



October 11, 2007

The Joint Commission
Division of Standards & Survey Methods
Standards Improvement Initiative
One Renaissance Blvd.
Oakbrook Terrace, IL 60181

To Whom it May Concern:

Chaff & Co., a corporate communications company that focuses on employee health and safety with an emphasis on health care facilities, would like to take this opportunity to thank The Joint Commission for providing their proposed revisions to the Environment of Care standards for public comment.

Chaff & Co. offers the following recommendations to The Joint Commission:

1. Rescind the proposed revised standards, E.C. 1.01.0, 2.01.0, and 3.01.0.
2. Revise the Environment of Care standards (and other accreditation standards as appropriate) so that patient safety, employee safety, security, and environmental issues each have their own Standards and Elements of Performance.

While the first recommendation is necessary, the second recommendation can be easily accomplished since Joint Commission Resources has worked with OSHA to develop the document, "*Protecting those who serve: Health Care Worker Safety.*" The Joint Commission has also spent a considerable amount of time working with the U.S. Environmental Protection Agency to improve the handling of hazardous wastes in health care facilities.

Chaff & Co. commends The Joint Commission for their continuing efforts to protect the health and of safety of patients in the thousands of health care facilities in the United States. But there is a human cost associated with providing that health care, which has become invisible. Data from the U.S. Bureau of Labor Statistics shows that each year for the past 25 years, more than 500,000 health care workers have been injured while providing for the health and well being of America's sick and injured. There is, of course, a substantial economic burden associated with those work-related injuries and illnesses. The most conservative estimates place the direct and indirect costs to the health care industry at about \$18 billion per year. This is based on an estimate from the Centers for Disease Control and Prevention that each work-related illness or injury costs about \$35,000 in direct and indirect costs.

Hospitals and other health care facilities, despite efforts by The Joint Commission, operate under the mistaken belief that accreditation ensures compliance with federal and state worker health and safety rules. In addition, because health care facilities place significant emphasis on patient safety and compliance with a host of federal regulations other than those that address employee safety, health care facilities tend to overlook the impact that employee injuries and illnesses have on health care delivery. In fact, in many instances, the success of employee health and safety programs is judged almost entirely on the success of accreditation surveys rather than on reducing the number of work-related injuries and illnesses.

This is due in part to the fact that the Environment of Care standards are scattered with elements of performance that require health care facilities to have employee safety programs in place but make few if any references to specific federal worker health and safety regulations with the implication that patient safety equates to worker safety. Thus, while health care facilities gauge success on the reduction of patient injuries and illnesses and a successful accreditation survey, they tend to overlook the escalating number of work-related employee injuries and illnesses. The proposed revisions to the Environment of Care standards further confuse the relationship between patient safety and health care worker safety and dilute the importance of worker safety by wrapping it in the cloak of safety and security risks.



The Joint Commission
Division of Standards & Survey Methods
Standards Improvement Initiative
October 11, 2007
Page 2

Another reason that there is apparent confusion about the role of state and federal regulations in health care facilities is because unlike its treatment of the National Fire Protection Association (NFPA) standards that are dealt with in a single location within the Environment of Care standards, references to worker safety and health standards are sprinkled throughout the Environment of Care standards, are often associated with unrelated patient safety standards, and sometimes intertwined with unrelated environmental standards.

The Joint Commission now proposes to meld patient safety, employee safety, and environmental issues with security in its Environment of Care standards. While there is overlap between patient safety, employee safety, environmental issues, and security, they are distinct disciplines and have distinct differences in their scope.

Because of the overlap between patient safety and these other disciplines, The Joint Commission has made an effort to ensure that health care facilities are aware of their responsibilities under state and federal regulations. However, unlike its approach with NFPA standards, which are addressed explicitly and in detail, The Joint Commission barely mentions the responsibility of health care facilities to comply with Occupational Safety and Health Administration (OSHA) and U.S. Environmental Protection Agency (EPA) regulations. It is, therefore, not surprising that health care facility administrators often have incomplete knowledge of their responsibilities under the regulations of those two agencies.

As the International Association of Hospital Security and Safety (IAHSS) points out in their October 9, 2007, letter to the Standards Improvement Initiative of The Joint Commission:

Our membership differs with your comment in the *Chapter Overview and Outline* stating that the "the field has indicated that...the safety and security requirements are closely related". These two disciplines overlap in some general areas; however each has a very distinct purpose and role in creating a safe and secure healthcare environment.

Chaff & Co. agrees completely with the IAHSS statement.

Chaff & Co. urges The Joint Commission to use this opportunity to help improve patient care and safety by improving employee care and safety. Chaff & Co. will be happy to discuss these recommendations in greater detail with The Joint Commission and other interested parties.

Cordially,

Linda Chaff
President