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CHARLES L. BOWMAN
PRESIDENT

July 21, 1994

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

RE: 42 CFR Part 84 — Respiratory Protective Devices; Proposed Rule

Dear Mr. Taft:

The Missouri Hospital Association (MHA) offers the following comments and recommendations on behalf of its 144 member hospitals:

We support the proposed rule. The proposed rule will allow manufacturers to develop an increased range of respirators that meet the Centers for Disease Control and Prevention's (CDC's) performance criteria in the proposed tuberculosis (TB) guidelines.

The high efficiency particulate air (HEPA) filter is the only currently available certified respirator that meets or exceeds the CDC's recommended performance criteria. Implementation of the proposed regulations would provide a new category of particulate respirators ("Class C" respirators) that would meet the CDC's recommended performance criteria for protection against TB. If the proposed rule is implemented there would be a broader range of certified respirators for use in health care settings that would be less expensive and more practical than the HEPA respirators.

It is recommended that the proposed regulation be placed on an accelerated implementation schedule in order to meet the dual objectives of protecting health care workers and holding down the cost of providing health care.

Thank you for the opportunity to comment on the proposed rule.

Sincerely,

Paul B. Guptill
Director of Planning

PBG/det

c Missouri Congressional Delegation
American Hospital Association

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