March 29, 2017

OSHA Docket Office
Docket No. OSHA-2016-0014
Technical Data Center
Room N-3653
OSHA
U.S. Department of Labor
200 Constitution Avenue NW.
Washington DC 20210

The attached response to Docket No. OSHA-2016-2014 / RIN 1218-AD-08 Request for Information is provided by the International Association for Healthcare Security and Safety (IAHSS) representing 2,200 members from more than 850 healthcare facilities in all 50 United States, 9 Canadian Provinces, and more than 15 other countries. IAHSS has developed security industry and design guidelines applicable to healthcare facilities and has educated and certified tens of thousands of healthcare security professionals through its four levels of certification.

Healthcare is critical infrastructure and has long been considered one of the most honorable of professions as it seeks to provide for the benefit and continued well-being of others. Since the vast majority of the violent incidents and injuries to caregivers are caused by the very persons they are trying to help, healthcare professionals must be supported in the adoption of strategies to better understand the circumstances and events leading up to these types of behaviors. A good foundation is the creation of rules and standards with which to better prevent and respond to incidents of workplace violence when they occur.

Healthcare facilities are no longer safe havens, and have joined other previously sacrosanct settings such as houses of worship and schools as prime venues for acts of violence.

IAHSS believes it is of paramount importance concrete steps be taken to mitigate this growing issue and to better equip healthcare workers with tools to detect, prevent and recover from such incidents when they occur.

IAHSS Board representatives attended the Occupational Safety and Health Administration’s Public Stakeholder Meeting on Preventing Workplace Violence in Healthcare and Social Assistance in Washington DC on January 10, 2017 to achieve a
better understanding of the next generation of standards and to better understand how to engage in this very important process

IAHSS believes that representation from the healthcare security industry is a critical part of any proposed panel discussions on this topic, since security professionals represent the front line response to acts of violence occurring to our direct patient care colleagues. Healthcare security leaders can provide subject matter expertise in the development and implementation of standards that are reasonable and appropriate for a variety of healthcare environments and consistent with the multitude of other rules and regulations in our industry.

Following the meeting in Washington DC, IAHSS assembled a group of experts responsible for healthcare security and safety programs across the United States. These experts have reviewed the OSHA Request for Information (OSHA-2016-0014) and are providing the attached response on behalf of IAHSS. Our responses include introductory language on IAHSS fronting each section in the event that different reviewers are assigned to different sections during your review process.

As the definitive source of expertise in healthcare security and safety, IAHSS looks forward to working with OSHA and the other stakeholders involved in the development of this standard.

Please contact Colleen Kucera (colleen@iahss.org) for more information and to further engage IAHSS in the process and thank you for including us in this very important initiative.

On behalf of the International Association for Healthcare Security & Safety

Respectfully,

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