

US Department of Labor

**Occupational Safety and Health Administration
William S. Moorhead Federal Building
1000 Liberty Avenue, Room 905
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Phone (412) 395-4903 FAX (412) 395-6380**



September 24, 2012

Jeffrey Romoff, President and Chief Executive Officer
UPMC
U.S. Steel Tower, Suite 6262
600 Grant Street
Pittsburgh, PA 15219

Dear Mr. Romoff:

An inspection of your workplace at the Western Psychiatric Institute and Clinic of UPMC (WPIC), 3811 O'Hara Street, Pittsburgh, Pennsylvania, revealed that employees were exposed to hazards associated with workplace violence. The Occupational Safety and Health Administration (OSHA) regards workplace violence as a serious safety and health hazard. The purpose of this letter is to heighten your awareness of this hazard and to encourage you to implement measures that will further address this serious problem.

OSHA's inspection involved an evaluation of the measures you have implemented at WPIC to address workplace violence hazards in order to protect workers from assaults by both clients and visitors. A review of incidents recorded by WPIC for calendar years 2007 through 2011 identified incidents that involved acts of violence (hitting, kicking, scratching, grabbing, objects thrown, etc.) by clients directed toward your employees. These incidents have resulted in numerous injuries to your employees. We consider this evidence that your facility should increase efforts to reduce the likelihood of these incidents.

No OSHA standard specifically addresses workplace violence. Based on the facts in this case, it is not considered appropriate at this time to invoke the General Duty Clause, Section 5(a)(1) of the Occupational Safety and Health Act of 1970, which requires all employers to maintain a safe and healthful workplace. In the interest of your employees' safety and health, however, it is recommended that you take the following steps to eliminate or reduce their exposure to assaults by clients and visitors:

Feasible methods to protect employees from workplace violence may be obtained from *Guidelines for Preventing Workplace Violence for Healthcare & Social Service Workers*, OSHA Publication #3148-IIR, 2004.

Additional measures to improve your program also include:

1. In order to reduce patient on staff violence, WPIC "safety" goals as well as policies and procedures must be expanded to include staff safety and wellness, in addition to patient safety and quality of care. Policies and procedures should clearly explain the organizational plan to prevent or reduce the likelihood of workplace violence, as well as what staff members should do to protect themselves in the event of such incidents.

2. WPIC should establish a joint labor-management health and safety committee whose primary focus is the tracking, review and discussion of patient-on-staff violence. This committee should be charged with identifying and evaluating the impact of:
 - a. Strategies designed to reduce organizational and unit level factors associated with incidents, and
 - b. Measures developed to protect staff during incidents of workplace violence.
3. WPIC should establish a system for written and oral communication of past and recent patient-related violence incidents so that all staff members have real time information about risk to staff and patients.
4. WPIC should re-evaluate policies and procedures for patient strip search and "wandering" of visitors to insure greater staff security. Given that weapons have been found during patient and visitor intake, WPIC should re-evaluate these procedures to insure greater staff security. The installation of cameras where "wandering" of visitors occurs may be one enhancement to provide additional staff safety.
5. WPIC should implement additional security for the reception area at the entrance to WPIC to provide some separation of the reception area from the general public. A security expert should be retained to evaluate and make the appropriate recommendations towards this end.
6. UPMC should ensure that all security databases maintained by individual facilities have cross-searching functionality between facilities. In this manner incident searches would be more complete to identify trends at all facilities.

Available resources for your consideration include OSHA's Internet web page on Workplace Violence: (www.osha.gov/SLTC/workplaceviolence/), OSHA publication #3148-11R, 2004, *Guidelines for Preventing Workplace Violence for Health Care & Social Service Workers*, and OSHA Directive CPL 02-01-052, *Enforcement Procedures for Investigating or Inspecting Workplace Violence Incidents*, 09/08/2011.

Under OSHA's current inspection procedures, we may return to your worksite in approximately one year to further examine the conditions noted above.

If you have any questions, please feel free to call the OSHA Pittsburgh Area Office at 412-395-4903.

Sincerely,



Robert P. Szymanski
Area Director