

Comment from Niederegger, Liz; UC Health

This is a Comment on the Occupational Safety and Health Administration (OSHA) Notice:

[Telecommunications; Extension of the Office of Management and Budget's \(OMB\) Approval of Information Collection \(Paperwork\) Requirements](#)

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Hello

I am a nurse practitioner who has lived through the transition from paper based charting and record keeping to an entirely electronic based medical record system. It remains a challenge, and at times difficult. It is often not efficient, intuitive or easy. Updates come along that attempt to increase efficiency, but issues remain.

I agree that there should be adequate training, ease of use, and non-intimidating ways to ensure employee reporting of job safety issues in a computer based, non paper system. There is always concern surrounding retaliation, and this should be reduced no matter what the reporting medium. Although all entities are moving toward entirely paperless systems, there still must be secure and reliable ways to document and monitor

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Comments

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any events. Organization is key... to be able to determine trends and also assist in corrective action. Employee assurance of safety and confidence in the ability to report without retaliation is vital.

There also must be a way to transfer prior data into a new system, without losing vital data (in a seamless fashion). The hours of training, and adjustment to a new system must also be considered. The transition time from an old system to a new system will often overlap, and will not immediately decrease workload (and actually increase it initially). Time and work hours must be transitioned as knowledge and confidence increases.

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