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RESPIRATORY PROTECTION PROGRAM ADMINISTRATOR (RPA): GUIDELINES FOR LONG TERM CARE FACILITIES

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Introduction

The purpose of this module is to provide guidance for the Respiratory Protection Program Administrator, also known as the Respirator Program Administrator (RPA), about the components of WA State Department of Labor and Industries (L&I) Respiratory Protection Program (RPP).

The written RPP outlines how your facility plans to protect your workers from exposure to respiratory hazards such as COVID-19, influenza, etc.

Use this module as a resource while you develop the RPP for your facility.

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Respiratory Protection Program Administrator (RPA)

1. ROLES AND RESPONSIBILITIES

The Role of the RPA

The designated RPA acts as the:

- Liaison between the leadership of your organization and your workers regarding respiratory protection
- In-house expert on respiratory protection
- “Go to” or "point person" for outside resources, workers, and respiratory protection equipment

The RPA's Responsibilities

- Create your facility's written RPP
 - Select the type of respirators that will be used to address the respiratory hazards in your facility
 - Determine:
 - Who will use respirators, and when and how respirators will be used
 - Where respirators will be stored and how they will be distributed
 - How medical evaluations will be provided
 - Training for users (development and ongoing implementation)
 - What type of fit testing will be used
 - How you will evaluate the effectiveness the RPP
- Inform employees where the written RPP can be found
- Be available to answer employee and/or leadership questions about the RPP at your facility

Written Respiratory Protection Program

2. THE WHAT AND THE WHY

What is the Written RPP and Why is it Necessary?

- The written RPP describes your facility's plan to protect employees from exposure to respiratory hazards in the workplace. It informs all employees of the facility's:
 - Respiratory hazards
 - Type of respirators available
 - Education and training requirements for respiratory protection
 - Procedure on how and when to dispose of N95 respirators
- The written RPP:
 - Identifies which employees will be required to use a respirator
 - Describes the medical evaluation process for employees
 - Identifies what type of fit testing will be done
 - Describes the recordkeeping process
 - Describes how the facility will evaluate the effectiveness of the RPP
 - Plan for job accommodation

Written Respiratory Protection Program

3. SELECTING RESPIRATORS

WAC 296-842-13005

Selecting Respirators

- You must select a respirator appropriate for the hazard
 - In healthcare, many respiratory hazards are biologic particles (such as COVID-19, tuberculosis, measles, etc.)
 - The respirator filter (e.g., tight-fitting N95 filtering facepiece) will help provide protection from inhaling hazardous particles
 - For healthcare, choose respirators that cover at least the nose, mouth, and chin (e.g., **half-face N95**)



Courtesy: Envo mask

This is a **quarter** face respirator: **Not covering chin.**
Do NOT use in LTC.

Selecting a Respirator (cont.)

- Respirators must have the National Institute for Occupational Safety and Health (NIOSH) stamp, a lot number, make, model, size and manufacturer name
- The N95 has an Assigned Protection Factor (APF) of 10 (See [Table 5, WAC 296-842](#))
- Obtain 2 to 4 different models and sizes of N95, especially if you have many employees
 - If a healthcare (medical grade) N95 is not available, provide non-medical grade respirators
 - Note: Respirators with exhalation valves do not provide source control

Documenting the Type of Respirator

- The written RPP should describe the types of respirators provided by your facility
- Include a description of the following:
 - Each manufacturer's brand, and the model and size respirator
 - Tip! Add a picture of each type of respirator for easier reference
 - Where respirators will be stored at your facility
 - How staff will get more respirators brought to the care area
 - How respirators will be discarded after use

Written Respiratory Protection Program

4. MEDICAL EVALUATION

Providing the Medical Evaluation

- Because breathing through a tight-fitting N95 respirator can place stress on the respiratory and cardiac systems, you must conduct a medical evaluation for each employee
- Each employee must complete their own medical evaluation/questionnaire
- Identify a licensed health care provider (LHCP) to perform your medical evaluations. You can:
 - Use the DOH program for online medical evaluations (DOH covers the cost for a limited time). Contact HAI-FitTest@doh.wa.gov for more information.
 - Choose your own LHCP for medical evaluations

Providing the Medical Evaluation (cont.)

- The LHCP you select will need to have:
 - A copy of your written RPP, and the regulations (WAC 296-842)
 - Information describing the respirators the employees will be using
 - A description of how respirators will be used:
 - Frequency of respirator use
 - Duration of respirator use
 - The employee's expected work effort
 - Additional PPE used with the respirator
 - If there will be temperature and humidity extremes

Providing the Medical Evaluation (cont.)

- Provide medical evaluations (questionnaire) at no cost to the employee and during paid work time
- The employee must understand the content of the medical evaluation questionnaire – [Translated material available](#)
- If requested, you must allow the employee to discuss the questionnaire with the LHCP
- The information the employee submits is **confidential** and qualifies as **protected health information** (WAC [296-842-14005](#)).
 - It must go directly to the LHCP without the employer seeing the contents or accessing the employee's medical evaluation questionnaire!

