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RESPIRATORY PROTECTION PROGRAM GUIDANCE FOR LONG TERM CARE FACILITIES

Healthcare-Associated Infections and Antimicrobial Resistance Office of
Communicable Disease Epidemiology
Disease Control and Health Statistics Division

Introduction

The Respiratory Protection Program is a federal and state OSHA requirement to protect workers from exposure to respiratory hazards. In Washington, it is regulated by Washington Labor and Industries (L&I) (WAC [296-842](#)).

The purpose of the module is to provide general information and guidance about the Respiratory Protection Program (RPP).

This module is for the facility Administrator/Owner. The Administrator/Owner has overall responsibility for the RPP at your facility.

Important!

- **Your facility will need to customize its program**
- There are many types of respirators! This module focuses specifically on **N95 respirators** for healthcare.

What is in this module?

This module will cover the following topics:

- Employer's obligation to provide respiratory protection
- The employer's tasks and responsibilities for the RPP:
 - Preparation
 - Development
 - Implementation
 - Maintenance
- The employee's tasks and responsibilities

Employer's Obligation



RESPIRATOR RULE

State Regulatory Requirement

- WAC [296-842](#) Respirator Rule and WAC [296-841](#) Airborne Contaminants Rule require employers to:
 - Provide respiratory protection for employees who are at risk of exposure to respiratory hazards, such as viruses like COVID-19
 - Identify someone to be the Administrator of the RPP to develop, implement, and maintain the program
 - Provide the training, medical clearance, and respirator fit testing all during paid time
 - Monitor employee compliance requirements for the RPP
 - Keep records of training, medical clearance, and fit testing

Employer's 4 Tasks

TASK #1 PREPARATION

Preparations for the Respiratory Protection Program

As the employer, select someone to develop, implement, and maintain the RPP. This person is the RPP Administrator also known as the Respirator Program Administrator (RPA).

● RPA Duties and Responsibilities

- Create a written RPP specific to your facility
- Understand the RPP and be able to answer questions employees and L&I may have
- Identify the Licensed Health Care Provider (LHCP) for medical evaluations, and be sure employee medical evaluations are completed
- Update your training as things change at the State and Federal levels
- For tight-fitting respirators, conduct respirator fit testing (or have a vendor to do it)
- Monitor the type of N95 respirators being purchased to be sure there has not been a change
- Evaluate the RPP on a regular basis, as determined by your facility's leadership

Getting N95 Respirators

- Provide your employees with N95 respirators
 - Tips for purchasing:
 - Order the same make/model/size respirator(s) the employees are fit tested to
 - If you get a different model of respirator, your employees will need to be re-fit tested to that respirator
 - Be sure you purchase NIOSH approved respirators from an authorized manufacturing company. Avoid counterfeit respirators.
 - ◆ CDC: [Counterfeit Respirators/Misrepresentation of NIOSH-Approval](#)
 - When possible, select medical-grade N95 respirators because they have a fluid barrier in addition to filtration abilities

Provide Respirators

- For fit testing, have more than one type of respirator to choose from
 - Purchase different style (example: cup, duckbill, tri-fold)/size respirator
 - Provide another type of respirator (e.g., a loose-fitting powered respirator)

Respirator Supply Considerations

- Follow current Center for Disease Control and Prevention (CDC) Personal Protective Equipment (PPE) guidance
- Be sure to have an ample supply of PPE for resident care, and Local Health Jurisdiction (LHJ) may assist you in times of respirator shortages
- Use a [burn-rate calculator](#) to help determine how much stock supply you will need

Not everyone can use a respirator!

Sometimes, an employee may not be able to wear a respirator. This can be due to health issues (i.e., they are not medically cleared to wear one), or respirator fit issues:

- Health issues:

- The N95 is a tight-fitting respirator. This can put extra strain on the body that may cause a problem. The medical evaluation will help determine if an employee can safely wear a respirator.

- Respirator fit issues:

- The N95 respirators you have may not fit all employees properly. We all have different sizes and shaped faces. Have an assortment of respirators in stock.

Accommodation

If an employee is not able to pass the medical evaluation or the respirator fit test, you must be prepared to provide reasonable accommodations to their work duties.

Examples of reasonable accommodation:

- Make care assignments such that the employee does not provide care for a resident/client with a known respiratory hazard (e.g., a COVID-19 positive or suspect positive resident/client, AGPs, etc.)

Note: Providing a work accommodation is not required by WAC 296-842; however, it does indicate you must protect employees from exposure to respiratory hazards. Other federal and state regulations govern obligations for job accommodation (e.g., American Disability Act, Workplace Anti Discrimination, etc.).

