

March 29, 2023

Delivery via Email: PAHPA2023Comments@help.senate.gov

RE: Senate Health, Education, Labor, and Pensions (HELP) Committee RFI on the Pandemic and All-Hazards Preparedness Act

Dear Chairman Sanders and Ranking Member Cassidy:

On behalf of TRSA – The Linen, Uniform and Facility Services Industry, I am writing to offer public comments relating to the Senate HELP Committee Request for Information on the Pandemic and All-Hazards Preparedness Act (PAHPA) reauthorization, issued on March 15, 2023.

TRSA represents companies that supply, launder and maintain linens and uniforms. Our members help businesses, retailers, healthcare facilities, restaurants, government and other organizations provide clean, safe environments for their employees and customers. The membership consists of 160 textile services companies representing over 1,100 facilities from chains with locations nationwide to single-laundry plant operations serving only their local markets. TRSA members process 90% of the healthcare linens and garments used by healthcare facilities across the United States. There is a dangerous shortage of disposable hospital products (masks, sheet covers) which is being supplemented by the reusable linen market.

COVID-19's onset revealed the United States' overreliance on single-use healthcare textile substitutes. Hospitals and other medical facilities paid a price in caregiver safety when these inventories fell short due to high demand without enough reusable equivalents to compensate. In order to learn from COVID-19, the PAHPA reauthorization should generate a task force to complete a comprehensive review of the COVID-19 response, specifically it should include the problems resulting from the United States' overreliance on personal protective equipment (PPE). Additionally, the PAHPA reauthorization should ensure that the strategic national stockpile (SNS) includes an adequate supply of reusable PPE. Doing so would improve safety for healthcare workers and patients and strengthen our supply chain.

Better Protection for Healthcare Staff

Since the beginning of the pandemic, clean isolation (cover) and patient gowns, scrubs and operating room (OR) linens have played a critical role in infection prevention. Whether reusable or disposable, these supplies are vital PPE. In summer 2020, the American Nursing Association found that 42% of U.S. nurses were experiencing widespread or intermittent PPE shortages, with 68% reusing single-use PPE.¹ Media reports across the country depicted makeshift alternatives to isolation (cover) gowns and masks, including nurses wearing trash bags and raincoats over their scrubs and using snorkels.

Florida State University and University of Kentucky researchers provided evidence in 2020 that reusable textiles are every bit as safe—if not safer than—their disposable substitutes. They tested isolation gowns rated by their manufacturers for various protection levels (I, lowest, III highest) and found the I and II disposable gowns did not meet Association of Advanced Medical Instrumentation (AAMI) performance specifications for water resistance. All three levels of disposable gowns also failed to meet American Society for Testing and Materials (ASTM) strength requirements.

All reusable gowns, regardless of protection level, met the minimum water resistance requirements of the American Association of Textile Chemists and Colorists (ATCC) and ASTM minimums for breaking strength. Even after 75 washes, no detrimental effects were witnessed on the quality of reusable gowns. The authors concluded the study supports reusables' "superior protection and performance."

Reusables' washing is heavily scrutinized, with hospitals requiring outsourced laundries to launder them under professionally managed, hygienically clean conditions. The CDC guides PPE use in healthcare facilities, including recommending laundering temperatures above 158° F (70° C)—the coronavirus deactivation level. Combinations of wash chemicals are well established

¹ <https://www.nursingworld.org/~4a558d/globalassets/covid19/ana-ppe-survey-one-pager---final.pdf>

for deactivating most strains of coronavirus, including the type responsible for COVID-19.

Supply Chain Implications

In the United States, more than 90 percent of healthcare PPE and OR textiles are single use, even though ample supplies of reusable equivalents are available. Reliance on single-use substitutes, primarily produced overseas, weakens the demand for reusables, thus limiting investment in the manufacture of these goods and putting our supply chain at risk. By comparison, other countries such as Canada and England maintain inventories of 80 percent reusables.²

As the association for linen, uniform and facility services, TRSA has determined that inventories of 50 percent reusable textiles would successfully hedge against future PPE shortages and urges Congress and the Biden administration to recommend this as a minimum.

Increasing Reusable PPE Would Fix The Problem

Even if another COVID-19-scale pandemic doesn't materialize, natural disasters or international conflicts could trigger similar PPE supply issues. Righting the PPE imbalance, including increasing reusable textile rotating inventory, can reduce health risk, protect the environment and reduce costs. The need to affect these vital outcomes leaves public authorities with no defense for ignoring or waiting to act on this issue.

The PAHPA reauthorization should do a comprehensive review of the COVID-19 response, by creating a bipartisan Task Force to examine the U.S.'s preparedness for and response to the COVID-19 pandemic. Included in this task force should be a significant review of PPE failures that were experienced during the pandemic. The over reliance of the U.S. on disposable healthcare textiles contributed to the extreme PPE shortage. Recommendations from the Task Force might include that hospitals increase their supply of their reusable HCTs in order to have backup that can be easily replenished in surge events. As of October 2022 the SNS contained 59.2 million surgical gowns and coveralls.³ It is unknown how many of these are reusable vs. disposable. Congress should ensure that the SNS contains a suitable number of reusable PPE in order to be prepared for supply chain disruptions during an emergency. This could be done by either requiring a specific number or percentage of reusable PPE in the SNS. Reusable PPE can be laundered and returned to healthcare facilities without stressing the supply chain during an emergency.

Thank you for the opportunity to comment on such a critical issue. The workforce crisis facing SNFs will only continue to grow, and it is essential we build a system through which our most vulnerable population has access to the high-quality, timely care they need and deserve. Please do not hesitate to reach out with any additional questions.

Sincerely,



F. Joseph Ricci
President and CEO
Textile Rental Services Association of America

² 'New Innovations in Reusable OR Textiles' - Encompass Group LLC - 2020

³ <https://aspr.hhs.gov/SNS/Pages/Personal-Protective-Equipment.aspx>