New COVID-19 Guidance documents from OSHA

**Enforcement Guidance for Respiratory Protection and the N95 Shortage Due to the Coronavirus Disease 2019 (COVID-19) Pandemic:** This memorandum provides interim guidance to compliance safety and health officers for enforcing the Respiratory Protection standard, 29 CFR 1910.134, and certain other health standards, with regard to supply shortages of disposable N95 filtering facepiece respirators. Specifically, it outlines enforcement discretion to permit the extended use and reuse of respirators, as well as the use of respirators that are beyond their manufacturer’s recommended shelf life (sometimes referred to as “expired”). This guidance applies in all industries, including workplaces in which healthcare personnel are exposed to patients with suspected or confirmed coronavirus disease (COVID-19) and the protection of workers exposed to other respiratory hazards is impacted by the shortage resulting from the response to the COVID-19 pandemic.

**Enforcement Guidance for Use of Respiratory Protection Equipment Certified under Standards of Other Countries or Jurisdictions During the Coronavirus Disease 2019 (COVID-19) Pandemic:** This memorandum provides interim guidance to compliance safety and health officers for enforcing the Respiratory Protection standard, 29 CFR 1910.134, and certain other health standards, with regard to supply shortages of disposable N95 filtering facepiece respirators (FFRs). Specifically, it outlines enforcement discretion to permit the use of FFRs and air-purifying elastomeric respirators that are either:

- Certified under certain standards of other countries or jurisdictions, as specified below; or
- When equipment certified under standards of other countries or jurisdictions is not available, previously certified under the standards of other countries or jurisdictions but are beyond their manufacturer’s recommended shelf life (i.e., expired).
## NIOSH Respirators vs Masks

### Understanding the Difference

<table>
<thead>
<tr>
<th></th>
<th>Surgical Mask</th>
<th>N95 Respirator</th>
<th>Elastomeric Half Facepiece Respirator</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Testing and Approval</strong></td>
<td>Cleared by the U.S. Food and Drug Administration (FDA)</td>
<td>Evaluated, tested, and approved by NIOSH as per the requirements in 42 CFR Part 84</td>
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</tr>
<tr>
<td><strong>Intended Use and Purpose</strong></td>
<td>Fluid resistant and provides the wearer protection against large droplets, splashes, or sprays of bodily or other hazardous fluids. Protects the patient from the wearer’s respiratory emissions.</td>
<td>Reduces wearer’s exposure to particles including small particle aerodynamic and large droplets (only non-oil aerosols)</td>
<td>Reusable device made of synthetic or rubber material</td>
</tr>
<tr>
<td><strong>Face Seal Fit</strong></td>
<td>Loose-fitting</td>
<td>Tight-fitting</td>
<td>Tight-fitting</td>
</tr>
<tr>
<td><strong>Fit Testing Requirement</strong></td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>Designed for Reuse</strong></td>
<td>No</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td><strong>User Seal Check</strong></td>
<td>No</td>
<td>Yes. Required each time the respirator is donned (put on)</td>
<td>Yes. Required each time the respirator is donned (put on)</td>
</tr>
<tr>
<td><strong>Filtration</strong></td>
<td>Does NOT provide the wearer with a reliable level of protection from inhaling smaller airborne particles and is not considered respiratory protection</td>
<td>Filters out at least 95% of airborne particles including large and small particles</td>
<td>May be equipped with filters that block 95%, 99%, or 100% of very small particulates. Also may be equipped to protect against vapors/gases.</td>
</tr>
<tr>
<td><strong>Leakage</strong></td>
<td>Leakage occurs around the edge of the mask when user inhales</td>
<td>When properly fitted and donned, minimal leakage occurs around edges of the respirator when user inhales</td>
<td>When properly fitted and donned, minimal leakage occurs around edges of the respirator when user inhales</td>
</tr>
<tr>
<td><strong>Use Limitations</strong></td>
<td>Disposable. Discard after each patient encounter.</td>
<td>Ideally should be discarded after each patient encounter and after aerosol-generating procedures. It should also be discarded when it becomes damaged or deformed, no longer forms an effective seal to the face; becomes wet or visibly dirty; breathing becomes difficult; or if it becomes contaminated with blood, respiratory or nasal secretions, or other bodily fluids.</td>
<td>Reusable and must be cleaned/disinfected and stored between each patient interaction</td>
</tr>
</tbody>
</table>