Employer's 4 Tasks

TASK #2 PROGRAM DEVELOPMENT

Written Respiratory Protection Program (RPP)

WAC 296-842-12005



Washington State Department of
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- The purpose of the written RPP is to let everyone know what the hazards are, how you are protecting the employees, how to use the respirator, and how to care for it
- There are seven components to the written RPP. All components need to be addressed in the written RPP.
- Usually, the RPA creates the written RPP

Components of the Written RPP

Include descriptions of:

1. How the proper respirators are selected and issued.
2. When and how the respirators will be used, and what the respiratory hazards are (biological hazard, such as COVID-19).
3. How the medical evaluations will be provided, reviewed, and stored.
4. How the N95 respirator fit testing will be done (test method, if vendor will be used, etc.).
5. Where staff will find respirators at the facility (location/s)
6. How respirators will be:
 - a. Provided
 - b. Inspected
 - c. Discarded

Note: Be sure to update your RPP with current practices (e.g., CDC, DSHS, etc.)
7. How the employees will be trained about respiratory hazards and the proper use of respirators at your facility.
8. How you will evaluate the effectiveness of your respiratory program.

Medical Evaluation

WAC 296-842-14005



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- The purpose of the medical evaluation is to be sure the employee can safely use a respirator
- A Licensed Health Care Provider (LHCP) must perform the medical evaluation
 - The RPA and employer will need to identify the LHCP
- Answers to the questions on the medical evaluation are confidential and should not be accessed by the employer
- Must be administered or completed during paid working hours
- Provided at no cost to the employee

Medical Evaluation (continue)

WAC 296-842-14005

- Complete the medical evaluation before the first fit test, and...
- Repeat the medical evaluation when:
 - LHCP indicates to repeat it (on the written recommendation)
 - Medical signs or symptoms (example: difficulty breathing) are:
 - Observed by the RPA or supervisor
 - Reported by the employee
 - Major health changes
 - There is a change in worksite conditions that may increase the employee's physiological stress



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Medical Evaluation (continue)

There are three options to complete the medical evaluation requirement:

1. Use the 3M Online Respirator Medical Evaluation program (DOH covers the cost as the funding allows):
 - If interested, email the following information to HAI-FitTest@doh.wa.gov:
 - Agency Name:
 - Agency Address:
 - Number of medical evaluations:
 - Contact person and e-mail address:
2. Hire or contract this service with a local Occupational Medicine clinic.
3. Use your own Occupational Health Licensed Provider. **Important! The questionnaire contains PHI and therefore you must follow occupational health medical recordkeeping rules.**

Note: The medical evaluation forms (from L&I) have been [translated into 12 languages](#)

Training

WAC 296-842-16005



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- The person providing the training must be qualified
- Train employees if they:
 - Use respirators, or supervise respirator users
 - Also, for non-N95 respirators, train on how to issue, repair, or adjust (e.g., PAPR)
- The training must be done *before* using the respirator for the first time, then every 12 months
 - If the person does not remember how to use the respirator after their initial training, repeat the training immediately
- There are specific topics the employee must know to keep them safe
- Training must be done at no cost to the employee and must occur during paid time

Components of Training

Respirator training must include:

- Why the N95 respirator is necessary
- What the N95 can and cannot do to keep the employee safe
- How to properly inspect, put on, do a seal check, use, and take off the N95
- How and where to store the N95 respirator
- What to do if there is an emergency for the employee, such as their N95 gets pulled off by a resident/client or a similar event
- Medical signs and symptoms that may interfere with using the N95 respirator

Respirator Fit Testing

WAC 296-842-15005

Respirator fit testing must be done:

- *Before* wearing a respirator for the first time to care for residents/clients that are COVID-19 positive or suspected to be positive
- When there is a new type, model, style, or size of N95 respirator
- If the employee has had any changes, such as:
 - Weight (gain or loss) for any reason
 - Facial structure changes
 - Dental changes
- If the employee or the LHCP says the respirator fit is not acceptable



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Respirator Fit Testing

- Respirator fit testing must be done:
 - Before an employee uses a specific tight-fitting respirator in an area that has respiratory hazards
 - Example hazards: COVID-19 positive resident/client
 - Every 12 months after the initial fit test
 - When the model of respirator used changes
- For the qualitative fit testing method, use either a bitter or sweet solution
- The person conducting the respirator fit test must be able to:
 - Prepare the test solution
 - Make sure the equipment is working properly
 - Perform the test correctly
 - Recognize when the test is invalid
 - Record fit test results

