

Proposed revised Occupational Health Questionnaire recommendation

History

The Board adopted specific recommendations to improve the Occupational History Questionnaire (OHQ) at the April 2018 meeting. These recommendations included:

1. Inclusion of tasks associated with listed toxic materials as well as frequency of exposure using a scale consistent with the current OHQ and the scale used by BTMED.
2. Expansion of the hazardous materials list to specifically include a list of hazards causing chronic obstructive pulmonary disease (COPD) and other health conditions.
3. Addition of tasks currently used in the exposure assessment by BTMED.
4. Adding a specific question to the OHQ regarding exposure to vapors, gases, dusts and fumes (VGDF), the most common cause of COPD in the current peer-reviewed published literature.

In November 2017 the Department of Labor (DOL) provided written responses to the Board's recommendations. The DOL did not accept the Board's recommendations concerning the OHQ revisions nor addition of questions concerning exposures to VGDF. OWCP welcomed specific recommendations on a draft revised OHQ and – 'a list of toxic substances that represents vapors, gases, dusts, and fumes.'

In February 2018 the Board considered the OWCP response and reviewed the draft revised OHQ provided by OWCP. The Board concluded that the draft OHQ provided too little detail and structure to serve as 'memory triggers' to help claimants recall specific tasks and exposures at DOE sites. The Board also noted that the recommended OHQ revisions were closely tied to other Board recommendations intended to improve the quality of claimant-provided exposure information and use of this information during claim adjudication.

In August 2018 the DEEOIC stated that it was 'continuing to review revisions of the OHQ and will consider the suggestions of the Board'.

Recommendations Concerning the Draft Revised OHQ

At the November 2018 Board meeting of the newly appointed Board, a working group was established to further review the draft proposed OHQ. The working group has performed a detailed review of the current OHQ and the DOL-revised draft OHQ. The working group also considered the prior Board recommendations concerning the current OHQ and the DOL responses.

The Board notes the following:

1. While free text descriptions of work and exposures are often extremely valuable, it remains the Board's opinion that the draft revised OHQ lacks sufficient structure and

detail to help claimants recall and record toxic substance exposures experienced at DOE sites.

2. The Board believes that some sections of the current OHQ that are omitted or significantly modified in the DOL-revised draft OHQ provide information potentially useful in claim evaluation and adjudication.
3. There are some sections of the draft revised OHQ that may require claimants significant time to complete but provide information of marginal use in evaluating claimed exposures. Therefore, Board recommends that some sections be dropped or substantially reduced in scope.

The following are the Board's recommendations on the draft revised OHQ by section. The Board has no recommendations for OHQ sections not discussed below.

Board Recommendations:

Section 4(D): LABOR CATEGORY (While employed at a DOE Facility)

The SEM plays an important role in the assessment of claimant exposures. Site and labor category are used by the SEM as primary variables in determining claimant exposures. While the labor categories and sub-categories in the Excel file dropdown list (or Attachment 3.A) seem appropriate for broad classification, it is not clear how these tie with the SEM jobs and job aliases? These ties should be made as explicit as possible, realizing the large number of jobs across DOE sites.

Section 4(E): WORK AREAS AND ACTIVITIES

This section requests that a claimant provide a free text description of the work performed in each job title from Section 4D to include ---- 'Area, Facility, Building Number/Name or Description; Work Activity; Labor Category / Job Title; Toxins / Agents; Years of Employment; Frequency (days / week, hours / month, etc.)'. The example provided represents a good work summary; however, such detail is not realistic to expect for most claimants by way of an unstructured response. The Board recommends more structure in this section.

Section 6 of the current OHQ provides more structure for collecting information about work areas and activities. The Board considers such structure to be an important aide to claimants as they attempt to recall and organize information. The Board recommends that this approximate structure be retained in the proposed OHQ. The column headings could be modified to reflect the types of information requested (e.g. 'Area, Facility or Building Number/Name or Description', 'Years of Employment', 'Description of the Work Performed', 'Toxic Substance Exposures', 'Frequency of Exposure'). These suggested headings replicate the items proposed in Section 4(E) of the DOL-revised draft OHQ.

While the frequency scale used in the current OHQ has been found useful for exposure assessment, a less complex scale based on key words more easily understood by claimants would

be sufficient. A BTMED COPD case-control¹ study found the following frequency scale adequate for assessment of exposures among DOE construction workers:

Rarely:	Less than once per month
Monthly:	1-2 times per month
Weekly:	Weekly or most weeks
Daily:	Daily or almost every day

Section 5: EXPOSURE INFORMATION

This section of the draft revised OHQ differs from the current OHQ in that only broad categories of toxic substances are listed, with exposure details relegated to free text descriptions to be provided by claimants. The Board recommends more structure in this section to aide in claimant recall and assessment of toxic substance exposures based on duration, frequency, and intensity of exposure. The Board specifically recommends the following.

1. Within each broad category of toxic substance, a list of specific substances should be provided similar to the current OHQ. The specific toxic substances within each category should be carefully chosen to be representative of exposures most common across DOE sites, with specific attention to toxic substances associated with the direct disease link work process (DDLWP), to link medical conditions to specific tasks (Chapter 15 and Appendix 1 of the EEOICP Procedure Manual (Version 2.3)).

Board recommends that substances from the published literature and/or the SEM causing or contributing to COPD be included in the specific toxic agents by major category.

Claimants should be allowed to add other toxic substances not specifically listed, with comparable data collected for these added substances.

2. The Board notes that the current OHQ has an extensive list of ‘High Explosives’ and recommends that some attention be given to reducing the number of listed materials to those most common across DOE sites.
3. Frequency of exposure to each toxic substances should be recorded on a qualitative scale such as previously described (e.g. Rarely, Monthly, Weekly, Daily).
4. Duration of exposure (e.g. years or months) should be recorded for each reported exposure.
5. Exposure intensity should be addressed by allowing the claimant to describe how they were exposed to each toxic substance, with an emphasis on specific tasks preformed with or around toxic substances.

6. A check box should be added for each toxic substance to indicated if work with or around the toxic material resulted in exposures to vapors, gases, dust, or fumes (VGDF).

The Board notes that radiological hazards are omitted in the broad categories of exposure in the proposed OHQ. The rational for this exclusion is not clear. The Board recommends that radiological hazards be retained in the revised OHQ.

Section 6: PERSONEL PROTECTIVE EQUIPMENT (PPE)

The current OHQ and the draft revised OHQ both contain a rather extensive listing of PPE and requests details of use. The Board understands the role of PPE in exposure mitigation; however, the actual field protection factors provided PPE are often poor. This is especially true historically when PPE may have been provided in the absence of an adequate program for proper PPE selection, fitting, deployment, and maintenance. Given these limitations, the Board recommends that this section of the OHQ be limited in scope or eliminated. The Board does not believe that positive answers to having worn PPE should be used as a factor in denying claims.

Rationale

The current recommendations are similar in scope and intent as the Board's original recommendations; therefore, the prior stated rational and references apply and are not repeated. An additional reference is provided for the proposed exposure frequency scale as well as a more general reference concerning the design of occupational exposure questionnaires.²

References

1. Dement J, Welch L, Ringen K, Quinn P, Chen A, Haas S. A case-control study of airways obstruction among construction workers. *American journal of industrial medicine*. 2015;58(10):1083-1097.
2. Nieuwenhuijsen MJ. Design of exposure questionnaires for epidemiological studies. *Occup Environ Med*. 2005;62(4):272-280, 212-274.