June 7, 2012

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

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:

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 nosocomial infections from these workers, and will also help to reduce transmission of the disease in the community.

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.

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

Sincerely,

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