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Supplemental Public Comment to the CDC Healthcare Infection
Control Practices Advisory Committee (HICPAC)

March 24, 2022

RE: Use of Gowns During the COVID-19 Hospital Encounters.

To Whom It May Concern:

This is a short comment regarding the use of gowns and gloves during the evaluation and treatment of COVID-19 patients. It appeared that the Committee was leaning to eventually recommend that gowns would not be required. If this conclusion is reached, I feel it would be in error.

The presented negative results for gowns and gloves were primarily based on two studies which derived usage data from healthcare worker surveys. In the study from Kuwaiti there was an apparent PPE shortage which may have caused gloves to be worn for long periods of time, rather than using a new pair for each patient. The study stated:

"We believe that this is the first study to find an association between the frequency of glove use and COVID-19 transmission. We postulate that this may be due healthcare workers changing their gloves less frequently between patients and procedure, due to perceived PPE shortages during the pandemic" .

SARS-CoV-2 is a rapidly mutating virus which is progressively increasing in infectivity. The current variant BA.2 is as infectious as measles. The virus can aerosolize with vocalization. I do not feel that comparisons to other viruses such as adeno and rhinovirus will be reliable. In addition, restriction of gown use to procedures which aerosolize the virus does not take into account that even less infectious variants were commonly aerosolized and transmitted with vocalization.

Healthcare worker safety is of utmost importance to try to reverse employee turnover and hemorrhaging of the nurses and other staff leaving the profession, we need to increase and not decrease worker safety.

Thank you for this consideration,

A handwritten signature in black ink, appearing to read 'Kevin T. Kavanagh', written in a cursive style.

Kevin T. Kavanagh, MD, MS
Health Watch USA

CC: Chris Pontus, Massachusetts Nurses Association
Zenei Cortez, National Nurses United.

