



AMERICAN SOCIETY OF  
**SAFETY PROFESSIONALS**

November 24, 2021

Centers for Disease Control and Prevention, HHS  
Robert A. Taft Laboratories, MS C-34  
1090 Tusculum Avenue  
Cincinnati, Ohio 45226-1998

**[Docket No. CDC-2021-0106; NIOSH-344]  
Interventions to Prevent Work-Related Stress and Support Healthy Worker Mental Health; Request for Information**

The American Society of Safety Professionals (ASSP) appreciates the opportunity to submit these comments in response to the U.S. Department of Health and Human Services (HHS)/Centers for Disease Control and Prevention (CDC) notification of Sept. 27, 2021, requesting comments about current evidence-based, workplace and occupational safety and health (OSH) interventions to prevent work-associated stress, support stress reduction, and foster positive mental health and well-being among the nation's health workers.

**Introduction**

As HHS, including the CDC, is aware, [ASSP](#) is the oldest society of safety professionals in the world. Founded in 1911, we represent more than 36,000 professionals advancing workplace safety and health in every industry, in every state and around the globe. ASSP members have set the OSH community's standards for excellence, ethics and practice for more than 100 years.

**ASSP Position**

We understand that CDC is charged by the American Rescue Plan Act of 2021 ([Pub. L. 117-2](#), sec. 2704) with educating health workers and first responders on primary prevention of mental health conditions and substance use disorders and encouraging these professionals to identify and seek support for their own mental health or substance use concerns. ASSP supports this initiative to gather information on current evidence-based, workplace and OSH interventions as well as interventions under development and research in progress to support and promote the mental health and well-being of health workers.

ASSP is committed to worker safety beyond physical safety programs such as hazardous energy management, confined space entry and protection when working at heights. ASSP also promotes programs, processes and training to reduce workplace stress and support worker wellness, including mental health. While ASSP does not directly implement interventions for healthcare workers, we provide tremendous resources for the healthcare community, which are then used to provide and support programs in health care across the country.

**Questions for Workplaces With Interventions and Services in Place**

ASSP reviewed the questions published in the Federal Register and is commenting on those about which we have specific and applicable experience and expertise. The first three questions address mental health programs from the perspective of implementation, diagnostic and therapeutic interventions, and offering services for mental health. Many ASSP members work for organizations that offer such services, and we have notified our membership of 36,000+ of this request for their participation and comment. For the purposes of this technical comment, ASSP's comments address questions 4 and 6. .

*Overall Question: Please describe any programs you are aware of that help employers to fund or otherwise develop interventions or services to support health worker mental health and well-being.*



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### Consensus Standards

As an advocate for workplace safety and OSH professionals, ASSP understands the importance of leading the discussion and evolution of voluntary safety standards. ASSP is the secretariat for 11 American National Standards Institute (ANSI) committees responsible for more than 100 safety standards. ASSP's role in the standards development process is to organize the committees and ensure the standards are developed, revised and published in a timely manner and in accordance with ANSI procedures.

Two of our standards address worker stress:

- 1) ANSI/ASSP Z10.0-2019, *Occupational Health and Safety Management Systems*
- 2) ISO/ANSI/ASSP 45003-2021, *Occupational Health and Safety Management – Psychological Health and Safety at Work - Guidelines for Managing Psychosocial Risks*.

The Z10.0 standard defines psychosocial stressors as “factors that contribute to or cause a person to experience psychological stress that affects health, safety or work performance. These include factors associated with the job and work environment with the organization of work; characteristics of the individual worker; and significant events within and external to the work environment.”

ISO 45003 aims to help organizations bring a greater focus to overall worker health, as well as safety, particularly regarding how safety professionals can incorporate psychological risk analysis into their occupational safety and health management systems.

Many safety professionals, including those who implement programs for healthcare workers, have implemented a safety management system with a psychosocial focus using these standards. Safety management systems bring all aspects of an organization together in a systems approach, instead of safety as an independent silo.

Management, line workers, human resources, safety professionals all work together for the benefit of the worker, to reduce injuries, illnesses and stress. ASSP provides training to develop the knowledge and confidence to successfully implement an occupational health and safety management system (OHSMS) as an integral part of an organization's overall business operations and objectives. The goal is to help OSH professionals understand the importance and value of implementing an OHSMS.

