

From Risk to Resilience

Navigate workplace violence internal audits

By Neda Sales, CPA, and Loosi Azarian

Maintaining a safe and secure workplace is of paramount importance for patients, staff and visitors. Workplace violence poses a significant threat and can have devastating consequences for everyone involved. Healthcare organizations must understand the stakes involved and implement comprehensive prevention strategies. Internal audit has a part to play.

Headlines highlighting the gory details of workplace violence incidents have become all too common. The healthcare industry is not spared from the rise in violence—in fact, data suggests that healthcare workers are [five times as likely](#) to experience workplace violence as other workers. This article serves as a guide to navigating the complexities of workplace violence prevention, and internal audit's role in evaluating your organization's program.

What is workplace violence?

According to the Occupational Safety and Health Administration (OSHA), "[workplace violence](#) is any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site."

What is your organization required to do?

Despite the alarming national trend, the rise in workplace violence incidents has not led to nationwide requirements or legislation. A federal bill ([H.R. 1195](#) – Workplace Violence Prevention for Health Care and Social Service Workers Act) passed the House of Representatives with bipartisan support, but it did not progress further in the legislative process. Similar legislation may be reintroduced in future sessions of Congress to continue addressing this important issue.

In the meantime, various states have taken the initiative to formalize requirements for preventing workplace violence, as summarized in Exhibit 1. As the American Nurses

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Understanding the stakes

"A nurse's fatal last visit to patient's home renews calls for better safety measures"

-[AP News](#)

"Connecticut nurse's murder sparks urgent call for improved safety measures in health care"

-[FOX News](#)

"What's behind an alarming rise in violent incidents in health care facilities" -[PBS](#)

OSHA Resources

- [General Duty Clause, Section 5a1 of the Occupational Safety and Health Act of 1970](#)
- [Enforcement Procedures and Scheduling for Occupational Exposure to Workplace Violence](#)
- [Guidelines for Preventing Workplace Violence for Healthcare and Social Service Workers](#)
- [Worker Safety in Hospitals: Preventing Workplace Violence in Healthcare](#)



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Exhibit 1 – Summary of state workplace violence actions

Required workplace violence prevention programs (as of March 2021):	Other workplace violence prevention actions by state:
California	Arkansas
Connecticut	New Hampshire
Illinois	Maine
Maryland	North Carolina
Minnesota	South Carolina
New Jersey	Texas
Oregon	Utah
Washington	Public Employers Only: New York

Association explained in March 2021, “There is variation between states as to which settings the law applies. Those states which [require employer run workplace violence prevention programs](#) include: California, Connecticut, Illinois, Maryland, Minnesota, New Jersey, Oregon, and Washington. New York is limited to public employers.”

The imperative of proactive internal audits

Your organization should be invested in creating a safe environment for patients, staff, and visitors, no matter the legal/regulatory circumstances in your state. In addition to improving safety, internal audits for workplace violence prevention can reduce liability and add a level of accountability for mitigating identified hazards. This can

help reduce workplace violence incidents, sustain your organization’s reputation, and enhance employee morale, thereby increasing staff retention.

If regulations don’t yet exist in your state, Internal audit can evaluate against leading practice, using [California’s Title 8, Section 3342](#) as a guide. If regulations do exist to formalize requirements, a comparison to leading practices can be supplemented with a compliance review.

Conducting a workplace violence prevention internal audit

Healthcare organizations are beginning to implement workplace violence prevention processes due to the rising number of incidents occurring in facilities each year, and

regulations being passed that require organizations to implement a workplace violence prevention program.

Even if your organization does not have a program already in place, workplace violence prevention processes and components of a successful program may already exist at your organization.

When conducting a review of workplace violence prevention at your organization, consider performing the elements outlined in Exhibit 2. If regulations apply in your state,

these elements encompass even the most comprehensive regulations.

Recommendations likely to stem from this review

The largest frustration amongst stakeholders is often that employees do not report workplace violence incidents because they accept it as part of the job.

This is an opportunity for organizations to re-emphasize a culture of employee safety. An internal audit recommendation could be to implement a process for sharing

Exhibit 2 – Workplace violence audit elements

Assess governance structure
<p>Responsibility for workplace violence prevention, including related programs, is often owned by safety and/or security departments. Organizations should also designate a workplace violence prevention committee comprised of safety, security, and clinical personnel representative of the staff who may experience workplace violence as part of their day-to-day activities. This committee should oversee the execution of workplace violence prevention activities and program elements. The established governance structure should allow your organization to make proactive and strategic decisions related to workplace violence prevention and establish accountability for workplace violence prevention processes.</p>
Review training provided to staff
<p>Organizations should also provide mandatory, paced training that addresses the workplace violence risks that employees may reasonably anticipate encountering in their jobs. This training should be specific to the organization’s operational practices and include how incidents can be prevented, responded to, and reported.</p>
Evaluate avenues for reporting
<p>At a minimum, two lines of reporting should exist—a direct line to an incident response team, such as security or safety, and an anonymous hotline. Employees should have the ability to report workplace violence occurrences to the organization without fear of retribution.</p>
Assess recordkeeping practices
<p>When employees report an incident, all information regarding the incident, post-incident response, investigation and results should be recorded in a consolidated log of violent incidents. This log should be used across the organization and include standardized fields that can facilitate meaningful data analysis. This log of incidents and a log of employees that completed the workplace violence prevention training should be maintained for multiple years.</p>

Healthcare organizations are beginning to implement workplace violence prevention processes.

