



Massachusetts Society of  
Clinical Oncologists



American Society of Clinical Oncology

May 16, 2017

To: The Honorable Chairs and Members  
Joint Committee on Public Health:

**Re: H. 2458 An Act relative to the safe handling of hazardous drugs**

The Massachusetts Society of Clinical Oncologists (MSCO) and the American Society of Clinical Oncology (ASCO) are pleased to provide comments on Massachusetts House Bill 2458, regarding the development of regulations for the handling of hazardous drugs in healthcare facilities.

MSCO represents oncology providers across the Commonwealth, who are dedicated to improving cancer care and treatment. ASCO is the world's leading professional society representing physicians and other health care professionals who care for people with cancer. With more than 42,000 members, our core mission is to ensure access to high quality cancer care.

MSCO and ASCO are deeply committed to safeguarding all patients and professionals who are treated with or exposed to chemotherapy drugs. In 2014, ASCO appointed a panel of experts to review the existing scientific evidence and to develop updated recommendations for the safe handling of hazardous drugs in the context of oncology care. ASCO is currently finalizing a set of standards on safe handling that reflects the realities of modern medical oncology practice and the most current scientific literature on the safe handling of hazardous drugs.

We urge the committee to proceed with great caution in this area, as there is significant risk of imposing mandates that are based on questionable scientific rationales and that may inadvertently undermine efforts to provide a safe workplace for the oncology workforce.

If the Committee wishes to advance legislation to address safe handling of hazardous drugs, we strongly urge you to refine the language to clarify that regulators may consider but should not exceed the provisions within the 2004 alert referenced in the bill. ASCO's expert panel has reviewed the existing literature in detail, and your legislation should avoid mandating or suggesting that regulators adopt all of the provisions in any existing standard. Second, we urge you to make explicit reference to the American Society of Clinical Oncology's Recommendations for the Safe Handling of Hazardous Drugs, which is nearly finalized for publication, as another resource for regulators to review.

Finally, medical oncologists are uniquely qualified to assess the existing literature on workplace safety and handling of hazardous drugs, as well as to provide guidance on any regulations that directly impact the practice of oncology. We urge you to expressly reference the Massachusetts Society of Clinical Oncologists (MSCO) on the list of stakeholders that will be actively involved in providing ongoing input on any proposed regulations, to ensure meaningful feedback is received from the oncology community. MSCO members would provide unique and important perspectives on both the impacts on oncology practices that serve patients with cancer and on the risk and prevention of cancer.

MSCO and ASCO welcome the opportunity to be a resource for you. Please contact Jennifer Brunelle at ASCO at [jennifer.brunelle@asco.org](mailto:jennifer.brunelle@asco.org) or Patrick Gagnon, M.D. at [MSCO@mms.org](mailto:MSCO@mms.org) if you have any questions or if we can be of assistance.

Sincerely,



Patrick Gagnon, MD  
President  
Massachusetts Society of Clinical Oncologists



Daniel F. Hayes, MD, FACP, FASCO  
President  
American Society of Clinical Oncology