1 Assessing the quality of nontraditional N95 filtering face-piece respirators available during the 2 COVID-19 pandemic

- 2 COVID-19 pandemic
- 3 Deborah Plana^{1,2,3*}, Enze Tian^{1,4,5*}, Avilash K. Cramer^{1,2*}, Helen Yang^{1,6*}, Mary M. Carmack^{1,6,7}, Michael
- 4 S. Sinha^{1,6}, Florence T. Bourgeois^{1,6,7}, Sherry H. Yu^{1,8}, Peter Masse^{1,9}, Jon Boyer^{1,9}, Minjune Kim⁵, Jinhan
- 5 Mo⁴, Nicole R. LeBoeuf^{1,10,†}, Ju Li^{1,5,†}, Peter K. Sorger^{1,3,6,†}
- ¹ Greater Boston Pandemic Fabrication Team (PanFab) c/o Harvard-MIT Center for Regulatory Science,
 Harvard Medical School, Boston, MA, USA
- 8 ² Harvard-MIT Division of Health Sciences & Technology, Cambridge, MA, USA
- ³ Harvard Ludwig Cancer Research Center and Department of Systems Biology, Harvard Medical School,
 Boston, MA, USA
- ⁴ Beijing Key Laboratory of Indoor Air Quality Evaluation and Control, Department of Building Science,
 Tsinghua University, Beijing, China
- ⁵ Department of Nuclear Science and Engineering and Department of Materials Science and Engineering,
- 14 MIT, Cambridge, MA, USA
- ⁶ Harvard-MIT Center for Regulatory Science, Harvard Medical School, Boston, MA, USA
- 16 ⁷Computational Health Informatics Program, Boston Children's Hospital, Boston, MA, USA
- 17 ⁸ Department of Dermatology, Yale University School of Medicine, New Haven, CT USA
- 18 ⁹ Environmental Affairs, Brigham & Women's Hospital, Boston, MA, USA
- ¹⁰ Department of Dermatology, Center for Cutaneous Oncology, Brigham and Women's Hospital; Dana-
- 20 Farber Cancer Institute, Boston, MA, USA
- 21
- 22 ^{*}These authors contributed equally to this work
- 23 [†]Co-corresponding authors. E-mails: nleboeuf@bwh.harvard.edu; liju@mit.edu;
- 24 peter_sorger@hms.harvard.edu cc: Maureen_Bergeron@hms.harvard.edu;
- 25
- 26 ORCID IDs:
- 27 Deborah Plana, 0000-0002-4218-1693
- 28 Enze Tian, 0000-0001-6410-5360
- 29 Avilash Cramer, 0000-0003-0014-8921
- 30 Mary Carmack, 0000-0003-4546-790X
- 31 Michael S. Sinha, MD, JD, MPH, 0000-0002-9165-8611
- 32 Florence T. Bourgeois, MD, MPH 0000-0001-7798-4560
- 33 Sherry H. Yu, MD, 0000-0002-1432-9128
- 34 Nicole R. LeBoeuf, MD, MPH, 0000-0002-8264-834X
- 35 Ju Li, PhD, 0000-0002-7841-8058
- 36 Peter Sorger, PhD, 0000-0002-3364-1838
- 37
- 38
- 39

41 ABSTRACT

Background: During the current COVID-19 pandemic, supply chains for Personal Protective Equipment 42 (PPE) have been severely disrupted and many products, particularly surgical N95 filtering facepiece 43 respirators (FFRs; "masks") are in short supply. As a consequence, an Emergency Use Authorization (EUA) 44 from the FDA has allowed importation of N95-type masks manufactured to international standards; these 45 46 include KN95 masks from China and FFP2 masks from the European Union. 47 **Methods:** We conducted a survey of mask in the inventory of major academic medical centers in Boston, 48 MA to determine provenance and manufacturer. We then assembled a simple apparatus for performing a 49 necessary (but not sufficient) test of filtration performance and tested masks from the inventory; an accompanying website shows how to build and use the testing apparatus. 50 51 **Results:** Our survey showed that, seven months after the start of the COVID-19 pandemic, over 100 52 different makes and models of N95-type masks are in the inventory of local hospitals as opposed to 2-5 models under normal circumstances. A substantial number of unfamiliar masks are from unknown 53 54 manufacturers. Many did not perform to accepted standards and are likely to be counterfeit. Due to the absence of publicly available information on mask suppliers in the FDA EUA and confusing or inconsistent 55 labeling of KN95 masks, it is difficult to distinguish legitimate and counterfeit products. 56 57 **Conclusions:** Many of the FFR masks available for procurement during the COVID-19 pandemic do not provide levels of fit and filtration similar to those of N95 masks and are not acceptable for use in healthcare 58 settings. Based on these results, and in consultation with occupational health officers, we make six 59 60 recommendations for end users to assist in acquiring legitimate products. In particular, institutions should 61 always assess masks from non-traditional supply chains by checking their markings and manufacturer 62 information against data provided by NIOSH and the latest FDA EUA Appendix A. In the absence of 63 verifiable information on the legitimacy of mask source, institutions should consider measuring mask fit and filtration directly. We also make suggestions for U.S and Chinese regulatory agencies with regard to 64 65 labeling and public disclosure aimed at increase pandemic resilience.

