OSHA 'Mini RPP'

Under the June 10 update to the COVID-19 Healthcare Emergency
Temporary Standard (ETS), OSHA established a relaxed version
of the Respiratory Protection Program (RPP), known as the mini RPP,
to provide for the use of respirators in a quick, but safe, manner during
the healthcare emergency. Healthcare employers may use the mini RPP requirements
in specific instances outlined in the ETS. Use this flow chart to determine which protocol
is applicable to your work situation.

Are workers generally exposed to suspected/confirmed sources of COVID-19 or are respirators only used for enhanced worker protection?



Exposed to suspected/confirmed sources of COVID-19



Subject to full RPP requirements



Full RPP required elements:

- Medical evaluations required
- Fit-testing required
- Written RPP protocol required
- User seal checks must be performed
- Respirator use training required



Respirators only used for enhanced worker protection



May use mini RPP requirements*



Mini RPP required elements:

- User seal checks must be performed
- Respirator use training required

*Mini RPP not needed for practices that have implemented a full RPP.

What is a seal check?

Seal checks are a quick way for workers to ensure their respirators fit correctly and are properly sealed. MIOSH and MSHA have additional information on how to perform these checks. Seal checks are not a substitute for fit testing.

How do I develop a written RPP protocol? Don't start from scratch. Customize the AAOM

Don't start from scratch. Customize the <u>AAOMS Sample Respiratory</u> <u>Protection Program</u> to meet compliance requirements.

What if my employees provide their own respirators?

Employees may provide their own respirators, but OSHA requires employers to provide the following notice:

OSHA-mandated Respirator Notice

Respirators can be an effective method of protection against COVID-19 hazards when properly selected and worn. Respirator use is encouraged to provide an additional level of comfort and protection for workers even in circumstances that do not require a respirator to be used. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. If your employer allows you to provide and use your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard. You should do the following:

- 1. Read and follow all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
- $2. \ Keep \ track \ of \ your \ respirator \ so \ that \ you \ do \ not \ mistakenly \ use \ someone \ else's \ respirator.$
- 3. Do not wear your respirator where other workplace hazards (e.g., chemical exposures) require use of a respirator. In such cases, your employer must provide you with a respirator that is used in accordance with OSHA's respiratory protection standard (29 CFR part 1910.134). For more information about using a respirator, see OSHA's respiratory protection safety and health topics page <u>OSHA.gov/respiratory-protection</u>.

These standards are only temporary, and OSHA must permanently adopt or rescind within six months of publication. Visit <u>OSHA.gov/coronavirus/ets</u> and check <u>AAOMS.org</u> frequently for updates.

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