

SAFETY NOTICE

Use of respirators during the pandemic

Not that long ago, most people had no idea what an N95 respirator was. Now, people are faced with the task of comparing N95 masks, to KN95 masks to surgical masks to cloth coverings. Is it voluntary or mandatory? What OSHA regulations may apply? Hopefully, the following information will assist you in making the best decisions for protecting your employees, and by extension your students.

Types of Respirators

There are two main categories of respirators: Air-purifying, which use filters, cartridges or canisters to remove contaminants and Air-supplying which provide clean air from an uncontaminated source.

The main focus during the pandemic is the use of air-purifying masks or other protective face coverings. The Centers for Disease Control and Prevention (CDC) has provided ever-changing guidance during this pandemic and OSHA has also stepped in to provide guidance related to regulatory compliance.

Respirators and Cloth Face Coverings

For most people, the CDC is recommending a cloth face covering to help reduce the spread of respiratory droplets in the air from sneezing, coughing and talking. This protection, along with proper social distancing (6 feet) is thought to significantly reduce the spread of COVID-19. Textured fabrics and multiple layers provide enhanced protection over a single layer of fabric.

As most people are acutely aware, the shortage of N95 and similar respirators is critical. The CDC and other health organizations have stated that N95 masks, surgical masks and other respirators should be reserved for frontline health care workers and first responders. An N95 mask is rated to filter out at least 95% of airborne contaminants that are 0.3 microns or larger, including most larger respiratory droplets. Therefore, it is critical to emergency workers that have a constant exposure potential.

N95 versus KN95

You have likely been hearing the term “KN95” mask used interchangeably with “N95” mask. Theoretically, they are similar in effectiveness. However, the big difference is the certification of the mask. An N95 mask is certified in the United States by National Institute for Occupational Safety and Health (NIOSH). All certified N95 masks will have a NIOSH approval number and stamp located on the package or on the mask. If there is no certification, the mask is not an approved NIOSH respirator.



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A KN95 mask is certified by Chinese testing standards. If properly constructed and tested, a KN95 mask has the same filtration ability as an N95 mask. There are some minor differences with regards to breathability, but in the critical area of filtering protection, they are the same. You may also see FFP2 which are European Union testing standards, though not as common as the KN95 masks.

As with any high demand product, criminals are looking for a way to make money. The critical shortage of masks has led to a huge increase in counterfeit masks. These masks may have fraudulent paperwork, packaging and/or labeling. They may be made with inferior materials and put wearers at risk because they have not had any type of independent testing.

The CDC maintains a searchable list of NIOSH-approved particulate filtering facepieces at:

https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/default.html

Please note that this is only for N95 approved respirators, not KN95 respirators. The US FDA has worked in conjunction with NIOSH to test imported KN95 masks under an emergency use authorization to increase available mask supplies. Some were approved after meeting certain test criteria, others were deemed non-approved. If you are looking to purchase KN95 or off-brand respirators, please check the lists at the FDA website:

<https://www.fda.gov/medical-devices/coronavirus-disease-2019-covid-19-emergency-use-authorizations-medical-devices/personal-protective-equipment-euas#appendixa>



Remember that an N95 or KN95 facepiece is generally meant to be a one-time use mask that is disposed of after each use. Reusing a disposable mask may increase the risk of disease transmission by continuous touching of the exterior where a virus may reside. While emergency disinfection protocols have been permitted and some disinfection methods have proven to be effective, the elevated transmission risk remains. Therefore, using these types of masks will require budgeting for replacements.

OSHA Regulations

OSHA has stated that cloth face coverings are not considered respirators and do not fall under the Respiratory Protection Standard. Therefore, employers are free to implement usage requirements within the context of state requirements and internal decisions. Additionally, the masks are not considered Personal Protective Equipment as defined under OSHA's Personal Protective Equipment



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regulations. So, employers are not required to pay for or provide these face coverings to employees. However, considering the various types of face coverings out there, an employer may wish to provide a quality face covering alternative to help ensure uniformity and compliance in the workplace.

If you have employees that wish to use an N95 mask (or equivalent KN95) as an extra precaution, some OSHA regulations would apply. N95 and KN95 masks are considered filtering facepiece respirators for the purpose of regulatory enforcement, similar to a dust mask. For **VOLUNTARY USE**, meaning the employee wishes to use a higher quality mask, but workplace hazards do not mandate such protection, the employer may allow it. **NOTE: Voluntary use and waiver of medical clearance and fit-testing is only applicable to disposable cloth N95 masks. Any tight-fitting elastomeric respirator (reusable rubber or plastic respirator with cartridges or filters that can be replaced) would not be exempt from these requirements.**

However, the employer is responsible for ensuring the mask being used is safe and does not present a hazard to the worker and the employer must ensure the mask is in good condition, clean and sanitary. Medical clearance and fit testing are not required for voluntary use. The employee must be provided with a copy of the OSHA Respiratory Protection Standard Appendix D, which is a short safety and care guide.

For most employees in a school district, mandatory use of an N95 mask is not required. The one possible exception may be a school nurse. There are currently no known mandates for school nurses to wear an N95 mask for COVID protection. The one possible exception would be if the nurse is providing nebulizer treatments for students with certain medical conditions. This would be considered an aerosol generating procedure that requires specific ventilation and cleaning protocols, in addition to the nurse using an N95 mask. This is not to be confused with inhaler use.

If a nurse has exposures that mandate use of an N95 mask or higher, then all OSHA Respiratory Protection regulations apply. This includes a written compliance program, annual training, annual fit testing and medical clearance with periodic reevaluation by the physician. For most, a nurse may be permitted to voluntarily wear an N95 mask when desired, requiring only the provision of the Appendix D handout.

Summary

Information about COVID-19 spread, protections and treatments continue to evolve, as do the guidance documents and regulatory requirements. This information is based on current requirements and suggestions. It is important to continuously evaluate all available information and analyze your district exposures to ensure you are implementing the best possible protocols to protect your students, employees and visitors.

Should you have any questions or need additional assistance, please contact the JIF Safety Director.



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