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Douglas L. Parker

Assistant Secretary of Labor for Occupational Safety and Health

U.S. Department of Labor

Occupational Safety & Health Administration (OSHA)

Sent via email to: Parker.Douglas@dol.gov

CC: Levinson.Andrew@dol.gov

Assistant Secretary Parker:

The below signed organizations, representing the nursing profession from across the country, are writing today urging the prompt release of a Workplace Violence Prevention for Health Care and Social Assistance Standard.

The impact of workplace violence on nurses and the nursing profession is dire. As nurses stand on the frontline of patient care and working with patient families, they are particularly at high risk to experience violence by the very nature of their job.¹ Workplace violence in health care remains a longstanding crisis that was exacerbated by the COVID-19 pandemic. A June 2022 survey of American Nurses Association (ANA) membership found 29 percent of respondents had experienced a violent incident at work in the last year.² In a November 2022 ANA survey, 53 percent of respondents reported verbal abuse had increased since the COVID-19 pandemic.³

The National Institute for Occupational Safety and Health (NIOSH) found in 2020 that 76% of people experiencing workplace violence incidents that required time off worked in the health care and social service industries.⁴ However, due to underreporting of workplace violence incidents and the lack of a national prevention standard to require reporting, we

¹ Rozina Somani, et al., *A Systematic Review: Effectiveness of Interventions to De-escalate Workplace Violence against Nurses in Healthcare Settings*, Safety and Health at Work, May 3, 2021, available at: <https://pubmed.ncbi.nlm.nih.gov/34527388/>.

² American Nurses Foundation, *Pulse on the Nation's Nurses Survey Series: 2022 Workplace Survey*, August 2, 2022, available at: <https://www.nursingworld.org/~4a209f/globalassets/covid19/anf-2022-workforce-written-report-final.pdf>.

³ American Nurses Foundation, *Three-year Annual Assessment Survey: Nurses Need Increased Support from their Employer*, January 24, 2023, available at: https://www.nursingworld.org/~48fb88/contentassets/23d4f79cea6b4f67ae24714de11783e9/anf-impact-assessment-third-year_v5.pdf.

⁴ The National Institute for Occupational Safety and Health, *Occupational Violence: Fast Facts*, last reviewed August 31, 2022, available at: <https://www.cdc.gov/niosh/topics/violence/fastfacts.html>.

cannot know the full extent of the issue. For example, the Bureau of Labor Statistics data has not analyzed incidents in the health care industry alone since 2018—when they found that healthcare workers accounted for 73 percent of all nonfatal workplace injuries and illnesses due to violence.⁵

OSHA has a leading responsibility to mitigate this violence and its consequences. A mandatory OSHA standard requiring national reporting of these incidents is a vital first step in preventing them. Without the best data and evidence, employers and health care systems cannot create effective prevention strategies. OSHA’s 2016 voluntary guidelines lead employers through an evidence-based process to create internal reporting systems, risk assessments, and tailored prevention strategies that avoid “one-size-fits-all” solutions. However, OSHA released its guidelines over eight years ago, and it is still not common practice in most health care workplaces despite the alarming increase in violence rates. We applaud OSHA for beginning the rulemaking process for this standard with the completion of the Small Business Advocacy Review in May 2023. OSHA acknowledged in its report of the Review that health care and social assistance workers now face nearly six times the risk of workplace violence than other industries.⁶ It is imperative that OSHA continue its rulemaking process for this standard.

Many states have stepped in to fill the gap left by federal inaction and passed important mandatory workplace violence prevention legislation. The Joint Commission began requiring violence prevention interventions in 2022 for their accredited hospitals. These efforts have made some strides, but remaining gaps leave nurses in many states and in diverse care settings without protection. Nurses across the country, providing care across all settings, need a national OSHA standard followed by effective enforcement. Nurses cannot continue to wait for this vital protection. It has been a year since OSHA began its rulemaking, we urge OSHA to rapidly finish this standard and release a proposed rule for public comment without further delay.

We appreciate your timely response to this issue. If you have any questions, please contact Tim Nanof, Vice President, Policy and Government Affairs at ANA, tim.nanof@ana.org or (301) 628-5166.

⁵ U.S. Bureau of Labor Statistics, *Workplace Violence in Healthcare, 2018*, Released April 2020, available at: <https://www.bls.gov/iif/factsheets/workplace-violence-healthcare-2018.htm>.

⁶ Occupational Safety and Health Administration, *Report of the Small Business Advocacy Review Panel on OSHA’s Potential Standard for Prevention of Workplace Violence in Healthcare and Social Assistance*, May 1, 2023, available at: <https://www.osha.gov/sites/default/files/OSHA-WPV-SBAR-Panel-Report.pdf>.

Sincerely,

American Nurses Association
Academy of Medical-Surgical Nurses
American Academy of Emergency Nurse Practitioners
American Academy of Nursing
American Association of Nurse Anesthesiology
American College of Nurse-Midwives
American Nephrology Nurses Association
American Psychiatric Nurses Association
Arkansas Nurses Association
Association of Nurses in AIDS Care
Association of Pediatric Hematology Oncology Nurses
Association of periOperative Registered Nurses
ANA\California
Colorado Nurses Association
Connecticut Nurses Association
Delaware Nurses Association
Dermatology Nurses' Association
Florida Nurses Association
Georgia Nurses Association
Gerontological Advanced Practice Nurses Association
Hawai'i-ANA
Hospice and Palliative Nurses Association
ANA Idaho
ANA Illinois
Indiana State Nurses Association
International Association of Forensic Nurses
International Society of Psychiatric-Mental Health Nurses
Iowa Nurses Association
Louisiana State Nurses Association
Maryland Nurses Association
ANA Massachusetts
Minnesota Organization of Registered Nurses
Missouri Nurses Association
Montana Nurses Association
National Association of Nurse Practitioners in Women's Health
Nebraska Nurses Association

Nevada Nurses Association
New Hampshire Nurses Association
New Jersey State Nurses Association
New Mexico Nurses Association
ANA-New York
North Carolina Nurses Association
North Dakota Nurses Association
Northeast Multistate Division
ANA-Ohio
Oklahoma Nurses Association
Oregon Nurses Association
Orthodox Jewish Nursing Association
Pennsylvania State Nurses Association
Preventive Cardiovascular Nurses Association
ANA Rhode Island
South Carolina Nurses Association
South Dakota Nurses Association
Tennessee Nurses Association
Texas Nurses Association
Utah Nurses Association
Virgin Islands State Nurses Association
Virginia Nurses Association
Washington State Nurses Association
Wyoming Nurses Association