

# U.S. OSHA Position on Fit Testing during COVID-19

## Background

Currently, there is a significant increase in the number of healthcare workers (HCW) needing to be respirator fit tested. Many HCW are using respirators for the first time and, due to supply issues, some HCW are needing to use a different model than they were fit tested on initially. Additionally, fit test supplies are constrained.

## Selecting Alternate Models of Filtering Facepiece Respirator (FFR)

Due to the significant increase in demand for respirators, many healthcare providers have had to select alternate models of respirators during the COVID-19 pandemic. Many facilities have found that they can increase their available supply by including standard FFRs in addition to the surgical N95s that they typically use. Standard N95s are appropriate for many tasks in healthcare.

Employers originally using surgical N95 models and now trying to decide on a standard respirator model to incorporate into their respiratory protection program may want to identify models that are similar in construction to the ones familiar to their employees. Other employers may face similar supply challenges.

When respirators and fit testing supplies are constrained or not available, it may be preferred to use a respirator with similar construction and fit characteristics than providing a “non-similar” model. Our laboratory testing indicates respirator models with similar construction may be more likely to fit a worker similarly. For example:

- **3M™ Particulate Respirators 8210, 8210Plus, and 1860** have similar constructions and shapes. A worker that passes a respirator fit test with one of these respirator models has a high likelihood of passing a respirator fit test with the other respirator model.
- **3M Particulate Respirators 8110S and 1860S** have similar constructions and shapes. A worker that passes a respirator fit test with one of these respirator models has a high likelihood of passing a respirator fit test with the other respirator model.
- **3M™ Particulate Respirators 1870+ and 9210+** have similar constructions and shapes. A worker that passes a respirator fit test with the 3M™ Particulate Respirator 1870+ has a high likelihood of passing a respirator fit test with the 3M™ Particulate Respirator 9210+.
- **3M™ Particulate Respirators 8511 and 8511P** have similar constructions and shapes. A worker that passes a respirator fit test with the 3M™ Particulate Respirator 8511 has a high likelihood of passing a respirator fit test with the 3M™ Particulate Respirator 8511P.
- **3M™ Particulate Respirators 1805 (discontinued) and 1804** have similar constructions and shapes. A worker that passes a respirator fit test with one of these respirator models has a high likelihood of passing a respirator fit test with the other respirator model.
- **3M™ Particulate Respirators 1805S (discontinued) and 1804S** have similar constructions and shapes. A worker that passes a respirator fit test with one of these respirator models has a high likelihood of passing a respirator fit test with the other respirator model.
- **3M™ Particulate Respirators 9205+ and 9210+** have similar constructions and shapes. A worker that passes a respirator fit test with the 3M™ Particulate Respirator 9205+ has a high likelihood of passing a respirator fit test with the 3M™ Particulate Respirator 9210+.

- **3M™ Particulate Respirators 9205+ and 1870+** have similar constructions and shapes. A worker that passes a respirator fit test with one of these respirator models has a high probability of passing a respirator fit test with the other respirator model.

## OSHA's Position on Fit Testing during COVID-19 Pandemic

The US Occupational Safety and Health Administration (OSHA) is the agency that enforces respirator use and selection in US workplaces. The OSHA respiratory protection standard [29 CFR § 1910.134(f)(2)] requires a fit test prior to initial use of any tight-fitting respirator new to the employee. This includes anytime an employee switches to a different size or model of tight-fitting respirator. This includes filtering facepiece respirators. OSHA also requires a repeat fit test annually for each respirator the employee uses. In an enforcement [memo](#) dated March 14, 2020, OSHA field offices declared that they will exercise enforcement discretion concerning the annual fit testing requirement, 29 CFR § 1910.134(f)(2), for healthcare facilities using N95 filtering facepieces during the COVID-19 outbreak. Subsequently, in an [enforcement memo](#) dated April 8 2020, OSHA expanded this guidance to include all workplaces and expanded it to cover all types of filtering facepiece respirators (FFRs). In that memorandum, OSHA states; *“In the absence of quantitative or qualitative fit-testing capabilities required under mandatory Appendix A to 29 CFR § 1910.134 Appendix A, the following additional guidance is provided to assist with decision-making with respect to use of N95s or other FFRs. Most respirator manufacturers produce multiple models that use the same basic head form for size/fit. Manufacturers may have a crosswalk (i.e., a list of their respirators with equivalent fit). Therefore, if a user’s respirator model (e.g., model x) is out of stock, employers should consult the manufacturer to see if it recommends a different model (e.g., model y or z) that fits similarly to the model (x) used previously by employees.”*

Accordingly, OSHA added additional time limited guidance to OSHA field offices; *“During this COVID-19 pandemic, OSHA field offices should exercise additional enforcement discretion regarding compliance with 29 CFR § 1910.134(f) when an employer switches to an equivalent-fitting make/model/size/style N95 or other filtering facepiece respirator without first performing an initial quantitative or qualitative fit test. Where the use of respiratory protection is required and an employer fails to comply with any other requirements, such as initial fit testing, maintenance, care, and training in the Respiratory Protection standard, cite the applicable section(s) of 29 CFR § 1910.134.”*

OSHA states that a good faith effort to comply with 29 CFR 1910.134 includes stressing the importance of visual inspection, user seal checks and proper training as part of an overall respiratory protection program.

**IMPORTANT NOTE:** This OSHA guidance is time limited to the current Covid-19 public health emergency. The reader should stay informed by frequently checking OSHA’s webpage at [www.osha.gov/coronavirus](http://www.osha.gov/coronavirus) for updates.

## For Further Information

For further information see [3M Technical Bulletin - Surgical N95 vs. Standard N95 – Which to Consider?](#), the CDC’s [Frequently Asked Questions about Personal Protective Equipment](#), and OSHA’s [Hospital Respiratory Protection Program Toolkit](#).

## 3M Respirator Fit Testing Resources

- [3M Quick Reference Guide to Qualitative Fit Testing \(OSHA\)](#)
- [3M Fit Testing Video](#)
- [3M Fit Testing Video \(Healthcare\)](#)
- [3M Fit Testing FAQs](#)
- [3M Technical Bulletin Quantitative Fit Testing of Respirators](#)
- [3M Technical Bulletin - Fit Test Hygiene During COVID-19 Pandemic](#)

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