



April 28, 2020

Occupational Safety and Health Administration
Columbus Area Office
200 North High Street, Room 620
Columbus, OH 43215

Public Employment Risk Reduction Program
State of Ohio Division of Safety and Hygiene
13430 Yarmouth Drive
Pickerington, OH 43147

Dear Sir or Madam:

As President of the Ohio State University Nurses Organization (OSUNO), representing over 4,000 Registered Nurses, I am writing to complain about hazardous SARS CoV-2 exposure to thousands of workers at the Ohio State University Wexner Medical Center (OSUWMC), located at 410 W 10th Ave., Columbus, OH 43210.

Registered Nurses, Patient Care Associates, Respiratory Therapists, and other healthcare professionals are in imminent danger of infection and serious illness associated with SARS CoV-2 across the entire Medical Center but especially on the following units: 8 W Doan, 7 BASH, 8 BASH, 9 BASH, 9 W Rhodes, 9 E Rhodes, 11 W Doan, 2 Ross, Medical Express, the University Hospital (UH) Operating Rooms, the Emergency Department, the UH Surgical ICU, the UH Medical ICU, and units on 10 James and 11 James. There have been at least 85 healthcare workers with confirmed COVID-19 infections across the Medical Center. Many have suffered serious illnesses and lost work time and may have also exposed or infected their families.

The Medical Center has failed to provide adequate protection and training for these workers including:

- OSUWMC has failed to provide each frontline healthcare worker who is taking care of a suspected or positive COVID patients a sufficient supply of N95 masks to minimize their risk of exposure. This is true across the entire Medical Center.
- On the Corrections Unit, 8 West Doan, frontline caregivers were exposed around April 5 to patients with COVID because the Medical Center did not provide sufficient eye protection and N95s. Nurses were forced to bring in their own goggles to try and provide some eye protection, and at the time the Medical Center's standard for COVID patients was not an N95. As a result, around ten employees contracted COVID and around two dozen employees were exposed and required to quarantine. Corrections Officers also suffered exposure and subsequent illness. The Medical Center has refused to provide the number of exposed and/or infected healthcare professionals as part of this outbreak. Also, prior to April 5, the Medical Center actually removed disinfecting wipes from patient rooms, which made it more difficult to properly disinfect high-touch surfaces in each room.
- The fourth floor in the Dodd Rehabilitation Hospital had a major outbreak of COVID exposure in mid-April, requiring dozens of nurses to quarantine.
- A unit on the fifth floor of the Ross Heart Hospital was temporarily closed in early April due to widespread COVID exposure and the need to quarantine staff.



- STAT team nurses have not always been provided appropriate PPE. They travel all over the hospital and deal with COVID patients daily, and there is one confirmed case on that team.
- A unit on the 11th floor of Doan had at least 16 staff on quarantine due to exposure.
- The Labor and Delivery unit had at least 27 staff exposed to COVID who were forced to quarantine. At least 12 staff on this unit became COVID positive. Nurses and other staff were not provided N95s and were forced to work in close proximity for extended periods of time.
- Overall, the Medical Center has *as a matter of written procedure* (see provided policies) denied N95 respirators, foreign equivalents, or stronger respirators to workers providing care or cleaning patient rooms within six feet of patients with suspected or confirmed COVID-19, resulting in staff exposures.
- Medical Center management has refused to provide initial fit testing for workers using respirators that they have not been fit tested for, or for workers who were not previously fit tested, without providing evidence that the facility is unable to provide fit testing and even after our facility changed to a low/no mask use method of fit testing.
- Management has claimed they do not have to provide fit testing for workers using new respirators such as when they change from one type of N95 to a different type.
- Prior to mid-April, management failed to provide training to workers on performing seal checks when donning respirators. Information on performing a seal check was only provided to healthcare professionals after our union brought it to management's attention.
- On or before April 1, 2020, the employer physically removed all N95 masks from James Comprehensive Cancer Hospital outpatient clinics despite patients still being seen in those clinics. On April 1st, 2020, the Code Blue policy (which requires proper PPE prior to responding) was reviewed with James Comprehensive Cancer Hospital senior Clinic management at the Stefanie Spielman Comprehensive Breast Center, and at that time management refused to provide N95s to the clinics for use even in emergencies.
- Individual unit managers in a variety of areas such as the Stefanie Spielman Comprehensive Breast Center, part of the James Comprehensive Cancer Hospital, have directed employees not to use employee-provided PPE even when employer-provided PPE is not available.
- Until mid-April, management failed to provide engineering controls to reduce the risk of exposure to COVID such as plexiglass at the triage desk the Emergency Department despite repeated requests from staff dating back to well before the current pandemic.

Should you conduct a site investigation, please ask for the following union representatives during the opening and closing conferences and inspections: Rick Lucas or Amy Pompeii (7:00 am to 7:30 pm shift); Holly Rowe or Lukas Killian (7:00 pm to 7:30 am shift). Please inform me of the disposition of this complaint and any pursuant inspections. You can reach me at 740-605-2127 if you require more information about the complaint. I can also arrange to be at the Medical Center at the time of any site investigation.

Sincerely,

A handwritten signature in black ink that reads "Rick Lucas".

Rick Lucas BSN RN OCN VA-BC CCRN
President, OSUNO