

**Universal Masking during the COVID-19 Pandemic**  
Baptist Health South Florida's COVID-19 PPE Utilization Task Force

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**SUMMARY & PURPOSE:**

Recognizing that healthcare facilities must be prepared for the rapid pace and dynamic characteristics of a pandemic, Baptist Health South Florida (BHSF) joins the World Health Organization (WHO), the United States Department of Health and Human Services (HHS), the Centers for Disease Control and Prevention (CDC), the State of Florida, Florida Department of Health (FDOH) and other local agencies and organizations in the development of a plan to create a seamless preparedness network. To address asymptomatic and pre-symptomatic COVID-19 transmission, CDC recommends that healthcare facilities "...implement source control for everyone entering a healthcare facility (e.g., healthcare personnel, patients, visitors), regardless of symptoms..." (April 2020). Source control involves having all occupants wear a facemask over their mouth and nose to contain their respiratory secretions, and thus reduce the dispersion of droplets from an infected or potentially infected individual. This will decrease the possibility that anyone with unrecognized COVID-19 infection will expose others.

**POLICY:**

The Occupational Safety and Health Administration (OSHA) has adopted CDC's universal masking guideline. In addition to entity-specific Infection Prevention & Control and Safety Control Plans, the use of a facemask and adhering to other required safety measures are enforceable by the following OSHA guidelines and regulations:

- Guidance on Preparing Workplaces for COVID-19 (OSHA 3990-03 2020)
- General Duty Clause (Section 5(a))
- Subpart I, Personal Protective Equipment Standard (29 CFR 1910.132)
- Respiratory Protection Standard (29 CFR 1910.134)

**DEFINITIONS:**

- Facemasks for universal masking: are loose-fitting, disposable devices that create a physical barrier between the mouth and nose of the wearer and potential contaminants in the immediate environment. However, the universal use recommended during this crisis is to prevent the wearer's oral and nasal secretions from reaching the nearby environment primarily intended to protect others from the person wearing the facemask.
- Personal facemask: a facemask not supplied by BHSF.
- Surgical masks: loose-fitting mask that are regulated by the U.S. Food and Drug Administration and may be labeled as surgical, isolation or medical procedure masks. These are often referred to as facemasks, although not all facemasks are regulated as surgical masks. Surgical masks are made in different thicknesses and with different ability to protect you from contact with liquids. These properties may also affect how easily you can breathe through the facemask and how well the surgical mask protects you.
- Respirators: a respirator (e.g., surgical N95 respirator, N99 respirator) is a protective device designed to achieve a very close facial fit and a very efficient filtration. Surgical N95 Respirators are commonly used in

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healthcare settings and are a subset of N95 Filtering Facepiece Respirators (FFRs), often referred to as N95s. Some models have exhalation valves that can make breathing out easier and help reduce heat build-up. Note that respirators with exhalation valves (i.e., N99 respirators) should not be used when sterile conditions are needed.

This policy addresses the use of facemasks during the COVID-19 pandemic for source control; it does not address the expectations related to the required use of a medical/surgical mask or a respirator while providing care to a COVID-19 patient. The need for personal protective equipment, to include surgical/ medical mask or a respirator (i.e., N95 respirator), should be assessed and based on the care provided and potential exposure risk. All BHSF entities and departments shall review and determine the actions that each area must take in order to implement universal masking and related safety measures. It is the responsibility of each entity's senior leadership to ensure that each leader, medical staff members, and staff members understands what is expected of them.

## **PROCEDURES TO ENSURE COMPLIANCE:**

All individuals, to include visitors, employees, medical staff, volunteer, students and vendors must be screened for symptoms of COVID-19 when entering a BHSF building.

