

**ABSA**

American Biological Safety Association

1200 Allanson Road • Mundelein, IL 60060-3808 • 866-425-1385 • 847-949-1517  
Fax: 847-566-4580 • E-mail: [info@absa.org](mailto:info@absa.org) • Web Site: [www.absa.org](http://www.absa.org)**President**

LouAnn Burnett, MS, CBSP  
Sandia National Laboratories  
International Bio Threat Reduction  
P.O. Box 5800, MS 1363  
Albuquerque, NM 87185  
505-284-4133  
[louann.burnett@gmail.com](mailto:louann.burnett@gmail.com)

June 7, 2012

Department of Health and Human Service  
Office of Healthcare Quality  
200 Independence Ave, S.W., Room 711G  
Washington, D.C. 20201

**President-Elect**

Barbara Fox Nellis, RBP, CBSP  
Barb Nellis Consulting  
4239 Cascade Falls Drive  
Sarasota, FL 34243  
941-351-8491  
[bfoxnellis@verizon.net](mailto:bfoxnellis@verizon.net)

Attention: Draft National HAI AP

Ladies and Gentlemen,

The American Biological Safety Association (ABSA) is an international group of biological safety professionals and one of the world's foremost resources on biological safety practices. ABSA has reviewed the draft National Action Plan to Prevent Health-care Infections which was announced in the April 25, 2012 Federal Register and ABSA has the following comments to share regarding the proposed revisions:

**Secretary**

Betty Kupskey, MSc, RBP  
University of Minnesota  
W-160 Boynton Health Service  
410 Church Street, SE  
Minneapolis, MN 55455  
612-626-5590  
[kupsk001@umn.edu](mailto:kupsk001@umn.edu)

The draft plan contains recommendations for the immunization of healthcare workers against seasonal influenza. Included in the definition of healthcare workers are laboratory personnel. Immunization of these laboratory workers against seasonal influenza is also supported and should be mentioned. Doing so will help reduce the likelihood of noscomial infections from these workers, and will also help to reduce transmission of the disease in the community.

**Treasurer**

Rosamond Rutledge-Burns, MS, CBSP  
National Institute of Standards & Technology  
100 Bureau Drive, MS 1730  
Building 301, Room B116  
Gaithersburg, MD 20899-1730  
301-975-5819  
[rburns@nist.gov](mailto:rburns@nist.gov)

The only additional comment to share is to caution against consideration of additional immunizations for laboratory workers beyond the hepatitis B virus and the other vaccine preventable diseases noted in the November 25, 2011 Advisory Committee on Immunization Practices (ACIP) recommendations. Some clinical laboratories have microbiology laboratories, and some microbiology laboratories may isolate Centers for Disease Control and Prevention (CDC) Select Agents. Vaccines may be available for some of these pathogens (e.g. *Bacillus anthracis*), but the reality is that most clinical microbiology laboratories will not routinely isolate these organisms, and they may never isolate an organism for which a vaccine is available. Given some of the adverse side effects of these immunizations, it is wise not to include immunizations against CDC Select Agents amongst the vaccination recommendations. The additional benefits to patient care would be very limited.

**Past-President**

Karen B. Byers, MS, RBP, CBSP  
Dana-Farber Cancer Institute  
450 Brookline Avenue—LGM 18  
Boston, MA 02215  
617-632-3890  
[karen\\_byers@dfci.harvard.edu](mailto:karen_byers@dfci.harvard.edu)

We thank you for this opportunity to have provided these comments.  
Sincerely,

**Councilors**

Marian Downing, RBP, CBSP (13)  
Robert Heckert, DVM, PhD, CBSP (14)  
Michelle McKinney, CBSP (12)  
Richard Rebar, MS, RBP, CBSP (12)

**2012 Biosafety Conference Chairpersons**

Scientific Program Committee  
Dawn P. Wooley, PhD, RBP, CBSP  
Exhibitors Advisory Committee  
Stephen Sowa, MS  
Local Arrangements Committee  
Jose Vazquez, Jr.

LouAnn Crawford Burnett, MS, CBSP  
President  
American Biological Safety Association

**Executive Director**

Edward J. Stygar, III, MBA, CAE  
[ed@absaoffice.org](mailto:ed@absaoffice.org)