Keywords: N95, KN95, FFR (filtering facepiece respirator), PPE (personal protective equipment), COVID19, filtration testing, NIOSH, FDA EUA (Emergency Use Authorization), occupational health, regulatory
science

69

70 BACKGROUND

71 Filtering facepiece respirators (FFRs) such as N95 masks are the primary mode of respiratory 72 protection for healthcare workers treating infectious agents that are airborne or transmissible via aerosols 73 (1). As a result of the COVID-19 pandemic, demand for N95 masks and other personal protective 74 equipment (PPE) has greatly outstripped supply, leading to widespread and persistent shortages. In the US, 75 surgical N95 FFRs used in healthcare are regulated by the National Institute for Occupational Safety and 76 Health (NIOSH), a part of the Centers for Disease Control and Prevention (CDC), and by the Food and 77 Drug Administration (FDA) as described in US Code of Federal Regulations 42 CFR part 84 (2). Similar 78 standards and enforcement mechanisms exist in other industrialized countries (3). Some FFRs with the 79 filtering properties of healthcare N95 masks, including industrial N95 masks and elastomeric respirators, 80 commonly have exhalation valves; such devices are traditionally not permitted for use healthcare settings 81 because air exhaled through the valve is unfiltered, precluding the maintenance of a sterile field (4). 82 Unfiltered exhalation through valves is also a possible avenue of disease transmission.

83 Very high demand for N95 respirators, coupled with disruption of medical supply chains, has led to 84 a severe shortage of respiratory protection for healthcare workers during the 2020 COVID-19 pandemic (5). 85 In February 2020, the FDA issued the first in a series of Emergency Use Authorizations (EUAs) relaxing regulations on N95 masks to help increase supply (6). These EUAs permitted the use in U.S. healthcare 86 settings of masks manufactured for industrial use as well as of non-NIOSH approved masks meeting foreign 87 88 standards functionally equivalent to those for N95 masks. As described in the EUAs "Authorized Imported, Non-NIOSH Disposable Filtering Facepiece Respirators" and "Non-NIOSH Approved Disposable Filtering 89 Facepiece Respirators Manufactured in China" authorized masks include KN95 masks manufactured in 90

91 China to the GB2626-2006 standard (7), FFP2 masks manufactured to European standard EN 149:2001, and 92 masks manufactured in Australia, Brazil, Japan, Korea, and Mexico to other trusted performance standards (we refer to these collectively as N95-type masks) (8). As a practical matter, however, masks from China 93 94 are the most common of these masks, reflecting China's role as a leading producer of medical supplies. 95 Manufacturing N95-equivalent masks requires special fabrics and careful quality control and such 96 masks must exhibit three essential functional properties: 1) the ability to filter out small particles (in the case 97 of N95s, 95% of particles of the most penetrating aerosol size tested – typically down to 0.3 μ m diameter); 98 2) a tight fit to the face so that inhaled air is directed through the filter fabric and not around the side of the 99 mask; and 3) low inhalation resistance so that a user does not experience difficulty breathing. Unfortunately 100 data from the CDC (9) and other groups (10) has shown that, subsequent to the EUA permitting their use in 101 US healthcare, some respirators manufactured overseas and labeled as N95, FFP2, or KN95 fail to perform 102 as expected for filtration and fit. While this might be a consequence of manufacturing defects, it appears 103 more likely that many of these non-performing respirators are counterfeit or claim adherence to standards that they never intended to meet (11). While a number of Chinese-brand respirators have performed well in 104 105 quality testing, both unfamiliar products and counterfeits of known Chinese brands have been found in the 106 US supply. Unfortunately, fraudulent packaging poor labelling practices can make it difficult to determine if 107 a given respirator is genuine or not.

108 The first version of the FDA EUA on "Non-NIOSH Approved Disposable Filtering Facepiece 109 Respirators Manufactured in China" (February 2020) included a list of authorized respirators and vendors in 110 "Appendix A," but no testing data was required from purported manufacturers to corroborate performance 111 claims. As described below, it is hard to even identify the business addresses or websites of many of 112 suppliers on Appendix A. Subsequent to the FDA EUA, the CDC noted a dramatic increase in counterfeit 113 respirators with labeling that misrepresented such products as having been approved to NIOSH or 114 equivalent foreign agencies (11). The CDC therefore began a program of performance testing and on May 7, 115 2020 the FDA substantially shortened Appendix A based on data demonstrating widespread inadequacies in

116 filtration efficiency (12). The CDC continues to evaluate masks and to post photographs of the mask

packaging for known counterfeit products, while the FDA continues to refine Appendix A. The most recent
version Appendix A (issued on June 9, 2020) includes 144 FFR models from 86 manufacturers, down from
148 models and 68 manufacturers on July 13, 2020 (13).

120 In this paper we consider the problem of non-traditional N95-type masks from the perspective of an 121 end user involved in healthcare, specifically large teaching hospitals affiliated with Harvard Medical School 122 (HMS). For these users, one consequence of supply chain disruption and the initially permissive FDA EUA 123 is that a large number of unfamiliar models of N95-type masks have become available (14), some of which 124 come through irregular supply chains (14) or are donated and have unclear provenance. In a healthcare 125 setting, fit testing masks on individual users is standard (e.g. using the 3M FT-30 qualitative fit test kit) (15), 126 but hospitals are rarely if ever equipped to measure filtration efficiency (14). Such testing is usually 127 performed by manufacturers either in-house or by commercial pre-certification laboratories on behalf of manufacturers. In the absence of such capabilities, end users are forced to evaluate masks from dozens of 128 129 unknown manufacturers based on little or no information. In this paper, we attempt to assess the impact of 130 these issues.

