

94-2226



July 15, 1994

UC DAVIS MEDICAL CENTER
2315 STOCKTON BOULEVARD
SACRAMENTO, CALIFORNIA 95817

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

From: Sherri J. Reese, RN *Sherri Reese RN*
Critical Care Infection Control Nurse
Department of Epidemiology/Infection Control
University of California Davis Medical Center

RE: Proposed Particulate Respirator Certification

I am writing to support the recent NIOSH proposal for certification of respirators. This certification is certainly the most cost effective approach to be taken in light of the enormous cost of the currently recommended HEPA respirators and fit testing programs. The unjustified cost of these devices and programs in these tough economic times only scratches the surface of the problems these devices create, not to mention their unproven benefit in comparison to other less costly protective devices available. We have experienced first hand the problems created by these respirators in relation to patient care. First there are the communication difficulties between patient and staff. Next is the inability of the staff to tolerate wearing the respirator for long periods while providing care to the patient. This potentially makes quality patient care a casualty of this respirator controversy. Next are the problems caused in the operating room suite both in the ability of the staff to tolerate wearing these respirators during long procedures as well as problems in staff to staff communication.

In conclusion, I support the certification of respirators and recommend the adoption of the Class C respirator to be used for the prevention of the transmission of TB in the hospital setting. I also suggest the elimination of fit-testing as long as a documented education program is in place and covers the important aspects of respirator use as well as proper fit.

JUL 22 1994