Providing the Medical Evaluation (cont.)

- As the RPA, you will receive a letter from the LHCP with written recommendations for each employee's ability to wear a respirator. The employee will be:
 - Cleared to use a respirator
 - Cleared with limitations/restrictions on respirator use
 - Examples of limitations of respirator use:
 - ◆ Employee can only use a respirator for short periods of time (e.g., only use for 30 minutes)
 - ◆ Employee is restricted to use a Powered Air Purifying Respirator only
 - Referred for further medical evaluation
 - Identify a LHCP for medical referral
 - ◆ The LHCP should have expertise in Occupational Health and/or the WA Respirator rule
 - The DOH program does not cover the cost of referral evaluations

Providing the Medical Evaluation (cont)

For employees that need further medical evaluation:

- Provide follow-up in-person medical evaluations with a LHCP who has expertise in Occupational Health and/or the WA Respirator rule. Be sure you, and they, follow WAC [296-842-14005, Step 3](#)
 - DOH does NOT cover the cost of referral medical evaluations
- After the referral medical evaluation, you must receive a written recommendation from the referral LHCP indicating:
 - Whether the employee can or cannot use a respirator
 - The limitations for the employee's respirator use
 - What future medical evaluations are needed
 - An indication that a copy of the written recommendation has been provided to the employee

Job Accommodations

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.).

Frequency of the Medical Evaluation

- The first medical evaluation must be done **before** the respirator fit test
- Repeat the medical evaluation when:
 - Your LHCP recommends an employee needs to be re-evaluated
 - You (as RPA), or the employee's supervisor, indicates an employee needs to be re-evaluated
 - The fit tester observes, or employee reports, medical signs and symptoms during fit test
 - Example: Problems such as difficulty breathing, dizziness, etc.
 - Worksite conditions change and could increase stress on the employee's body
 - Example: The employee will need to climb several flights of stairs with the respirator on

Written Respiratory Protection Program

5. TRAINING YOUR EMPLOYEES

Who needs to be trained?

The following employees will need respirator training:

- Employees who have risk for exposure to respiratory hazards in the workplace
 - Example: Employees who will be caring for COVID-19 positive (or suspected positive) residents/clients
- Supervisors of employees who have risk for exposure to respiratory hazards in the workplace
- Other employees who may need to enter a quarantine/isolation room will need respirator training
 - Example: Environmental Service employees, Building Maintenance, etc.

How should the training be done?

- Respirator training can be done through online audio-visuals/slide presentation, in-person or online streamed classroom instruction, training programs by outside sources, or a combination
 - Informal discussions/in-services can be done to reinforce formal respirator training
- Training must be presented in a way the employees will understand
- The trainer must be qualified and competent in respiratory protection
- The employee must demonstrate knowledge and skill in using a respirator while performing their job duties
 - Example: Employees take a short quiz, perform return demonstration, answer key questions, etc.

The Content of the Training

The RPA must ensure respirator training includes the following:

- Why respirators are necessary, and in what settings
- What respirators can and cannot do
- How a poorly fitted respirator or misused respirator may not protect the employee
- How to inspect, put on, seal check, use, and remove the respirator properly
- How to store the respirator
- What to do in an emergency or if the respirator fails
- Medical signs and symptoms that may limit or prevent the effective use of respirators (e.g., shortness of breath, dizziness)
- The employer's obligation to provide respiratory protection

Written Respiratory Protection Program

6. FIT TESTING

Respirator Fit Testing

- The purpose of the respirator fit test is to test the seal of the respirator to be sure it will adequately protect the employee
- The fit test consists of various exercises to simulate activities an employee may do while wearing a respirator
- Prior to the respirator fit test, the fit tester (or RPA) must verify that the employee completed the:
 1. Medical evaluation AND is cleared for wearing an N95 respirator
 2. Training program that is specific to the facility

When Should the Fit Test be Done?

The respirator fit test must be done:

- Before using the respirator for the first time
- At least every 12 months after the first fit test
- Any time physical changes happen after the first fit test that could affect the seal of the respirator such as:
 - Facial injuries or scarring
 - Dental changes, example: dentures
 - Cosmetic surgery to the face
 - Weight gain or loss – no matter the reason, example: pregnancy
- If the employee or the LHCP notifies you the respirator no longer fits properly

Who does the fit testing?

Options for respirator fit testing include:

- Selecting a person or two at your facility to be trained to become fit testers for your employees
 - Commercial training In-person, online-base
 - DOH provided training: Material on our website, in-person/video feedback
- Sending your employees to an Occupational Health clinic to have their fit testing done

Important! As the RPA, you must make sure the person doing the fit testing for your employees is trained and follows the L&I rules for fit testing. Not following the rules will invalidate the fit test and the worker will not be adequately protected!