131 We inventoried masks on hand at HMS hospitals; attempted to match vendors and models to 132 information in the FDA EUA Appendix A, and selected a subset for performance testing. We describe a 133 simple filtration testing instrument assembled from commonly available components that can be used to 134 determine if a mask is likely to meet performance standards: the instrument does not guarantee performance 135 to N95-type standards but no legitimate mask should fail to exhibit at least 95% filtration efficiency using 136 the apparatus we describe. We demonstrate multiple labeling and performance problems with non-137 traditional N95-style masks and formulate a set of recommendations to help guide healthcare organizations 138 and other users in assessing mask donations and purchases. We also suggest ways in which the FDA and 139 CDC can improve future EUAs.

141 METHODS

142 Samples of N95-type masks 70 mm \times 70 mm in size were cut from each mask and inserted into a 143 circular acrylic air duct with an inner diameter of 50 mm (Figure 1). Either ambient particles or KCl aerosol 144 particles were driven through the respirator filter using air flow to serve as a pollutant source. KCl aerosol 145 was generated by a Collision Nebulizer (BGI Inc., USA) using 10 wt% KCl solution with the volume of free 146 air set at 1 L/min. The concentration of 0.3-10 µm particles was determined using an optical particle counter 147 (Aerotrak 9306, TSI Inc., USA). Concentrations were recorded twice at a one-minute intervals both 148 upstream and downstream of the respirator filter, and the measurements then repeated once. The single-pass 149 filtration efficiency η (d_p) of particles with a size of d_p (µm) was calculated over an 8-minute test period as 150 follows:

$$\eta \left(d_{\rm p} \right) = \left(\frac{C_{\rm up} \left(d_{\rm p} \right) - C_{\rm down} \left(d_{\rm p} \right)}{C_{\rm up} \left(d_{\rm p} \right)} \right) \times 100\%$$

151

where C_{up} and C_{down} are the average particle counts (pcs) upstream and downstream of the filter,

respectively. The pressure drop across the filter was measured by using a differential gauge. The air temperature was nominally $T = 24 \pm 1$ °C and relative humidity $30 \pm 20\%$; these values were not controlled but were measured along with air face velocity (which was typically in the range of 0.1 to 0.3 m/s) using a mini thermo-anemometer located at the air duct exhaust. Further information about the construction and use of this filter-testing instrument can be found at http://cleanmask.org.

158

159 **RESULTS**

160 Qualitative examination of mask labeling helps identify legitimate respirators

161 To assess the diversity of the mask supply available for use during the COVID-19 pandemic, we 162 inventoried models and makes of respirators, many donated, from HMS-affiliated medical centers in

163 Boston, MA. We identified over 100 brands and models in the inventory. In contrast under, standard non-

164 emergency conditions only two masks models, both from a traditional domestic manufacturer and provided

165 via a familiar supply chain, would normally be in the inventory of the hospitals surveyed (Table 1). A 166 substantial number of the masks on hand originate from unknown vendors and appear to be of Chinese 167 origin (based on the writing on the box). Many lacked even basic information such as manufacturer address or website, and respirator model numbers were generally lacking (Figure 3C). In some cases visual 168 169 inspection revealed that masks in this inventory were similar in appearance or packaging to masks identified 170 as counterfeit by the CDC and posted on their website (11). Moreover, a substantial number of masks listed 171 multiple regulatory approvals from different countries. However, no mask claiming compliance to N95 172 standards should also claim compliance with KN95 or FFP2 standards because these are different, even if 173 functionally similar (e.g. Figure 3B: label #2, Supplementary Material 2). Any mask claiming multiple 174 non-identical regulatory approvals is *prima facia* counterfeit. Several masks additionally including labels 175 such as "PM 2.5" that are typically meant to denote protection from nuisance dust and air pollutants (label 176 #6, **Supplementary Material 2**). Such masks are likely fraudulently relabeled simply by stamping "N95" 177 or "KN95" on the box.

178 After excluding brands that were visibly counterfeit based on these criteria, 18 of the most 179 commonly donated mask models from the inventory were selected for further study. These masks had 180 identifiable manufacturer markings and included two FFP2, nine KN95, and eight N95 respirators. In 181 addition to the nine KN95 masks with markings, six unmarked KN95 masks that had been provided in bulk 182 were selected for further investigation. N95 masks meeting NIOSH standards must have TC-approval 183 numbers (11) printed on the mask and must be listed on the NIOSH Certified Equipment List (CEL) (16) or 184 the NIOSH Trusted-Source list (17) (e.g. Figure 3A; label #24, Supplementary Material 2). NIOSH has 185 an excellent infographic illustrating the correct labeling of N95 masks that we reproduce in supplementary 186 materials for convenience (Supplementary Material 1). These CEL and Trusted-Source lists pre-date the 187 COVID-19 pandemic and contain information on FFRs that would normally be available through traditional 188 healthcare supply chains; several are manufactured in China. All eight N95 mask models evaluated had 189 valid TC numbers and information could easily be obtained on them by searching the manufacturers'

190 websites. This is not necessarily a sufficient test for legitimacy because the CDC has reported that some

191 counterfeiters steal TC- numbers from legitimate suppliers (11).

