

TO: All Vermont Health Care Providers, Health Care Facilities and EMS Providers

FROM: Vermont Department of Health

Temporary Enforcement Guidance Regarding Annual Fit Testing Requirement

Personal Protective Equipment (PPE) shortages have created challenges for health care and EMS providers worldwide. Vermont providers are also experiencing shortages of PPE. The Occupational Safety and Health Administration (OSHA) recommends following existing U.S. Centers for Disease Control and Prevention (CDC) guidelines, including taking measures to conserve supplies of these respirators while safeguarding providers. For additional guidance, see *Strategies for Optimizing the Supply of N95 Respirators* at:

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirator-supply-strategies.html>.

On March 14, 2020, OSHA issued [Temporary Enforcement Guidance - Healthcare Respiratory Protection Annual Fit-Testing for N95 Filtering Facepieces During the COVID-19 Outbreak](#).

Under the temporary enforcement guidance, OSHA Compliance Safety and Health Officers shall exercise enforcement discretion concerning the annual fit testing requirement, 29 CFR § 1910.134(f)(2), as long as employers follow the guidance, which includes:

- Implementing CDC and OSHA strategies for optimizing the supply of N95 filtering facepiece respirators and prioritizing their use, as discussed above;
- Performing initial fit tests for each provider with the same model, style, and size respirator that the worker will be required to wear for protection against COVID-19 (initial fit testing is essential to determine if the respirator properly fits the worker and is capable of providing the expected level of protection);
- Informing workers that the employer is temporarily suspending the annual fit testing of N95 filtering facepiece respirators to preserve and prioritize the supply of respirators for use in situations where they are required to be worn;

This temporary guidance took effect on March 14, 2020 and will remain in effect until further notice.

If you have any questions please contact the HAN Coordinator at 802-859-5900 or vthan@vermont.gov.

HAN Message Type Definitions

Health Alert: Conveys the highest level of importance; warrants immediate action or attention.

Health Advisory: Provides important information for a specific incident or situation may not require immediate action.

Health Update: Provides updated information regarding an incident or situation; unlikely to require immediate action.

Info Service Message: Provides general correspondence from VDH, which is not necessarily considered to be of an emergent nature.