



## **New OSHA Rule Clarifies Fit Requirements for PPE**

OSHA has finalized a long-anticipated rule clarifying that personal protective equipment (PPE) in construction must properly fit each employee. The rule reshapes employer responsibilities and raises the standard for worker protection by extending the same level of PPE protection to construction workers that employees in general industry and maritime have long received.

Under the updated regulations, employers must evaluate PPE for proper fit as part of hazard mitigation, offer a range of sizes and/or adjustable options, and replace poorly fitting gear—even if it meets technical safety specifications. These steps are critical from a compliance standpoint: if an employee is injured while wearing ill-fitting PPE, the employer may be cited as if no PPE had been provided at all.

### **What the Final Rule Says**

The final rule, Personal Protective Equipment in Construction, took effect in January 2025 and amends 29 CFR 1926 to explicitly state that PPE must be provided to properly fit each affected employee.

The rule has two primary components: First, PPE for construction workers must be of a safe design for the work being performed. Second, all PPE must fit each affected construction employee properly.

The rule applies to all construction workers, including women and individuals who may require non-standard sizing options, such as short or tall fits and extended sizes 3XL and above.

### **How the Rule Impacts Women in the Field**

OSHA estimates that about 14% of construction workers in the U.S. are women. However, most “universal” or “unisex” PPE is designed for male body proportions. As a result, female workers often wear ill-fitting PPE with excessive or overhanging material — particularly at the shoulders, waist, and legs — which increases the risk of snagging or being caught in machinery.

OSHA’s emphasis on fit means that employers will need to source PPE such as clothing, vests, footwear and harnesses with specific sizing and cuts for women, rather than selecting gear based on average-sized male body dimensions.

### **What the Rule Means for Employers**

Previously, employers were only required to consider whether a particular piece of PPE met the safety specifications for the work being performed. Under the new rule, they must also confirm that the selected PPE properly fits each affected employee.

Below are steps employers can take now to align their PPE and safety workwear programs with the updated OSHA requirements.

### **Evaluate Suppliers**

According to OSHA, manufacturers are an important source of information about the proper fit of PPE and safety workwear.

Manufacturers who belong to the International Safety Equipment Association (ISEA) have been working with OSHA officials throughout the rulemaking process to meet the new requirements with inclusive sizing, gender-specific lines, and ergonomically designed PPE and safety workwear.

The ISEA Buyers Guide provides helpful links to ISEA-member manufacturers who design PPE sizes for women, as well as non-standard sizes for both men and women in short and tall lengths and extended sizes up to 3XL and beyond.

### **Fit for a Variety of Body Types**

Employers must acknowledge that ill-fitting PPE may not protect and could even create new hazards and begin assessing PPE fit as part of standard hazard mitigation practices. Employers should shop around for PPE and safety workwear designed to women's sizes and proportions, as well as an extended range of sizes from XS to 3XL and beyond, if needed.

Look for labels or ask the supplier to explain whether the PPE was designed for men, for women, or for a unisex fit. Then, use the instructions provided in the size chart to ensure that measurements are taken correctly for the best fit.

Make an assessment for proper fit part of the standard operating procedures for outfitting new employees at onboarding and periodically throughout the year. Look for gaps, excess fabric, or unnecessary extra length in the fingers of gloves or the hems of sleeves and pant legs that show the PPE is too large. Also, look for signs that PPE is too tight, such as discolored skin or lasting marks after the gear is removed, that indicate restricted blood flow.

### **Field Test for Fit and Function**

Work with selected suppliers to conduct on-site PPE fittings or request samples for affected employees to field test for fit and function in a practical setting. Ask workers if they can move freely enough to do their work safely and efficiently. Ask them if any part of the PPE interferes with their vision, dexterity, range of motion or otherwise causes discomfort.

When employees report discomfort, take their complaints seriously. OSHA considers comfort as an important part of "properly fitting PPE, both because more comfortable PPE is more likely to be worn by workers rather than discarded and unused and because discomfort in many cases can indicate improper fit."

### **Update Policies & Training**

Finally, employers must document their efforts to provide PPE that fits properly. Update written safety policies or employee handbooks to explain which employees need PPE, when it must be worn and how it should fit.

Make sure workers understand how to wear the PPE, how to adjust the fit if the product allows for such adjustments, and how to request replacement PPE if it becomes damaged, no longer fits properly or is unsafe to use.

## **Enforcement Outlook**

OSHA has not yet announced aggressive enforcement actions for the updated rule. However, employers can expect that PPE will be a point of focus during inspections and investigations. OSHA views poorly fitting PPE as the functional equivalent of providing no PPE at all; so, employers that don't follow the updated rule may face citations and fines.

It's important for employers to view this rule as more than just regulatory change. Workers who feel seen and protected by comfortable and properly fitting PPE are more likely to follow safety policies. This creates an enhanced safety culture that goes further to keep workers safe and guard employers against costly fines, accidents, or worse.