

Miller, Diane M. (CDC/NIOSH/EID)

From: Katie Slavin [Katie.Slavin@ana.org]
Sent: Friday, May 08, 2009 4:13 PM
To: NIOSH Docket Office (CDC)
Subject: 105a - Haz Drug Appx A Rev
Attachments: ANA Response FR docket NIOSH-105A.doc; Katie Slavin.vcf

Attached is the American Nurses Association's response to Federal Register docket number NIOSH 105A regarding updating the NIOSH list of hazardous drugs.

Thank you for your time.

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May 8, 2009

Thomas H. Connor, Ph.D.
Research Biologist, NIOSH MS C-23
4676 Columbia Parkway
Cincinnati, OH 45226

Dear Dr. Connor,

This letter is in response to Federal Register docket number NIOSH-105A regarding updating the list of hazardous drugs for the NIOSH Alert.

American Nurses Association (ANA) strongly supports the addition of the proposed drugs (as of April 6, 2009) to Appendix A of the NIOSH Alert regarding occupational exposure to hazardous drugs (HD).

ANA's position statement *Risk and Responsibility in Nursing Care* (2006) and ANA's adoption of the Precautionary Principle in 2003, supports ANA's desire to ensure nurses are adequately protected from hazardous drugs. Considering ANA's 2006 House of Delegates Resolution: *Nursing Practice, Chemical Exposure, and Right-to-know*, ANA also strongly encourages efforts to educate and train nursing staff on the potential exposure of these drugs and proper methods to minimize exposure.

Alternatively, ANA does NOT support the deletion of Bacillus Calmette-Guerin (BCG) from the NIOSH list of hazardous drugs.

Although there is concern regarding the specific preparation, handling, and disposal of BCG separate from other HD to avoid cross-contamination and subsequent nosocomial infections, BCG still meets HD criteria. ANA urges that BCG remain on the HD list, but with special notation indicating this drug has unique preparation, handling, and disposal instructions due to infectious properties.

Feel free to contact Katie Slavin at katie.slavin@ana.org or 301-628-5138 with any questions.

Sincerely,

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