

OSHA Temporary Enforcement Guidance/COVID-19: Respirator Fit-Testing in Healthcare



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The Occupational Safety and Health Administration (“OSHA”) issued temporary guidance regarding the enforcement of its Respiratory Protection standard during the COVID-19 outbreak.

The stated purpose of the guidance is to ensure healthcare workers have full access to N95 respiratory protection because of expected shortages.

The OSHA guidance addresses healthcare personnel giving direct care to patients with known or suspected coronavirus with other respirators that provide equal or higher protection. These are stated to include:

- N99 or N100 filtering facepieces
- Reusable elastomeric respirators with appropriate filters or cartridges
- Powered air purifying respirators

The guidance also recommends that healthcare employers change from a quantitative fit testing method to a qualitative testing method to preserve integrity of N95 respirators. OSHA field offices are provided the discretion to:

... not cite an employer for violations of the annual fit testing requirement as long as employers:

- Make a good faith effort to comply with the respiratory protection standard;
- Use only NIOSH-certified respirators;
- Implement strategies recommended by OSHA and Centers for Disease Control and Prevention for optimizing and prioritizing N95 respirators;
- Perform initial fit tests for each healthcare employee with the same model, style, and size respirator that the employee will be required to wear for protection from coronavirus;
- Tell employees that the employer is temporarily suspending the annual fit testing of N95 respirators to preserve the supply for use in situations where they are required to be worn;
- Explain to employees the importance of conducting a fit check after putting on the respirator to make sure they are getting an adequate seal;
- Conduct a fit test if they observe visual changes in an employee’s physical condition that could affect respirator fit; and
- Remind employees to notify management if the integrity or fit of their N95 respirator is compromised.

The duration of the guidance is from March 14th until further notice.

A copy of the guidance can be downloaded [here](#).