N95 Interim Guidance: NYSDOH Position Statement

- 1. DOH has a number of concerns about CDC's interim guidance on N95 respirator use by healthcare workers during a pandemic, including the lack of a solid evidence base for the recommendations, the possible adverse impact that focusing on respiratory protection will detract from other, more important infection control measures, and the difficulties with stockpiling sufficient N95 respirators and fit testing all staff who would use them.
 - As with other aspects of federal pandemic influenza recommendations with which DOH is not in complete agreement (i.e. current antiviral and vaccine prioritization schemes), DOH will incorporate this interim guidance into the state pandemic planning effort but will continue to raise these concerns to the federal government to influence subsequent updates of the federal guidance.
 - We recognize that the guidance is labeled as "interim" and thus may change, particularly if epidemiological data from a true pandemic becomes available showing use of N95 respirators is not necessary.
 - We are asking hospitals to relay their specific concerns regarding the guidance to the Department, and we will raise them with CDC.
- 2. It is important for healthcare providers to have NIOSH-approved N95 respirators available for all employees who will be working in high risk situations—such as performing intubation on a suspected or confirmed pandemic flu patient—and surgical masks for all others involved in direct care of a pandemic flu patient.
 - This approach protects those who would be at highest risk, while recognizing that there are limitations to the supply of N95 respirators and their optimal use.
 - It would be impossible for manufacturers to provide enough N95 respirators for ALL healthcare workers included in the interim guidance unless the respirators are purchased in advance and stockpiled.
 - We are continuing to advise hospitals to have at least at three-day supply of N95 respirators readily available for use in a variety of emergency situations.
 - DOH will press the federal government for guidance and resources for stockpiling N95 respirators, recognizing that if N95 respirators are purchased before a pandemic is imminent, few, if any, hospitals would have a place to store them in the volume that would be required—aside from the cost issues involved.
 - We do have an emergency supply of N95 respirators available in the state's Medical Emergency Response Cache (MERC).
 - A decision on whether it is prudent for a hospital or the MERC to stockpile more N95 respirators depends a lot on how many N95 respirators would be available from the Strategic National Stockpile; however federal officials have not provided this information following issuance of the CDC interim guidance.

- 3. Neither N95 respirators nor surgical masks provide complete protection against infection from the influenza virus.
 - Healthcare workers must be thoroughly educated on the benefits and limitations of N95 respirators and surgical masks and how to use them most effectively.
 - Special care needs to be taken that N95 respirator use does not result in individuals becoming lax about other infection control issues.
 - The interim guidance begs the question of why N95 respirators are not recommended for protection against seasonal flu if they are believed to be the prudent choice, resulting in an inconsistent message to healthcare workers and an inaccurate public perception of the risk of exposure.