



DEPARTMENT OF HEALTH & HUMAN SERVICES

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Centers for Disease Control  
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January 11, 2000

Janice C. Bradley, CSP  
The Safety Equipment Association  
Technical Director  
1901 North Moore Street  
Arlington, Virginia 22209-1762

Dear Ms. Bradley:

Thank you for your letter of December 6, 1999, where you provided additional information regarding the appropriateness of including validated approval fit tests within the Administrative/Quality Assurance module. We appreciate your continued comments and dialogue in response to our notice of priorities for rulemaking, published in the Federal Register on August 24, 1999 (64 FR 46178). As stated in that notice, we continue to welcome additional comments and information on module content and the need to re-prioritize module topics.

The research to validate fit test methods is sufficiently developed to enable us to propose fitting characteristic requirements for approval of some respirator types. We also recognize that issues surrounding fit test protocols will be raised and need to be addressed during the rulemaking process. We intend to hold one or more public forums for presentation and discussion of the scientific issues surrounding this important topic this calendar year. We anticipate that the issues you have raised, as well as others, will be discussed in these forums. We welcome your comments and information now as well. As with all comments received, we are placing this series of correspondence in the NIOSH Docket. We believe all such input will help us prepare the best standards for enhancing worker protection.

NIOSH has considered the merits and disadvantages of proceeding with fit test requirements for some respirator types within the Administrative/Quality Assurance module versus proposing those same requirements in a separate module. We have concluded that, while it will require more administrative oversight and coordination, it may be beneficial to separate this topic into its own module.

We recognize and appreciate the support provided by The Safety Equipment Association (ISEA) for the modular approach to rulemaking, and look forward to your continued support and participation throughout this process. By continuing to work together with the respirator community, we believe we will be better able to facilitate the delivery of improved and innovative products to enhance worker health and safety.

Sincerely yours,

  
Gregory R. Wagner, M.D.  
Director  
Division of Respiratory Disease Studies

cc:NIOSH Docket Office