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The
Rehabilitation
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AT SANTA BARBARA

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Wednesday, June 29, 1994

I support the NIOSH proposed rule on respiratory protective devices as published in the Federal Register May 24, 1994. This is an appropriate and reasonable first step in improving respirator certification in the health care setting. I hope that this will allow NIOSH to certify various forms of respiratory protection that will more effectively meet the individual needs of each facility and each health care worker.

At this time I am most particularly concerned about the mandated use of high efficiency particulate air filter masks to prevent transmission of tuberculosis. Scientific evidence is lacking that this type of mask does indeed afford a higher protection against TB. Although workers have every right to expect a reasonably safe workplace, in the healthcare setting it is unrealistic to mandate zero tolerance to theoretical microbial exposure.

Health care workers are unavoidably exposed to various microbes on a daily basis. These exposures must be considered as natural a part of the job as the risk to a truck driver of having an accident on the freeway, or the risk of drowning to a deep-sea diver. One can educate and protect oneself against these risks, but the health care worker's job cannot be done without some exposure. Many care-givers are only rarely, if ever, exposed to tuberculosis. I look to OSHA and NIOSH to not only define tolerable levels of microbial exposure, but to adopt more reasonable and feasible standards for respiratory protection.

The cost of health care is being driven up by unreasonable and scientifically unsound mandates by regulatory agencies. Our hospitals are failing at an unprecedented rate due to these spiraling costs. Quality of care and patient comfort is threatened by regulatory demands for the use of protective equipment that is not only expensive and uncomfortable, but indeed, in some cases, unsafe for the health care worker to wear while performing his duties. In those areas where TB prevalence is low, scarce resources might better be used for early diagnosis and treatment systems than for purchasing pricey respirators that might never need to be used.

Those agencies that were established to protect the health and welfare of workers will serve us best if they adopt realistic standards. It is well known that compliance can be expected only if rules are achievable.

Sincerely,



Kathleen Yeomans, RN/Member
APIC, Camino Real Chapter

JUL 5 1994