



HEALTHIER WORKPLACES | A HEALTHIER WORLD

March 13, 2023

Representative Richard Hudson (NC)
District 9
Committee on Energy & Commerce
United States House of Representatives

Representative Anna Eshoo (CA)
District 16
Committee on Energy & Commerce
United States House of Representatives

AIHA's Recommendations on the Pandemic and All-Hazards Preparedness Act (PAHPA) Request for Information

Dear Representatives Hudson and Eshoo:

AIHA, the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety (OEHS), appreciates the opportunity to provide feedback on your request for information (RFI) on the reauthorization of Pandemic and All-Hazards Preparedness Act programs. We hope you find our feedback useful and are happy to answer any questions you may have.

Suggestions on how to reauthorize and revise existing PAHPA programs

HHS has not yet published its Evaluation of Progress (EOP) for the 2019-2023 period and is just beginning to prepare the 2023-2026 National Health Security Strategy (NHSS), which is the foundation and rationale for all the PAHPA programs. The National Health Security Strategy Implementation Plan will lag even farther behind the authorization. Congress should consider a short-term, provisional fund, similar to a continuing resolution, for the interim period in which the U.S. will be operating from an outdated strategy. Given that the 2019-2023 EOP will contain the lessons learned from the COVID-19 pandemic, it is imperative that it informs the next NHSS. We recommend readdressing the full PAHPA after HHS has published a draft of the EOP and NHSS and presented them to Congress. We also encourage HHS to solicit public comment on the draft EOP and NHSS.

Notwithstanding the absence of an EOP, we recommend the following improvements for the next NHSS.

1. The document should more clearly identify the actions for which HHS Assistant Secretary for Preparedness and Response (ASPR) is truly the lead and when they are supporting. For example, the document acknowledges that ASPR performs some of its functions through Emergency Support Function (ESF) 8, but later discussions of

chemical, biological, radiological, and nuclear (CBRN) responses imply that ASPR is the lead. ASPR will be supporting the U.S. Department of Homeland Security under the National Response Plan.

2. It seems this “muddiness” results from the attempt to write the strategy to address all hazards. For example, Objective 2 of the 2019-2022 strategy combines emerging and pandemic diseases with CBRN. While we agree that the strategy should address all hazards, (1) ASPR’s role and authorities in each hazard type varies significantly and (2) the lack of hazard-specific guidance in the strategy probably contributed to some of the challenges the country faced during the pandemic. As a result, we recommend the next version of the NHSS distinguishes between hazard types.
 - a. Move the “B” out of CBRN and include it with pandemic preparedness. Then, pandemic preparedness and biological agent response goals and objectives must address:
 - i. Respiratory transmission
 - ii. Droplet transmission
 - iii. Contact transmission
 - iv. Vector transmissionRationale: ASPR is the lead for the pandemic/biological hazard type. Then, each type of disease transmission requires different planning and preparedness. The national shortage of N-95 respirators during the pandemic may have been somewhat mitigated if the U.S. had better planned, detected, and prepared for respiratory transmission.
 - b. Chemical/radiological (including fallout). Rationale: ASPR is responsible for medical countermeasures (MCM) and medical consequence management. ASPR will be in a supporting role.
 - c. Explosions/nuclear/trauma. Rationale: ASPR is responsible for MCM and medical consequence management. ASPR will be in a supporting role.
 - d. Natural disasters and weather phenomena. Rationale: ASPR is responsible for MCM and medical consequence management. ASPR will be in a supporting role.
3. The next version of the strategy should address partnerships to rapidly create personal protective equipment (PPE) in addition to the current goals to perform these functions for MCM. The strategy should also address initiatives to bolster the availability of PPE through the strategic national stockpile (SNS).

The National Health Security Strategy (NHSS, <https://aspr.hhs.gov/ResponseOperations/legal/NHSS/Pages/default.aspx>) “establishes a framework for strengthening our national capability to prevent, detect, assess, prepare for, mitigate, respond to, and recover from all national disasters and emergencies.” The need for such a plan is exemplified by recent weather disasters, and hazardous material transportation incidents affecting community residents and responder health and safety. Persons preparing such a plan should include industrial hygienists and environmental health

and safety professionals, for example, who have experience in implementing OSHA requirements for corporate compliance and development of plans and policies for emergency response found in OSHA HAZWOPER regulations as described in 29 CFR 1910.120.

AIHA supports the NHSS all-hazards approach to the development and implementation of a National Health Security Strategy (Source: National Health Security Strategy 2019-2022 retrieved from: <https://aspr.hhs.gov/ResponseOperations/legal/NHSS/Documents/NHSS-Strategy-508.pdf>). These emergencies are addressed, in part by OSHA for natural or human-made situations which may include hurricanes, tornadoes, earthquakes, floods, wildfires, severe weather, disease outbreaks, and the release of biological and chemical agents including explosions involving nuclear or radiological sources. These emergencies may, in many situations, be unanticipated, however, pre-planning can help all persons reduce health and safety risks. (OSHA reference for Emergency Preparedness and Response: <https://www.osha.gov/emergency-preparedness/getting-started>)

Public Health Emergency Preparedness (PHEP) cooperative-agreement program

AIHA recommends coordination for PHEP with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the respective environmental health emergency preparedness experts in the Armed Services, for example, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, and the American Public Health Association (<https://www.apha.org/>).

