



Health Care Association of Michigan

94-084

June 28, 1994

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

Re: **Proposed Rule, 42 CFR Part 84
Respiratory Protective Devices
DHHS, Public Health Service**

Gentlemen:

The Health Care Association of Michigan is a trade association representing 275 proprietary and nonprofit nursing homes serving some 30,000 patients and employing an equal number of people. Our comments regarding the Institute's proposed rule regarding Respiratory Protective Devices are made on behalf of this membership.

We support the Institute's proposed certification requirements for manufacturers of respiratory protective devices.

Michigan nursing homes have historically supported measures for preventing transmission of tuberculosis. It is important, however, that options be available to facilities which provide necessary and adequate protections without incurring exorbitant and unnecessary costs.

In comments submitted earlier this year regarding draft guidelines for preventing transmission of TB, we expressed this concern with proposals to require HEPA filtered respirators on the basis that this "upgrading of acceptable levels of respiratory protection from the particulate respirator previously recommended promotes a level of protection that may be excessive." We further noted concerns with the unavailability of HEPA filter products.

The Institute's proposed rules satisfactorily address those concerns by permitting selection from a broader range of certified respirators to meet the performance criteria recommended by the Centers for Disease Control and Prevention.

We urge expedited adoption of these certification requirements to assist facilities in complying with employee protection standards.

Thank you for your consideration of these comments.

Sincerely,

Helen Wentz, NHA
Assistant Vice President

JUN 30 1994