



HEALTHIER WORKPLACES | A HEALTHIER WORLD

July 16, 2021

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

AIHA Comments on Needs and Challenges in Personal Protective Equipment (PPE) Use for Underserved User Populations

Document Number: 2021-13263

Dear Dr. Howard:

AIHA, representing approximately 8,500 occupational and environmental health and safety professionals, supports efforts to provide PPE for all user groups – particularly underserved populations. Below is lightly edited and anonymized feedback we received from our members in response to the National Institute for Occupational Safety and Health's (NIOSH) request for information on the needs and challenges of PPE use for underserved user populations.

Please describe your experiences related to PPE use, availability, accessibility, acceptability, and knowledge issues for underserved PPE user populations within the U.S. (e.g., individuals of small or large size; members of gender, racial, ethnic or other minority group of a specific occupation, non-traditional workers, etc.)

Obtaining smaller/petite or larger (XXX) PPE, such as high visibility vests, jackets, gloves, eyeglasses, and hearing protection remains a challenge. This is particularly true for women and racial/ethnic groups, such as Asian-Pacific Islanders, who are either smaller or larger than average.

Please describe PPE gaps/barriers that remain to be addressed for underserved PPE user populations within the U.S. related to PPE use, availability, accessibility, acceptability, and knowledge issues (if any).

Vendors in general do not feel compelled to supply extended sizes (such as smaller/petite or larger/XXX) or women's cut PPE due to what is considered a small market. Vendors and manufacturers will supply this PPE as custom orders, but often only at high prices and long lead times. Typically, PPE needs are immediate, but difficult to source in short timeframes.

What PPE research gaps/barriers remain to be addressed?

- Glove size standardization
- PPE for pregnant employees, including fall protection

- Materials that are lighter, yet more protective

What PPE service gaps/barriers remain to be addressed?

- Glove size standardization
- Flame resistant PPE in extended sizes, particularly smaller and women's sizes

What PPE policy gaps/barriers remain to be addressed?

PPE should not only be provided, but assurance must be made for proper fit and comfort to ensure employee acceptance. Availability is an issue. One size does not fit all.

Conclusion

AIHA thanks you for the opportunity to provide feedback from our members on the needs and challenges of PPE use for underserved user populations. If you have any questions about our comments or would additional information, please contact Mark Ames at mames@aiha.org or (703) 846-0730.

Sincerely,



Lawrence Sloan, MBA, CAE
Chief Executive Officer
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.