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# [Insert organization name] Respiratory Protection Program

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**This temporary face sheet is provided due to public health emergency with information from OSHA memorandums related to the Coronavirus Disease 2019 (COVID-19) Pandemic.**

- ▶ This memorandum expands temporary enforcement guidance provided in OSHA’s March 14, 2020, memorandum to Compliance Safety and Health Officers for enforcing **annual fit-testing** requirements of the Respiratory Protection standard, 29 CFR § 1910.134(f)(2), with regard to supply shortages of N95s or other filtering facepiece respirators (FFRs) due to the coronavirus disease 2019 (COVID-19) pandemic
- ▶ During this COVID-19 pandemic, OSHA field offices should exercise additional enforcement discretion regarding compliance with 29 CFR § 1910.134(f) when an employer switches to an equivalent-fitting make/model/size/style N95 or other filtering facepiece respirator without first performing an initial quantitative or qualitative fit test.
- ▶ Where the use of respiratory protection is required and an employer fails to comply with any other requirements, such as initial fit testing, maintenance, care, and training in the Respiratory Protection standard, cite the applicable section(s) of 29 CFR § 1910.134.

**A full list of OSHA memorandums related to the COVID-19 Pandemic (found here- <https://www.osha.gov/enforcementmemos>) are listed below:**

03/12/2021 - Updated Interim Enforcement Response Plan for Coronavirus Disease 2019 (COVID-19)

10/02/2020 - Temporary Enforcement Guidance – Tight-Fitting Powered Air Purifying Respirators (PAPRs) Used During the Coronavirus Disease 2019 (COVID-19) Pandemic

05/19/2020 - Revised Enforcement Guidance for Recording Cases of Coronavirus Disease 2019 (COVID-19) - [1904.1(a)(1); 1904.5; 1904.7]

04/24/2020 - Enforcement Guidance on Decontamination of Filtering Facepiece Respirators in Healthcare During the Coronavirus Disease 2019 (COVID-19) Pandemic

04/16/2020 - Discretion in Enforcement when Considering an Employer's Good Faith Efforts During the Coronavirus Disease 2019 (COVID-19) Pandemic

04/08/2020 - Expanded Temporary Enforcement Guidance on Respiratory Protection Fit-Testing for N95 Filtering Facepieces in All Industries During the Coronavirus Disease 2019 (COVID-19) Pandemic

04/03/2020 - Enforcement Guidance for Respiratory Protection and the N95 Shortage Due to the Coronavirus Disease 2019 (COVID-19) Pandemic - [1910.134 App B-1]

04/03/2020 - Enforcement Guidance for Use of Respiratory Protection Equipment Certified under Standards of Other Countries or Jurisdictions During the Coronavirus Disease 2019 (COVID-19) Pandemic

03/14/2020 - Temporary Enforcement Guidance - Healthcare Respiratory Protection Annual Fit-Testing for N95 Filtering Facepieces During the COVID-19 Outbreak

**(Remove this facesheet from policy when no longer under a public health emergency)**

## **Purpose**

It is the policy of [INSERT ORGANIZATION NAME] that all employees shall be protected from occupational diseases that may be caused by exposure to an airborne contaminant, including but not limited to novel viruses such as SARS-CoV-2, the virus that causes COVID-19. The purpose of this Respiratory Protection Program (“Respiratory Protection Program” or “Program”) is to ensure that all employees are protected from exposure to airborne contaminants that may transmit diseases when these diseases can be prevented by the use of engineering and administrative controls and/or the appropriate selection and use of respirators. Under OSHA’s traditional “hierarchy of controls” engineering (ventilation) and administrative controls (hand hygiene) are preferred over personal protective equipment and will therefore be reassessed routinely.

## **Scope and Application**

This program applies to all employees who are required to wear respirators when performing their job duties. All employers whose employees are required to use or are permitted voluntary use of respiratory protection must continue to manage their respiratory protection programs (RPPs) in accordance with the OSHA respiratory standard, which can be found at: (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>). In all situations of voluntary use of any respirator, [INSERT ORGANIZATION NAME] will ensure that a copy of Appendix D of this Program is provided to the employee.

