July 1, 1994

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

Dear Gentle person;

The Orange County Chapter of the Association of Hospital Employee Health Professionals is supportive of a revision of the original draft requirement involving HEPA respirators in health care settings as a protection from M.Tuberculosis. AHEHP is an organization of nurses and other professionals who are responsible for the occupational health programs in medical centers, hospitals and other healthcare settings. Our focus is safety for the healthcare worker and our recommendation is based on a belief that the proposed revision of the respirator requirement would be both safe and practical for the varied needs in the clinical setting.

The proposal for a variation in the levels of efficiency of particulate respirators with a minimum standard of 95% efficiency offers both protection from exposure and is cost effective for most acute care settings.

With so many variables in the equation, care givers need options which make sense. The engineering controls and work practice / training requirements are providing environmental protection which allow the worker to be protected while using masks that offer practical efficiency and comfort.

In an effort to provide the protection from the chance of exposure, the comfort of the caregiver in a very busy environment must not be overlooked.

My peers and I urge NIOSH to adopt the proposal of 3 level efficiency for particulate respirators as a protection for tuberculosis.

Yours very truly,

Carol Arritt MS COHN
President, AHEHP Orange County Chapter