



94-357

# St. Francis

One St. Francis Drive  
Greenville, SC 29601  
(803) 255-1000

July 27, 1994

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

Dear Sir:

St. Francis Hospital, Inc. in Greenville, S.C. wants to protect all employees, volunteers, and visitors from the transmission of TB at all times. However, I do not feel it is necessary to use the HEPA respirator in our facility.

## I. Risk Assessment

In the past two years St. Francis has only had 5 cases reported to the Public Health Department. In the past 5 years we have only had one employee exposed to a TB patient seroconvert. We have educated our staff to institute Respiratory Precautions on all patients on admission that meet certain criteria.

## II. Engineering Controls

St. Francis presently has 4 single rooms with 6 or more air exchanges per minute and negative pressure.

## III. Administrative Controls

St. Francis has an effective TB control program. Patients with TB are detected early, placed in isolation and treated with the appropriate medication. We have written policies to ensure rapid detection, isolation diagnostic evaluation, and treatment to persons likely to have TB as well as have implemented effective work practices by persons working in the health-care facility.

## IV. Respiratory Protection

The Hospital at present uses a fluid resistant anti-fog face mask. We have surveyed other hospitals in the area. Most hospitals are using the 1812 face mask. St. Francis would consider changing to other mask if necessary. However, we feel our present protocols protect patients, employees, physicians and visitors according to our statistics.

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V. Education and Training

All health care workers receive education about TB that is appropriate to their job category. Training is provided monthly for all health care workers by the Infection Control Nurses. Each health care worker is required to receive this training once a year.

The Employee Health Nurse goes over with all HCW's the purpose of PPD skin testing and the significance of a positive result.

VI. HCW Counseling, Screening, and Evaluation

All health care workers are screened, evaluated, and counseled through our Employee Health Office. All employees are required to attend a mandatory educational inservice yearly.

I support the proposed standard as a first step in improving the certification process beginning with the particulate filter respirator.

Sincerely,



Emma Barksdale, RN, Coordinator  
Risk Management/Infection Control

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