## **Responsibilities**

### **Program Administrator**

The Program Administrator is responsible for administering the Respiratory Protection Program. Responsibilities of the Program Administrator include:

- Identifying work areas and tasks requiring a mandatory use of respirators.
- Selection of respiratory protection options that meet guidelines for the situation.
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications.
- Arranging for and/or conducting training.
- Ensuring proper storage, cleaning, inspections, and maintenance of respiratory stock and testing equipment.
- Arranging for and/or conducting fit testing.
- Ensuring the medical evaluation and surveillance program are in accordance with the OSHA respiratory standard.

- Maintaining records required by the Program.
- Evaluating the Program.
- Updating the Program, as needed.

### ***Supervisor***

Supervisors are responsible for ensuring that the Respiratory Protection Program is implemented. In addition to being knowledgeable about the Program requirements for their own protection, supervisors must also ensure that the Program is understood and followed by employees.

Responsibilities of the supervisor include:

- Ensuring that employees under their supervision (including new hires) have received appropriate training, annual medical evaluation, and fit testing if duties require use of a respirator.
- Ensuring the availability of appropriate respirators.
- Being aware of tasks requiring the use of respiratory protection.
- Enforcing the proper use of respiratory protection when necessary.
- Ensuring that respirators are properly cleaned, maintained, inspected, and stored according to the Respiratory Protection Program.
- Ensuring that respirators fit well and do not cause discomfort.
- Coordinating with the Program Administrator on how to address hazards or other concerns regarding the Program.

### ***Employees***

Employees have the responsibility to:

- Wear their respirators when and where required and in the way they were trained (appropriate donning, doffing and performing fit check).
- Care for and maintain their respirators as instructed, and store them in a clean, sanitary location when reuse protocols are in effect.
- Inform their supervisor if the respirator no longer fits and request a new one.
- Inform their supervisor or the Program Administrator of any respiratory hazards they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the Program.

- Inform their supervisor of need for a medical re-evaluation.

[INSERT OTHER KEY POSITIONS WITH RESPRIATOR RESPONSIBILITIES]

### **Program Elements**

#### ***Procedures for selecting the respirator***

The Program Administrator will select respirators to be used based on the airborne transmissible disease hazards to which employees are exposed and in accordance with all applicable OSHA standards. The employer shall select a NIOSH- certified respirator and must select respirators from enough models and sizes. The Program Administrator will conduct a hazard evaluation and document the evaluation. The hazard evaluation will involve a review of job tasks to determine where potential exposures may occur with employees.

The Program Administrator will revise and update the hazard assessment as needed. If an employee feels that respiratory protection is needed during a particular activity, he/she is to contact his or her supervisor or the Program Administrator. The Program Administrator will then:

- Evaluate the potential hazard, arranging for outside evaluation, as necessary.
- Communicate the results of that assessment back to the employees. If it is determined that respiratory protection is necessary, all other elements of this Program will be in effect for those tasks, and this Program will be updated accordingly.

[INSERT JOBS WHERE RESPIRATORS ARE REQUIRED AND RESPIRATORS TO BE USED]

## Voluntary Respirator Use

[INSERT COMPANY NAME] also allows for voluntary use of respirators under certain circumstances. Under the voluntary Respirator Use Program, [INSERT COMPANY NAME] will:

- Authorize voluntary use of respiratory protective equipment as requested by employees on a case-by-case basis, depending on specific workplace conditions and the results of medical evaluations.
- Provide all employees who voluntarily choose to wear a respirator with a copy of ***Appendix D*** as specified by OSHA's Respiratory Protection Standard (29 CFR 1910.134). Appendix D details the requirements for voluntary use of respirators by workers and is appended to this Program.
- If filtering facepiece respirators are the only respirator being worn voluntarily, employers are only required to provide the employee with a copy of *Appendix D* and make sure that the respirator itself is not creating a hazard, such as dermatitis from a dirty respirator.

## ***Medical Evaluation***

Employees who are required to wear respirators must pass a medical evaluation before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators, as covered by this Program, until cleared to do so by a physician or licensed healthcare professional ("PLHCP").

Any employee who refuses the medical evaluation will not be allowed to work in a position requiring respirator use. All affected employees will be given a copy of the medical questionnaire to complete.

