

February 10, 2006

Linda Slepicka
Division of Standards and Survey Methods
Joint Commission on Accreditation of Healthcare Organizations
One Renaissance Boulevard
Oakbrook Terrace, IL 60181

RE: JCAHO Proposed Standards for Immunization of Staff, Students,
Volunteers, and Licensed Independent Practitioners against Influenza

Dear Ms. Slepicka:

On behalf of the Association of Occupational Health Professionals in Healthcare's (AOHP) 1,000 members we appreciate this opportunity to comment on the JCAHO's proposed standard on immunization of staff, students, volunteers and licensed independent practitioners against influenza. We applaud JCAHO for investigating this topic for patient and healthcare worker safety along with the intent for the standard.

We support offering vaccinations free of charge to all healthcare workers. However we wanted to voice our concerns as noted below.

Comments:

- Most, if not all, hospitals already offer the influenza vaccine to their employees and volunteers. These activities are based on pre-existing recommendations by the Centers for Disease Control and Prevention (CDC).
- For physicians who are not employed by the facility, AOHP would encourage privileging requirements be changed to reflect the recommendation for annual influenza vaccination.
- Regarding Licensed Independent Practitioners, AOHP's recommendation is for vaccination free of charge if the hospitals have an adequate supply to provide this in addition to providing to their staff and volunteers.
- AOHP believes hospitals should not be accountable for maintaining influenza immunization records of caregivers whose immunizations take

place outside of the hospital's own program. Such a request is costly, inefficient, and burdensome. We recommend limiting the maintenance of records requirements to immunizations provided through the hospital's program.

- There are annual issues with influenza vaccine supply, which greatly hinders the achievement of the proposed standard. For the last 3 years there has been inconsistent supply, delays in distribution and vaccine shortages which have limited hospital programs.
- More time and effort should be vested to increase participation in such areas as emergency, intensive care units, oncology, home care, hospice, pediatrics as well as including ancillary areas such as radiology, dietary, housekeeping and transport. Hospitals should maintain records to monitor percentages of participation yearly. A multidisciplinary process involving medical staff, occupational health, infection control and patient care should be involved.
- At this time AOHP does not support obtaining declinations for healthcare workers who do not wish to be vaccinated for influenza. We support all organizations that are concerned with healthcare workers' participation in vaccination programs which will ultimately protect staff and patients. We would recommend that JCAHO consult with associations that provide the direct care to healthcare workers such as AOHP and the American College of Occupational and Environmental Medicine (ACOEM) to develop best practice models.
 - Occupational health nurses (OHN) have limited resources especially at this time of the year. Let the OHN spend the time to educate, counsel on benefits of vaccination.
 - There are legitimate reasons not to vaccinate i.e. allergy to eggs, severe past reaction (which the Advisory Committee on Immunization Practices [ACIP] and Healthcare Infection Control Practices Advisory Committee [HICPAC] would need to clearly identify).
 - Influenza vaccine doesn't have the efficacy/effectiveness of other vaccines, i.e. Hepatitis B vaccine. Therefore, even mandating it may not significantly reduce influenza outbreaks in the facility.

Overall, AOHP recommends that hospitals be provided flexibility in how they monitor influenza vaccination rates allowing the organizations to more effectively measure progress and permits creativity in influenza immunization while avoiding any punitive overtones.

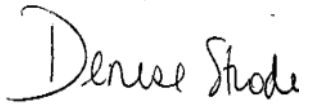
AOHP's position statement regarding this topic is also attached with this document.

We thank you for this opportunity to communicate our comments and look forward to an opportunity to provide additional information or assist you further. Please contact Sandra Prickitt at (415) 492-4790 or prickis@sutterhealth.org for additional information. .

AOHP, a national association of approximately 1000 members, 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.

Sincerely,


Denise Stode
Executive President