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Sent: Friday, May 02, 2008 4:37 PM

To: Boiano, James M. (CDC/NIOSH/DSHEFS)

Subject: RE: NIOSH Public Meeting on Proposed Worker and Management Surveys in Healthcare

Hi Jim,

Thanks again for the opportunity for input. After the meeting, I contacted ACOEM. Per a recent survey about 64% of the membership are primarily in patient care/clinical practice, and 22 % are in administrative roles. There are about 5000 members.

I attended the Management group for the breakout sessions, and did express my opinion there. At the wrap-up, it sounded like there were similar comments in the Individual's group; I will repeat some of my comments to you, just to be sure.

Some Management Survey questions, e.g. Anti-neoplastic Agents Module B.11 and B.13 (and comparable questions in other modules) seemed somewhat challenging in tone, implying that such services be should offered or else justify why not.. The problem with medical surveillance in this setting is that the sensitivity and specificity of testing or exam is very low; positive predictive value is very low. There are no accepted biomarkers for exposure or effect that are valid or useful across the various classes of anti-neoplastics exposures. (If there are such markers, they are still considered research tools, and are not widely available outside of research settings.)

At the meeting, we discussed the introductory material that should necessarily accompany the survey, to explain that the purpose is research /information gathering, and to explicitly disclaim re any regulatory or enforcement agenda ---or link to OSHA. This discussion helped mitigate the implication/ perception that such measures *should* be in place, just because they were included in the survey.

Please consider whether there is a way to modify or soften the language of the questions; to clarify that the various measures presented are "possible approaches", not to be construed as "requirements" or "evidence-based best practice" (when that is the actual case). For several of these chemical exposures the risk from the hazard is potential or theoretical, not well-quantified or quantifiable. Even the effectiveness of PPE is not well-defined for some, although prevention of exposures is undeniably the prudent course.

Such an approach might help increase your participation rates---by relieving Management concern or reluctance to participate in reporting their practices---if their initial reaction is similar to mine.

Again we appreciate being part of the process and wish you the best as you proceed.

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