The PLHCP will provide the medical evaluations. Medical evaluation procedures are as follows:

- Perform an initial medical examination **OR**.
- Use the questionnaire provided in Appendix C of OSHA's Respiratory Protection Standard which can be found at: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppC>.
  - The Program Administrator or assigned PLHCP will provide a copy of this questionnaire to all employees requiring medical evaluations. The PLHCP should be present during the completion of the questionnaire or the employee should be given an opportunity to place it in a sealable envelope with PLHCP identification. The Program Administrator will ensure the medical evaluations are given to the PLHCP.
  - To the extent feasible, the [INSERT ORGANIZATION NAME] will assist employees who are unable to read the questionnaire (by providing help in reading the questionnaire).

When this is not possible, the employee will be sent directly to the PLHCP for medical evaluation.

- A follow-up medical evaluation shall be provided to any employee who gives a positive response to any question among questions 1-8 in Section 2.

Employees will:

- Be permitted to fill out the questionnaire during the employee's normal work hours.
- Be granted follow-up medical examinations as required by the Respiratory Protection Standard, and/or as deemed necessary by the PLHCP.
- Be granted the opportunity to speak with a PLHCP about their medical evaluation if they so request.

The following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning the employee's ability to use a respirator.

- A copy of this Program, and a copy of the Respiratory Protection Standard.
- List of infectious diseases the employee may come into contact with during the course of their job duties.
- The employee's title.
- Proposed respirator type and length of time required to wear the respirator.
- Expected physical workload (light, moderate, or heavy), potential temperature and humidity extremes.
- Any additional protective clothing required.

The PLHCP shall give a written recommendation regarding the employee's ability to use a respirator which shall provide the following information:

- Any limitation or respirator use related to a medical condition or workplace condition.
- The need for additional medical evaluation
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided if:

- The employee reports signs and/or symptoms related to their use of a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
- The PLHCP or supervisor informs the Program Administrator that the employee needs to be re-evaluated. An example where the PLHCP or employee's supervisor may request a



medical re-evaluation is if there has been a change in job activities that may result in an increased physiological burden on the employee.

- Information from this program, including observations made during fit testing and program evaluation, indicates a need for re-evaluation.

A list of employees participating in medical surveillance is provided in Table 1 of this Program. All examinations and questionnaires are to remain confidential to the extent permitted by law.

### ***Fit Testing***

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting facepiece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used. Employee must:

- Pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT)
- Be fit tested prior to initial use, whenever a different respirator is used, and at least annually.
  - Additionally, fit testing must also be completed whenever changes in the employee's physical condition that could impact fit of respirator such as dental changes, cosmetic surgery, or obvious change in body weight.

The Program Administrator will ensure fit tests are conducted in accordance with any appropriate and OSHA-approved protocol from Appendix A of the Respiratory Protection Standard which is located at <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppA>.

[INSERT FIT TESTING PROTOCOLS USED]

### ***Respirator Use- Procedures for proper use***

All employees wearing a respirator are responsible for and agree to use respirators under conditions specified by this Program, and in accordance with their training. The respirator must not be used in a manner for which it is not certified by NIOSH or by its manufacturer.

- Conduct user seal checks each time the respirator is worn, in accordance with the Respiratory Protection Standard: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppB1>.

- Do not wear tight-fitting respirators if employees have:
  - Facial scars, facial hair, or missing dentures that prevents them from achieving a good seal.
  - Any conditions that interfere with seal
- Do not wear headphones, jewelry, or other articles that may interfere with the seal.

***Use of Respirators to Prevent Airborne Transmissible Diseases***

- All healthcare personnel entering an enclosed area of a resident who has a known or suspected airborne transmissible disease or who are present for aerosol-generating procedures (AGPs) will wear a respiratory protective device such as a Filtering Facepiece Respirator (FFR), N95 respirator. Such a device should be donned prior to entering the room and doffed only after exiting the room.

***Inspecting, Cleaning, Storage, and Discarding of Respirators***

Each disposable respirator shall be used by one individual and must not be shared.

Disposable respirators should not be folded or manipulated to an abnormal shape or position which may impair the respirator’s function

Employees should consider use of a face shield over the respirator to reduce surface contamination, clean and sanitize hands before putting on and after taking off the respirator, and use clean gloves when putting a respirator on and performing the seal check.

**Inspecting**

The employer must ensure respirators are properly inspected. All respirators used in routine situations shall be inspected before each use.