192 Masks claiming compliance with KN95 and FFR2 standards were cross-referenced with the FDA 193 Appendix A list (13) and assessed for a valid business website associated with the brand. Neither of the 194 FFP2 masks in our inventory are presently listed on Appendix A of the FDA EUA (13) (Table 1). Data on 195 3M K112 is readily available (18) and appears to be widely distributed in Europe but we found no reliable 196 information on the Guangzhou Kangly 9501 model (labels #1 and #2 respectively, Supplementary 197 Material 2). Nine of the KN95 masks tested had markings on their surface or packaging and six were 198 completely unmarked. Of the nine marked KN95 masks studied in detail, two were listed on Appendix A 199 initially but one (Jinan VHOLD Co. VH95, label #7, Supplementary Material 2) was removed as of July 200 13, 2020 leaving only aRUN Industrial Co. N9 (Label #4); seven could not be matched to any brand or 201 model on Appendix A based on information on the packaging or the mask itself (Table 1; labels #3 and 5, 6 and 8-11). Six additional KN95 mask types were completely unmarked and could therefore not be checked 202 203 against Appendix A or a manufacturer's website (Figure 3C; Labels #12-17, Supplementary Material 2).

204

205 Testing mask performance

We subjected the masks described above to filtration performance testing at a university laboratory 206 207 (Figure 2). Testing was performed on both ambient particulate matter and aerosolized potassium chloride (KCl) in the size range 0.3 to 10 µm, a relevant range for N95 FFRs. Passing this test is not sufficient to 208 209 establish conformity with NIOSH, EN149 or GB2626 standards since all three involve a range of tests for 210 multiple performance characteristics under carefully controlled conditions (3). However, we have found that 211 results obtained using our testing system conform well to tests performed at a commercial pre-certification 212 laboratory to NIOSH standards (see http://cleanmask.org/procedures for further details). Our testing 213 revealed that all N95 masks and a subset of KN95 masks performed as expected in that they repeatedly 214 removed >95% of particles down to 0.3 um. However, a substantial number of KN95 models, both marked

215 and unmarked, failed testing and one unmarked mask released more particles than were present at the input 216 of the testing apparatus, which presents *negative* filtration performance (Figure 2; Supplementary 217 **Material 3**). The single KN95 mask tested that is still listed on Appendix A exhibited greater than 95% 218 filtration efficiency (aRUN Industrial Co. N9) whereas one mask model formerly on the FDA EUA 219 Appendix A demonstrated less than 95% filtration efficiency (Jinan VHOLD Co., LTD Model VH95). 220 These data confirm results from other sources, including the CDC (11) that poorly performing masks make 221 up a substantial portion of the inventory of non-domestic N95 type masks available in major academic 222 medical centers in the US. Fortunately, as of writing, none of the mask models analyzed in this paper saw 223 use in clinical practice and they are currently being stored for potential emergency use. 224 Fit is a critical feature of N95-equivalent masks and is typically evaluated by end users using OSHA-225 regulated fit tests. It has been observed that KN95 masks with ear loops instead of headband straps often fail 226 fit testing and this is a factor that must be considered when choosing a product (7,11,19). We have recently 227 described devices for improving the fit of such masks using secondary mask frames (20). We observed that 228 some masks labelled KN95 (a subset of the unmarked KN95s in **Figure 2**) have thin perforations and may 229 also have embossed 'KN95' lettering that exposes the thin filter layer. This makes the masks particularly 230 fragile and subject to ripping when donned. Such masks should probably be avoided.

231

232 **DISCUSSION**

233A growing number of investigators and Federal agencies have reported that many N95-equivalent234masks manufactured overseas whose distribution in the US became possible due to recent FDA EUAs do235not perform to relevant US and international standards (11). Our data show that, several months into the236COVID-19 pandemic, these under-performing masks made up a substantial portion of the donated inventory237at major medical centers in the US (Figure 2). Our performance testing, although limited in scope, suggests238that some masks perform very poorly, removing only 8% - 80% of 0.3 μm particles; alarmingly, at least one239mask added particulate matter to the airstream and therefore had negative efficiency. In many cases these

240	masks claim compliance with multiple non-identical regulatory standards and they are clearly counterfeits.
241	Remarkably, several models of KN95 that passed preliminary performance testing had little or no
242	identifying markings, or had labelling that was inconsistent with listings in FDA EUA Appendix A: even
243	legitimate KN95 masks lack vendor-specific information similar to the TC numbers required by NIOSH on
244	all N95 masks. We devoted substantial effort to tracking down information on these KN95 masks but in
245	many cases could not find corresponding manufacturers, distributors or informational websites. We
246	conclude that is impossible in many cases to determine whether a KN95 mask is legitimate or not based on
247	the label or packaging. Unfortunately, this would appear to be an ideal setting for counterfeiters.
248	
249	Recommendations for end users
250	Based on the current study, and in consultation with environmental and occupational health offices
251	at three different hospitals, we propose the following guidelines for sourcing N95-equivalent masks:
252	1. Use trusted supply chains. Whenever possible, use trusted supply chains to provide products and
253	ask for the technical datasheets or certification documents for a specific brand and model. These
254	documents should not contain obvious spelling or grammatical errors. For all N95 and FFP2 that
255	passed testing, these materials could easily be located on manufacturer websites.
256	2. For FFRs claiming N95 certification, check for active and correct TC numbers on the <u>NIOSH</u>
257	Certified Equipment List (CEL) or the NIOSH Trusted-Source. Check that the TC number matches
258	the style and manufacturer of the mask. Check that all other information matches NIOSH
259	requirements (see infographic in Supplementary Figure 1).
260	3. Check for similarity to a fraudulent product on the <u>NIOSH Web site</u> . We recommend sending
261	pictures of products falsely labelled as "N95" to the CDC so the agency can expand its on-line
262	gallery and assist others in identifying products that should not be used under any circumstances.
263	Even seemingly high-quality packaging can hide a nonfunctional product.

