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November 1, 2025

Submitted via Regulations.gov

David Keeling

Assistant Secretary of Labor for the Occupational Safety and Health Administration  
United States Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

***RE: OSHA-2025-0006; Amending the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators***

Dear Assistant Secretary Keeling:

We are writing on behalf of the 3 million members of the National Education Association (NEA) and the 50 million students we serve. We welcome the opportunity to provide comments on OSHA's proposal to amend the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators. **The NEA strongly opposes the proposal to change the requirement for the medical evaluation of workers who use filtering face mask respirators (FFRs) or loose-fitting powered air-purifying respirators (PAPRs).**

NEA, the largest labor union in the country, represents members who work in and around 100,000 public school buildings. Our members include teachers, paraprofessionals, nurses, bus drivers, security staff, mechanics, custodians, food service workers, HVAC technicians, office professionals, and many other types of educators. The majority of NEA's members work in public schools and institutions of higher education in states with OSHA plans that cover state and local government employees. Our members also include educators working in private K-12 and higher education institutions, who are directly covered by the OSH Act and other public-sector employees. We are deeply committed to the health and safety of our members, the

students they serve, and the communities in which they live and work. We respectfully urge OSHA to consider our recommendations when finalizing the proposed amendment.

School nurses, healthcare professionals, custodians, and woodworking teachers are examples of educators who use respirators in schools and higher education. The use of FFRs is part of a broader set of control measures implemented to reduce exposure to inhalation hazards. Medical evaluations, fit testing, and training are essential components of OSHA's Respiratory Protection Program (RPP). According to OSHA's Respiratory Protection Standard, all workers must undergo medical clearance before using respirators.<sup>1</sup> Medical evaluation is a well-established practice in which a physician or other licensed health care professional makes a medical determination as to whether a worker can safely wear a respirator.<sup>2</sup> This vital step assesses the worker's ability to tolerate breathing through a potential additional airflow resistance imposed by the filter and respirator. While a relatively modest increase, such an increase in resistance may not be tolerated by workers with cardiopulmonary disease or other health conditions.

We agree with the American College of Occupational and Environmental Medicine's position (Comment ID: OSHA-2025-0006-0287) that any amendment should be supported by the presence, not the absence, of published evidence.<sup>3</sup> Eliminating important health and safety protections because epidemiologic data on adverse outcomes are not available can lead to harm.

OSHA's proposed amendment would not align with the National Institute for Occupational Safety and Health (NIOSH)'s current recommendations.<sup>4</sup> In 1970, the Occupational Safety and Health Act established NIOSH to be a supportive technical resource for OSHA's rulemaking. OSHA should rely on NIOSH's research and guidance on respirator use. The National Personal Protective Technology Laboratory at NIOSH carries out research, testing, and postmarked activities specific to respirator protection and other personal protective equipment.<sup>5</sup> When it comes to personal protective equipment research, NIOSH is a leader in the industry. Additionally, other health and safety organizations, such as the American National Standards Institute, which publishes non-regulatory standards, have adopted the well-established practice of medical evaluation.<sup>6</sup>

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<sup>1</sup> Occupational Safety and Health Administration, "Respiratory Protection Standard," Retrieved from:

<https://www.osha.gov/lawsregs/regulations/standardnumber/1910/1910.134>

<sup>2</sup> The University of Maryland, Baltimore, "Implementation Guided to Support Use of Elastomeric Half Mask Respirators in Healthcare," (February 3, 2021). Retrieved from <https://archive.hshsl.umaryland.edu/server/api/core/bitstreams/136907b8-142e-4232-83a8-2505ef6a0c7f/content>

<sup>3</sup> See American College of Occupational and Environmental Medicine rulemaking comments (ID: OSHA-2025-0006-0287) Retrieved from: <https://www.regulations.gov/comment/OSHA-2025-0006-0287>

<sup>4</sup> National Institute for Occupational Safety and Health, "Respirator Types and Use," (March 4, 2025). Retrieved from: <https://www.cdc.gov/niosh/ppe/respirators/index.html>

<sup>5</sup> National Institute for Occupational Safety and Health, "About National Personal Protective Technology Laboratory," (January 17, 2025). Retrieved from <https://www.cdc.gov/niosh/divisions-offices/personal-protective-tech-lab.html>

<sup>6</sup> American National Standards Institute, "ANSI Z88.6-2006, Respirator Use-Physical Qualifications for Personnel (reference 2)," (2006). Retrieved from [https://webstore.ansi.org/preview-pages/AIHA/preview\\_ansi-z88-6.pdf](https://webstore.ansi.org/preview-pages/AIHA/preview_ansi-z88-6.pdf)

Workers across the country need a strong, comprehensive respiratory protection standard that includes medical evaluations. NIOSH estimates that approximately five million workers in the United States use respirators.<sup>7</sup> This amendment would jeopardize the lives and health of those workers.

The 3 million members of the National Education Association oppose OSHA's Amendment to the Medical Evaluation Requirements in the Respiratory Protection Standard for Certain Types of Respirators. Please do not hesitate to contact Eunice Salcedo at [esalcedo@nea.org](mailto:esalcedo@nea.org) should you have any questions. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Daaiyah Bilal-Threats". The signature is written in a cursive style with a long horizontal line extending to the right.

Daaiyah Bilal-Threats  
Senior Director, Education Policy and Implementation Center  
National Education Association

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<sup>7</sup> National Institute for Occupational Safety and Health, "100 Years of Respirators," (January 8, 2020). Retrieved from [https://archive.cdc.gov/www\\_cdc.gov/niosh/](https://archive.cdc.gov/www_cdc.gov/niosh/)