August 19, 2022

John J. Howard  
Director  
National Institute for Occupational Safety and Health  
Centers for Disease Control and Prevention

AIHA Comments on NIOSH’s Draft Healthcare Personal Protective Technology (PPT) Targets for 2020 to 2030  
Docket Number CDC-2022-0066, NIOSH-346

Dear Director Howard:

AIHA, the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety (OEHS), appreciates the opportunity to provide feedback on the Draft NIOSH Healthcare Personal Protective Technology Targets for 2020 to 2030. Below are our comments, which we hope you find useful.

Summary

AIHA supports NIOSH’s efforts in developing new and improved methods for PPT for Health Care Personnel (HCP). Similar objectives and methodologies are also recommended for police, fire protection, and similar emergency response or other job categories for all persons who may be at increased risk of exposure to new and developing harmful workplace agents. We believe that NIOSH should be the CDC lead agency for researching new and innovative workplace PPT because of the existing established NIOSH PPT infrastructure and advanced laboratories, work-specific hazard and research capabilities and activities. Similarly, we believe that NIOSH should be the leading government agency for awarding new and advanced technology, while identifying methods for future PPE availability and applicability. Coordinating efforts with the FDA for surgical mask approval for health care settings is long overdue.

Objective 1: Conduct workplace exposure assessments and subsequent hazard evaluations to inform PPT policy, standards, and conformity assessment needs. Industrial hygienists are trained and experienced in developing exposure assessment plans and evaluating results and possible controls. These professionals should be the frontline workers for objective 1.
Objective 2: Develop, evaluate, and continually innovate PPE performance requirements and test methods through the integration of advanced PPT and design guidance.
NIOSH has the established infrastructure for PPE performance and PPT. NIOSH is the leader for current respirator testing and certification and AIHA supports NIOSH in all target efforts with objective 2.

Objective 3: Develop and disseminate strategies and tactics to extend PPT supplies during emergencies, disasters, or PPT shortages.
The COVID-19 pandemic caused shortages of NIOSH-approved N95 or better respirators for healthcare providers, dentists, and dental hygienists. Plans must be made to overcome this limitation through the means necessary. Objective 3 is most important and will require efforts to include global public and private company suppliers of PPE and PPT. AIHA supports NIOSH taking the lead for this effort in objective 3.

Objective 4: Develop and disseminate guidance and best practices to inform PPT implementation and enhance user adherence.
AIHA fully supports NIOSH in its priorities and targets for objective 4.

Objective 5: Provide national leadership to inform the design and execution of NIOSH’s RAP and other PPT conformity assessment schemes.
AIHA fully supports NIOSH in its priorities and targets for objective 5.

Objective 6: Expand U.S. capacity for PPT research and innovation.
Research grants should be made available to occupational and environmental health and similar accredited universities, the PPT Centers for Excellence, and others for expanding our knowledge of PPT. AIHA fully supports objective 6.

Conclusion and next steps
AIHA thanks you for the opportunity to provide feedback on NIOSH’s Draft Healthcare Personal Protective Technology Targets for 2020 to 2030. We look forward to our continued work together, helping protect the health and safety of all workers and their communities. If you have any questions on these comments or other matters, please contact me at mames@aiha.org or (703) 846-0730.

Sincerely,
Mark Ames
Director, Government Relations
AIHA
About AIHA
AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA’s nearly 8,500 members are Certified Industrial Hygienists and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.