

DFW-APIC Government Affairs Committee (GAC)

Prepared: Patti Grant; 2003-2004 GAC Chair

NATIONAL APIC UPDATES

-- UPDATE: OSHA MANDATE ANNUAL FIT-TESTING --

Dear Chapter Legislative Representatives:

On Thursday, April 29th, 2004, representatives from APIC and the American Hospital Association (AHA) met with OSHA Administrator John Henshaw and other OSHA officials, regarding the agency's recent decision to include exposure to patients with potentially infectious TB under the General Industry Respiratory Protection Standard.

Rachel Stricof, on behalf of APIC, outlined our major concerns with this decision, citing the lack of scientific/epidemiologic justification for annual fit-testing and the success of already existing TB control strategies.

Secretary Henshaw was very open to working with us to better address this issue. He maintained that his number one concern is protecting workers, but also stated that he has no intention of imposing anything that is unnecessary or that will be a waste of resources. He is strongly considering a delay in enforcement (beyond July 1, 2004), and is meeting with CDC's Julie Gerberding in mid-May to discuss this and other issues.

We will have more definitive information after this meeting.

In the meantime, we are very hopeful that this is just the beginning of a strong collaboration between CDC, OSHA, NIOSH, APIC, AHA and other stakeholder organizations. We stressed that APIC is very concerned about worker safety, and that we would welcome the opportunity to work with OSHA to identify measures that would be effective in meeting this objective

-- UPDATE: PLACEMENT OF ALCOHOL RUBS IN CORRIDORS --

Dear Chapters,

The following article from American Society for Healthcare Engineering (ASHE) outlines a major decision made earlier this week, regarding the placement of alcohol-based hand product dispensers in health care facilities. APIC has been working on this issue for more than a year, partnering with the ASHE, American Hospital Association, and others. Special thanks to Judene Bartley and Loretta Fauerbach for their work on this issue.

Life Safety Code Amendment allows Alcohol Based Hand Rubs

The National Fire Protection Association (NFPA) announced the amendment of the 2003 Edition of the Life Safety Code (LSC) to specifically recognize and permit the use of alcohol-based handrub solutions in patient rooms, corridors and suites of healthcare facilities. The LSC is enforced by a number of regulatory and compliance organization including the Joint Commission (JCAHO), the Center for Medicare and Medicaid Services (CMS), and many state and local authorities.

Adoption of this tentative interim amendment (TIA) provides Authorities having Jurisdiction (AHJs) with clear code language required to allow the use of these handrubs. By providing detailed criteria on the use and storage of alcohol-based handrubs, the TIA provides guidance to minimize any potential fire risk while allowing handrub dispensers to be located in convenient locations to maximize access and use by healthcare workers.

The adoption of the TIA is the result of a year-long advocacy effort led by the American Society for Healthcare Engineering (ASHE) of the American Hospital Association (AHA) in collaboration with the Centers for Disease Control (CDC), the Association for Professionals in Infection Control Inc., (APIC) the Society for Healthcare Epidemiology of America, Inc., (SHEA) and other members of the infection control and fire safety community.

According to the CDC, Healthcare-Acquired Infections (HAI) strike nearly two million people each year, leading to roughly 88,000 deaths per year[1]. To combat this problem, in October 2002 the CDC issued recommendations stating that "alcohol based handrubs may be a better option than traditional hand washing with plain soap and water". Additionally the Joint Commission on Accreditation of Healthcare Organizations (JCAHO) established National Patient Safety Goals to focus attention on the reduction of HAIs by calling for hospitals to follow the CDC recommendations. However, according to AHA News health care facilities ran into problems installing dispensers since national and local fire codes restrict the location and use of flammable liquids, such as the alcohol based rubs.

In July 2003 ASHE, AHA, CDC, APIC, SHEA, and other members of the healthcare and fire safety communities, including fire safety officials, met to address the HAI issue. While it was agreed upon that in theory, the use of alcohol-based handrubs had an impact on infection rates, it was noted that current fire codes restricted the use and storage of flammable liquids. During the course of the meeting ASHE provided the results of a fire safety engineering study[2] they had commissioned to determine how alcohol-based hand0rub dispensers could be safely installed and managed in corridors. The review and acceptance of the findings of the study led to the development of the exact code language of the TIA.

The TIA allows the installation of dispensers in corridors provided that the following conditions are met:

- * The corridor width is 6 feet or greater and dispensers are separated at least 4 feet apart.
- * The maximum individual dispenser fluid capacity is 1.2 liters for dispensers in rooms, corridors, and areas open to corridors, and 2.0 liters for dispensers in suites of rooms
- * The dispensers are not installed over or directly adjacent to electrical outlets and switches.
- * In locations with carpeted floor coverings, dispensers installed directly over carpeted surfaces are permitted only in sprinklered smoke compartments.

In addition:

- * Each smoke compartment may contain a maximum aggregate of 10 gallons of alcohol-based handrub solution in dispensers and a maximum of 5 gallons in storage.

This is a significant step toward allowing hospitals convenient access to life-saving alcohol handrubs, but it is not the final step. The International Code Council (ICC) publishes the International Fire Code (and companion International Building Code), which are referenced by many state and local fire agencies. ASHE has collaborated with the ICC task force charged with investigating and providing recommendations regarding the safe usage of alcohol-based handrubs.

The task group is comprised of fire marshals, hospital engineers, and industry experts and is moving forward with a strong sense of what best meets the patients clinical and fire safety needs. If amended, this action paves the way for state agencies to also allow dispensers in corridors effectively getting national, state, and local fire agencies all on the same page on the issue of alcohol-based handrubs.

[1] <http://www.cdc.gov/handhygiene/pressrelease.htm>

[2] The study is available at www.hospitalconnect.com/ashe/currentevent/abhi.html

FEDERAL REGISTER PUBLICATION: Volume 69, Number 71, Pages 19433-10435

- ?? 04/13/04 “Notice Regarding FDA [Docket No. 2004N-0154] Medical Devices; Semicritical Reprocessed Single-Use Devices; Termination of Exemptions from Premarket Notification; Requirement for Submission of Validation data. This notice is changing the category of 3 devices, classified as semicritical reprocessed SUD’s with previous exemptions from premarket notification requirements [510(k)], which will now require 510(k).
- ?? This can be access by going to www.gpo.gov

PHARMACY “CLEAN ROOM” REQUIEIMENTS

- ?? On 03/23/04 the American Society of Health-System Pharmacists (ASHP) published a document titled “ASHP Guidelines on Quality Assurance for Pharmacy-Prepared Sterile Products”
- ?? Barbara Moody has prepared a check-off list you can give to your pharmacy to assess if they are in compliance (available at www.apicdfw.org)
- ?? You can access document by going to www.ashp.org ☞ Typing GUIDELINES into the search box ☞ and then document #7 is the guideline listed above
- ?? This document is directly linked to USP (United States Pharmacopeia National Formulary), Chapter 797, and is “FDA enforceable” – Your pharmacy director should be able to access this document for you

TEXAS REGISTER

- ?? No proposed/adopted rules with infection control impact