



ASSOCIATION FOR PROFESSIONALS IN
INFECTION CONTROL AND EPIDEMIOLOGY, INC

Virginia Chapter

July 22, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34
4676 Columbia Parkway
Cincinnati, Ohio 45226

TO WHOM IT MAY CONCERN:


The Association for Professionals in Infection Control and Epidemiology, Inc. - Virginia Chapter wishes to comment on the proposed rule for certification of respiratory protective devices. We would like to state our support of the proposed standard as a first step in improving the certification process. We recognize that this seems to finally address a certification process more appropriate to the healthcare setting. We stand in support of Type C filter with 95% efficiency which should be acceptable for most healthcare worker needs.

We recognize Tuberculosis (TB) as a significant public health problem; however, nosocomial transmission from patients to healthcare workers has primarily been related to delayed diagnosis, treatment, and incomplete application of proper TB isolation precautions, as well as ineffective coordination between facilities and community agencies. While we are generally supportive, we question the efficacy and appropriateness of the various types of protective respiratory devices recommended in the absence of specific, scientific data illustrating failure of existing control measures.

We ask that you give serious consideration to options of respiratory personal protective equipment for healthcare workers that provide coverage with comfort and fewer fit testing and usage problems. This is a must to assure individual compliance.

Thank you for your consideration and time in addressing our concerns.

Sincerely,


Joyce G. Dayvault, RN, CIC
Legislative Representative
APIC-Virginia

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