Exhibit 2 – Workplace violence audit elements (cont.)

Assess reporting practices
<p>At a minimum, workplace violence incidents that result in injury, per OSHA Injury and Illness Recordkeeping and Reporting Requirements, must be reported via Form 300, Form 300A, or Form 301. Management should make sure that the log of incidents is filed with OSHA and required state agencies.</p>
Evaluate annual safety assessment
<p>Annually, the workplace violence prevention committee or other designated person or group should conduct an assessment to identify hazards that may be attributed to workplace violence. The assessment should consider:</p> <ol style="list-style-type: none"> 1. Does the workplace have physical security measures including, but not limited to, trained security personnel, appropriate facility design, badging system, metal detectors, panic buttons, alarm systems, and mirrors? 2. Are workers trained to appropriately respond during emergencies, report violent incidents or threats, handle difficult patients, prevent or defuse potentially violent situations? Are they trained in personal safety or self-defense? 3. Are there workplace procedures in place to facilitate a safe and calm environment including, but not limited to, controlled public access, requiring identification tags for staff and visitors, signage, reasonable wait times to prevent patient frustration, special security measures for late night staff, and floor plan visibility limited only to staff? 4. Are corrective actions implemented for identified hazards? Are reported incidents investigated and corresponding corrective actions enacted timely? Are reported incidents documented, concluded, and analyzed to identify trends and resulting corrective actions implemented timely? <p>All hazards attributed to workplace violence should be logged, including those identified through previous assessments, investigations, internal audit recommendations, and other means. Prevention mechanisms should be implemented to mitigate the root causes of these hazards.</p>
Assess the workplace violence prevention plan
<p>Results of the assessment as well as incident logging and training procedures should be documented in a comprehensive workplace violence prevention plan. This plan will serve as your organization’s roadmap for workplace violence prevention. This should include an overview of the responsible parties for workplace violence prevention at your organization, identified hazards and corrective measures, and procedures related to preventing and responding to workplace violence. The plan should also describe mechanisms for completing incident logs, designing and providing training and guidance, reporting, and recordkeeping.</p>

positive outcomes when incidents are escalated timely to appropriate personnel, to encourage other employees to report incidents in real time.

When employees take workplace violence prevention training, or when the workplace violence prevention plan and related procedures are developed, the information

included needs to provide adequate guidance related to operational practices in each specific facility. For example, if the training states that panic buttons can be used to discreetly notify safety or security that an incident is occurring, it must also share where the panic buttons are and how they can be used.

The largest frustration amongst stakeholders is often that employees do not report workplace violence incidents.

Although organizations may establish avenues for reporting workplace violence incidents, other departments such as Human Resources or Patient Access may become aware of unreported incidents that occurred at the organization. To ensure they are adequately recorded in the log of incidents and to facilitate meaningful data analysis, incident documentation processes should be standardized across the organization. Larger organizations may design a reporting form to be used by any reporting party; this form should include drop-down fields to standardize how information is collected.

As part of meaningful data analysis, metrics should be established to identify hazards and facilitate implementation of improvement opportunities, preventive measures, and corrective measures. Profound metrics can include:

- Number of incidents for which a response team (security or safety) is called to perform a patient assist (calming patient) versus patient restraint (utilizing cuffs or sedation to curtail patient)
- Number of incidents by incident type
- Reported incidents versus validated incidents
- Number of incidents occurring at each location


The log of incidents, and related data analysis and resulting metrics, should be reviewed as part of the annual

Employee Safety	↑
Patient Safety	↑
Risk of Noncompliance	↓
Brand Protection	↑
Incident Preparedness	↑


assessment to determine whether the number of incidents are decreasing at the organization or if the reported incidents are indicative of an unidentified hazard. Beyond reviewing past incidents, the annual assessment should be a comprehensive review of the effectiveness of current prevention mechanisms and opportunities to implement additional measures such as additional security staff.

Empowering organizations for resilience

So why conduct a workplace violence prevention internal audit? In the simplest sense, it can save a life. Internal audit departments should feel emboldened to demand and cultivate a safe healthcare environment. **NP**



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No act of kindness, no matter how small, is ever wasted. - Aesop