November 11, 2009

Docket Number NIOSH-150
NIOSH Mail Stop: C-34
Robert A. Taft Lab
4676 Columbia Parkway
Cincinnati, OH 45226

Dear Sir or Madam:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to comment on the NIOSH Request for Information on Alternative Duty: Temporary Reassignment for Health Care Workers Who Work With Hazardous Drugs. Worker safety is the primary objective of AOHP. We would support temporary reassignment of workers if all other avenues of working safely with these drugs were exhausted.

Efforts need to continue to develop engineering controls and personal protective equipment that would eliminate the exposure to these drugs for all workers. The majority of the healthcare workforce is women of child-bearing age and their safety and the health, including their offspring, are critical. Many facilities now have policies/practices in place to address this issue. If the reassignment is not feasible, the employee may need to go on a leave of absence during this time. An unexpected leave may be a financial hardship for the worker as well as the employer who would need to replace staff in order not to compromise patient care.

AOHP is a national organization with over 1000 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, Association Community Liaison if AOHP can provide any assistance in this effort. We would welcome the opportunity to be involved. MaryAnn can be reached at 412/578-6792 or by email at magaohp@yahoo.com.

Sincerely,

Sandra Prickitt,
AOHP Executive President