



July 22, 1994

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

Dear Sirs:

This letter is in response to your call for comments on the "Draft Guidelines for Preventing the Transmission of Tuberculosis in Health Care Facilities". As many have expressed, we are very concerned about the Guidelines requirement for HEPA respirators. Our concerns are based on several issues. First the lack of documented efficacy of these respirators. The Guidelines provide no references documenting a greater efficacy of these respirators over any other type of device. Though the theory seems reasonable (optimize healthcare worker protection to prevent transmission), the published outbreaks have been controlled when facilities followed the 1990 Guidelines (no HEPA respirators required or used). As these outbreaks included drug resistant cases, drug therapy was by definition less effective and sputum sterilization less rapid. To us this implies a greater risk that was not translated into a greater likelihood of transmission after the 1990 Guidelines were followed (i.e. these Guidelines worked).

In our Medical Center (a regional Medical Center with approximately 700 acute care and 150 rehabilitation beds and 3500 employees), we have had 1-2 skin test conversions each year for the past four years and no case of HCW tuberculosis. This very low rate of conversion is very similar to the experience of the University of Virginia Hospital. They have recently published their analysis of skin test conversions and a cost analysis of HEPA respirators (Adal et al NEJM 1994; 331:169-73). Their analysis is much like ours--that, even assuming 100% efficacy of a HEPA respirator, the cost of the respirators is as high as \$18,508,947 for every case of HCW tuberculosis prevented.

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It is our request, then, that the final Guidelines drop the requirements for HEPA respirators and related requirements (fit testing, qualitative testing, etc.) because of lack of evidence of efficacy, lack of evidence that transmission is still occurring when the 1990 Guidelines are observed, and prohibitive cost.

Sincerely,



Jeff D. Douglas, M.D.
Infection Control Director
DCH Regional Medical Center