264	4.	For FFRs claiming compliance to a non-US standard (e.g. KN95s, FFP2s), check if masks are on
265		the FDA Appendix A or Exhibit 1 lists of respirators authorized for importation under EUA. Also
266		check the <u>CDC Assessment Results for Not NIOSH-approved respirators</u> for filtration performance.
267		If the mask is not on the list, it can be submitted for testing on the CDC International Respirator
268		Assessment Request page.
269	5.	Check for inconsistent markings. No FFP2/3, KN95, DS/DL, P2/3, or PFF product should bear a
270		NIOSH stamp since NIOSH only certifies the US N95 standard (the reciprocal is also true).
271		Additionally, fraudulent products often carry multiple labels (KN95, N95, FFP2). A list of different
272		respirator certifications by nation is available at the CDC Website:
273		https://www.cdc.gov/niosh/npptl/respirators/testing/NonNIOSH.html.
274	6.	Consider independently performing filtration testing in the absence of verifiable manufacturer
275		information for a specific mask. This can be accomplished by submitting the mask for testing to a
276		CDC or a NIOSH-approved commercial facility. Some institutions may want to consider using their
277		own testing apparatus, as described in the methods section of this paper and at <u>http://cleanmask.org</u> .
278		Fit testing should be performed on all masks used in a healthcare setting.
279		
280		For large donations of respirators from unknown suppliers, we recommend that quality assurance
281	testing	, including filtration testing, be performed before the respirators are issued to healthcare providers or

283 independent institutions, commercial pre-certification laboratories are able to provide this service at a

282

other frontline personnel. Although we recognize that such testing is difficult to perform for many

reasonable cost and turnaround time. For example, the Manufacturing Emergency Response Team ($\underline{M-ERT}$)

has <u>collaborated with a network of local testing laboratories</u> across Massachusetts in response to the

286 pandemic; their ability to provide functional testing of N95-type masks contributes to community resiliency.

287 The possibility that counterfeit masks can have negative filtration efficiency strongly suggests that masks of

unknown provenance, or masks whose manufacturer cannot be independently verified should not be used.High quality surgical masks are likely to be a safer option.

290

291 CONCLUSIONS

292 The inconsistent and at times bewildering labeling on KN95 masks makes it difficult to identify 293 manufacturers and determine if they are legitimate products. We recommend that all N95-type masks have 294 identifying information printed directly on the product that identifies their manufacturer, such as numbers 295 functionally similar to TC numbers for N95 masks. We also recommend that the FDA make public all data submitted by manufacturers listed in EUA Appendix A. All companies should be required to provide basic 296 297 operational data including name and place of business, proprietary or brand name, model number, marketing 298 authorization, a copy of the product labeling and evidence of authorization with quality management 299 systems for healthcare devices (e.g. through 21 CFR Part 820, ISO 13485 or an equivalent) (21). Any 300 legitimate company will have this information immediately available, although it may initially be provided 301 in a foreign language. Such information is readily available for standard NIOSH-approved N95 masks, and 302 this provides a template for Appendix A as well (e.g. a listing of approved surgical N95 manufacturers and 303 models that include links to legitimate corporate websites and donning instructions).

304 Since the initial EUA issuance, the FDA has twice amended information on non-NIOSH approved 305 masks, once in May and once in June, to improve supply chain oversight. Additional criteria have been 306 established for Appendix A listings including required CE marks (Conformitè Europëenne, denoting health, safety, and environmental protection standards for products sold within the European Economic Area(22)) 307 308 or NMPA certification (National Medical Products Administration, a Chinese government agency for 309 regulating pharmaceuticals, medical devices, and cosmetics (23)), to ascertain certification from a trusted 310 notified body. The FDA and CDC have also initiated a large-scale testing program to randomly sample 311 respirators imported from China and test their filtration ability, but this will be of limited use without a 312 method for end users to link information on foreign-manufactured masks with test results, such as through

use of TC and/or lot numbers. We also recommend stronger oversight of the respirator supply chain by
Federal regulatory agencies, including required performance testing of non-NIOSH approved respirators
prior to distribution, even in times of crisis. As the current pandemic evolves, generating and maintaining an
updated list of trusted alternate suppliers will leave us better prepared for current and future supply
shortages.