### **Universal masking during community-wide transmission of COVID-19.**

- a. All individuals, to include visitors, employees, medical staff, volunteer, students and vendors must wear a BHSF-supplied facemask when entering a BHSF building.
- b. According to CDC Guidelines, a child age 2 and under, and anyone who has trouble breathing or is unconscious, incapacitated or otherwise unable to remove the face cover should not wear a mask.
- c. The following actions shall take place if the individual declines to wear a BHSF-supplied facemask:
  - i. Visitors and vendors: the individual will be denied entry.
  - ii. Employee, medical staff, volunteer, and student: the individual will be denied entry and referred to contact their leader, Medical Staff, Occupational Health or Human Resources.
  - iii. Accommodations: If an employee cannot wear a mask due to a medical or other restriction, the individual must contact the Occupational Health Office to request an accommodation.
- d. If the individual is seeking medical care and is unable to wear a BHSF-supplied facemask (per section b), the entity clinical team will determine if wearing a mask is clinically inappropriate. If the care team so determines, the individual should not be required to wear a mask, and alternative infection control measures should be implemented and enforced.
- e. Because we cannot guarantee the safety of a personal facemask, and ultimately cannot guarantee that nearby individuals are being properly protected from the visitor wearing a personal mask or face covering, all individuals, to include visitors, employees, medical staff, volunteer, students and vendors must wear the BHSF-provided facemask while inside our facilities.
- f. The use of a facemask over a respirator is not a NIOSH-approved configuration and such practice voids the approval of the respirator in accordance with OSHA's Respiratory Protection Standard. In addition, the use of a facemask over a personal mask/ face covering is not allowed as both practices place a strain on the user, and the detrimental physiological and psychological burdens normally imposed by wearing a facemask or a respirator could be magnified by the addition of an extra layer (i.e., mask).

### **Patients.**

- a. In-Room Use. A patient may remove their facemask when in the patient's room and alone. A patient will wear their mask when any occupant, including family members, employee, and medical staff, is inside the room.
- b. Outside the room and sleeping. The patient will wear a facemask before leaving the room. A patient should wear a facemask during any transport. Patients should not wear a mask when sleeping, whether hospital staff are present or not.

Exceptions: In the interest of necessary patient care, the CMO, CNO or their delegate may authorize exceptions to the requirements of this policy. Any such exceptions should be infrequent and as limited as possible.

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## **SUPPORTING/REFERENCE DOCUMENTATION:**

- Center for Disease Control / U.S. Department of Health & Human Services  
<https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/index.html>
- Florida Department of Health  
<https://floridahealthcovid19.gov/>
- Florida Agency for Health Care Administration  
[https://ahca.myflorida.com/docs/Novel\\_Coronavirus\\_Update\\_for\\_Health\\_Care\\_Facilities\\_and\\_Providers.pdf](https://ahca.myflorida.com/docs/Novel_Coronavirus_Update_for_Health_Care_Facilities_and_Providers.pdf)
- World Health Organization (WHO)  
<https://www.who.int/emergencies/diseases/novel-coronavirus-2019>
- Occupational Safety and Health Administration (OSHA)  
<https://www.osha.gov/SLTC/covid-19/>  
<https://www.osha.gov/Publications/OSHA3990.pdf>  
<https://www.osha.gov/laws-regs/oshact/section5-duties>  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.132>  
<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>
- U.S. Food and Drug Administration (FDA)  
<https://www.fda.gov/emergency-preparedness-and-response/mcm-issues/coronavirus-disease-2019-covid-19>

## **RELATED POLICIES, PROCEDURES, AND ASSOCIATED FORMS:**

- BHSF-690.16 Respiratory Protection Program
- BHSF-10000-66490-40 Baptist Health South Florida Pandemic Preparedness Plan
- Entity-specific Infection Prevention & Control and Safety Control Plans

## **ENFORCEMENT & SANCTIONS:**

Violations of this policy may be referred to the appropriate HR management level. See HR policies 5250 and 5300 for applicable sanctions. Those violations determined by the Chief Information Security Officer (CISO) to infringe on privacy policies will be referred to the Chief Privacy Officer (CPO) for further investigation as appropriate.