

**From:** [Jessica Rubenstein](#)  
**To:** [DIR\\_RS](#)  
**Cc:** [Delizo, Grace@DIR](#); [Delizo, Grace@DIR](#); [Amy Durbin](#); [Yvonne Choong](#)  
**Subject:** Surgical Plume comments  
**Date:** Tuesday, January 15, 2019 1:48:30 PM

---

To Whom It May Concern:

On behalf of more than 44,000 physicians and medical students in the State, the California Medical Association (CMA) thanks you for the opportunity to submit comments on the draft of possible language regarding Occupational Safety and Health Standards Board Petition 567, on Occupational Exposure to Surgical Plume.

If the Board intends to promulgate formal regulations, CMA supports maintaining the current scope and application of the language as specified in section (a), which limits the rulemaking to hospitals. We believe that additional standards for physician offices regarding the evacuation of plume/surgical smoke generated during a medical procedure are unnecessary because there are already standards in place to require that any smoke in the operating room be continuously removed. Furthermore, accrediting organizations, such as Institute for Medical Quality (IMQ), already require the use of safety measures for plume smoke generated by certain procedures as part of their accreditation procedures for ambulatory and office-based surgery practices.

Additionally, if the Board elects to formalize standards for hospitals, it should ensure that any requirements hospitals may impose physicians do not interfere with the practice of medicine. We look forward to assisting the Board in developing standards that best protect physicians and their patients.

We appreciate the opportunity to comment and look forward to discussing this further. If you have any questions, please contact me.

Sincerely,

Jessica

**Jessica Rubenstein, J.D.**

Associate Director, Center for Health Policy

California Medical Association

(916) 551-2554 | [jrubenstein@cmadocs.org](mailto:jrubenstein@cmadocs.org)