



## Respirators and Fit Tests

It is important that all HPAE employees who directly serve leaders, LEBs, members, and prospective members, understand current issues related to Respiratory Protection, worker rights and the COVID-19 pandemic. Healthcare workers in NJ and around the country have sickened and died as a direct result of not having legitimate respirators, or due to being assigned respirators that do not fit them properly. This memo discusses RESPIRATORS AND FIT TESTING REQUIREMENTS in place now under OSHA.

This information is current as of April 18, 2020. Currently, agencies of the federal government change safety rules frequently. We need to FIGHT to keep our members FIT TESTED, in order to save lives.

1. How does a respirator work? A respirator (N95 or other filtering respirator) works in two ways.
  - a. Made of non-woven filter material to filter out toxins, biologicals, chemicals, etc. Filter fabric is electrostatically charged to better trap microscopic particles, virus, bacteria.
    - o Designed to make TIGHT SEAL on user's face so that- when breathing- person ONLY breathes through filter material and does not breathe in air from around the edges of the respirator. There should be two straps, one for above and one for below the ear so the respirator fit is TIGHT. **Ear Loops do not provide a tight seal.**
    - o Respirators come in different sizes and configurations.
    - o Sizes are NOT STANDARD. Every manufacturer sizes their respirator differently and sometimes respirator models made by the same manufacturer will fit differently regardless of size marking.
    - o Respirators must fit the wearer's face completely- or else they are NOT PROTECTING THE WORKER.
      - Workers cannot wear a respirator if they have facial hair. Toxins/ virus will reach the lungs through spaces between hairs, under the respirator seal. People must be clean shaven to be protected with a respirator.
  - b. What is an initial fit test?
    - a. Initial fit test is performed **each and every time** a NEW BRAND OR MODEL RESPIRATOR is provided to worker.
      - i. It's not necessarily connected to when the worker is initially hired and has nothing to do with hire date!
      - ii. It is connected to the exact type of respirator provided.
    - b. A fit tester places the person wearing the new-to-them type of respirator in a little booth (or tent) and then releases a strong chemical into the booth. In healthcare, saccharin is used. The worker should be instructed to move their head vigorously, breathe heavily, and talk/ read a passage aloud. If the person wearing the respirator tastes or smells saccharin, the respirator has NOT protected them and they FAIL the fit test.

- c. If a worker fails the fit test, employer is OBLIGATED (under OSHA) to provide them with a different type of respirator that fits better. Employer must perform another initial fit test on that new type of respirator to ensure it protects the worker effectively.
    - i. Employer CAN NOT punish worker for failing the fit test IN ANY WAY.
    - ii. Employer must document all fit tests.
  - d. When workers PASS their fit test, management MUST provide them with that exact type, brand, model and make of respirator.
  - e. Management must teach the worker how to put on and take off the respirator safely (don and doff).
3. What is a User Seal Check?
- a. Every time a worker puts on a respirator, they have to hold their hands in a certain way over the front of it. They need to puff and inhale air gently to make sure the SEAL around the respirator's edge is effective.
  - b. Management is obligated (under OSHA) to teach workers how to perform this user seal check for each type of respirator they assign, and management is required to ensure workers are performing this seal check every single time they don the respirator, before they enter a hazardous atmosphere/location.
4. What stayed the same and what changed regarding respirators during this PANDEMIC?
- a. **INITIAL FIT TESTS FOR RESPIRATORS ARE STILL REQUIRED.**
    - i. Related OSHA VIOLATIONS:
      - 1. Assigning KN95s or other foreign respirators to workers and requiring they wear them without an initial fit test
      - 2. Assigning a different type and brand of respirator to workers and requiring they use them without an initial fit test
      - 3. Making a worker wear a different SIZE respirator than the one they were initially fit tested to wear.
    - b. CHANGED: Before March 14, 2020, the employer was obligated to provide an Annual Fit Test- that is, to annually REPEAT the fit test- for every worker assigned a respirator- on the exact kind of respirator provided.
    - c. OSHA said they would use discretion in requiring healthcare employers to perform ANNUAL fit tests with workers. Management can get away with not providing annual fit tests now.
5. Other OSHA requirements:
- a. Management MUST provide training to workers about when a respirator has reached its end of service life, even under the current rules that allow for reuse of respirators.
    - i. Hard to breathe through
    - ii. Distorted, bent, damaged
    - iii. Worker is unable to pass user seal check with that respirator
    - iv. Soiled, covered in secretions (including nose and mouth secretions, breathing tubes, etc.), bloody, dirty
    - v. IN THESE SITUATIONS, A NEW RESPIRATOR MUST BE PROVIDED (if they exist!)