

# HBI OSHA Respiratory Protection Update

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## OSHA Healthcare Citations

OSHA inspectors continue to cite healthcare operations for respiratory protection program violations related to COVID-19. In the latest reports, OSHA cited a residential care facility for failing to provide workers with respirators and a hospital faces fines for failing to fit test and train workers. These continue to be the major violations found in the health care industry.

Additionally, it is becoming harder for employers in the healthcare field to meet the requirements of the respiratory program with the supply shortages of National Institute for Occupational Safety and Health (NIOSH) approved face masks. The more widely available KN95 respirators, which do not meet the requirements of NIOSH have been approved for use during the supply shortages. 200 different alternative masks known as KN95 masks, have been analyzed and tested by a nonprofit company, ECRI, that advises the healthcare industry on products like these. They have stated the masks do not meet the requirements set forth by NIOSH and can endanger frontline staff and their patients/residents because of the mask limitations.

While the KN95 masks do not meet the NIOSH requirements ECRI states they should still be used as a last resort in procedures that have limited potential for bodily fluid contact. KN95 respirators may not be the only option employers can use to negate the lack of N95 masks, this means potentially moving into the realm of half-face respirators with more powerful filters. This is a huge cost in comparison, but it may not be as costly as an OSHA citation for not meeting the requirements to protect employees.

OSHA inspectors will be looking for:

- Written program specific to the facility or location requiring respiratory protection
- Procedure for respirator selection, including verification of NIOSH approval
- Medical evaluations by a medical professional to ensure the wearer is capable to do so
- Fit testing for tight fitting respirators (N95, Half face, Full face respirators)
- Procedures and schedules for cleaning/replacing tight fitting respirators
- Training on proper use, wearing, potential limitations and maintenance of respirators

For additional information and best practices please contact your Risk Control representative or contact [riskcontrol@hendersonbrothers.com](mailto:riskcontrol@hendersonbrothers.com)