



August 21, 2023

Members of the Healthcare Infection Control Practices Advisory Committee (HICPAC)
Centers for Disease Control and Prevention

Dr. Alexander J. Kallen
Designated Federal Officer for HICPAC
Chief, Prevention and Response Branch
National Center for Zoonotic Infectious Diseases
Centers for Disease Control and Prevention

Dr. Michael Bell
Deputy Director Division of Healthcare Quality Promotion
Centers for Disease Control and Prevention

RE: HICPAC and the CDC Must Fully Recognize Aerosol Transmission and Protect Health Care Workers and Patients

Dear Members and Staff of the Healthcare Infection Control Practices Advisory Committee (HICPAC):

We, the undersigned individuals and organizations, recognize the pivotal role you play in setting guidance that shapes infection control and prevention practices in hospitals, nursing homes, and other health care settings across the nation and around the world.

We urge HICPAC and the CDC to ensure the following elements are upheld in updates to infection control guidance in health care settings:

1. Fully recognize aerosol transmission of SARS-CoV-2 and other respiratory pathogens.

HICPAC and the CDC should ensure that updated guidance includes the use of multiple control measures that have been shown to effectively prevent transmission of respiratory pathogens, including SARS-CoV-2 and others, including:ⁱ

- Ventilation to remove aerosolized viral particles and other pathogens, including the use of negative pressure isolation and other engineering controls.ⁱⁱ
- Respiratory and eye protection for health care workers providing care to patients with suspected or confirmed respiratory infections.ⁱⁱⁱ
- Safe staffing is essential to effective infection control and prevention. Updated CDC/HICPAC guidance must recognize this and must not make allowances for health care employers to circumvent measures necessary to protect worker and patient health due to staffing concerns.

2. Maintain and strengthen respiratory protection and other protections for health care workers caring for patients with suspected or confirmed respiratory infections.

N95 filtering facepiece respirators represent the *minimum* level of respiratory protection available and are essential to protecting health care workers from respiratory infections. HICPAC and CDC should clearly and explicitly incorporate elastomeric and powered air-purifying respirators (PAPRs) into any updated guidance on health care infection control. PAPRs and elastomeric respirators can provide a higher level and more reliable protection than N95s, be more comfortable to wear, and more cost-effective for employers to implement.^{iv}

3. The CDC must maintain an approach in any updated infection control guidance that is clear and explicit on the precautions that are needed in situations where infectious pathogens are present or may be present in health care settings; don't adopt a crisis standards approach.

4. CDC and HICPAC should engage with stakeholders, including direct care health care workers, their unions, patients, and community members to provide them with the ability to review and provide essential input into guidance updates.

We are concerned about the lack of transparency in your process to update the CDC's guidance document, *Isolation Precautions: Preventing Transmission of Infectious Agents in Healthcare Settings* (last updated in 2007). Changes to this guidance will impact health care workers, patients, and communities in every state, but you have no clear mechanism to garner input from those health care workers, their unions, or patients and community members before the updates are finalized.

Sincerely,
The undersigned organizations and individuals

Organizational signatures:

National Nurses United
American Federation of Government Employees
United Food and Commercial Workers International (UFCW)
International Union, UAW
United Steelworkers
National Education Association
National Federation of Federal Employees
Utility Workers Union Of America
National Union of Healthcare Worker
Massachusetts Nurses Association
Civil Service Employees Association, Local 1000 AFSCME
UFCW Local 222ACE - ActionCareEquity.org
AJ Rosen & Associates LLC

ARTS, CRAFTS & THEATER SAFETY

Asbestos Disease Awareness Org
Association of Occupational and Environmental Clinics
Association Winslow Santé Publique
Health Watch USA(sm)
Cartwright Counseling Inc.
Celebrate845
Center for Independent Living
Clean Air Crew
Colorado for Universal Health Care
COVID Safe MSU/Michigan
COVID-19 Organizing Resistance and Education
CRLA Foundation
Disability Policy Consortium
Foundation for Integrative AIDS Research (FIAR)
Fundación Desinflámate para la Medicina Social
Hawaii for a Safe Return to Schools
Immigrant Service Providers Group/Health
Hearts and Minds Learning Community
Labor Occupational Health Program
Labor Today International
Long Covid Action Project
Long COVID PR
Long COVID Justice & Strategies for High Impact
Lower Hudson Valley Democratic Socialists of America
Marked By Covid
Mask Bloc Albuquerque
MassCOSH - Massachusetts Coalition for Occupational Safety and Health
National Council for Occupational Safety and Health
Occupational Health and Safety Section (APHA)
Pandemic Equity Initiative
Pan End It!
PDX Non-Binary Collective
People's CDC
Prevention at Work, LLC
REPSS, Inc.
RICOSH
Rise Up WV
SafeWork Washington
San Joaquin Valley Democratic Club
Senior and Disability Action
Something Wild Wellness
Southsiders for Peace
Stop Bullying Coalition

And 10,932 individual signatures

ⁱ Baker, M. et al. “Rapid Control of Hospital-Based Severe Acute Respiratory Syndrome Coronavirus 2 Omicron Clusters Through Daily Testing and Universal Use of N95 Respirators.” *Clinical Infect Diseases* (Feb. 2022). <https://doi.org/10.1093/cid/ciac113>

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