

August 30, 2004

OSHA Docket Office
Docket No. GE2004-1
Technical Data Center
Room N-2625
OSHA
US Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) wishes to thank OSHA for the opportunity to comment on the final draft of *OSHA Best Practices for Protection of Hospital-Based First Receivers of Victims from Mass Casualty Incidents Involving the Release of Hazardous Substances*. We thank OSHA and all those who assisted in the preparation of this draft.

As a comprehensive document, it will be an important resource for all facilities regardless of the present state of their emergency preparedness plans. This document will be an asset because it:

- Defines who first receivers are and differentiates them from first responders;
- Can be used as a benchmark when an existing plan is reviewed. Given that it is based on first hand experience from seven hospitals/medical centers across the country and expert research, it is a credible reference. It will enable those responsible for the development, maintenance and evaluation of the plan to critically evaluate the various components of a facility's plan;
- Identifies various levels of receivers, training, decontamination and personal protective equipment (PPE) needs;
- Includes appropriate sequences to don and duff PPE;
- Provides guidelines for monitoring individual employee's physical response, including stress, when working in the decontamination zone;
- Ties into JCAHO requirements (example: hazard vulnerability analysis [HVA]), rather than setting separate guidelines for facilities to follow;
- Notes the importance of community involvement for the individual facility;
- Recommends a tiered approach to PPE that includes more than respirators. The discussion of materials for gloves and boots, and other protective garments provides recommendations, yet lets individual facilities make the final decision for appropriate PPE;

- Provides evidence that unprotected first receivers rarely reported adverse effects when they were near contaminated victims. This information is useful in reassuring employees, however, it is recognized that this is certainly not a reason to have unprotected staff taking care of victims.

The document is devoted to exposures to hazardous and unknown substances. Its comprehensive approach could also be used as a template for the development of best practices for first receivers in biologic emergencies.


Within the document are numerous references. These are a valuable resource in and of themselves. The web-based resources would be invaluable if they were available at the click of a mouse on CD-ROM for individuals who do not have access to the Internet.

Our AOHP members appreciate the opportunity to comment on this draft and look forward to the final set of best practices. AOHP is a national organization of occupational health professionals, primarily nurses. Our 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 and
- Partnering with employers, regulatory agencies and related associations.

Please feel free to contact MaryAnn Gruden at 412/578-6792 or email: magaohp@yahoo.org if you would like to discuss this further.

Sincerely,



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AOHP Executive President