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April 30, 2021

Via <http://www.regulations.gov/document/CDC-2020-0011-0004>

Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30329

Docket No. CDC–2020–0011

Re: DRAFT Infection Control in Healthcare Personnel: Epidemiology and Control of Selected Infections Transmitted Among Healthcare Personnel and Patients

The Infectious Diseases Society of America (IDSAs) appreciates the opportunity to provide written comments on the Centers for Disease Control and Prevention (CDC) Draft Infection Control in Healthcare Personnel: Epidemiology and Control of Selected Infections Transmitted Among Healthcare Personnel and Patients: Diphtheria, Group A Streptococcus, Meningococcal Disease, and Pertussis Sections (“Draft Guideline”).

IDSAs represents a community of over 12,000 physicians, scientists and public health experts who specialize in infectious diseases. Our members work across a variety of healthcare settings, including hospitals, academic medical centers, long-term care facilities, public health departments, publicly funded clinics, and private practice. We are pleased to support the comprehensive, timely, and informative Draft Guideline and offer recommendations that we believe would help strengthen the text.

The Draft Guideline provides an appropriate discussion of epidemiology, modes of transmission, frequency of asymptomatic carriage relative to incidence of invasive disease, and post-exposure prophylaxis. The embedded links to more comprehensive guidelines (such as the criteria for PEP) are extremely helpful. Our members were also pleased to see recommendations for immunization of microbiology workers and others at high risk for infection. IDSAs further appreciates the Draft Guideline’s format and references, which provide additional detail.

Recommendations

IDSAs urges CDC to incorporate more gender-inclusive language across the Draft Guideline. Suggested text replacements include:

- Lines 257-271: Gender neutral language related to pregnancy – change “female HCP of childbearing age” to “HCP capable of becoming pregnant”.

IDSAs comments re: DRAFT Infection Control in Healthcare Personnel

- Change “woman” or “women” to “person,” “people,” or “persons.”
- Line 501: Instead of “female genital tract”, use “vagina”
- Line 839: Change "Women" to "People (in their third trimester of pregnancy)"

We thank you for the opportunity to provide comments on the Draft Guideline and are happy to serve as a resource in the development of the final document. For any questions about our comments or to connect with IDSA, please contact Jaclyn Levy, Director of Public Policy, at jlevy@idsociety.org.

Sincerely,

A handwritten signature in cursive script, appearing to read "Barbara D. Alexander".

Barbara D. Alexander, MD, MHS, FIDSA
President, IDSA