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July 22, 1994

NIOSH Docket Office
Robert A. Taft Laboratories
Mail Stop C34
4678 Columbia Parkway
Cincinnati, OH 45226

RE: PROPOSED RULE ON RESPIRATORY PROTECTIVE DEVICES

To Whom it May Concern:

Our Clinical Practice Committee has received member comments regarding the NIOSH proposed rule on respiratory protective devices. The Academy of Medical-Surgical Nurses supports the standard proposed by the Association for Professionals in Infection Control (APIC) regarding HEPA masks. The HEPA masks are very expensive, hard to fit, and must be stored in specific areas. Employees with asthma, bronchitis, or other physical or psychiatric problems may not be able to tolerate the masks. Lastly, there is no specific evidence to prove that TB transmission occurs with the use of dust/mist masks (masks that are currently being used by health care workers) when the 1990 CDC guidelines are properly implemented.

In conclusion, the Type C Filters (the 95% filter efficiency) should be acceptable for most health care worker needs.

Sincerely,

Cecelia Gatson Grindel, Ph D, RN
President

jad

cc: Barbara Russell, RN, MPH, CIC - APIC
Cindy Ludwig, MS, RN, AMSN Western Region Director
Louanne King, Chairman, AMSN Clinical Practice Committee