



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control
and Prevention (CDC)
National Institute for Occupational
Safety and Health (NIOSH)
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September 29, 2022

Theresa Rohr-Kirchgraber, MD, FACP
President
American Medical Women's Association (AMWA)
1100 E. Woodfield Road, Suite 350
Schaumburg, Illinois 60173

Dear Dr. Rohr-Kirchgraber:

Thank you for your letter to the Department of Health and Human Services (HHS) Secretary Xavier Becerra and Centers for Disease Control and Prevention (CDC) Director Rochelle P. Walensky, MD, MPH, regarding your advocacy for personal protective equipment (PPE) equity issues, specifically those associated with improving PPE fit for women. I am responding on behalf of HHS and CDC.

The CDC is committed to improving the messaging, guidance, and recommendations to prioritize the well-being of populations who are underserved PPE users, including women. To address issues for high-risk populations associated with PPE, CDC's National Institute for Occupational Safety and Health (NIOSH) is developing a national strategy to address equitable PPE protection for all workers and has a research and intervention initiative underway to expand its portfolio to identify and address the needs and challenges in promoting equitable PPE protection for underserved user populations. Underserved PPE user populations include but are not limited to: workers of atypical size; non-traditional workers; workers of racial, ethnic, gender, linguistic, or other minority groups; and members of sub-disciplines that are not the primary focus of the current PPE activities within their larger field.

In the short-term, NIOSH is collaborating with the National Aeronautics and Space Administration Center of Excellence for Collaborative Innovation to conduct the "Protective Clothing Challenge—Leaving No Body Unprotected," which focuses on innovations to address fit-related protective clothing inequities for the full spectrum of U.S. workers. Traditional sizing approaches do not accommodate the shapes and sizes of all workers, and current designs and knowledge management materials (e.g., training) for protective clothing may not support differences that arise from important religious or cultural practices. Up to five teams in the challenge whose ideas help overcome poor fit in protective clothing will be awarded a total prize of \$55,000.

NIOSH also is collaborating with the Equal Employment Opportunity Commission and Occupational Safety and Health Administration to develop a co-branded fact sheet on Respirators, Facial Hair, and Reasonable Accommodations to help employers and employees better understand reasonable accommodations for employees who cannot wear respirators due to a disability or a sincerely held religious belief, observance, or practice.

An ad hoc committee of the National Academies of Sciences, Engineering, and Medicine recently conducted a study, “Frameworks for Protecting Workers and the Public from Inhalation Hazards” at the request of NIOSH, the Environmental Protection Agency, and the Department of State to evaluate processes for ensuring effective and appropriate respiratory protection for the public and all workers facing inhalation hazards. The framework recognizes a new paradigm is needed that is directed at reducing both population harm and individual risk, and that supports groups with limited access to protective devices. NIOSH is reviewing this report to identify next steps and actions needed to address the recommendations.

NIOSH is committed to PPE equity and has met with several groups of concerned individuals to better understand their needs as the PPE research portfolio is expanded. To date, we have met with the Sikh coalition, the hearing-impaired community, representatives of tribal affairs, and several women’s groups. NIOSH published a Federal Register notice on June 24, 2021, to solicit public input on the needs and challenges of PPE use for populations who are medically underserved. The comment period for the notice was open until October 2021. NIOSH received 39 submissions from industry, professional associations and advocacy groups, academia, and government agencies. Needs and challenges were focused on PPE sizing, fit, availability and accessibility, and language barriers and training opportunities. These needs and challenges are being discussed with industry sectors (healthcare, construction, public safety) and other partners (e.g., manufacturers, National Academies Committee on PPE for the Workplace). As part of the PPE equity strategy, NIOSH will hold a workshop on November 8-9, 2022, where members of affected communities will discuss our approach to and strategies for addressing research and practice gaps related to underserved PPE users, including women.

I appreciate your letter and interest in this important public health topic. CDC and NIOSH remain committed to leading with science, promoting equity, and protecting the American public. If you have further questions on the efforts described in this letter, please contact the NIOSH National Personal Protective Technology Laboratory Director, Dr. Maryann D’Alessandro at mdalessandro@cdc.gov or by phone at 412-386-4033.

Sincerely,

John J.
Howard -S

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John Howard, M.D.
Director

¹ www.nationalacademies.org/our-work/respiratory-protection-for-the-public-and-workers-without-respiratory-protection-programs-at-their-workplaces

² www.federalregister.gov/documents/2021/06/24/2021-13263/needs-and-challenges-in-personal-protective-equipment-ppe-use-for-underserved-user-populations