Hospital Preparedness Program (HPP)

AIHA recommends coordination for hospital preparedness with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the American Hospital Association (<https://www.aha.org/>).

Regional Health Care Emergency Preparedness and Response Systems (RHCEPRS) Program

AIHA recommends coordination for regional health care emergency preparedness and response systems with the American College of Environmental and Occupational Medicine (<https://acoem.org/>).

Military and Civilian Partnership for Trauma Readiness Grant Program

AIHA recommends coordination for medical issues with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the respective Safety and Environmental Health experts in the Armed Services, for example, the Naval Safety Center, U.S. Army Public Health Center, and the Navy and Marine Corps Public Health Center.

Public Health Situational Awareness and Biosurveillance Network Programs

AIHA recommends coordination for public health situational awareness and biosurveillance network programs with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the respective Safety and Environmental Health experts in the Armed Services, for example, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, and also, with the American Public Health Association (<https://www.apha.org/>).

Public Health Emergency Fund (PHEF)

AIHA recommends coordination for PHEF with the American Public Health Association (<https://www.apha.org/>).

Emergency System for Advance Registration of Volunteer Health Professionals (ESAR-VRP)

AIHA recommends coordination with the American Public Health Association (<https://www.apha.org/>), for Emergency System for Advance Registration of Volunteer Health Professionals.

National Disaster Medical System (NDMS)

AIHA recommends coordination for NDMS with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the respective Environmental Health experts in the Armed Services, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, and the American Public Health Association (<https://www.apha.org/>).

Medical Reserve Corps (MRC)

AIHA recommends coordination for Medical Reserve Corps with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the Armed Services, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, and the American Public Health Association (<https://www.apha.org/>).

Assistant Secretary for Preparedness and Response (ASPR)

AIHA recommends coordination of ASPR with training and sharing information on public health preparedness with PHEP and the Public Health Emergency Medical Countermeasures Enterprises (PHEMCE).

Children's Preparedness Unit

AIHA recommends coordination for Children's Preparedness Unit with the American Pediatrics Society (<https://www.aps1888.org/>).

National Advisory Committee (NAC) on Children and Disasters

AIHA recommends coordination for NAC on Children and Disasters with the American Pediatrics Society (<https://www.aps1888.org/>).

National Advisory Committee (NAC) on Seniors and Disasters

“The National Advisory Committee on Seniors and Disasters (NACSD) evaluates issues and programs and provide findings, advice, and recommendations to the Secretary of Health and Human Services to support and enhance all-hazards public health and medical preparedness, response, and recovery activities related to meeting the unique needs of older adults.”

(<https://aspr.hhs.gov/AboutASPR/WorkingwithASPR/BoardsandCommittees/Pages/NACSD/default.aspx#:~:text=The%20National%20Advisory%20Committee%20on,and%20recovery%20activities%20related%20to>)

AIHA recommends coordination for NAC on Seniors and Disasters with Centers for Disease Control and Prevention (<https://www.cdc.gov/aging/publications/features/older-adult-emergency.html>) and AIHA’s Emergency Preparedness and Response committee, (<https://www.aiha.org/taxonomy/topics/emergency-preparedness-response>).

National Advisory Committee (NAC) on Individuals with Disabilities and Disasters

AIHA recommends coordination for NAC on Individuals with Disabilities and Disasters with the American Association of People with Disabilities (<https://www.aapd.com/>).

Public Health Emergency Medical Countermeasures Enterprises (PHEMCE)

AIHA recommends coordination for PHEMCE with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the respective Safety and Environmental Health experts in the Armed Services, for example, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, a U.S. Air Force School of Aerospace Medicine, the Uniformed Services University, and the American Public Health Association (<https://www.apha.org/>).

Strategic National Stockpile (SNS)

AIHA recommends coordination for SNS with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the respective Safety and Environmental Health experts in the Armed Services, for example, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, the American Public Health Association (<https://www.apha.org/>) U.S. Air Force School of Aerospace Medicine and the Uniformed Services University.

Strategic Initiatives Program

AIHA recommends coordination for Strategic Initiatives Program with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, the Centers for Disease Control and Prevention, and the American Public Health Association (<https://www.apha.org/>).

Federal Select Agent Program (FSAP)

The Federal Select Agent Program oversees the possession, use and transfer of biological select agents and toxins, which have the potential to pose a severe threat to public, animal or plant health or to animal or plant products. As such, AIHA recommends coordination and responsibility for FSAP with the Centers for Disease Control and Prevention Division of Select Agents and Toxins, and the U.S. Department of Agriculture Animal and Plant Health Inspection Service (<https://www.selectagents.gov/>), and The International Association for Biosafety and Biosecurity (<https://absa.org/>).