Written Respiratory Protection Program

7. IMPLEMENTING YOUR RPP

Getting your Program off the Ground

1. Download the L&I Respiratory Protection Program template and the checklist from the DOH website.
 - Adapt the template to your facility. Complete it as best you can and use it as an outline for your next steps.
 - <https://lni.wa.gov/safety-health/docs/Respirator-Program-Template%20-Guide-for-N95-Use-in-LTC-During-the-COVID-19-Pandemic.docx>
 - Keep track of the tasks that need to be done by using the [RPP checklist](#)
2. Have at least two types of N95 respirators on hand.
 - Stock the respirators your employees are fitted to!
3. Determine where your N95 respirators will be stored, and how employees will get respirators when needed.
 - Store respirators in a climate-controlled environment!

Getting your Program off the Ground (cont.)

4. Identify which employees/jobs will require using a respirator.
5. Notify the selected employees they will need to complete the medical evaluation and the training before getting fit tested.
6. Set up the process for getting the employees their medical evaluation and training completed.
7. Set up your fit testing date(s) and time(s).
8. Manage your employee's records (records for medical clearance, training, and fit test). Employee records will be stored in _____.

Getting your Program off the Ground (cont.)

Questions to address:

- How will you get the medical evaluations done?
 - The DOH vendor
 - Use your own LHCP who is familiar with the RPP
 - Contract with an occupational health clinic vendor
- Who will do the initial fit testing?
 - Fit test your own staff (become a fit tester!)
 - Contract your own vendor
- How will you do the training for the employees? (check all that apply)
 - Live classroom training
 - Slides
 - Videos

Written Respiratory Protection Program

8. RECURRING TASKS

Maintaining Your Respiratory Protection Program

Recurring tasks for the RPA:

- Be sure employees:
 - Do a seal check every time when donning the N95
 - Notify you or their supervisor if the N95 no longer seems to fit or if they are having issues while wearing it
 - Medical evaluation done as directed by the LHCP
 - Do annual training
 - Do annual fit testing for tight-fitting respirators
- Update the written program with:
 - Changes from L&I
 - Type of respirators your facility has
 - Processes relating to donning and/or doffing the respirator
 - Any change in the type of hazard that may affect the employee

Maintaining Your Respiratory Protection Program

Recordkeeping:

- Be sure to keep the following records:
 - LHCP written recommendation of the employee's ability to wear a respirator
 - Training records
 - Fit test records for tight-fitting respirators
- If your facility performs your own medical evaluations, the questionnaires need to be kept 30-years post termination of employment

Written Respiratory Protection Program

9. EVALUATING YOUR RPP

Evaluating the RPP

- Periodically, evaluate your RPP to determine its effectiveness. You may need to make improvements to continue protecting your employees from harm.
- Our recommendations include:
 - Make sure your RPP specifications are followed and appropriate
 - Make sure your selection of respirators is effective in protecting employees
 - Example: Has there been a change in the work environment or conditions?
 - Update your written RPP as changes are made by the Department of Labor and Industries
 - In pandemic situations, keep documentation of respirator supply issues and your attempts to procure supply

Evaluating the RPP (continue)

- Recommendations continued:
 - Have supervisors periodically monitor employee respirator use to make sure employees are using it correctly
 - Regularly ask your employees that are required to use respirators about their views on the RPP effectiveness in keeping them safe
 - Develop a tool to document your observations
 - Regularly monitor employee compliance with requirements

Written Respiratory Protection Program

RESOURCES

Resources

- CDC, Nursing Homes and Long-Term Care Facilities, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/nursing-home-long-term-care.html>, accessed 4/19/2021
- CDC, Strategies for Optimizing the Supply of N95 Respirators, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/respirators-strategy/index.html>, accessed 4/19/2021
- CDC, Summary for Healthcare Facilities: Strategies for Optimizing the Supply of PPE during Shortages, <https://www.cdc.gov/coronavirus/2019-ncov/hcp/ppe-strategy/strategies-optimize-ppe-shortages.html>, accessed 4/19/2021
- COVID-19 Prevention: Respiratory Protection for Nursing and Residential Care, <https://lni.wa.gov/forms-publications/F414-161-000.pdf>, accessed 4/19/2021
- DOH PPE for LTC, [Personal Protective Equipment \(PPE\) for Long-Term Care Settings during the COVID-19 Pandemic \(wa.gov\)](#)
- DOH Fit Testing Project, www.doh.wa.gov/ltrcpp
- DOSH Directive 11.80, [Compliance guidance specific to COVID-19](#)

Resources (con't)

- L&I Safety & Health Consultant, <https://lni.wa.gov/safety-health/preventing-injuries-illnesses/request-consultation/consultant-near-you>
- Safety Standards for Respirators, Chapter 296-842 WAC, <https://www.lni.wa.gov/safety-health/safety-rules/chapter-pdfs/WAC296-842.pdf>, accessed 4/19/2021
- Using Face Masks at Work, (Power Point, general information), [Using face masks at work: Including dust masks, surgical masks and N-95 masks](#)



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