

FACT SHEET

Mini Respiratory Protection Program



What is the mini respiratory protection program?

The mini respiratory protection program (29 CFR 1910.504) is one part of the OSHA COVID-19 Healthcare Emergency Temporary Standard (ETS). **It applies only to specific circumstances specified under the ETS**, generally when workers are not exposed to suspected or confirmed sources of COVID-19 but where respirator use could offer enhanced worker protection. The mini respiratory protection program does not replace or substitute for OSHA’s normal Respiratory Protection standard (29 CFR 1910.134), which applies to:

- Circumstances under the ETS when workers are exposed to suspected or confirmed sources of COVID-19.
- Any other workplace hazards that might require respiratory protection (e.g., silica, asbestos, airborne infectious agents such as *Mycobacterium tuberculosis*).

Why is the mini respiratory protection program needed as part of the ETS?

The ETS addresses an emergency health crisis and the mini respiratory protection program is designed to improve worker protections with limited provisions for the safe use of respirators that can be implemented more quickly and easily than the more comprehensive respiratory protection program required by the Respiratory Protection standard (e.g., medical evaluation, fit testing) (Table 1).

Table 1. Key requirements of the mini respiratory protection program vs. the respiratory protection standard

KEY PROGRAM ELEMENT ¹	MINI RPP ² (1910.504)	NORMAL RPP ³ (1910.134)
Medical Evaluation		✓
Fit Testing		✓
Written Program		✓
User Seal Checks	✓	✓
Training	✓	✓

¹ This is not a comprehensive list of required program elements

² These are key requirements pertaining to employer-provided respirators (as opposed to worker-provided respirators)

³ For additional information about the Respiratory Protection standard’s requirements, see: NIOSH/OSHA’s “Hospital Respiratory Protection Program Toolkit Resources for Respirator Program Administrators” at: www.osha.gov/sites/default/files/publications/OSHA3767.pdf

When must employers comply with the normal Respiratory Protection standard instead of the mini respiratory protection program?

The mini respiratory protection program only applies to respirator use covered by *specific* provisions of the ETS (Table 2). The normal Respiratory Protection standard is applicable to other respirator use required under the ETS and to hazards not covered by the ETS for which respiratory protection is required.

Table 2. Applicability of the mini respiratory protection program vs. the Respiratory Protection standard

COVID-19 ETS PROVISION	MINI RPP (1910.504)	NORMAL RPP (1910.134)
1910.502(f)(2) – for exposure to person with suspected/confirmed COVID-19		✓
1910.502(f)(3) – for AGP ¹ on person with suspected/confirmed COVID-19		✓
1910.502(f)(4) – in place of facemask when respirator is not required	✓	
1910.502(f)(5) – for Standard and Transmission-Based Precautions		✓

¹ AGP = aerosol-generating procedure (as defined by 1910.502)

What do employers need to do when workers provide their own respirators?

The employer must provide workers with a specific notice contained in 1910.504(c). The notice is intended to inform workers to take certain precautions to be sure that the respirator itself does not present a hazard.

What do employers need to do when they provide respirators to workers?

- Provide specific training (e.g., how to inspect/put on/remove/use a respirator; how to conduct a user seal check; how to store/maintain/inspect a respirator).
- Ensure that user seal checks are conducted for tight-fitting respirators and that workers correct any problems discovered during a user seal check.
- Ensure that if respirators are reused, they are reused properly.
- Ensure the discontinuation of respirator use under certain conditions.

What is a user seal check?

A user seal check is a quick and easy way for workers to verify that they have put on their respirators correctly and that the respirators are properly seated to the face. User seal checks are not a substitute for fit testing, but they can improve the effectiveness of a respirator even when the respirator has not been fit tested. For additional information on user seal checks, see OSHA’s training video at www.osha.gov/respiratory-protection/training and CDC’s fact sheet at www.cdc.gov/niosh/docs/2018-130/pdfs/2018-130.pdf.

How can I learn more about the COVID-19 ETS?

Visit OSHA’s COVID-19 rulemaking webpage at www.osha.gov/coronavirus/ets.

This Fact Sheet is intended to provide information about the COVID-19 Emergency Temporary Standard. The Occupational Safety and Health Act requires employers to comply with safety and health standards promulgated by OSHA or by a state with an OSHA-approved state plan. However, this Fact Sheet is not itself a standard or regulation, and it creates no new legal obligations.