and self-inspections conducted and other information requested to the MAMNTC Project Team quarterly.
3. Provide documentation of progress made in developing and implementing the elements of a safety and health program, in accordance with the timeframes agreed to in the action plan developed by the MAMNTC Project Team and participating employer.

MAMNTC Project Team agrees to:

1. Maintain a list of participating establishments and notify OSHA of any terminations in participation for failure to perform in accordance with the program requirements.
2. Provide quarterly and annual **summary reports** to the Oklahoma City Area Office addressing the following measurements:
 - a. Percentage of employees trained in accordance with the requirements of the partnership.
 - b. Number of job task screening surveys and self-inspections conducted and resulting actions (i.e., number of job task modifications, stress reducing measures instituted, product substitution, training etc.)
 - c. Incidence rate for ergonomic-related injuries and disorders. Total incidence rate for the establishment.
 - d. Progress of establishments in developing and implementing the elements of a safety and health program in accordance with the timeframes agreed to in the action plan.
 - e. Resource utilization hours.

Appendix B provides a recommended report form.

EMPLOYEE RIGHTS

Under the partnership, employees are free to exercise their rights as guaranteed under the OSHAct including but not limited to the right to file a safety and health complaint without fear of reprisal and the right to request information collected pursuant to OSHA requirements.

OSHA INVOLVEMENT

OSHA agrees to:

1. Periodically attend quarterly program reviews conducted by the MAMNTC Project Team and accompany MAMNTC Project Team members on quarterly onsite monitoring visits.
2. Review quarterly and annual summary statistics / evaluation reports prepared by the MAMNTC Project Team to track progress made toward meeting program goals and to make recommendations for program improvements.
3. Offer employers in good standing **compliance incentives**:
 - a. Employers selected for a verification inspection will not receive another such inspection within the next 12 months.
 - b. In the event of a verification inspection, the focus will be on ergonomic hazards and issues related to the prevention of musculoskeletal injuries and disorders.
 - c. Other-than-serious violations will not result in a citation, provided the violations are abated immediately and abatement is observed by OSHA.
 - d. Eligibility for the maximum penalty reductions currently permitted by the OSHA Field Inspection Reference Manual (CPL 2.103).
 - e. Provided assistance with safety and health training.
 - f. Provide onsite and / or offsite technical assistance as needed and resources allow.
 - g. Maximize the use of phone-fax to handle complaints in accordance with provisions of OSHA's FIRM and compliance directive(s).

OSHA VERIFICATION INSPECTIONS

1. The partnership does not exempt employers from unprogrammed activity (i.e., complaint and referral inspections, fatality and catastrophe investigations) or verification inspections.
2. Verification inspections will be conducted when determined to be warranted by the Area Director based on workplace conditions and program reviews.

INTERFACE WITH OTHER COMPLIANCE ACTIVITIES

1. Unprogrammed activity (i.e., complaint and referral inspections, fatality and catastrophe investigations) maybe combined with inspections outlined under this program in the interest of efficient use of resources.

2. Any establishment selected for inspection by a National Emphasis Program (NEP) or Local Emphasis Program (LEP) will remain subject to such inspections, however, the scope of the inspection would be limited to the hazard(s) targeted by the emphasis program.

LEVERAGING

The partnership incorporates the following leveraging components:

1. Employer performed screening surveys and self-inspections.
2. MANTC Project Team quarterly onsite monitoring visits and program reviews.
3. MAMNTC Project Team and staff provided training and education.

PROGRAM EVALUATION

Annual evaluations will be done by the Oklahoma City Area Office using the guidelines provided in the OSHA Strategic Partnership for Worker Safety and Health Directive (TED 8-0.2, Appendix C).

An evaluation of the program may be done and any recommendations to OSHA for program improvements may be made by Mid-America and Moore Norman Technology Centers and partnership participants.

TERMS OF THE AGREEMENT

The partnership will exist for the duration of 3 years. Should any of the parties choose to withdraw from the program, a 30 day written notice will be given, and the program will be terminated.

Appendix A Training Program

The objectives of the program are, upon completion, for individuals to be able to:

- **Demonstrate good body mechanics**
- **Demonstrate good lifting techniques**
- **Demonstrate safe transfer techniques**
- **Identify fall prevention procedures**
- **Demonstrate an understanding of resident lifting equipment**
- **Demonstrate the ability to participate in a preventive exercise program**
- **Demonstrate a team approach to job related tasks**

The program subject matter will include:

1. Pre-test
2. Body Mechanics
3. Demonstration Activity
3. Lifting Techniques
4. “Body Mechanics Activity”
5. Multiple Person Lifting
6. Demonstration Activity
7. Guidelines for Transfers
8. Transfer Techniques
9. Demonstration Activity
10. Ambulatory Procedures
11. Fall Precautions
12. Lifting and Transfer Equipment
13. Demonstration Activity
14. Exercise Program
15. Communication Skills
16. Criteria for Proficiency
17. Post-test
18. Clinical Skills Assessment

Appendix B
Quarterly and Annual Summary Report Form

Date: _____
Contact: Name
 Tite
 Phone #

Project Information
(Accumulative Data)

# of employees covered at the establishment	Work hours	# of msd or injury lost work day cases	# of msd or injury cases	# of total cases involving days away; restricted or job transfer for the establishment

Hazard Prevention and Control
(Accumulative Data)

# of screening surveys, self-inspections other job task / practices / equipment evaluations conducted	# of screening surveys, self-inspections, job tasks etc. conducted with employee participation	# job tasks / practices / equip. replaced, eliminated or modified.	CSHP development and implementation (completed; in progress)

Training
(Accumulative Data)

# of initial MAMNTC training sessions	# of employees trained	# of mgt. /others trained in performing screening surveys; accident/injury invest.	# of training hours

SIGNATURES

This Strategic Partnership for Worker Safety and Health is effective upon the signature of all parties hereto:

**OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
OKLAHOMA CITY AREA OFFICE**

By: _____ Date: _____

Title: _____

McCASKILL NURSING HOME, MAYSVILLE

By: _____ Date: _____

Title: _____

**MID-AMERICA TECHNOLOGY CENTER, DIVISION OF BUSINESS &
INDUSTRY SERVICES**

By: _____ Date: _____

Title: _____

**MOORE NORMAN TECHNOLOGY CENTER, DIVISION OF BUSINESS &
INDUSTRY SERVICES**

By: _____ Date: _____

Title: _____