

July 18, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C 34
4676 Columbia Parkway
Cincinnati, OH 45226

To Whom It May Concern:

This letter is in response to the NIOSH proposed standard published in the Federal Register, May 24, 1994 regarding respiratory devices for protection against tuberculosis and other biologic hazards.

The Three Rivers Chapter of the Association for Practitioners in Infection Control and Epidemiology recognizes the urgent need for a certification process that will address the Centers for Disease Controls performance criteria for respiratory protection against tuberculosis and will be acceptable to the needs of the healthcare workers such as the dust-mist or dust-mist-fume respirators. TRAPIC realizes that these certification procedures will not eliminate the need for a Respiratory Protection Plan including medical screening and fit-testing of employees which is a very time consuming and costly endeavor. With the soaring cost of healthcare today, funds should be better utilized for more important and proven control measures such as early identification, prompt treatment, isolation precautions and skin testing.

TRAPIC commends NIOSH, however, for "researching" the respiratory certification process as it relates to healthcare settings and recognizing the urgency of this issue.

Sincerely,



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