318

319 Limitations of this study

The testing performed in this study uses readily available equipment but is not equivalent to NIOSH-320 321 approved testing. We have collected data on a set of N95 masks exposed to various sterilization procedures 322 using the equipment described here and also using testing to NIOSH standards at a commercial laboratory 323 (ICS Laboratories, USA; equipped to perform NIOSH pre-certification testing) (24). Instantaneous filtration 324 efficiency values measured in the two tests for different masks of the same model undergoing the same 325 sterilization procedure had a correlation coefficient of 0.89 and all masks demonstrating greater than 95% 326 filtration efficiency also passed ICS tests (and vice versa; see cleanmask.org). We therefore conclude that 327 our testing procedure provides a reasonable estimate of filtration performance for N95-type masks. 328 Nonetheless, the results described here should be interpreted as relative, not absolute, measures of filtration 329 efficiency and no mask should be considered suitable for human use based on our data alone. 330

331 LIST OF ABBREVIATIONS

- 332 CDC: Centers for Disease Control and Prevention
- 333 CEL: Certified Equipment List
- 334 EUA: Emergency Use Authorization
- 335 FDA: Food and Drug Administration
- **336** FFRs: Filtering Facepiece Respirator
- 337 NIOSH: National Institute for Occupational Safety and Health

- 338 PPE: Personal Protective Equipment
- 339
- 340 **DECLARATIONS**
- 341 Ethics approval and consent to participate
- 342 Not applicable.
- 343
- 344 Consent for publication
- 345 Not applicable.
- 346
- 347 Availability of data and materials

All data generated or analyzed during this study are included in this published article and its supplementaryinformation files.

350

351 Competing interests

- PK Sorger is a member of the SAB or Board of Directors of Applied Biomath, Glencoe Software and
- 353 RareCyte Inc and has equity in these companies. In the last five years the Sorger lab has received
- research funding from Novartis and Merck. Sorger declares that none of these relationships are directly
- 355 or indirectly related to the content of this manuscript.
- NR LeBoeuf is a consultant for or has received honoraria from the following companies: Seattle
 Genetics, Sanofi and Bayer.
- J Li has consulted for L2 Infinity LLC, which imports personal protective equipment into the US.
- 359 Funding

360 Local fabricators, makers and citizens generously donated their time and resources and were essential for all

361 stages of the project. This work was also supported by the Harvard MIT Center for Regulatory Sciences and

- 362 by NIH/NCI grants U54-CA225088 (to PKS, NL and DP) and by T32-GM007753 (to DP) and by the
- 363 Harvard Ludwig Center.
- 364

365 Author Contributions

- 366 Assessing mask donations: S.H.Y., P.M., J.B.
- 367 Mask filtration testing: E.T, J.M., J.L.
- 368 Website construction: M.K.
- 369 Writing: D.P., E.T., A.K.C., H.Y., M.M.C, M.S.S., F.T.B., S.H.Y., N.R.L, J.L., P.K.S.
- 370 Greater Boston Pandemic Fabrication Team (PanFab) Consortium Coordination: D.P., H.Y., P.K.S.

371

- 372 Acknowledgements Above all we thank the members of the Greater Boston Pandemic Fabrication Team
- 373 (PanFab) for technical, administrative, and logistic support necessary for the execution of this project.
- 374 Membership found at https://www.panfab.org/the-team-and-the-project/consortium-members. Local
- 375 fabricators, makers and citizens generously donated their time and resources and were essential for all stages
- 376 of the project. This work was also supported by the Harvard MIT Center for Regulatory Sciences and by
- 377 NIH/NCI grants U54-CA225088 (to PKS, NRL and DP) and by T32-GM007753 (to DP) and by the
- 378 Harvard Ludwig Center.

379

380

382 **REFERENCES**

383

- Eninger RM, Honda T, Adhikari A, Heinonen-Tanski H, Reponen T, Grinshpun SA. FILTER
 PERFORMANCE OF N99 AND N95 FACEPIECE RESPIRATORS AGAINST VIRUSES AND
 ULTRAFINE PARTICLES. Ann Occup Hyg. 2008 Jul;52(5):385–96.
- CDC NPPTL NIOSH-Approved Particulate Filtering Facepiece Respirators [Internet]. 2020 [cited 2020 May 29]. Available from:
- 389 https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/default.html
- Comparison of FFP2, KN95, and N95 and Other Filtering Facepiece Respirator Classes. Technical Bulletin. Revision 4. [Internet]. 3M; 2020. Available from: https://multimedia.3m.com/mws/media/1791500O/comparison-ffp2-kn95-n95-filtering-facepiecerespirator-classes-tb.pdf
- 4. Ancillary Respirator Information, Healthcare FAQs | NPPTL | NIOSH | CDC [Internet]. 2020 [cited
 2020 Jul 14]. Available from:
- 396 https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/respsource3healthcare.html
- Shortage of personal protective equipment endangering health workers worldwide [Internet]. World
 Health Organization. [cited 2020 Jun 27]. Available from: https://www.who.int/news-room/detail/03 03-2020-shortage-of-personal-protective-equipment-endangering-health-workers-worldwide
- 400 6. Emergency Use Authorizations [Internet]. FDA. FDA; 2020 [cited 2020 May 9]. Available from:
 401 https://www.fda.gov/medical-devices/emergency-situations-medical-devices/emergency-use 402 authorizations
- 403 7. International Respirator Assessment Request | NPPTL | NIOSH | CDC [Internet]. 2020 [cited 2020 Jun
 404 10]. Available from: https://www.cdc.gov/niosh/npptl/respirators/testing/NonNIOSH.html

