



Delta Memorial Hospital

A Sutter Health Affiliate

July 14, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34, 4678 Columbia Parkway
Cincinnati, Ohio 45226

To whom it may concern;

I am writing with regard to your proposed change in the ruling on respiratory protective devices. As the Acting Director of Case Management, Risk Management and Infection Control at Delta Memorial Hospital, I lend my support to the APIC recommendation that health care workers wear respirators that meet performance criteria outlined by the CDC in the draft 1993 TB guidelines.

I believe this recommendation is a first step in improving the certification process. This process finally addresses the concerns and needs of the health care setting. In addition, it advocates a level of filter efficiency (95%) which is acceptable for most health care workers' needs. I hope you will consider this support in your efforts to change the ruling on respiratory protective devices.

Sincerely;

Sarah M. Miller
Acting Director, Case Management

cc: Linda Horn, Administrator, Delta Memorial
Jacki Bryan, Chair, Governmental Affairs Committee, APIC

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A L E R T

Issues Affecting Workers' Compensation and OSHA Standards

Priority: Urgent
Today's Date: 7/7/94
Deadline: 7/22/94

ATTENTION: CHAIS Workers' Compensation Program Members

BULLETIN: ***Tuberculosis Respirators***

The requirements of OSHA now state that we must have a NIOSH approved Hepa Particulate Respirator filter to protect health care workers from TB.

This is a costly regulation and one that poses many problems to health care facilities. Now we have a chance to help change this regulation.

NIOSH has proposed a change in the ruling on respiratory protective devices. You, as a health care provider, have until July 22, 1994 for written comment. This date has been extended beyond the July 6th date noted in the Federal Register.

The Association for Professionals in Infection Control and Epidemiology, Inc. (APIC), recommends that health care workers wear respirators that meet performance criteria outlined by the CDC in the draft 1993 TB guidelines. The proposal enables manufacturers to produce a broader range of certified respirators which provide the necessary protection. Essentially, this eliminates the earlier NIOSH recommendation and allows options other than the currently mandated Hepa Particulate Respirators.

The rule proposes 3 levels of minimum efficiency performance standards describing the filter elements:

- Type A filters - 99.97%
- Type B filters - 99%
- Type C filters - 95%

We concur with APIC and advise the following:

Write to NIOSH by July 22, 1994, stating your support of the proposed standard, as a first step in improving the certification process. Also, please note that this first step recognizes that the certification process finally addresses the health care setting and that the 95% filter efficiency is acceptable for most healthcare worker needs.

APIC states that comments should be sent in triplicate to:

NIOSH DOCKET OFFICE
Robert A. Taft Laboratories
Mail Stop C34, 4678 Columbia Parkway
Cincinnati, Ohio 45226

Copies of the proposed regulation can be obtained by calling 1-800/35-NIOSH. In addition, the APIC Governmental Affairs Committee will be responding officially. Please send copies of your letters to APIC'S National Office, c/o Jacki Bryan, Chairperson of the Governmental Affairs Committee, 1016 Sixteenth Street, NW, Sixth Floor, Washington, 20036. If you have any questions, please contact your Loss Control Consultant or CHAIS Loss Control at (916) 631-0333.

LK:vc - 7/94