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# SHEA News

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## SHEA's Response to Proposed OSHA TB Exposure Rule

Based on a detailed analysis by the SHEA AIDS/TB Subcommittee, chaired by Michael Tapper, MD, SHEA officially responded to the OSHA proposed rule on occupational exposure to TB. Based on its presented data, the letter outlines the following conclusions:

"...SHEA believes that the criterion for determining that existing conditions pose a significant risk to healthcare workers has not been met and that the promulgation of the proposed standard cannot be scientifically justified at this time... SHEA believes that the proposed risk-assessment strategy should be revised consistent with the CDC recommendations... SHEA believes that

several elements of OSHA's proposed performance standard are not scientifically supported and need reconsideration, beginning with the focus of an exposure control plan. The scientific literature has demonstrated that, when greater effort is placed on identifying persons with active TB at the earliest point of encounter, the risk of TB transmission to healthcare workers in that setting is measurably reduced. . . In addition, SHEA contends that the proposed fit-testing requirements for respirators are unnecessary, costly, and lack scientific support. The proposed frequency and routine use of two-step testing are also unnecessary and excessive. . . [C]ertain aspects of the standard are

inconsistent with accepted standards of practice, fail to consider the multitude of factors and confounding influences that affect risk and the interpretation of TB risk to healthcare workers, and inappropriately infringe on patient care and professional judgement. As written, the proposed standard lacks credibility in the scientific community and will be difficult to implement and enforce. SHEA is committed to the use of scientifically supported TB control measures in healthcare facilities to protect workers. We encourage OSHA to reconsider those performance elements that are challenged scientifically and to focus its efforts on those that have proven benefits to workers."

### SHEA Letter to OSHA Available Electronically

The full text of SHEA's response to OSHA's proposed TB rule has been put on our web site by John Sellick, DO, chair of SHEA's Publications Committee and manager of SHEA's home page. The full letter details the reasoning behind the conclusions outlined above. It may be downloaded from the recently revised SHEA home page at <http://www.medscape.com/SHEA>.

*Brief items of interest for the SHEA News or Newsletter may be sent to Murray D. Batt, MD, SHEA News Editor, Washoe Medical Center, 77 Pringle Way, Reno NV 89520; fax (702) 328-4797.*