

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

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**From:** Justine Coffey [JCoffey@ashp.org]  
**Sent:** Monday, October 26, 2009 2:03 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** Docket Number NIOSH-150  
**Attachments:** AlternDutyCommentsfinal.pdf

Hello -

Attached please find the American Society of Health-System Pharmacists' comments relating to Docket Number NIOSH-150, Request for Information on Alternative Duty.

If you could please email me confirmation that you have received our comments, I would greatly appreciate it.

Thank you,  
Justine

Justine Coffey, JD, LLM  
Director, Federal Regulatory Affairs  
American Society of Health-System Pharmacists  
Government Affairs Division  
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October 26, 2009

NIOSH Docket Office  
Robert A. Taft Laboratories  
MS-C34  
4676 Columbia Parkway  
Cincinnati, Ohio 45226

**Re: NIOSH Docket No. 150 – Request for Information on Alternative Duty:  
Temporary Reassignment for Health Care Workers Who Work With Hazardous  
Drugs**

Dear Sir/Madam:

The American Society of Health-System Pharmacists (ASHP) is pleased to submit comments on the request for information on alternative duty. For more than 60 years, ASHP has helped pharmacists who practice in hospitals and health systems improve medication use and enhance patient safety. The Society's 35,000 members include pharmacists and pharmacy technicians who practice in inpatient, outpatient, home-care, and long-term-care settings, as well as pharmacy students.

The Society is pleased that NIOSH intends to publish a Current Intelligence Bulletin on alternative duty and other forms of administrative controls for health care workers who work with hazardous drugs and are trying to conceive, are pregnant, or are breast feeding. ASHP Guidelines on Handling Hazardous Drugs state: "Because reproductive risks have been associated with exposure to hazardous drugs, alternative duty should be offered to individuals who are pregnant, breast-feeding, or attempting to conceive or father a child. Employees' physicians should be involved in making these determinations."

Alternative duty policies should encourage health care workers to provide early notification, whenever possible, if they are seeking alternative duty assignments. ASHP recommends the proactive establishment of timely and convenient systems by employers that protect health care workers from occupational hazards while allowing managers sufficient time to create alternatives that address worker concerns and also ensure there are not interruptions in patient care.

As part of this policy on alternative duty for health care workers who work with hazardous drugs, ASHP encourages NIOSH to provide educational materials for workers to determine their risk in their current work assignment and whether an alternative

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assignment is needed. These educational materials should include information on hazardous drugs, their risks as they relate to pregnancy, breast-feeding, or attempts to conceive or father a child, appropriate handling, and the use of appropriate personal protective equipment.

The Society appreciates this opportunity to provide comments. Please feel free to contact me if you have any questions. I can be reached by telephone at 301-664-8702, or by e-mail at [jcoffey@ashp.org](mailto:jcoffey@ashp.org).

Sincerely,

A handwritten signature in cursive script that reads "Justine Coffey".

Justine Coffey, JD, LLM  
Director, Federal Regulatory Affairs