

# DRAKE Center

Rehabilitation and Long-Term Care

94-040

Drake Center, Inc.  
151 West Galbraith Road  
Cincinnati, Ohio 45216-1096  
(513) 948-2500  
Fax 948-2501  
TDD 948-2524

Affiliated with the University of Cincinnati

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

June 7, 1994

Dear Sirs:

As the delegated member from the Drake Center Inc., Infection Control Committee, who met on June 3, 1994, I am writing to voice our support of the May 24, 1994 proposed rule on respiratory protective devices. We understand this proposal will replace existing Mine Safety & Health Administration (MSHA) regulations with new public health regulations, while upgrading current testing requirements for particulate filters. We support you in taking a first step in improving the certification process that addresses the health care setting. A 95% filter efficiency **would** be acceptable in our 316 bed Rehabilitation and Long Term Care facility with a low risk assessment for TB.

Our Committee requests a broader range of certified respirators which provide the necessary level of protection that allow fewer usage problems and greater comfort to the HCW who serve our patients. We believe the PARP's and the currently mandated HEPA particulate respirators, which we ordered and have been waiting for delivery for the past two months, have no clinical data to support their use. Since they are used for patient care we understand they should also be approved by the FDA.

With the rising cost of health care we are placing our trust in you to resolve this current situation in the favor of all in the health care setting.

Sincerely,



Gayle Carlucci, RN, CIC

cc: Linda Rosenstock, MD, Director NIOSH  
APIC's Governmental Affairs Committee  
Drake Center Inc., Infection Control Committee

JUN 13 1994