UPDATE on FDA and CDC positions on crisis standards for N95 respirators

Due to constant pressure from nurses and National Nurses United’s (NNU) advocacy, the Food and Drug Administration (FDA) encouraged health care facilities in mid-April 2021 to stop reusing decontaminated disposable respirators and the Centers for Disease Control and Prevention (CDC) updated its guidance on crisis standards for N95 respirators, recognizing the increased availability of personal protective equipment (PPE). Here are the details.

The FDA released a letter on April 9, 2021, to health care facilities and personnel “encouraging” them to move away from using decontaminated disposable respirators. This is an important step in the right direction. Last year, NNU evaluated the available evidence on decontamination methods and determined that no method is both safe and effective. Nurses held numerous protests against using so-called decontaminated or reprocessed N95s and forced their employers to stop using them. Now, the FDA is listening, too.

THE FDA NOW RECOMMENDS THAT HEALTH CARE PERSONNEL AND FACILITIES:

- Transition away from a crisis capacity strategy for respirators, including decontamination of N95s.
- Limit decontamination of disposable respirators, which should only be used when PPE is insufficient and new N95s are unavailable.
- Increase inventory of available NIOSH-approved respirators (N95s, elastomeric respirators, and powered air-purifying respirators (PAPRs)).
- Use a new respirator before decontaminating a disposable respirator.

THE NEXT STEP is for the FDA to revoke its emergency use authorizations and end all use of decontamination systems for N95s.

The CDC updated its guidance on the “optimization” of N95 respirators (crisis standards) on April 9, and clearly states, “Once personal protective equipment (PPE) supplies and availability return to normal, healthcare facilities should promptly resume conventional practices. The supply and availability of NIOSH-approved respirators have increased significantly over the last several months.” That means that all health care facilities should immediately end crisis strategies and return to the pre-pandemic standard of single use of N95 respirators.

THE UPDATED CDC GUIDANCE ON CRISIS STANDARDS FOR N95 RESPIRATORS ALSO INCLUDED:

- Removal of decontamination of N95s from the CDC’s list of crisis standards for N95s.
- Additional language on the use of N95 respirators with exhalation valves: The CDC finally recognized research from the National Institute for Occupational Safety and Health (NIOSH) that found that, even without covering the valve, N95s with exhalation valves perform the same or better than surgical masks, procedure masks, cloth masks, or fabric coverings. For nurses who purchased their own elastomeric (P-100) or other respirators when their employers failed to protect them, this is a victory.
- More specific guidance about extended use that says to immediately discard N95 respirators after they are taken off, such as for a meal break.

THE NEXT STEP is for the CDC to fully recognize aerosol transmission of this virus, strengthen its Covid guidance for health care and other workplaces, and revoke all crisis standards for N95s and other PPE.

WHEN NURSES FIGHT TOGETHER, WE WIN!

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