



## Association of Operating Room Nurses, Inc.

2170 South Parker Road, Suite 300, Denver, Colorado 80231-5711

(303) 755-6300 or (303) 755-6304

June 21, 1994

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

To whom it may concern:

The Association of Operating Room Nurses is the professional organization of perioperative nurses with a current membership of over 48,000 members. The purpose of the organization is to enhance the professionalism of perioperative nurses, promote standards of perioperative nursing to better serve the needs of society, and to provide a forum for interaction and exchange of ideas related to perioperative health care.

The Association is writing in response to the May 24, 1994, Federal Register to state their support of the proposed standard on respiratory protective devices. We believe this proposed standard is a first step in improving the certification process. AORN agrees that the proposal will promote implementation of better methods for evaluating respirator efficiency. The proposed rule recognizes that the certification process addresses the health care setting and urges NIOSH to reevaluate the appropriateness of a blanket rule requiring the use of an expensive and possibly unnecessary High Efficiency Particulate Air (HEPA) particulate respirators (PR). Ninety-five percent filter efficiency should be acceptable for most health care worker needs.

Thank you for your consideration of AORN's comments. We believe this will help us to provide a safer work environment with a more user friendly, cost effective device.

Yours in perioperative nursing,

Dr. Jane C. Rothrock, DNSc, RN, CNOR  
AORN President

cc: Barbara Russell, RN, MPH, CIC  
1994 APIC President  
Barbara Stanewick

JUL 5 1994