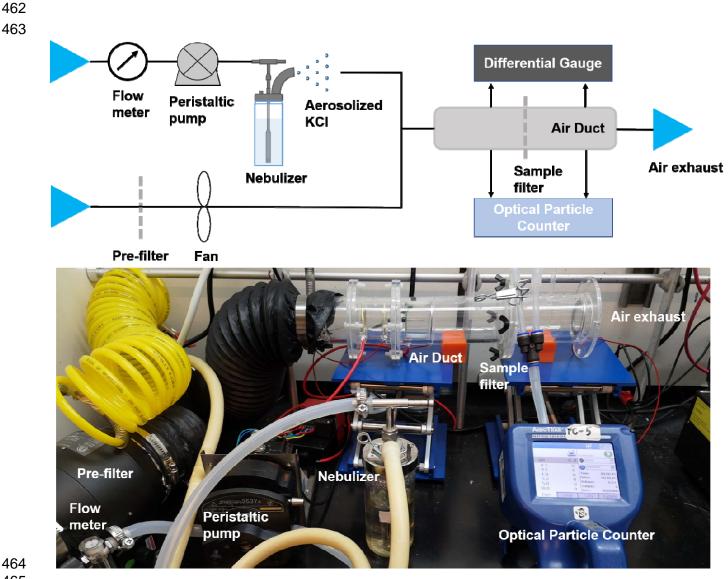
8. CEN/TC 79 - Respiratory protective devices [Internet]. CEN- European Committee on Standardization. [cited 2020 Jun 10]. Available from: https://standards.cen.eu/dyn/www/f?p=204:110:0::::FSP_PROJECT,FSP_ORG_ID:32928,6062&cs=1 FC98AD34A5EE26A0CB5A6155ED4D6E5E

- 409 9. International Assessment Results | NPPTL | NIOSH | CDC [Internet]. 2020 [cited 2020 Jun 10].
 410 Available from: https://www.cdc.gov/niosh/npptl/respirators/testing/NonNIOSHresults.html
- 411 10. Commonwealth of Massachusetts. KN95 Respirator Test Results [Internet]. Mass.gov. 2020 [cited
 412 2020 Jun 10]. Available from: https://www.mass.gov/doc/kn95-respirator-test-results
- 413 11. Counterfeit Respirators / Misrepresentation of NIOSH-Approval | NPPTL | NIOSH | CDC [Internet].
 414 2020 [cited 2020 Apr 26]. Available from:
- 415 https://www.cdc.gov/niosh/npptl/usernotices/counterfeitResp.html
- 416
 12. Denise M. Hinton. Manufacturers of Imported, Non-NIOSH-Approved Disposable Filtering Facepiece
 417 Respirators; Health Care Personnel; Hospital Purchasing Departments and Distributors; Importers and
 418 Commercial Wholesalers; and Any Other Applicable Stakeholders. [Internet]. Food and Drug
- 419 Administration; 2020. Available from: https://www.fda.gov/media/136664/download

- 420 13. Appendix A: Authorized Respirators [Internet]. FDA; 2020. Available from:
 421 https://www.fda.gov/media/136663/download
- 422 14. Artenstein AW. In Pursuit of PPE. New England Journal of Medicine. 2020 Apr 17;0(0):e46.
- 423 15. 3MTM Qualitative Fit Test Apparatus FT-30, Bitter 1 EA/Case [Internet]. [cited 2020 Jul 22]. Available
 424 from: https://www.3m.com/3M/en_US/company-us/all-3m-products/~/3M-Qualitative-Fit-Test425 Apparatus-FT-30-Bitter-1-EA-Case/?N=5002385+3294795973&rt=rud
- 426 16. Certified Equipment List | NPPTL | NIOSH | CDC [Internet]. 2020 [cited 2020 Jun 10]. Available
 427 from: https://www.cdc.gov/niosh/npptl/topics/respirators/cel/default.html
- 428 17. Respirator Trusted-Source Information | NPPTL | NIOSH | CDC [Internet]. 2020 [cited 2020 Jun 10].
 429 Available from: https://www.cdc.gov/niosh/npptl/topics/respirators/disp_part/respsource.html
- 430 18. 3MTM Disposable Respirator, FFP2, Valved, K112 [Internet]. [cited 2020 Jul 23]. Available from:
 431 https://www.3m.com/3M/en_NG/company-mea/all-3m-products/~/3M-Disposable-Respirator-FFP2432 Valved-K112/?N=5002385+3294470405&rt=rud
- 433 19. Anderegg L, Meisenhelder C, Ngooi CO, Liao L, Xiao W, Chu S, et al. A scalable method of applying
 434 heat and humidity for decontamination of N95 respirators during the COVID-19 crisis. Mukherjee A,
 435 editor. PLoS ONE. 2020 Jul 1;15(7):e0234851.
- 436 20. The "Double Eights Mask Brace" Improves the Fit and Protection and Protection of a Basic Surgical
 437 Mask Amidst Covid-19 Pandemic | medRxiv [Internet]. [cited 2020 Jul 14]. Available from:
 438 https://www.medrxiv.org/content/10.1101/2020.05.18.20099325v1
- 439 21. FAQs on the EUAs for Non-NIOSH Approved Respirators During the COVID-19 Pandemic
 440 [Internet]. FDA. FDA; 2020 [cited 2020 Jun 10]. Available from: https://www.fda.gov/medical 441 devices/emergency-situations-medical-devices/faqs-euas-non-niosh-approved-respirators-during 442 covid-19-pandemic
- 443 22. CE marking [Internet]. European Commission website. 2016 [cited 2020 Jul 23]. Available from:
 444 https://ec.europa.eu/growth/single-market/ce-marking_en
- 445 23. About NMPA [Internet]. National Medical Products Administration. [cited 2020 Jul 23]. Available
 446 from: http://english.nmpa.gov.cn/aboutNMPA.html
- Cramer A, Plana D, Yang HL, Carmack M, Tian E, Sinha MS, et al. Analysis of SteraMist ionized
 hydrogen peroxide technology as a method for sterilizing N95 respirators and other personal protective
 equipment [Internet]. Occupational and Environmental Health; 2020 Apr [cited 2020 Apr 24].
 Available from: http://medrxiv.org/lookup/doi/10.1101/2020.04.19.20069997
- 451

