



AMERICAN ACADEMY OF NURSING

transforming health policy and practice through nursing knowledge

October 14, 2020

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

RE: Request for Information Regarding A National Elastomeric Half Mask Respirator (EHMR) Strategy for Use in Healthcare Settings During an Infectious Disease Outbreak/Pandemic

Dear Dr. Greenawald:

The American Academy of Nursing (Academy) is pleased to offer the following comments in response to the September 14, 2020 request for information and comment regarding the deployment and use of elastomeric half-mask respirators (EHMRs) in healthcare settings and emergency medical services (EMS) organizations during the coronavirus (COVID-19) crisis. The Academy serves the public and the nursing profession by advancing health policy and practice through the generation, synthesis and dissemination of nursing knowledge. It's more than 2,700 Fellows are nursing's most accomplished leaders in education, management, practice, research, and policy. They have been recognized for their extraordinary contributions to the promotion of the public's health through evidence and innovation.

The Academy acknowledges and is appreciative of the National Institute for Occupational Safety and Health's (NIOSH) efforts to prevent shortages of N95 masks by providing EHMRs in healthcare settings. With over 7.8 million confirmed coronavirus cases in the United States,¹ we cannot stress enough how indispensably important it is to continue to ensure that healthcare professionals have the personal protective equipment (PPE) and other supplies they need in order for them to stay healthy and provide high quality care. We are on record requesting resources for NIOSH as a result of the COVID-19 pandemic.² Guidance, recommendations, and resources from NIOSH will be vital to ensure safe and healthy working conditions for all through training, outreach, education, and research as local communities reopen or shift their plans as a result of increasing coronavirus cases. As NIOSH considers the deployment and use of EHMRs in healthcare settings and EMS organizations, evidence-based policies and procedures on fitting, testing, and cleaning of equipment will be necessary along with the masks for the most effective use of them in these settings.

We believe NIOSH should test EHMR masks to ensure they prevent the spread of infectious diseases before conducting any training to ensure that healthcare settings and providers are comfortable in using the EHMR mask during the current COVID-19 pandemic and a future public health crisis. Members of the Academy's Emerging Infectious Disease Expert Panel have shared anecdotes about EHMRs regarding concerns with unfiltered valves in the mask protecting the user but infecting other healthcare professionals and patients. Another concern is the difficulty in communicating with other personnel and patients while wearing the mask. Because of this, the Academy strongly encourages NIOSH to include safety assessments to prevent the spread of infectious disease as well as the ease of communication in any tests of EHMRs. We also recommend that nurses with expertise in public health, infectious disease

control, and PPE be included in the evaluation of these tests with the various EHMR masks used in at the demonstration sites.

In summary, the Academy shares your goal in ensuring that all frontline workers in healthcare settings and EMS organizations have access and training to the appropriate PPE. We believe that NIOSH's commitment to partnering with healthcare providers to test out EHMRs will greatly help frontline healthcare workers be better prepared for the next pandemic or public health emergency. Thank you for the opportunity to provide our comments and recommendations. If you have any questions or need additional information, please feel free to contact the Academy's Senior Director of Policy, Christine Murphy, at cmurphy@aannet.org or 202-777-1170.

Sincerely,



Eileen Sullivan-Marx, PhD, RN, FAAN
President

¹ *Coronavirus Resource Center*. (n.d.). Johns Hopkins University. <https://coronavirus.jhu.edu/>

² American Academy of Nursing. (2020, April 29). American Academy of Nursing letter to Congressional leaders with recommendations to address the coronavirus pandemic.

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