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Office of the Executive Vice President

Ralph W. Hale, MD, FACOG

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February 14, 2000

Docket No. 98-045N
USDA/FSIS Hearing Clerk
300 12th St., SW., Rm. 102
Cotton Annex
Washington, DC 20250-3700

Docket No. 97N-0074
FDA/Dockets Management Branch (HFA-305)
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Dear Hearing Clerk/Dockets Manager:

Thank you for the opportunity to comment on the "Draft Preliminary Food Safety Strategic Plan for Public Review". The American College of Obstetricians and Gynecologists (ACOG), an organization representing 40,000 physicians dedicated to improving women's health care, is concerned about food safety, particularly for vulnerable populations. Among these are pregnant women and their infants, the elderly, and patients with immune deficiencies such as those with HIV or undergoing cancer treatment. These patients rely on our physicians, not only to help them maintain good health and restore it when they are ill, but also to answer their questions about health concerns that are announced publicly.

Our primary concern relates to the "Risk Communication Goal". You have identified health professionals as one of the groups needing education in food safety, but not specifically as a group for special attention when there are emergent food safety problems. We would urge that your strategic plan be made more specific in this area so that physicians caring for women in these vulnerable groups receive at least as much information as the public, and receive it as rapidly as possible. Establishing active lines of communication with professional societies is one means; others can be patterned on various rapid alert programs now used by federal agencies to notify physicians of equipment and drug problems and high priority research findings, for example.

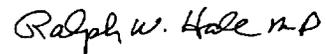
The organizational discussion in your document refers in several places to the concept of "one voice" on food safety. Means to implement that concept could constitute a first step in achieving better communication. The difficulty is illustrated by the exercise of responding to the Federal Register notice regarding this activity. In order to respond in writing, one must decide whether to direct a response to FDA or USDA, using different docket numbers for each. If one cannot choose, the electronic response option is available, and appears to be directed to EPA, using yet another docket number.

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In summary, ACOG recommends that the communications channels between the responsible government agencies and health professionals and their patients be improved and made more visible and user-friendly – that a single source for professional information be clearly identified to health professionals. In addition, agency outreach should include active programs to educate and promptly inform health professionals about food safety issues, so that they may better care for their patients.

Sincerely,

A handwritten signature in black ink that reads "Ralph W. Hale MD". The signature is written in a cursive style with a loop at the end of the "Hale" part.

Ralph W. Hale, MD, FACOG
Executive Vice President

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