NSC RESEARCH SNAPSHOT:

Reporting and Documenting Impairment

Documenting and reporting potential impairment can be difficult due to the lack of a consistent definition of impairment and the limited ability to detect and measure impairment from various causes.

Workplaces must engage workers in reporting potential impairment concerns and risk management. Data collection channels, such as routine worker wellbeing assessments, can help document the impact of impairment and its contributing factors in the workplace.

Research Methodology

1. Literature Review
   Articles Reviewed: 349

2. Subject Matter Expert Interviews
   Experts Interviewed: 31

3. Database Review
   Public Databases Reviewed: 18

Workplace impairment can be reported through **incident investigations** and **root cause analysis**, but it depends on the investigator and available resources. Training and support to conduct thorough investigations and risk assessments in workplaces are limited, which impacts the ability to understand the potential influence of impairment.

The National Safety Council defines workplace impairment as *a temporary negative change in a person's ability to do their work normally or safely, regardless of cause.*

Limitations of Impairment Documentation and Reporting

Reliance on data provided in OSHA logs, which does not require or track impairment and its risk factors	Fear of repercussions or judgment for reporting
Inadequate education on the safety impact of impairment	Most datasets do not collect the underlying or contributing causes of workplace fatality and injury
Privacy and confidentiality requirements can prohibit data collection	Overdoses can be both a potential contributing factor and a direct cause of death
Inconsistent information and limited availability of autopsy and toxicology reports	Drug testing is not sufficient to understand how substance use might impact workplace incidents and deaths
Reliance on imperfect data, such as self-reported surveys	Lack of clear reporting policies

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Example Proxy Measures for Impairment Documentation and Reporting	
Organizational Reporting	Near-miss and hazard recognition reports
	Incident investigations
	Health data from onsite occupational health teams
	Drug testing results
	Organizational surveys
	Comments in OSHA logs
	Workers' compensation claims data
	Employee assistance program use metrics
	Reasonable cause reporting
	Data provided by prescription benefits managers (PBMs)
	Worker reporting programs
External Reporting	State-level workers' compensation data
	Toxicology and coroner data
	Wellness assessments
	The Census for Occupational Injuries (CFOI) and the Survey of Occupational Injuries and Illnesses (SOII)
	Post-injury emergency room data
	Unemployment insurance claims
	Prescription Drug Monitoring Programs (PDMPs)

Workplace and Environmental Health and Safety leaders should…

- Provide resources and support to conduct thorough incident investigations and root cause analysis
- Promote non-punitive policies to encourage workers to report potential concerns
- Provide consistent feedback on workers' reports and concerns
- Protect workers' privacy and confidentiality in data collection efforts
- Consult professionals on legal requirements in data collection
- Integrate data collection procedures into the workplace safety management systems

For the full report, visit

nsc.org/scope

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