COVID-19
Emergency Temporary Standard (ETS)
Mini Respiratory Protection Program
29 CFR 1910.504

Employee Training Presentation

June 2021

OSHA has issued a COVID-19 Emergency Temporary Standard, **referred to as an "ETS,"** during the limited period of the COVID-19 pandemic.

The ETS includes a Mini Respiratory Protection Program section, **referred to as the "mini RPP**."

This training is designed for employees whose employers have decided to provide respirators for "enhanced" protection against COVID-19 for situations where only facemasks are required by OSHA.

When would this apply?

- If an employee would rather wear an N95 respirator in place of their surgical mask
- Or if NDHC wanted to implement N95's use in place of surgical masks
- This application of an N95 is **ONLY** to be used in situations that only require a surgical mask but the employee is more comfortable wearing an N95. (see User Seal Check section in this document)
- If the employee is in an N95 required area (example a Covid positive room) then they would have to be first fit tested and pass a health screening in order to safely and effectively wear an N95.
- Continue reading for a more detailed explanation.

COVID-19 ETS (Subpart U)

- **1910.502 – Healthcare**
  - Applies to settings where employees provide healthcare services or healthcare support services
  - Sets requirements for the use of facemasks and respirators during the COVID-19 pandemic

- **1910.504 – Mini Respiratory Protection Program ("mini RPP")**
  - Applies when employees use respirators where only facemasks are required by OSHA
  - In contrast, OSHA's normal Respiratory Protection Standard (1910.134) applies whenever respirators are <u>required</u> by OSHA

Applicability of Mini RPP vs. Normal RPP

COVID-19 ETS PROVISION	MINI RPP (1910.504)	NORMAL RPP (1910.134)
1910.502(f)(2) – for exposure to person with suspected/confirmed COVID-19		✓
1910.502(f)(3) – for AGP[1] on person with suspected/confirmed COVID-19		✓
1910.502(f)(4) – in place of facemask when respirator is not required	✓	
1910.502(f)(5) – for Standard and Transmission-Based Precautions		✓

[1] AGP = aerosol-generating procedure (as defined by 1910.502)

Why Is the Mini RPP Necessary?

- Wearing a respirator can in itself present a hazard, such as:
  - Causing difficulty breathing when you have certain underlying medical conditions
  - Causing a facial rash if the respirator has not been properly cleaned or stored

- The Mini RPP is designed to improve worker protections with a streamlined set of requirements for the safe use of respirators that are easier and faster to implement than the more comprehensive respiratory protection program elements required by OSHA's normal Respiratory Protection Standard.

Key Differences Between Mini RPP & Normal RPP

KEY PROGRAM ELEMENT[1]	MINI RPP[2] (1910.504)	NORMAL RPP (1910.134)
Medical Evaluation		✓
Fit Testing		✓
Written Program		✓
User Seal Checks	✓	✓
Training	✓	✓

[1] This is not a comprehensive list of required program elements

[2] These are key requirements pertaining to employer-provided respirators (as opposed to worker-provided respirators)

Basic Information for the Safe Use of Respirators

- Respirators can be an effective method of protection against COVID-19 hazards when properly selected and worn. Respirator use is encouraged to provide an additional level of comfort and protection for workers even in circumstances that do not require a respirator to be used. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker.
- You need to take certain precautions to be sure that the respirator itself does not present a hazard. You should do the following:

  (1) Read and follow all instructions provided by the manufacturer on use, maintenance, cleaning and care, and **warnings regarding the respirator's limitations**.

  (2) Keep track of your respirator so that you do not mistakenly use someone else's respirator.

  (3) Do not wear your respirator where other workplace hazards (e.g., chemical exposures) require use of a respirator. In such cases, your employer must provide you with a respirator that is used in accordance with OSHA's Respiratory Protection Standard (1910.134).

Types of Respiratory Protection

Filtering Facepiece Respirators (FFRs):

- Series:
  - N – **N**ot resistant to oil
  - R – somewhat **R**esistant to oil
  - P – strongly resistant (oil **P**roof)

- Filter efficiency:
  - 95% - filter out at least 95% of airborne particles
  - 99% - filter out at least 99% of airborne particles
  - 100% - filter out at least 99.97% of airborne particles

- Examples include ”N95” FFRs and “P99” FFRs

Types of Respiratory Protection (cont'd)

- Elastomeric Respirators:
  - Two types:
    - **Half-mask** – offer the same level of protection as FFRs
    - **Full facepiece** – offer a higher level of protection than FFRs
  - Equipped with replaceable filters, cartridges, or canisters

- Powered air-purifying respirators (PAPRs):
  - Offer a higher level of protection than FFRs
  - Use HEPA filters, which are as efficient as P100 filters

Fit Testing

- A fit test evaluates the fit of a tight-fitting respirator to an individual's face
  - It verifies that you have found a make, model, and size of respirator that fits to your face
    - Much like finding a style and size of shoe that fits your foot properly
  - Fit testing is required under the normal RPP

- Fit testing is <u>not</u> required under the mini RPP
  - Without a fit test, there is less control over whether employees are receiving the full, expected level of protection that a respirator is capable of providing. Therefore, a user seal check is required each time you put on your respirator.