*As of July 2, 2020, NIOSH evaluated 109 PAPRs intended for use in healthcare for biocompatibility, breathability, and fluid resistance to ensure conformity to respiratory protection standards during the appraisal process. These tests were previously performed by the FDA.*

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**Resources**
More federal government information and resources are available at [coronavirus.gov](https://coronavirus.gov) and from the following agencies:

**Environmental Protection Agency (EPA)**
- EPA Website for Coronavirus
- List N: Disinfectants for Use Against SARS-CoV-2
- FAQs for Coronavirus
- Coronavirus and Drinking Water and Wastewater

**Wage and Hour Division (WHD)**
- General Information on the WHD COVID-19 Response
- COVID-19 and the American Workplace
- Families First Coronavirus Response Act: Employee Paid Leave Rights Fact Sheet

**Food and Drug Administration (FDA)**
- FDA Actions to Address Coronavirus
- Emergency Use Authorization (EUA) for Filtering Facepiece Respirators
- EUA Clarification Letter
- Non-NIOSH Approved Respirator EUA FAQ
- Emergency Situations (Medical Devices)
- Medical Glove Conservation Strategies

**Other Federal Agencies**
- US Department of Health and Human Services (HHS) Strategic National Stockpile Information
- Federal Emergency Management Agency (FEMA) Coronavirus Response

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**FEDERAL RESOURCES**

**OTHER RESOURCES**

The Associated General Contractors (AGC) is promoting a national Coronavirus Safety Stand Down on April 9th.

A free course has been compiled by the University of Utah’s Rocky Mountain Center for Occupational and Environmental Health (RMCOEH) using multiple sources and expert opinion. It will be updated as the pandemic progresses/recedes and information becomes available. Significant updates will be added as they are known. Click on the flyer (left) to enroll or click here to view the videos.

Use this Excel spreadsheet to calculate your PPE burn rate
This newsletter is distributed quarterly. Call John Olaechea (720-264-6586) or send an e-mail to olaechea.john@dol.gov to subscribe or to submit comments, questions or suggestions.

SILO: Edge of the Real World, which premiered in 2017 at the TriBeCa Film Festival in New York City. The success of the 10-minute documentary helped inspire the full-length, award-winning feature film SILO. In honor of planting season, and because gatherings for screenings of the full-length feature film are currently not possible, the SILO team is re-releasing SILO: Edge of the Real World. Starting today, you can view the documentary here for free. Please share this information with your audiences, partners, and anyone in your community who will benefit from it. Download the documentary discussion guide here.

STAND UP 4 GRAIN SAFETY WEEK WEBINAR SERIES

Tuesday, April 14 10:00 AM
An Ounce of Prevention - Maintenance is more than a Grease Gun

Wednesday, April 15 10:00 AM
Machine Guard Makeover!

Thursday, April 16 2:00 PM
Marked Safe for Bin Entry - how far do you have to go?

Friday, April 17 10:00 AM
Falling for Fridays

SPECIAL NOTE: Due to COVID-19 concerns, employers are encouraged to comply with current CDC guidelines and to minimize gatherings and emphasize social distancing. Social media events, virtual campaigns, and other electronic and remote tools should be utilized when possible.

The 7th annual National Stand-Down to Prevent Falls in Construction, originally scheduled for May 4-8, 2020, has been postponed due to the COVID-19 pandemic. The event will be re-scheduled this summer.