- Inspect the respirator, including the straps for tears or damage.
- If, during an inspection, an employee discovers a defect in a respirator, it should be brought to the attention of the supervisor.
- When a FFR is noted to be defective, it must not be reused, and the employee must be given a replacement of the same make, model, and size.
- If the employee is not given a replacement of the same make, model, and size, then the employee must be fit tested for a new make, model, and size available before being allowed to use the respirator in a care situation.

The following checklist will be used when inspecting FFR(N95s):

- Facepiece:
  - cracks, tears, or holes
  - facemask distortion
- Headstraps:
  - breaks or tears

- broken buckles

For respirators maintained for emergency use, the employer shall:

- Certify the respirator by documenting the date the inspection was performed, the name (or signature) of the person who made the inspection, the findings, required remedial action, and a serial number or other means of identifying the inspected respirator and
- Provide this information on a tag or label that is attached to the storage compartment for the respirator, is kept with the respirator, or is included in inspection reports stored as paper or electronic files. This information shall be maintained until replaced following a subsequent certification.

### **Cleaning**

The employer shall provide each respirator user with a respirator that is clean, sanitary and in good working order. The employer shall ensure that respirators are cleaned and disinfected using the procedures in Appendix B-2 of the Respiratory Protection Standard:

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppB2>.

### **Storage**

- Note that while N95 Filtering Facepiece Respirators (FFR) are meant to be discarded after each use, CDC has developed contingency and crisis strategies, including reuse and decontamination of N95 FFRs, to help healthcare facilities conserve their supplies in the face of shortages.
- For additional information, refer to [CDC's Implementing Filtering Facepiece Respirator \(FFR\) Reuse, Including Reuse after Decontamination, When There Are Known Shortages of N95 Respirators](#) and CDC's [Elastomeric Respirators: Strategies During Conventional and Surge Demand Situations](#)

Emergency respirators must be:

- Kept accessible to the work area;
- Stored in compartments or in covers that are clearly marked as containing emergency respirators; and
- Stored in accordance with any applicable manufacturer instructions.

### **Discarding**

Discard respirators appropriately and wash hands immediately after discarding.

### **Training**

The Program Administrator will provide training to respirator users and their supervisors on the Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection Standard.

- Employees will be trained prior to using a respirator in the workplace.
- The training must be comprehensive and understandable, and must recur annually, and more often if necessary.
- As with any employee, supervisors must be trained prior to using a respirator in the workplace; they also should be trained prior to supervising workers who must wear respirators if the supervisors themselves do not use a respirator.
- Supervisors will provide the basic information on respirators in Appendix D of the Respiratory Protection Standard (appended to this Program) to employees who are voluntarily wearing a respirator.
- Supervisors will ensure that each employee using a respirator can demonstrate knowledge of at least the following:
  - Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator.
  - What the limitations and capabilities of the respirator are.
  - How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions.
  - How to inspect, put on and remove, use, and check the seals of the respirator.
  - What the procedures are for maintenance and storage of the respirator.
  - How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.
  - The general requirements of the Respiratory Protection Standard.

Retraining shall be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator renders previous training obsolete.
- Inadequacies in the employee's knowledge or use of the respirator indicates that the worker has not retained the requisite understanding or skill.
- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

### **Program Evaluation**

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of the program are being effectively implemented and that it continues to be effective.

The employer will regularly consult employees required to use respirators to assess the employees' views on program effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed include, but are not limited to:

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance)

- Appropriate respirator selection for the hazards to which the employee is exposed
- Proper respirator use under the workplace conditions the employee encounters
- Proper respirator maintenance.

Problems identified will be noted and corrected by the Program Administrator.

### **Documentation and Recordkeeping**

The following documentation and recordkeeping will be maintained:

- A written copy of this Program and the Respiratory Protection Standard is kept in [ENTER LOCATION] and is available to all employees who wish to review it.
- Copies of training materials will be maintained in the [ENTER LOCATION].
- Copies of fit test records will be maintained in the [ENTER LOCATION]. Fit test records must have the following documentation:
  - The name or identification of the employee tested
  - Type of fit test performed
  - Specific make, model, style, and size of respirator tested
  - Date of test
  - The pass/fail results
- Records will be updated as new employees are trained and as existing employees receive refresher training.
- Medical evaluation and examination records.
  - The Program Administrator will maintain copies of medical evaluation and examination records for all employees covered under the program. These records will be treated as confidential and will remain with the Program Administrator in a locked and secure location with limited access.

## **Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard**

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

