

March 20, 2016

Docket No. CDC-2016-0011

To Whom It May Concern:

The Association of Occupational Health Professionals in Healthcare (AOHP) appreciates the opportunity to comment on the proposed study, "Monitoring and Coordinating Personal Protective Equipment (PPE) in Healthcare to Enhance Domestic Preparedness for Ebola Response." The availability of effective personal protective equipment (PPE) for healthcare workers in the event of a pandemic or threat of bioterrorism is of utmost concern. We are glad that a national surveillance system is being explored. The study request is to develop an ongoing PPE sentinel surveillance system in the hospital setting that will document data used to evaluate and monitor use and effectiveness for PPE usage in healthcare workers.

AOHP supports this study. However, based on the information in the public notice, there are several points that come to mind and may already have been addressed.

- Has consideration been given to creating a model of the care of an Ebola patient and the PPE needs required? This model could be used to project needs in the event of a pandemic.
- How is documenting regular usage going to prepare the facility for an emergent situation since most facilities need to be able to support themselves for a minimum of 96 hours in event of an emergency?
- A national system would need to ensure that the "right" PPE was sent to a particular hospital as indicated in the proposal. Would there be a way to work with the various manufacturers to increase production of needed PPE in the event of a pandemic?
- Tracking can be cumbersome. Would the usage number not be able to be obtained through the facility's purchasing department rather than through hospital managers such as infection prevention submitting quarterly reports?
- Discussion of the pilot included that there was experience and knowledge of respirator selection, availability, and aspects of fit testing. These are important issues but not necessarily germane to the study of developing a national system. Respirator use by healthcare worker and effectiveness of PPE usage in healthcare workers has been studied in the NIOSH REACH studies and is an area worthy of additional research.

AOHP is a national association with more than 1,000 members who serve as leaders in championing the vital role of occupational health professionals in healthcare today. Through their active involvement at local, state and national levels, AOHP has become the defining resource and leading advocate for occupational health and safety in healthcare, representing tens of thousands of healthcare workers throughout the nation. AOHP promotes health and safety for healthcare workers through: advocacy; occupational health education and networking opportunities; health and safety advancement through best practice and research; and partnering with other invested stakeholders.

Thank you again for the opportunity to comment on this important study. If you have additional questions or comments, please contact MaryAnn Gruden, Association Community Liaison by email at [magruden@wpahs.org](mailto:magruden@wpahs.org) or phone 412-359-6470.

Sincerely,



Mary Bliss, RN, COHN  
AOHP Executive President