

Dragon, Karen E. (CDC/NIOSH/EID)

From: MaryAnn Gruden [magaohp@yahoo.com]
Sent: Friday, April 11, 2008 4:07 PM
To: NIOSH Docket Office (CDC)
Subject: NIOSH Reference Docket #126 - comments

Attachments: 1403389316-ep goal comments 4.08.doc



ep goal comments
4.08.doc (794...

Please see the attached comments on Docket #126 from the Association of Occupational Health Professionals in Healthcare. Thank you.

MaryAnn Gruden



Dedicated to the health and safety of healthcare workers

April 9, 2008

Re: NIOSH Reference Docket #126

Dear Sir or Madam:

The Association of Occupational Health Professionals in Healthcare (AOHP) welcomes the opportunity to comment on the proposed NIOSH Strategic Goals for Emergency Preparedness and Response. The eight goals identified are appropriate and necessary to fully address emergency preparedness for any type of disaster. They also overlap in some instances which is appropriate. Of the eight strategic goals identified, the following were ranked as the top three from our perspective. They were 1) characterization/ assessment of the potential hazard, 2) personal protective equipment (PPE) and 3) engineering/technological interventions and controls. A fourth goal that ties closely to these is environmental and biological monitoring of terrorism and is specifically related to vaccination rates and antibody testing of responders and healthcare workers as first receivers.

The rationale for choosing these three goals is that it is imperative to accurately and speedily identify the potential hazard in order to develop the plan to control or eliminate the hazard. Once the hazard is identified, appropriate PPE must be available to protect the first responders and others involved in the recovery process after the event. We support Goal 2.1.4 in particular to research the essential elements of screening tools for PPE. An example is the lengthy medical clearance form for respirator use. Researching the key medical questions that are needed to safely clear a rescue worker for respirator use in a timely manner would be extremely beneficial.

Performance targets are needed to measure progress. We recommend that some target measures be clarified as to what they are going to be measured against. Two examples are:

- The safety climate overall performance measure states "reduce exposures, illnesses, or injuries attributable to improvements to safety climate by an estimated 10%."
- The PPE overall performance measure "by 2016, reduce by 10% the number of injuries and illnesses to first responders as a result of improper selection or use (or non-use) of PPE."

Each disaster is different and, in many instances, they are unpredictable. These factors make it difficult to measure improvement in these areas? Are there other data sources available in addition to the BLS injury rates that can be used as benchmarks for these targeted measures?

An area for consideration of research is related to the emotional response and fear of healthcare workers in response to working during/after a disaster or terrorism event. Little research has been done in this area. It is worthy of further investigation as healthcare workers will be needed to care for the injured and ill.

Thank you for the opportunity to provide comments on this document. AOHP is a national organization with over 1100 occupational health professionals who work in healthcare settings, primarily hospitals. AOHP's vision is to be the defining resource and leading advocate for occupational health and safety in healthcare. Our mission is dedicated to promoting the health and safety of workers in healthcare. This is accomplished through:

- Advocating for employee health and safety
- Occupational health education and networking opportunities
- Health and safety advancement through best practice and research
- Partnering with employers, regulatory agencies and related associations.

Please contact MaryAnn Gruden, our Association Community Liaison, for additional information or questions as needed. She can be reached at 412/578-6792 or by email at magaohp@yahoo.com.

Sincerely,

Sandra Domeracki Prickitt, RN, FNP, COHN-S
AOHP Executive President