

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

From: Gail Mallory [GMallory@ons.org]
Sent: Tuesday, July 01, 2008 12:12 PM
To: NIOSH Docket Office (CDC)
Cc: Kelly Egnotovich; Kris LeFebvre
Subject: Oncology Nursing Society comments for NIOSH-135
Attachments: NIOSH Surveys of Healthcare Workers and Management Health and Safety Practices - Comments 6-20-08.doc

Greetings,

I have attached specific comments for several questions in the Healthcare Workers Survey based on current information taught at the Oncology Nursing Society Chemotherapy and Biotherapy Course.

Please let us know if you have questions or would like additional discussion.

Thank you very much for the opportunity to comment and for ONS members to participate in this important survey.

Gail

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NIOSH Surveys of Healthcare Workers and Management Health and Safety Practices

Comments and Changes from the Oncology Nursing Society

Worker Core Module, Draft Page 4, Question 3 (Job and Faculty Description):

- Under Nurses and Nursing Support Staff, add choices for: Advanced Practice Nurse, Nurse Educator and Clinical Nurse Specialist

Module B: Antineoplastic Agents (Pharmacists, Pharmacy technicians) – Draft Page B-1

- COMMENT: A large number of nurses are still mixing chemo, please add nurses to the title of this section after pharmacy technicians
- Add to the text box: This module is directed towards individuals, such as pharmacists or pharmacy technicians or nurses . . .
- Same page, Add to choices for question 3: Hospital-Based Chemotherapy and Biotherapy Course, and Oncology Nursing Society (ONS) Chemotherapy and Biotherapy Course
- Question 3 – ONS is not sure if other professional societies offer courses...

Module B: Antineoplastic Agents (Pharmacists, Pharmacy technicians) – Draft Page B-2

- Question 8: Include biotherapy agents and update chemotherapy list
- Recommend using for both biotherapy and chemotherapy – separate questions
- Who is preparing oral medications – same precautions and same preparation as for IV antineoplastic agents?

Module B: Antineoplastic Agents (Pharmacists, Pharmacy technicians) – Draft Page B-4

- Question 17: Type of Hood
- Hood in community-based practices – how maintaining and cleaning directions (e.g. hood should stay “on” all the time). Maintenance protocol (who is cleaning).

Module B: Antineoplastic Agents (Pharmacists, Pharmacy technicians) – Draft Page B-6

- Question 24 and others relating to gloves: perception of accuracy of this item – latex and chemo gloves are different – NIOSH (2004) recommends Double gloving with chemo gloves (both pair) – this should be reflected in ALL questions – as the questions are written it implies that latex and chemo gloves are the same or interchangeable.
- Add, Do you weargloves? Yes No
- Add, If you don't weargloves, why not?

Module B: Antineoplastic Agents (Pharmacists, Pharmacy technicians) – Draft Page B-10

- After Question 34A: Transportation of drug from pharmacy to admin unit
- Need procedure questions such as - Prime tubing, no needle, type of container, double bagged, leak proof, steps to transport, where stored in unit, who can transport, med room or chemo only area or remain in container, and what if it leaks?

Module C: Antineoplastic Agents (Oncology Nurses) – Draft Page C-1

- Question 3: Revise to, “Have you received any formal (classroom) education for handling antineoplastic agents? Change answer options to:
 - Yes, employer based
 - Yes, ONS chemotherapy and Biotherapy Course
 - Yes, other (please specify) ____
- Question 9 – draft page C-2

- Add new drugs
- Add biotherapy
- Suggest making two questions – one with chemotherapy drugs and one for biotherapy drugs

Module C: Antineoplastic Agents (Oncology Nurses) – Draft Page C-4

- Question 13: Add for answer options:
 - E. Phaseal system, closed system
- Add after Question 18 a new question 19: Cleaning surfaces of administration area (maintenance before spill), general wipedown.
- Add questions from above regarding latex and chemo gloves and double gloving from C-6 on

Module C: Antineoplastic Agents (Oncology Nurses) – Draft Page C-7

- Question 26: add “or chewing gun” to option “d”.
- Add an option “f. apply cosmetics (eg. Lip balm) to Question 26.

Module C: Antineoplastic Agents (Oncology Nurses) – Draft Page C-8

- Need questions about: Patient education for call at home, incontinent at home, pre-wash, double wash clothes/diapers, separate wash, stay away from kids, especially aged and pediatrics.

Module C: Antineoplastic Agents (Oncology Nurses) – Draft Page C-1

- End of page – need questions about disposal:
 - Lid down
 - Double flush
 - Chemo gowns
 - Chux pad disposal
 - Radioactive
 - Disposal of output
 - Urine
 - Stool
 - Irrigation returns
- Need questions about face protection
- Survey ends abruptly – may want to add an open ended question

Management Questionnaire – Draft Page 7

- For the option:
 - Routine worker notification of medical surveillance results – does it capture chemotherapy adm?

Management Questionnaire – Draft Page 13

- Check spellings for: Metho-trexate, pegaspargase, and procarbazine

Management Questionnaire – Draft Page 18

Policies for Preparing Antineoplastic Agents

- Incorporated into mixing and administration of chemotherapy B 15 through B – 27
- Policies in institution at end of preparer and administration
- These questions should be in the “Mixing” section also