er to design carefully research studies to answer these important questions. Studies should be performed on large numbers of workers with different job descriptions to determine the validity, reliability, and outcome of fit testing using N-95 and other respirators. Comparing time, cost, and outcome of functional quick fit testing, fit checking, and education alone with traditional fit testing would be useful. Determining the necessity or benefit of medical screening prior to fit testing would be useful as well. If carefully designed studies show substantial validity and benefit of fit testing, then it is much easier to justify the substantial resource involved. However, if the data show no benefit, NIOSH and OSHA should not mandate these components in all respiratory protection programs. For these studies to take place, funding should be made available to determine the validity, consistency, and outcome of fit testing with N-95 respirators in healthcare settings. The goal of such research studies would be to answer these questions systematically and to contribute to improving the occupational health and safety of healthcare workers.

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Repeat Fit Testing Not Routinely Required

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As noted recently in the SHEA Newsletter (volume 6, number 2, Summer 1996), OSHA has clarified that fit testing of respirators for protection from tuberculosis need not be repeated routinely (eg, annually). In an October 1992 letter responding to an inquiry, Roger A. Clark, Acting Director, OSHA Directorate of

Compliance Programs, wrote, "You ask how often the fit test indicated at 29 CFR 1910.134 (e) (5) (i) must be provided for employees who wear a negative-pressure, air-purifying respirator. Fit testing must be repeated whenever respirator design or facial changes occur that could affect the proper fit of the respirator. Please bear in mind that the OSHA standards for asbestos, arsenic, lead, and

acrylonitrile require that respirators be fit tested at least semiannually, and the standards for benzene and formaldehyde require that respirators be fit tested at least annually."

Thus, repeat fit testing is required only in the event of a change in the respirator or a change in the employee (injury, surgery, major weight change, etc) that could affect respirator fit.