

**U.S. Department of Labor**

Occupational Safety and Health Administration  
Marlton Area Office  
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January 6, 2015

Mr. Jeff Bezos, President & CEO  
Amazon Headquarters  
410 Terry Avenue  
North Seattle, Washington, 98109

Dear Mr. Bezos,

An inspection of the workplace at Amazon Fulfillment Center at 50 New Canton Way Robbinsville, New Jersey was performed on or about July 1, 2015. The AMCARE in-plant medical unit was reviewed as part of the inspection. AMCARE provides immediate medical service and primarily first aid treatment to Amazon workers at the Robbinsville warehouse who have an injury or health complaints. The goals of this service include early intervention to prevent an injury or limit the severity of the injury, provide referrals to an outside health care provider when necessary either in an emergency situations or when first aid treatment is insufficient, and to educate workers on ergonomic techniques and problem-solving to prevent injuries. OSHA's investigation identified the following hazard:

After reviewing relevant facts pertaining to this case, it has been determined that AMCARE is providing medical care beyond first aid. First Aid is defined as "emergency care provided for injury or sudden illness before emergency medical treatment is available" (OSHA 2006). Medical (or health) care, consisting of a clinical history, physical examination, assessment and management plan, is being performed by the Onsite Medical Representatives (OMRs) in AMCARE. Medical care must be provided or supervised by a healthcare provider licensed to practice independently, per New Jersey State law. EMTs do not practice independently, and Amazon specifically states that the OMRs, although all licensed EMTs, are not practicing under their licenses. Review of the "Amazon Associate Care Policy" states that the OMRs are required to maintain their EMT licenses/certifications, but also states that "Amazon.com is not licensed by the Department of Health, therefore OMRs are not able to function under the full capacity of their licensure/certification." AMCARE personnel were providing medical care beyond what is allowed by their licensing and certification without the supervision of a board certified qualified medical professional licensed to practice independently.

At this time the Occupational Safety and Health Administration will not issue a citation for providing medical care beyond first aid, which is an issue that would be addressed under the General Duty Clause of the Occupational Safety and Health Act of 1970.

However, in the interest of workplace safety and health, I recommend you voluntarily take reasonable steps in addressing this issue. The following recommendations are actions which could be taken to enhance the safety of your employees.

- Amazon should consult New Jersey State law regarding medical practice to determine the appropriate health care providers and supervisory structure for the care being provided in AMCARE.
- AMCARE should contract with a local Board Certified Occupational Medicine physician who can become familiar with the Robbinsville warehouse operations, job hazards and injuries. This physician can re-evaluate the AMCARE program at Robbinsville and make recommendations for appropriate staffing, structure, supervision and quality assurance.
- An occupational medical physician can also provide on-going training for the AMCARE staff, regularly review their medical records, be available to provide guidance for the staff, review trends in symptoms and injuries, and be involved in the ergonomics program.
- Specific issues to be addressed in AMCARE include documentation, earlier referral when symptoms are not improving, and decision-making in specific cases.

To evaluate your progress in addressing these hazards, please send me a letter detailing the actions you have taken or plan to take to address our concerns by Friday February 19, 2016. The Marlton Area Office will follow up at a later date to evaluate any newly implemented or enhanced engineering controls, administrative controls, policies, procedures, training or other measures taken to address the hazards identified above.

We appreciate your attention to these areas of concern. If you have any questions, please feel free to contact Kristine Logue, Assistant Area Director, at (856)596-5237.

Respectfully,



Paula Dixon-Roderick  
Area Director