453 TABLES AND FIGURES

- 454 **Table 1**: Mask models donated to major academic medical centers in Boston during the COVID-19
- 455 pandemic and their corresponding regulatory designation. Highlighted models indicate masks models that
- 456 underwent filtration testing at academic medical center. N95 model certification was checked in the NIOSH
- 457 Certified Equipment List. *Known counterfeit masks are listed on CDC
- 458 website; Suspected counterfeit masks were identified by guidance listed on the same website. ** Jinan
- 459 VHOLD Co LTD VH95 was later removed from Appendix A.
- 460
- 461





466 Figure 1. Apparatus assembled from common components and used to test FFRs in this study. Details

of the fabrication and use of this device for testing the filtration ion efficiency of N95-type masks using 467

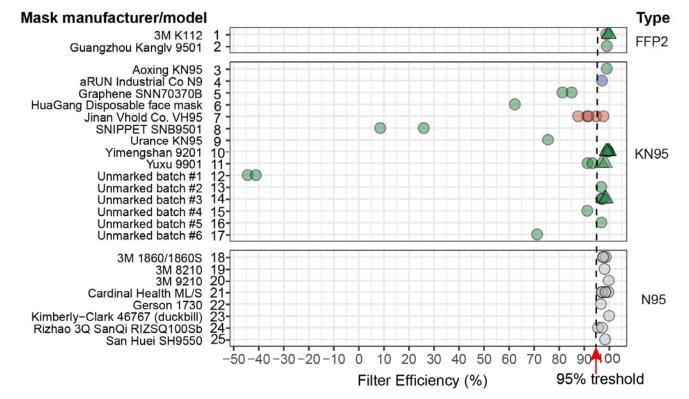
ambient particles and KCl droplets can be found in supplementary materials and at 468

http://cleanmask.org/setup. No legitimate FFR should demonstrate less than 95% filtration efficiency using 469

470 this test, but testing performed with this apparatus is not sufficient to confirm performance to U.S.,

471 European, Chinese or other regulatory standards. Such testing involves a wider range of conditions, greater

- control over test conditions and a formal approach to quality assurance and calibration. 472
- 473



474 475 476	◯ Ambient 🛆 KCI 🔘 NIOSH N95 ● Appendix A ● Not on Appendix A ● Formerly on Appendix A
	Figure 2: Filtration efficiency of N95-type masks using ambient particles and aerosolized KCl
477	particles as testing agents. The lowest filtration efficiency recorded for any particle size tested in shown;
478	full data are provided in Supplementary Table 3. Masks are grouped based on the testing standard they
479	comply with (FFP2, KN95, or N95) but some masks incorrectly claim compliance with multiple standards.
480	"NIOSH N95" refers to masks appearing on the list of NIOSH-Approved N95 Particulate Filtering
481	Facepiece Respirators and regulated according to US standards; six of these models are manufactured in the
482	US and the Rizhao and San Huei masks are manufactured in China; all of these masks were available on the
483	US market prior to the current COVID pandemic. "Appendix A" refers to masks that are listed in the FDA
484	EUA "Non-NIOSH Approved Disposable Filtering Facepiece Respirators Manufactured in China" first
485	issuedon February 2020 and subsequently updated. These masks have been made available only as a result
486	of the pandemic.

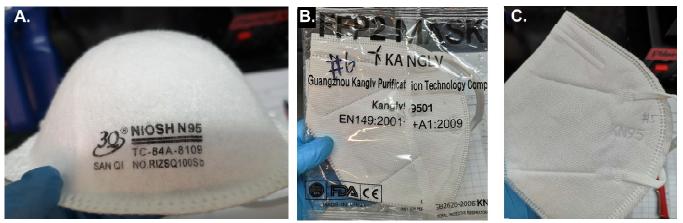


Figure 3. Images of a subset of masks subjected to performance testing and manufactured in China. 489 490 A. A dome-type mask manufactured to N95 standards and listed on the NIOSH website for sale in the U.S. 491 that has all of the required markings. This mask performed as expected (Figure 2, line 24). B. A flat-fold 492 mask that claims compliance with European FFP2 but contains an FDA logo, which is not allowable. This 493 mask performed well in our tests across all particle sizes and has the performance expected of a legitimate 494 product (Figure 2, line 2). C. A flat-fold mask supplied in bulk with no markings other the embossed KN95 495 label; this mask had negative filtration efficiency, and more particles were detected at the output of our test 496 apparatus than at the input (Figure 2, line 12). Additional photographs of mask are available in 497 Supplementary Material 2. 498

499 SUPPLEMENTARY MATERIALS

Supplementary Material 1: NIOSH infographic illustrating the correct labeling of N95 masks "NIOSH
Diagram.pdf".

502 Supplementary Material 2: Photographs of masks undergoing filtration efficiency testing "Photographs of
503 masks tested.ppt". Numbers on images correspond to number on Figure 2 and first column of

504 Supplementary Material 3.

505 Supplementary Material 3: Filtration efficiency raw data (depicted in Figure 2) "Filtration Efficiency
506 Data.csv".