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**NIOSH Docket Office (CDC)**

**From:** Katie Slavin [Katie.Slavin@ana.org]

**Sent:** Wed 1/30/2008 9:39 AM

**To:** NIOSH Docket Office (CDC)

**Cc:**

**Subject:** Docket # 115

**Attachments:**  Docket NIOSH-115.doc(298KB)

Hello,

I reviewed the NIOSH docket site to submit comments regarding Docket # NIOSH-115 regarding the draft CIB entitled "Interim Guidance on Medical Screening of Workers Potentially Exposed to Engineered Nanoparticles". Docket NIOSH-115 is not currently an option available to submit comments on the docket page. I have attached comments on behalf of American Nurses Association. Alternatively, if you are able to add a link to the website I can submit there.

Thank you for your time and assistance.

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January 24, 2008

National Institute of Occupational Safety and Health Docket Office  
Robert A. Taft Laboratories  
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To Whom It May Concern:

Although there is currently insufficient evidence regarding detrimental health effects following occupational exposure to engineered nanoparticles, concerns have been raised regarding the potential for increased detrimental adverse health outcomes these materials may pose to workers. Since nanotechnology is used in pharmaceutical, biological product, and medical device engineering for diagnostic and therapeutic intended use, American Nurses Association (ANA) is concerned with the adverse health effects these products, containing nanoscale material, may pose to nurses and other health care workers exposed. For these reasons, ANA supports medical surveillance for workers with potential exposure to nanoparticles.

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 present and potential occupational hazards. 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 hazardous materials and proper controls to minimize exposure.

Medical surveillance and establishment of an exposure registry for workers exposed to engineered nanoparticles will not only protect the health of workers from a material, which effects are currently unknown, but also contribute to a body of evidence regarding the health effects of nanoparticles that is currently lacking.

Thank you for providing the opportunity to comment on this important issue.

Sincerely,

Katie E. Slavin, MS, RN  
Senior Staff Specialist  
Center for Occupational & Environmental Health  
American Nurses Association

Nancy L. Hughes, MS, RN  
Director  
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