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June 29, 2004

The Honorable Elaine Chao
Secretary, U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210

Dear Secretary Chao:

On behalf of our nearly 5,000 hospital, health care system, network and other health care provider members, as well as more than 28,000 personal members, the American Hospital Association (AHA) strongly urges the Department of Labor to further delay enforcement of the General Industry Respiratory Protection Standard (GIRPS) application to occupational exposure to tuberculosis (TB).

The hospital workplace must be made as safe as possible for caregivers and other hospital workers. To that end, hospitals have put into place many effective administrative, engineering and personal respiratory protections, as recommended by the Centers for Disease Control and Prevention (CDC). The Occupational Safety and Health Administration (OSHA) enforces these provisions through its General Duty Clause. Because these prevention and control strategies have proved so effective, and because the nationwide incidence of TB is at its lowest level in recorded history, we are confident that further delay of the GIRPS will in no way endanger our caregivers.

Such a delay will enable the CDC and other informed stakeholders and experts to come together to properly evaluate recent scientific evidence in order to develop a workable approach that effectively protects our health care workers from exposure to TB and other infectious diseases. The CDC has announced a stakeholders meeting to discuss these issues later this year. Such a delay is supported by numerous organizations, including the CDC's Advisory Committee for the Elimination of Tuberculosis.



Please be assured of AHA's desire to work with the Department to develop an evidence-based approach to this issue. If you have any questions or comments, please do not hesitate to contact Roslyne Schulman, AHA's senior associate director for policy development, at (202) 626-2273.

Sincerely,

Rick Pollack
Executive Vice President