

October 25, 2004

Attention: Pandemic Plan  
National Vaccine Program Office  
Hubert H. Humphrey Building, Room 725H  
200 Independence Avenue, SW  
Washington, DC 20201

RE: Draft Pandemic Flu Plan

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) has reviewed the draft of the *Pandemic Influenza Preparedness and Response Plan* and has the following comments.

AOHP believes that the plan serves as a constructive tool for planning services during a pandemic flu event. However, AOHP believes that there is a significant need to focus on the development of a surge capacity for vaccine production as well as keeping healthcare professionals in the high priority category for both antiviral chemoprophylaxis and vaccine administration once vaccine is available.

Further, distribution of the vaccine should include both the private and government sectors in the development of the distribution plan. The recently reported manufacturing problem that is affecting half of the flu vaccine supply for 2004-2005 underscores how important vaccine production is and will be during a pandemic. We also believe there needs to be tighter control via federal, state, and local health departments when vaccine supply is diminished and the vaccine is being given at drug stores and other such venues.

In the event of a pandemic flu outbreak, AOHP recommends that first line providers (healthcare workers, EMTs, fire, police) be the first to receive the vaccine/chemoprophylaxis so as to ensure continuity of care, triaging and prevention of secondary infections.

AOHP also recommends that the plan better address how exactly the antiviral chemoprophylaxis is going to be produced and distributed since this is the mainstay of prevention until the actual vaccine becomes available. The plan also needs to better define how much chemoprophylaxis will be made available.

AOHP recommends that occupational health professionals have a higher level of involvement in the response plan, from antiviral chemoprophylaxis, vaccine administration to management of ill employees. Further, occupational health professionals should participate in the development of guidelines at all levels – national, state and local.

AOHP would welcome the opportunity to work with CDC to develop strategies and programs to educate providers about the importance of preparation and training tools for staff.

Please contact MaryAnn Gruden at 415/578-6792 or [magaohp@yahoo.com](mailto:magaohp@yahoo.com) for additional information.

AOHP is a national association whose 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.

Sincerely,



Denise Strode, BSN, COHN-S/CM  
Executive President