

October 14, 2020

Submitted electronically via: ppeconcerns@cdc.gov

Dr. Lee Greenawald
National Institute for Occupational Safety and Health
626 Cochran's Mill Road, Building 141
Pittsburgh, PA 15236

Shoshana Krilow
Vizient, Inc.
799 9th St NW
Suite 210
Washington, DC 20001
Email: Shoshana.Krilow@vizientinc.com
Phone: (202) 354-2607

Re: A National Elastomeric Half Mask Respirator (EHMR) Strategy for Use in Healthcare Settings During an Infectious Disease Outbreak/Pandemic (85 FR 56618)

Dear Dr. Greenawald,

Vizient, Inc. appreciates the significant efforts of the National Institute for Occupational Safety and Health (NIOSH) of the Centers for Disease Control Prevention during the COVID-19 Public Health Emergency (PHE). Vizient is pleased to submit the following information in response to NIOSH's announcement of a request for information (RFI) regarding the deployment and use of elastomeric half-mask respirators (EHMR) in healthcare settings and emergency medical services (EMS) organizations during the COVID-19 crisis and subsequent infectious disease outbreaks or pandemics. Vizient believes federal purchase and deployment of EHMRs would be beneficial to healthcare worker safety. As noted in the RFI, these masks provide at least the same level of protection as disposable N95s. Additionally, EHMRs are reusable, which ultimately, can be a more cost-effective option than disposable N95s. Finally, EHMRs have been shown in recent studies to withstand extended storage periods. Based on this information, Vizient supports NIOSH's efforts to bolster the supply and use of EHMRs.

Background

Vizient, Inc. provides solutions and services that improve the delivery of high-value care by aligning cost, quality and market performance for more than 50% of the nation's acute care providers, which includes 95% of the nation's academic medical centers, and more than 20% of ambulatory providers. Vizient provides expertise, analytics, and advisory services, as well as a contract portfolio that represents more than \$100 billion in annual purchasing volume, to improve patient outcomes and lower costs. Headquartered in Irving, Texas, Vizient has offices throughout the United States.

Information to assist NIOSH in the refinement of the EHMR demonstration projects

In the RFI, NIOSH seeks information that may be used by the Strategic National Stockpile (SNS) to conduct a program to deploy EHMRs across the nation. Under the program, the SNS would provide

participating organizations with a fixed quantity of EHMR devices and best practices and implementation guidance. Participating organizations would then provide NIOSH with reports which will be used to inform future updates to best practices and implementation guidance. Additionally, NIOSH seeks feedback regarding strategic parameters of this and future EHMR demonstration programs (e.g., considerations for fit testing, training, education, filter change-out schedule, cleaning/disinfection, storage considerations, and appropriate clinical care settings for EMHR use). Vizient encourages NIOSH to consider manufacturers' instructions for use for several factors including fit testing, disinfection and storage. In addition, regarding the fit test, Vizient notes that facilities often have a fit test protocol already in place. As a result, to prevent confusion and reduce burden, Vizient recommends those facilities be provided flexibility to adhere to facility-established policy. Considering care setting, Vizient believes the appropriate care setting would include any care setting where care is provided to patients suspected or confirmed to have been infected with the identified pathogen. Should NIOSH require any additional information regarding clinical efficacy, Vizient is willing to provide our expertise to help inform the demonstration.

NIOSH also asks for feedback regarding the potential criteria to be used to determine how EHMR devices should be distributed to demonstration sites. Vizient suggests NIOSH consider needs and requests from providers, federal response plans and other variables, including hotspots, shortages, provider needs, disease prevalence and more.

Conclusion

Vizient welcomes NIOSH's efforts to seek feedback regarding the deployment and use of EMHRs in healthcare settings and emergency medical services organizations during the COVID-19 pandemic and beyond. In addition, Vizient believes federal purchase and deployment of EHMRs would be beneficial to healthcare worker safety and supports NIOSH's efforts to bolster the supply and use of EHMRs during future infectious disease outbreaks or pandemics.

Vizient membership includes a wide variety of hospitals ranging from independent, community-based hospitals to large, integrated health care systems that serve acute and non-acute care needs. Additionally, many are specialized, including academic medical centers and pediatric facilities. Individually, our members are integral partners in their local communities, and many are ranked among the nation's top health care providers. In closing, on behalf of Vizient, I would like to thank NIOSH for providing us the opportunity to comment on this important RFI. Please feel free to contact me or Jenna Stern at jenna.stern@vizientinc.com, if you have any questions or if Vizient may provide any assistance as you consider these issues.

Respectfully submitted,



Shoshana Krilow
Vice President of Public Policy and Government Relations
Vizient, Inc.