User Seal Checks

- A user seal check determines whether a tight-fitting respirator has properly sealed to your face once it has been put on

- A user seal check must be conducted each time you put a respirator on

- Two types of user seal checks:

  - **Positive pressure user seal check** - the respirator user exhales

  - **Negative pressure user seal check** - the respirator user inhales

Positive Pressure User Seal Checks

To conduct a positive pressure user seal check for a FFR:

1. Once you have conducted proper hand hygiene and properly donned the respirator, place your hands over the facepiece, covering as much surface area as possible.
2. Exhale gently into the facepiece.
3. The face fit is considered satisfactory if a slight positive pressure is being built up inside the facepiece without any evidence of outward leakage of air at the seal. Examples of evidence that it is leaking could be:
   - The feeling of air movement on your face along the seal of the facepiece
   - Fogging of your glasses
   - A lack of pressure being built up inside the facepiece.

** If the FFR has an exhalation valve, then performing a positive pressure check may not be possible unless the user can cover the exhalation valve. In such cases, a negative pressure check must be performed.

Negative Pressure User Seal Checks

To conduct a negative pressure user seal check:

1. Once you have conducted proper hand hygiene and properly donned the respirator, cover the filter surface with your hands as much as possible and then inhale.
2. The facepiece should collapse on the wearer's face and should not feel air passing between the face and facepiece.

How to Put On/Remove a FFR
&
How to Conduct a User Seal Check for a FFR

English: www.youtube.com/watch?v=oU4stQgCtV8

Spanish: www.youtube.com/watch?v=A28xg7Oepxw

Discontinuing the Use of Respirators

- Medical evaluation, to determine if an employee is medically fit to use a respirator, is required under the normal RPP but not under the mini RPP.

- Mini RPP Requirements:

  - Any employee who has previously had a medical evaluation and was determined not be medically fit to wear a respirator must not be provided with a respirator unless they are re-evaluated and medically cleared to use a respirator.

  - Employees must discontinue respirator use when either the employee or a supervisor reports medical signs or symptoms that are related to ability to use a respirator.
    - Shortness of breath, coughing, wheezing, chest pain, or any other symptoms related to lung problems or cardiovascular symptoms

Cleaning, Maintenance, and Storage

N95's can be used 5 times for the same patient care during that current shift. Store in a paper bag between those 5 uses. By the end of the shift regardless if under the 5 maximum the N95 will be thrown. If visibly soiled, even after one use, throw the N95 and get a new one. If used in place of surgical mask as source control it can be worn throughout the shift.

Reusable respirators should be cleaned with hydrogen peroxide spray and left wet for a minimum of 1 minute. Can then be wiped dry or allowed to air dry. This should be done for the inside and outside of the respirator.

Reusing Filtering Facepiece Respirators (FFRs)

- The reuse of single-use FFRs is discouraged
- If reused, a FFR must only be reused by the employee it was provided to
- A FFR can only be reused <u>when</u>:
  a. The respirator is not visibly soiled or damaged;
  b. The respirator has been stored in a breathable storage container (e.g., paper bag) for at least 5 calendar days between use and has been kept away from water or moisture;
  c. The employee does a visual check in adequate lighting for damage to the respirator's fabric or seal;
  d. The employee successfully completes a user seal check;
  e. The employee uses proper hand hygiene before putting the respirator on and conducting the user seal check; and
  f. The respirator has not been worn more than 5 days total

Reusing Elastomerics or PAPRs

- Elastomeric respirators and PAPRs are designed to be cleaned & reused

- Elastomeric respirators and PAPRs can only be reused <u>when</u>:
  a. The respirator is not damaged;
  b. The respirator is cleaned and disinfected as often as necessary to be maintained in a sanitary condition; and
  c. A change schedule is implemented for cartridges, canisters, or filters.

Any questions?
Please contact:
Andrew Johnson RN Clinical Support Services Manager and Designated COVID-19 Plan Safety Coordinator
701-587-6440

More Information

www.osha.gov/coronavirus

www.osha.gov/respiratory-protection
(OSHA's respiratory protection safety and health topics page)