Most healthcare organizations consider safety as a core value. However, the industry has one of the worst injury rates for all occupations. In 2012, injury rates for the skilled nursing industry prompted OSHA to implement an aggressive review to improve ergonomic, slip and fall, bloodborne, and workplace violence prevention practices. OSHA compliance officers conducted site visits with specialists in ergonomics at facilities across the US.

One of those inspections at a senior living facility resulted in a “serious level” citation for the lack of a safe patient-handling (ergonomic) program as well as other violations.

The client’s journey through this inspection and citation resulted in Lockton helping the client to implement a comprehensive Safe Patient/Resident Mobility Program (SPRMP), which dramatically reduced its lost-time and restructured-duty days and helped to create a safer and more effective operation.

The Journey Begins: Records Review

The process started with a multiday OSHA visit. The client’s OSHA 300 logs showed three consecutive years of incidents on the rise, especially strains to healthcare workers.
For example, in the prior years before the inspection, the Days Away, Restricted, and Transfer (DART) rate was 9.3, nearly twice the highest national average for nursing and residential care facilities. The year just before the inspection, the logs showed a 16.3 DART rate, three times the national average.

Further, the review determined that more than 50 percent of the recordable injuries were due to ergonomic strain creating back and shoulder injuries to certified nursing assistants. This statistical review set in motion a complete review of the client’s prevention programs for hazard identification and control.

**OSHA Inspection Results and Findings**

- OSHA hit the operator with a $6,300 penalty—as part of a $14,900 total fine—due to the lack of a SPRMP.
- The facility lacked formal processes to conduct hazard assessments for all occupations.
- Inspectors cited deficiencies in the bloodborne pathogens (BBP) program, with no reviews of their exposure control plan (ECP) or new sharps technology.
- The personal protective equipment (PPE) program for voluntary use of dust mist respirators lacked use of the Appendix D Federal OSHA standards.
- There was no emergency eye wash station in the laundry area and no Spanish education for the Spanish-speaking staff.
- There were errors in OSHA recordkeeping for sharps/privacy cases.
Addressing the Citation

The organization’s CEO decided to negotiate the citation and make safety a priority again in this facility. The facility’s leadership team and corporate operations vice president met with the OSHA regional director who issued the citation, and agreed on a safety management plan:

- OSHA reduced the monetary fine by 25 percent.
- The “serious” citation designation and monetary fine of the SPRMP violation remained.
- The facility had just 45 days to develop and implement a comprehensive SPRMP program and to abate and comply with other OSHA-required programs for hazard assessments, BBP, eye wash, sharps recordkeeping, and PPE.
- OSHA required a third-party special status report on the SPRMP implementation 60 days after implementation, documenting areas of completion, deficiencies, and ongoing steps.
- Federal OSHA inspectors would return to the facility to evaluate and document post-implementation.
- A $70,000 fine would be levied if the return visit showed that the facility had failed to implement the required SPRMP program.

Solution and Results

Once the agreement was in place, it was time to go to work. Lockton stepped in and assisted the national skilled nursing provider with not only meeting the requirements, but implementing a system that went above and beyond the basics. This system was spot-on to OSHA’s expectations, as it was based on the ANA SPHM Standard, which OSHA follows. In addition, this was all completed in just a four-month timeframe, spanning from the OSHA citation in August to completion in December.
Lockton Loss Control assisted, working through a comprehensive SPRMP checklist and helping with implementation. The facility team and Lockton used the highly regarded national safe patient-handling and mobility standards, created by the American Nurses Association (ANA), that were released the year of the inspection:

**ESTABLISH A CULTURE OF SAFETY**
- Created a written safety program defining management’s role in overseeing employee safety.
- Produced a new “teachable moment/coaching” process, which inserts immediate, positive feedback on the floor, reinforcing SPRMP behaviors.

**IMPLEMENT AND SUSTAIN A SPRMP PROGRAM**
- A new administrator now supports a dedicated staff person to employee safety, including SPRMP oversight, and she successfully sustains the SPRMP program.
- As part of the program’s initial launch, training was conducted for 150 healthcare workers.

**INCORPORATE ERGONOMIC DESIGN PRINCIPLES**
- Lockton Loss Control and an equipment vendor conducted a needs assessment to identify the appropriate quantity and mix of safety solutions, lifts, and assistive devices.
- Employees were reminded of their on-site safety committee and its open forum to address any safety issue or SPRMP concerns with management.

**SELECT, INSTALL, AND MAINTAIN SPRMP TECHNOLOGY**
- Increased resident lifts by 50 percent and slings by 100 percent.
- Implemented monthly inspections by a third-party vendor, facilitating a routine maintenance program.
ESTABLISH AN EDUCATION, TRAINING, AND MAINTAINING COMPETENCE SYSTEM

- Implemented new SPRMP education system with 14 employees selected as the “go to” SPRMP staff members covering all shifts for their peers.

- Unannounced observations are conducted five times per week to assist in SPRMP learning.

INTEGRATE RESIDENT-CENTERED SPRMP ASSESSMENT, PLAN OF CARE, AND USE OF SPRMP TECHNOLOGY

- System created to resolve a resident or family refusal of SPRMP equipment.

INCLUDE SPRMP IN REASONABLE ACCOMMODATION AND POSTINJURY RETURN TO WORK

- HR established as the first line to monitor incident reports.

- Employees empowered to alert management regarding physician restrictions with enhanced local clinic relationships that provide a proactive return-to-work process.

ESTABLISH A COMPREHENSIVE EVALUATION SYSTEM

- Developed an SPRMP quality control process involving six different groups within the company.

- Transparency enforced with front-line staff being informed of goals and reporting any high-level discrepancies.
The facility staff and the Lockton Loss Control team implemented the SPRMP program to the letter. The client saw dramatic results within the first 12 months compared to the OSHA logs of the previous year. The client is now replicating this SPRMP program throughout its facilities in the US, and it will continue to monitor their success. This skilled nursing provider enhanced its SPRMP program and significantly improved its OSHA log statistics:

<table>
<thead>
<tr>
<th></th>
<th>Original OSHA Log</th>
<th>OSHA Log 2 Years Later</th>
<th>% Reduction</th>
</tr>
</thead>
<tbody>
<tr>
<td># Cases Lost Time</td>
<td>10</td>
<td>9</td>
<td>↓ 10%</td>
</tr>
<tr>
<td># Cases Restricted Duty</td>
<td>20</td>
<td>13</td>
<td>↓ 35%</td>
</tr>
<tr>
<td># Lost-Time Days</td>
<td>167</td>
<td>137</td>
<td>↓ 18%</td>
</tr>
<tr>
<td># Restricted-Duty Days</td>
<td>1,620</td>
<td>358</td>
<td>↓ 78%</td>
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Moving Forward With Better Solutions and Understanding of OSHA Requirements

It is a new day in healthcare safety as OSHA is informed about SPRMP and has experienced healthcare ergonomists to inspect your facilities in both skilled nursing and assisted living. OSHA compliance inspectors can and will use the National Emphasis Program and cite employers under the General Duty Clause. They are focused on SPRMP, not body mechanics education. They see engineering solutions as an important part of the safety equation. For example, OSHA views the appropriate ratio of patient lifts to be at least 10:1 (for every 10 dependent patients, there is one patient lift).

Lockton focuses on helping make our clients’ businesses better. Lockton Loss Control Consultants will help your business by strategically enhancing your safety program. We have the proven results. Whether you begin from the ground up or revise and revitalize your existing SPRMP and overall safety program, results from this example are compelling reasons why an improved or new safety program is necessary.