

Miller, Diane M. (CDC/NIOSH/EID)

From: Melissa.Temkin. (PSC)
Sent: Thursday, November 12, 2009 3:20 PM
To: NIOSH Docket Office (CDC)
Subject: Docket NIOSH-150
Attachments: Alternative Duty for Haz Drugs. November 2009. Letterhead.pdf

Please see the attached comments from the American Health Care Association and the National Center for Assisted Living for docket number NIOSH-150, "Request for Information on Alternative Duty: Temporary Reassignment for Health Care Workers Who Work With Hazardous Drugs."

Thank you,

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Docket Number: NIOSH-150

To Whom It May Concern:

The American Health Care Association (AHCA) and the National Center for Assisted Living (NCAL) welcome the opportunity to provide comments to the National Institute for Occupational Safety and Health (NIOSH) on a future Current Intelligence Bulletin (CIB) on alternative duty and other administrative controls for health care workers who work with hazardous drugs and are trying to conceive, are pregnant, and/or are breastfeeding.

AHCA and NCAL represent more than 10,000 non-profit and for-profit providers dedicated to continuous improvement in the delivery of professional and compassionate care for our nation's frail, elderly and disabled citizens who live in long term care (LTC) facilities, including nursing facilities, assisted living residences, sub-acute centers and homes for individuals with developmental disabilities. Our member facilities employ nearly one million workers, the majority of whom are front-line caregivers. On behalf of our more than 11,000 LTC employers, their employees and the patients that they serve, we submit the following information:

- In LTC facilities that administer drugs that may be hazardous to workers, e.g. chemotherapy drugs, some facilities have policies to disclose this information on hire.
- The facility may also try to accommodate the employee in another position/task if the employee is originally assigned to work with an affected patient.
- For facilities that administer potentially toxic medication, some may add warning statements such as "use safe handling precautions" to the yellow box on the medication label to notify employees that glove use or other precautions are necessary.

As NIOSH moves forward in designing this CIB, AHCA/NCAL stands ready to provide feedback on how the document will be used by, and may affect LTC providers. We encourage NIOSH to contact us at any time for additional information.

Sincerely,



Melissa Temkin
Director of Membership and Regulatory Relations