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Regulatory Compliance: Respirators and Fit Testing

In any workplace where respirators are necessary to protect the health of employees or when they are required by the employer, OSHAⁱ requires that the employer establish and implement a respiratory protection program.ⁱⁱ A [template](#) for the respiratory protection program is available for customization on cda.org.

There are several requirements of a respiratory protection program but this article discusses four of them in the context of documenting regulatory compliance: (1) medical evaluation of employees required to use respirators; (2) staff training on proper use of respirators (3) initial fit testing and (4) annual fit testing.

Documentation

CDA recognizes the challenges dental practices have in completing these requirements when respirators and fit testing supplies are hard to come by. It is important for each employer to demonstrate its intent to comply with respiratory protection regulations by documenting both efforts to acquire N95 equivalent or better respirators and to provide initial fit testing to employees. Document when vendors are contacted and what information vendors provide regarding supplies or services.

Medical evaluation. This can be completed with few obstacles and should be completed as soon as possible. A description of the medical evaluation is available in [N95 Mask Fit Testing Requirements](#).

Below is a list of options where you may send employees to be medically evaluated:

- [3m](#) offers an online service that costs \$29 per user
- Perform a web search to locate a hospital or occupational health clinic in your region
- Contact your local county public health department to determine if they may be able to assist you in locating medical evaluation options.
- The companies listed on the next page may offer the medical evaluation in addition to the fit test service.

After an employee is medically evaluated, the employer is notified of the following:

- Employee is approved to use a N95 or other respirator, or
- Further evaluation is needed, or
- The employee is not approved to wear a N95 or other respirator (usually due to anatomy related issues)

Staff training. An individual trained in the requirements of a respiratory protection program should deliver this training. A practice owner may serve as the dental practice's respiratory program administrator, or else designate someone to serve in that role. The program administrator is required to understand the requirements of the regulation and lead compliance efforts. Training for the program administrator can be as simple as reviewing Cal/OSHA's "[Respiratory Protection in the Workplace: A Practical Guide for Small-Business Employers](#)." One of the program administrator's responsibilities is to train staff before they start using respirators and annually thereafter. Training topics are discussed in the Cal/OSHA publication. Be certain to document training.

Initial fit testing. This may take some time to complete due to the supply shortage and personnel to administer it. Be sure to document efforts to acquire respirators and to schedule fit testing. Know that there are two types of fit testing: qualitative and quantitative. Qualitative fit testing is normally used for half-mask respirators such as the N95. Quantitative fit testing can be used on any type of tight-fitting respirator. OSHA has a [training video](#) online.

Below are options for providing initial fit testing. Provision of vendor names does not imply endorsement.

- Industrial hygiene consultants for hire are available through this [website](#), search by state and "respiratory protection" specialty.
- The following companies were identified through an internet search:
 - Antea Group
 - Theresa McCollom, CIH,CSP, 425-498-7722
 - Richard Moore, CIH, 916-389-6976
 - ATCGS
 - Paul Lowe, 925-460-5300
 - Estella Villacorta, 323-517-9654
 - Stephen Drengson, 323-517-9780
 - Alex Peck, 425-273-3858
 - [Benchmark Environmental Engineering](#)
 - [Breathe-Safe Environmental](#)
 - [Concentra](#) (multiple locations)
 - [Enviro Safetech](#)
 - [FastResponse On-Site Testing](#)
 - [Industrial Safety Professionals](#)
 - [Memorial Occupational Health](#)
 - [Mobile Health Net](#) (multiple locations)
 - [National Association of Training and Environmental Consulting](#)
 - [NES, Inc.](#)
 - [On-Site Health and Safety](#)
 - [PHS Mobile Health Solutions](#)
 - [SafeWest](#)
 - [SCM Safety Compliance Management](#)
 - [SoCal First Aid](#)
 - [Universal Urgent Care Occupational Medicine](#)
 - [Zee Medical](#) (includes training)

- DIY. Take a course and purchase supplies to administer fit testing to your staff. The fit test administrator must know how to conduct a test, recognize invalid results, and properly clean and maintain equipment.
 - o Course providers:
 - [3M](#) (qualitative)
 - [Moldex](#) (quantitative and qualitative)
 - [PortaCount](#) (for use with their proprietary equipment/quantitative)
 - [XO Safety Academy](#) (qualitative)
 - o Supply providers:
 - 3M (multiple vendors)
 - [FisherSci](#)
 - [Moldex](#)

Annual fit testing. This requirement has been waived for the duration of the COVID-19 public health emergency.ⁱⁱⁱ

If an employee wants to **voluntarily wear a respirator** at the workplace, ensure the respirator will not create a hazard. Provide the employee with information similar to that contained in Title 8 CCR Section 5144 [Appendix D](#).

i Cal/OSHA requirements must be at least equivalent to Federal OSHA requirements.

ii Respiratory Protection Program, Title 8 CCR Section 5144, <https://www.dir.ca.gov/title8/5144.html>

iii Expanded Temporary Enforcement Guidance on Respiratory Protection Fit-Testing for N95 Filtering Facepieces in All Industries During the Coronavirus Disease 2019 (COVID-19) Pandemic, OSHA, April 8, 2020, <https://www.osha.gov/memos/2020-04-08/expanded-temporary-enforcement-guidance-respiratory-protection-fit-testing-n95>