### Training and Education

ASSP is the preferred source for training and education among OSH professionals. ASSP has a long-standing reputation of providing top-quality safety training and education that can be immediately put into practice to create safe work environments. The Society is accredited by the International Association for Continuing Education and Training (IACET) and authorized to offer IACET CEUs for programs that qualify under the ANSI/IACET standard, which is recognized internationally as a standard of excellence in instructional practices.

ASSP offers multiple training modalities, including instructor-led and self-paced online courses, live virtual classroom, live in-person classroom and webinars to create multiple paths by which OSH professionals can complete training that fits in their schedule, learning style and budget. In particular, ASSP's Corporate Safety Management, Implementing ISO 45001 and Implementing Z10 Management Systems Based Thinking courses all focus on creating programs to keep workers safe, both physically and mentally.

When the COVID-19 pandemic first started, ASSP created a series of webinars related to both the disease as well as the associated risks. Information was changing quickly in early 2020 and ASSP remained at the forefront with data from safety experts on how to keep workers safe. As the pandemic continues, the emotional burden and stress, especially on the healthcare community continues to grow. And ASSP continues to provide resources and information for the healthcare community to implement in their workplaces.





When OSHA published an emergency temporary standard (ETS) for the healthcare industry, ASSP hosted a webinar to explain the standard. Participants were able to connect with the speaker to gain insight on specific questions.

### **Questions About Health Workers' Communication Preferences**

*Please tell us about your workplace's most effective methods of informing health workers about available interventions, services and workplace practices and policies, including but not limited to: notification channels, trusted messengers (e.g., upper management, front line supervisor, union representatives), and efforts to reach workers who are underserved by mental health/behavioral health resources.*

### Resources

ASSP members participate in 18 practice specialties, including Construction, Consultants, Engineering, Environmental, Ergonomics, Fire Protection, Global Operations, Healthcare, Industrial Hygiene, Management, Manufacturing, Military, Oil, Gas, Mining and Mineral Resources, Public Sector, Risk Management, Training and Communications, Transportation and Utilities. ASSP also has four common interest groups: Blacks in Safety Excellence, Emerging Professionals in OSH, Hispanics in Safety and Women in Safety Excellence. All of these groups have been active in helping our members address worker mental health.

For example, ASSP's Healthcare Practice Specialty develops healthcare safety education programs and technical materials. It also identifies and promotes research around emerging healthcare safety technologies to better serve OSH professionals in the healthcare industry. These include individuals working for hospitals, extended-care facilities, medical clinics, doctors'/dentists' offices, psychiatric facilities, substance abuse facilities, paramedic operations and industries providing goods or services to medical facilities. The Healthcare Practice Specialty provides members with networking opportunities via social media, conference calls and in-person meetings. Our healthcare members receive professional development opportunities, including healthcare- and safety-focused education that they can immediately put into practice, mentor relationships that facilitate sharing knowledge and volunteer and leadership opportunities to build skills and enhance their resume. With the COVID-19 pandemic, it has been imperative for safety professionals who support healthcare providers to continue to connect to discuss best practices to keep workers safe both physically and mentally.

ASSP facilitates shared knowledge and education to its members. A common method for healthcare safety professionals to share information on the safety and mental health of their workers is the online ASSP Community. Questions are posed and case studies and best practices are shared, allowing members from around the globe to collaborate on best practices. The ASSP Community is designed so members can quickly find the information they need. Recently, the Healthcare Practice Specialty hosted webinars on preventing workplace violence, and addressing emotional fatigue and burnout syndrome. The group also published several podcasts related to pandemic responses and sharps injury prevention, distributed a newsletter and hosted a discussion to identify the most relevant and valuable resources for members. On the surface, a sharps injury prevention podcast might not sound related to mental health. But for healthcare workers, every needle has the potential to transmit a virus or illness to the workers and that constant hazards produces mental stress.

### Summary

ASSP supports NIOSH's effort to gather data on the implementation of safety programs to improve the health and well-being of healthcare workers. Our members continue to work with businesses, employers, employees, regulators and legislators at all levels to increase workplace safety for all — a mission that will remain until every worker returns home safe, both physically and mentally.

If requested, ASSP will apprise our membership of this proposed initiative. Our membership would have interest, and we believe the Society can proactively and positively contribute.





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Thank you for your time and attention to our comments. If we can be of any assistance in this matter, please feel free to contact ASSP via the information provided below.

Respectfully submitted,

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