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Occupational Safety and Health Administration (OSHA) expanded temporary enforcement guidance on respiratory protection fit testing for N95 filtering facepieces and other filtering facepiece respirators (FFRs).

OSHA's temporary guidance has eased enforcement of annual fit-testing requirements with regards to supply shortages of N95s or other FFRs. This guidance applies to workplaces covered by OSHA where there is required use of respirators for patient care. As dermatology offices are not mandated to use N95s, these requirements for fit testing are not applicable unless an office regularly sees COVID-19 positive patients. If a decision is made to use N95s, complying with fit testing requirements will provide the full benefit of the mask. Without the appropriate fit testing, an N95 mask may be no more protective than a surgical mask - which are not designed or approved to provide protection against airborne particles, potentially leading to a false sense of security. This guidance is temporary and intended to be time-limited to the current public health crisis – for updates please check OSHA's webpage at www.osha.gov/coronavirus.

OSHA will waive enforcement concerning annual fit testing requirements during the pandemic, however, in settings where N95s are mandated (offices/hospitals routinely taking care of COVID-19 patients) an initial fit test is required for all employees. Employees are expected to do a positive and negative pressure test every day an N95 is used. Data strongly indicates that to protect the safety of the N95 respirator user, fit testing is essential, initially and after decontamination as decontamination processes could compromise fit, leading to loss of integrity and thus, potentially exposing the wearer to harmful particles.

Dermatology offices regularly seeing COVID-19 positive patients and using N95s should also consider the following:

- Assessment on an ongoing basis of engineering controls, work practices and administrative controls to identify any possible changes to decrease the need for N95s or other FFRs
 - o Possible consideration to use wet methods, portable local exhaust systems, moving operations outdoors, temporary suspension of certain non-essential operations
- Taking the necessary steps to prioritize the appropriate equipment for employees who must use respirators for high-hazard procedures
- Consultation of respirator manufacturer model list to identify alternatives that have similar fits, if a model used by employees is out of stock

For detailed information, please refer to:

OSHA memo - http://www.osha.gov/memos/2020-04-08/expanded-temporary-enforcement-guidance-respiratory-protection-fit-testing-n95.

OSHA respirator fit testing:

- https://www.osha.gov/video/respiratory_protection/fittesting_transcript.html
- https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppA

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