Recordkeeping

WAC 296-842-12010



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- A written copy of the current RPP must be kept by the employer
- Records that need to be kept include each employee's:
 - Fit test results (keep current)
 - Training records (keep yearly)
 - LHCP written recommendation WAC 296-842-12010
 - For medical evaluation questionnaire, the LHCP keeps it 30 years after end of employment (also see WAC 296-802)
- The employee and their representative can examine and copy any of these records

Recordkeeping

- Respirator fit test records must include:
 - The employee's name
 - The test date
 - The type of fit test performed
 - Description of the type, manufacturer, model, style, and size of the respirator tested
 - Results of the fit test (pass/fail)
 - Who did the fit testing (name of tester/company)
- Training records must include:
 - The employee's name
 - The date(s) training was done
 - An indication of understanding the content or a passing score, such as pass/fail
- The written recommendation from the LHCP should not include any PHI

Employer's 4 Tasks

TASK #3 IMPLEMENTATION

Recommended Steps for the Employer

1. Identify who will be the RPA.
2. Decide how you will get the medical evaluations done.
3. Authorize the RPA to develop the written RPP and the training component.
 - Training can occur through a web-based method, or in-person. **Note:** *The initial and annual **fit test** does not qualify as training!*
4. Inform your employees of the requirements that must be met (medical evaluation, training, and fit testing).
5. Allow the RPA to manage the medical evaluation, training, and fit testing process.

Employer's 4 Tasks

TASK #4 MAINTENANCE

Maintaining Your Respirator Program

- Keep your written RPP up to date with changes from L&I
 - Immediately inform your RPA and/or employees of any changes
- On a regular basis, evaluate your RPP effectiveness in protecting your employees from workplace exposure to COVID-19

Examples:

- Do a spot check and have the employee review how and when to do a seal check
- Observe how employees remove their N95
- Check to see if all your new employees have done their medical clearance, training, and have completed their fit test before they started using the N95 respirator

Employee's Tasks

EMPLOYEE RESPONSIBILITIES

Employee Responsibilities

Be sure your employees do the following:

- Complete the medical evaluation form truthfully
 - This information is not shared with the employer. It will help determine if the employee will be able to tolerate wearing a respirator.
- Complete the medical evaluation form **before** getting fit tested
- Complete the training before the fit test. Reinforce training at the time of the fit testing.
- Come prepared to do the fit test and demonstrate their understanding of respirator use
- Inspect, put on, do a seal check, use, take off correctly every time. No exceptions.

Summary



KEY POINTS

Key Points

- Develop the written RPP and set up your written plan for employee medical clearance, training, fit testing, and recordkeeping
 - Appoint someone at your facility to be your RPA
 - If you appoint someone outside your facility to be your RPA, you must provide them with the information they will need to put the program together
- Be available to help your RPA!
- Understand the why, how, and the when of the RPP and help the RPA keep your employees healthy and safe
- Reach out to governmental resources for help (see Resources below)
- Allow your employees the time to learn this information. Once they know how to do it, it will be easier to keep them safe.

Questions?

Use the resources listed on the Resource page

Resources

- CDC, Nursing Homes and Long-Term Care Facilities, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/nursing-home-long-term-care.html>
- CDC, Strategies for Optimizing the Supply of N95 Respirators, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html>
- COVID-19 Prevention: Respiratory Protection for Nursing and Residential Care, <https://lni.wa.gov/forms-publications/F414-161-000.pdf>
- DOH Respiratory Protection Program for LTC Facilities webpage, <https://www.doh.wa.gov/ForPublicHealthandHealthcareProviders/HealthcareProfessionsandFacilities/HealthcareAssociatedInfections/RespiratoryProtectionProgram>
- L&I, Request Consultation, <https://lni.wa.gov/safety-health/preventing-injuries-illnesses/request-consultation/>
- PPE Burn Rate Calculator: <https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/burn-calculator.html>
- Respiratory Protection Program Checklist: [420-356-RespiratorProgramPlanningChecklist.pdf \(wa.gov\)](https://www.doh.wa.gov/ForPublicHealthandHealthcareProviders/HealthcareProfessionsandFacilities/HealthcareAssociatedInfections/RespiratoryProtectionProgram/420-356-RespiratorProgramPlanningChecklist.pdf)
- Safety Standards for Respirators, Chapter 296-842 WAC, <https://www.lni.wa.gov/safety-health/safety-rules/chapter-pdfs/WAC296-842.pdf>



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