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To: NIOSH Docket Office (CDC)
Subject: 105a - Haz Drug Appx A Rev

I would not delete BCG vaccine from the list. It is a bio-hazard and hazardous to the person that is preparing it because it is a live vaccine and can cause infection. It should be prepared in a protected environment like any other hazardous drug.

Check the spelling on the listed drugs. Several are misspelled.

What about all hormones used to prepare BHRT? These substances are hazardous to the compounder and should be prepared in a protected environment. The compounder should also be monitored for exposure and health risks associated with the hormones.

I think there should be different levels of hazardous drugs. Practitioners are having a hard time distinguishing and developing policies from the list. For example, administering or handling a solid, intact valganciclovir tablet does not pose the same risk as compounding a suspension from those tablets. Preparing an antineoplastic drug does not have the same risk as preparing estrogen capsules for BHRT. Some of the drugs on the list do not have any hazardous warning labels on the commercial packaging (i.e. zonisamide, Sirolimus, megestrol).