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January 12, 2021

John J. Howard, MD
 Director
 National Institute for Occupational Safety and Health
 Centers for Disease Control and Prevention
 Patriots Plaza 1
 395 East Street, SW, Suite 9200
 Washington, DC 20201

Re: Interventions to prevent work-related stress and support health worker mental health; request for information [CDC-2021-0106; NIOSH-344]

Dear Administrator Howard:

The Healthcare Association of New York state, on behalf of our member nonprofit and public hospitals, nursing homes, home health agencies and other healthcare providers, appreciates the opportunity to respond to the CDC's request for information related to the mental health and well-being of the nation's healthcare workers.

The pandemic has exacted an extraordinary toll on healthcare workers. Many have experienced heightened chronic stress, grief and trauma while serving on the frontlines. We thank you for recognizing the pandemic's psychological impacts and your commitment to helping workers cope and recover.

Programs, tools and training to help healthcare workers manage chronic job stress and trauma have proliferated since 2020. There are now robust, diverse libraries on this topic. HANYYS has contributed to this body of work and shared [thoughtful resources](#) from other organizations on our website.

New York state hospitals and health systems have found a number of initiatives to be particularly helpful, including:

- peer-to-peer programming like that offered by the [Medical Society of New York](#) and the [Helping Healers Heal](#) program implemented by NYC Health + Hospitals;
- respite or recharge rooms for staff to step away when in distress, like those at [St. John's Episcopal Hospital](#) and [Mount Sinai](#);
- scheduled time to openly and honestly discuss social and emotional issues faced when caring for patients and families, e.g., [Schwartz Rounds](#);

- dedicated codes for response to or in anticipation of immediate staff mental health needs, e.g., code lavender; and
- the provision of practical needs, such as additional scrubs or uniforms and showers, sustenance and childcare during particularly demanding times.

Tools and training to support staff well-being are now widely available, but challenges persist.

In addition to interventions aimed at helping healthcare workers adapt, HANYS recommends that NIOSH also explore interventions that improve the overall healthcare environment and culture.

Investments should be made to gain a better understanding of the unique healthcare occupational exposures to circumstances that are known to cause mental distress. This should be paired with efforts to learn more about the effectiveness of strategies to prevent, mitigate and address those exposures and poor outcomes, with an eye on populations that are disproportionately impacted. Insight from frontline workers and healthcare organizations throughout this process is essential, but every effort should be made to minimize burdens imposed by collecting this information.

Major obstacles to care for the general population also directly affect healthcare workers. These obstacles include the shortage of mental health professionals, cost of treatment, access to transportation or technology, social stigma and racial or cultural inequities. Investments in initiatives that address these challenges will help healthcare workers access mental healthcare.

Last, many healthcare organizations in New York state are operating with thin operating margins, allowing little flexibility for initiatives outside of their primary mission. Allocating funding to help them implement strategies to support staff mental health across settings would help them develop and sustain these programs.

We thank the agency and administration for focusing on the well-being of the healthcare workforce.

If you have questions regarding our comments, please contact me at 518.431.7730 or jgold@hanys.org or Sarah DuVall, director, behavioral health, at 518.431.7769 or sduvall@hanys.org.

Sincerely,



Jeffrey Gold
Senior Vice President and Special Counsel, Managed Care and Insurance