July 22, 1994

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

Gentlemen:

As an Infection Control Practitioner, I applaud NIOSH’s responsiveness to the concerns of healthcare providers in introducing science into the process for certifying respiratory protective devices.

Choosing equipment solely on specification standards rather than performance standards, only magnifies the problem of noncompliance. Selection of personal protective equipment needs to address scientific knowledge to minimize risks to healthcare workers without compromising patient care.

We must also address the unnecessary burden resulting from HEPA respirators. With today’s healthcare costs at unreachable highs, why are we adding to this burden? As stated in a special article written by K. A. Adal and others (New England Journal of Medicine, 1994: 331: 169-73), it was concluded that given the effectiveness of currently recommended measures to prevent nosocomial transmission of tuberculosis, the addition of HEPA respirators offers negligible protective efficacy at great cost.

More choices need to be made available to contain cost and develop a mask that is wearable; at the same time minimizing the risks to health care workers of nosocomial transmission of mycobacterium tuberculosis.

Sincerely,

Nancy I. McBurnie, R.N.  MS-n
Infection Control Coordinator

NM/as

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