

OSHA Respiratory Protection Standard

Requirements for Healthcare Employers During
COVID 19 Pandemic



OSHA Respiratory Protection Program

- Medical questionnaire and evaluations completed
- Selection of respirators based on hazard
- Different types and sizes to be available
- Fit testing outlined
- User trained in use and care
- Training records maintained



Responsibilities

- Employer
 - Assess workplace for hazards
 - Provide PPE
 - Instruct employees in proper use of PPE
 - Determine when to use
- Employees
 - Use PPE when and as instructed
 - Inspect daily & maintain in clean & reliable condition

Training Requirements

- Why PPE is necessary
- What PPE is necessary
- How to put on, take off, adjust and wear PPE
- Limitations of PPE
- Proper care, maintenance, useful life and disposal of PPE
- Defective or damaged PPE shall not be used

Medical Clearance

- Medical questionnaire sent to Licensed Health Care Provider
- LHCP must know (supplemental information)
 - Type of respirator to be used
 - Duration and frequency of use
 - Expected physical work effort
- Cleared for use or additional medical evaluations required
- Keep records 30 years

Fit Testing

- Prior to use, then annually – should update medical questionnaire)
- Also when visible changes in physical condition
 - Scarring
 - dental changes
 - cosmetic surgery
 - obvious change in body weight
- Quantitative or qualitative – type of test based on type of respirator (refer to OSHA Resp. Guide)
- Maintain record on file

Use or Respirators

- Leave work area if:
 - Detect vapor or gas breakthrough
 - Detect leakage of face piece
 - Have changes in breathing resistance

Temporary Enforcement Guidance

- 3-14-20 – OSHA issued a temporary enforcement guidance for N95 fit testing
- Purpose is to optimize availability of N95 respirators
- For healthcare workers in healthcare facilities
- Can use N99, KN95, N100 or PAPR* in place of N95
- Requirement for **annual** fit testing in the health care industry suspended until further notice
- Field offices to “exercise enforcement discretion” on annual fit testing requirements

**PAPRs do not require fit testing per the regulation.*

Temporary Enforcement Guidance

Enforcement Discretion Only if Employers:

- Make good-faith efforts to comply with regulations
- **Use only NIOSH-certified respirators**
- Still conduct initial fit tests – with same model, style and size of respirator worker will use
- Explain to workers importance of performing a seal check each time they put on a respirator
- Conduct fit test if observe visible changes in employee's physical condition (facial scarring, dental changes, changes in body weight)

Temporary Enforcement Guidance

- Remind workers to inform supervisors or respirator program administrators if integrity or fit of N95 respirator is compromised

NOTES:

Workers should visually inspect N95 respirator to determine if structural and functional integrity of has been compromised.

Over time, components such as the straps, nose bridge, and nose foam material may degrade, affecting quality of fit and seal.

If structural and functional integrity of any part of respirator is compromised, or if successful user seal check cannot be performed, discard the respirator and try another.

Enforceable Requirements

If use of respiratory protection is required and healthcare employer fails to comply with any other requirements of standard, citations should be issued. Those requirements include:

- **Initial fit testing**
- Maintenance, care, and training in Respiratory Protection standard

Appendix B-1 to § 1910.134

- User required seal check – how it is done
- <https://www.youtube.com/watch?v=pGXiUyAoEd8>
- Manufacturer's recommended user seal check procedures may be used instead of positive and/or negative pressure check – employer must demonstrate manufacturer's procedures are equally effective



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Questions/Discussion