Medical Countermeasure Budget Plan

AIHA recommends coordination for Medical Countermeasure Budget Plan with the Department of Defense, the American College of Environmental and Occupational Medicine, <https://acoem.org/>, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, the American Public Health Association (<https://www.apha.org/>), and the U.S. Air Force School of Aerospace Medicine.

Material Threat and Medical Countermeasure Determination

AIHA recommends coordination for Material Threat and Medical Countermeasures with the American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the Armed Services, the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, and with the American Public Health Association (<https://www.apha.org/>), and the U.S. Air Force School of Aerospace Medicine.

Biomedical Advanced Research and Development Authority (BARDA)

AIHA recommends coordination for BARDA with the American College of Environmental and Occupational Medicine (<https://acoem.org/>), and The International Association for Biosafety and Biosecurity (<https://absa.org/>).

BioShield Special Reserve Fund

“The objective of Project BioShield is to accelerate the research, development, procurement, and availability of effective medical countermeasures against biological, chemical, radiological, and nuclear (CBRN) agents”

(<https://www.medicalcountermeasures.gov/barda/cbrn/project-bioshield>). AIHA

recommends coordination for the BioShield Special Reserve Fund with the U.S. Centers for

Disease Control and Prevention's NIOSH (<https://www.cdc.gov/niosh/docs/2018-166/default.html>), the Navy and Marine Corps Public Health Center, (<https://www.med.navy.mil/Navy-Marine-Corps-Public-Health-Center/Pages/Home/>) and Defense Centers for Public Health (<https://phc.amedd.army.mil/Pages/default.aspx>) for respiratory protection programs against CBRN agents and leading research efforts.

Presidential Advisory Council on Combating Antibiotic-Resistant Bacteria (PACCARB)

AIHA recommends coordination for PACCARB with the American College of Environmental and Occupational Medicine (<https://acoem.org/>), the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, the American Public Health Association, (<https://www.apha.org/>), the U.S. Air Force School of Aerospace Medicine, Uniformed Services University of the Health Sciences, and The International Association for Biosafety and Biosecurity (<https://absa.org/>).

Medical Countermeasure Master Files

AIHA recommends coordination for medical countermeasures with the American College of Environmental and Occupational Medicine (<https://acoem.org/>).

Genomic Engineering Technologies

AIHA recommends coordination for Genomic Engineering Technologies with the American College of Environmental and Occupational Medicine (<https://acoem.org/>), The International Association for Biosafety and Biosecurity, (<https://absa.org/>), U.S. Air Force School of Aerospace Medicine, Uniformed Services University for the Health Sciences, and the American Association for the Advancement of Science (AAAS).

Strengthening Mosquito Abatement for Safety and Health (SMASH) Program

AIHA recommends coordination for mosquito abatement for safety and health with the National Environmental Health Association (NEHA) (<https://www.neha.org/>). NEHA members are experts in vector control, assessment, and preparedness and its associated environmental health repercussions.

Epidemiology and Laboratory Capacity Grant Program

AIHA recommends coordination for Epidemiology Capacity Grant Program with the American College of Epidemiology (<https://www.acepidemiology.org/>), American College of Environmental and Occupational Medicine (<https://acoem.org/>) and the American Public Health Association (<https://www.apha.org/>).

Medical Countermeasure Innovation Partner (MCIP) Program

AIHA recommends coordination for medical countermeasures with the American College of Environmental and Occupational Medicine (<https://acoem.org/>), the Naval Safety Center, U.S. Army Public Health Center, the Navy and Marine Corps Public Health Center, the American Public Health Association, (<https://www.apha.org/>), the U.S. Air Force School of Aerospace Medicine, and Uniformed Services University for the Health Sciences.

Veterans Affairs Emergency Preparedness Readiness Grants for Medical Centers

AIHA recommends coordination for veteran affairs emergency preparedness readiness with the Defense Health Agency.

Top Three Priorities

Finally, please submit your top three priorities for the 2023 PAHPA reauthorization in order of preference.

1. Strategic Initiatives Program
2. Public Health Emergency Medical Countermeasures Enterprises
3. Public Health Emergency Fund

If you have any questions about AIHA's responses to this RFI or other matters, please contact me at mames@aiha.org or (703) 846-0730. Thank you for your time and consideration.

Sincerely,



Mark Ames
Director, Government Relations
AIHA

About AIHA

AIHA is the association for scientists and professionals committed to preserving and ensuring occupational and environmental health and safety in the workplace and community. Founded in 1939, we support our members with our expertise, networks, comprehensive education programs, and other products and services that help them maintain the highest professional and competency standards. More than half of AIHA's nearly 8,500 members are Certified Industrial Hygienists, and many hold other professional designations. AIHA serves as a resource for those employed across the public and private sectors as well as to the communities in which they work. For more information, please visit www.aiha.org.