Dear Sir:

I am writing to provide comments on the above subject matter. The Institute of Medicine (IOM) completed a study in 2010 examining the conformity assessment that currently exists for personal protective technologies used in the workplace. The IOM study concluded that worker safety and health would be better served by having the National Institute of Occupational Safety and Health (NIOSH) assist in coordinating the various governmental and voluntary standards that currently exist in this area and to develop a risk model to determine what the role of government should be in the conformity assessment of personal protective technologies used by workers. The report can be found at: http://www.iom.edu/Reports/2010/Certifying-Personal-Protective-Technologies-Improving-Worker-Safety.aspx

My comment and recommendation is that NIOSH's role in the conformity assessment process for personal protective equipment would be an excellent case study for NIST to examine. Furthermore, NIST could contrast this process with the process used by NIOSH (as mandated by Federal law) to certify respiratory protection.

I had the privilege to chair the IOM study on conformity assessment of personal protective technologies in 2010, but my comment and recommendation is being made as an individual and not on behalf of the IOM.

Sincerely,

Howard J. Cohen, Ph.D., CIH