

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

From: Bill Kojola [Bkojola@afcio.org]
Sent: Thursday, February 03, 2011 4:00 PM
To: NIOSH Docket Office (CDC)
Subject: Infectious Diseases, 42 U.S.C. 300ff-131
Attachments: AFL-CIO Comments ER Infect Dis NIOSH-129.pdf

TO: NIOSH

RE: Docket Number NIOSH-219

Attached please find the comments being submitted by the AFL-CIO on the NIOSH proposed list of potentially life-threatening infectious diseases to which emergency response employees may be exposed.

Thank you very much,

Bill Kojola

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February 3, 2011

NIOSH Docket Office
Robert A. Taft Laboratories
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4676 Columbia Parkway
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RE: Docket Number NIOSH-219, Infectious Diseases, 42 U.S.C. 300ff-131

Dear Sir or Madam:

The AFL-CIO appreciates the opportunity to provide comments on the list of potentially life-threatening infectious diseases to which emergency response employees may be exposed. The proposed list of potentially life-threatening infectious diseases includes agents that do pose a serious risk of death to emergency response workers who are exposed and we believe that all of these infectious agents should be included in a final list.

In addition to the list of proposed infectious diseases, we believe the following infectious agents need to be added to the final list issued by NIOSH. These agents below all have the capacity to pose a threat of the loss of life in exposed emergency response workers and we urge NIOSH to include each of them in a final listing.

- *Novel Influenza*

In light of the recent experience we've just undergone with the 2009 H1N1 influenza pandemic, as well as our efforts as a nation to protect emergency responders and healthcare workers while they provide care to

persons who may be infected, the list must include novel influenza. Novel influenza A virus infections are nationally notifiable infectious conditions under CDC requirements. Cal/OSHA's aerosol transmissible disease standard, which includes coverage of emergency response employees under its scope, lists exposures to avian influenza, seasonal influenza, and novel or unknown pathogens that employers must protect workers who are exposed. As a novel agent, there is little or no preexisting immunological protection in humans, making notification and protective measures essential for those who may be exposed. Failure to include this agent on the list would constitute a gross oversight.

- *Pertussis*

Pertussis (whooping cough) is a serious infectious respiratory disease that can affect adults. It is a nationally notifiable infectious condition under CDC requirements and is included in the list of covered diseases in Cal/OSHA's aerosol transmissible disease standard that includes emergency response employees within its scope. The number of cases of pertussis in the United States is increasing. While childhood pertussis vaccination confers substantial protection among children, the degree of protection decreases with time such that adults may not have adequate protection. To address this problem, the CDC's Advisory Committee on Immunization Practices (ACIP) recommends that adults age 19 to 64 years, who have completed the recommended childhood pertussis vaccinations, receive an additional pertussis vaccine to provide adequate protection. In our view, these facts support the addition of this infectious agent in the final list.

- *Anthrax*

Anthrax is a serious threat to the health of those who are infected. It is a nationally notifiable infectious condition and is included in the list of covered diseases in Cal/OSHA's aerosol transmissible disease standard that includes emergency response employees within its scope. We believe that these facts support our view that anthrax should be included in the final list.

We welcome the opportunity to provide our views on the list of infectious diseases. The AFL-CIO believes that expanding the proposed list to include those infectious agents discussed above will strengthen the notification requirements and the protection of emergency response employees who may be exposed.

Sincerely,

A handwritten signature in cursive script that reads "Bill Kojola".

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