



94-266

St. Luke's-Memorial The HOSPITAL CENTER

Andrew E. Peterson, Executive Director

Affiliate of Mohawk Valley Network, Inc.

July 19, 1994

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

To Whom It May Concern:

We would like to take this opportunity to respond in favor of the new NIOSH Proposal on Respiratory Devices published for comment on May 24, 1994.

As a community based not-for-profit acute care facility, we care for patients suspected of and also those diagnosed with active tuberculosis. As a result, we are faced with the problem of which particulate respirator will serve to protect our employees and at the same time meet the current CDC, OSHA and New York State Department of Health (NYSDOH) requirements for respiratory protection. In addition, we are looking for a mask that will be comfortable to wear and not hinder patient care.

As you may be aware, NYSDOH's current position on respiratory protection differs from that of the CDC and OSHA in regards to the type of masks required. The DOH cites the lack of "comparative data regarding care impact, efficacy, compliance and cost/benefit" as their reasons for disagreeing with CDC and OSHA. Unfortunately, as a facility regulated by all three organizations this places us in a very precarious position.

Hopefully, the NIOSH Proposal on Respiratory Protective Devices will enable healthcare facilities like ours to choose a mask that complies with CDC, OSHA and NYSDOH recommendations/regulations. In doing so, we will maximize employee comfort and safety while continuing to providing quality patient care. We hope to do this at a reasonable cost to our facility.

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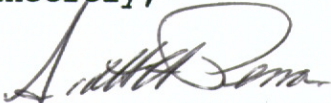
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In closing, we would like to again state that we support the proposed Rule on Respiratory Devices submitted by NIOSH. Thank you for your time and attention to this matter.

Sincerely,



Scott Perra
Chief Operating Officer



Michael Rominger, MD
Medical Director



Audrey A. Mathis, RN, CIC
Infection Control Coordinator

/jc