



RESPIRATORY PROTECTION PROGRAM:

N95 GUIDANCE FOR LONG TERM CARE FACILITIES

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

This module is intended for...

- Administrator/Owner of the facility
 - This module provides general information and guidance about the Respiratory Protection Program (RPP) for the Long-term Care (LTC) facility Administrator/ Owner
- Additional information:
 - 2-page summary: [What is a Respiratory Protection Program?](#)
 - Detailed [Respirator Program Administrator \(RPA\) training module](#)

Introduction

Employer tasks and responsibilities for the RPP:

- The RPP is a federal and state requirement to protect workers from exposure to respiratory hazards.
- In Washington, Labor and Industries (L&I) regulates the Respirator Rule (WAC [296-842](#)).
- The Administrator/Owner has overall responsibility for the RPP at your facility.

Important!

There are many types of respirators! This module focuses specifically on N95 respirators for LTC.

What is in this module?

This module will cover the following topics:

- Employer requirements
- Employer tasks and responsibilities for the RPP:
 - Preparation
 - Development
 - Implementation
 - Maintenance
- Employee tasks and responsibilities

Employer Requirements



RESPIRATOR RULE

State Regulatory Requirements

- WAC [296-842](#) Respirators, requires employers to:
 - **Identify & Assign:** The Respirator Program Administrator (RPA).
 - **Develop & Maintain:** The written RPP at your facility.
 - **Provide:** Respirator user training, medical evaluations, and respirator fit testing, during paid time
 - **Recordkeeping:** Keep training, medical clearance, and fit test records
 - **Monitor:** Employee compliance requirements for the RPP

Also, see WAC [296-841](#) Airborne Contaminants rule for biologic hazards

Employer's Tasks

TASK #1 PREPARATION

Preparations for the Respiratory Protection Program

- 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. Update it as things change at State and Federal levels.
 - Understand the RPP and be able to answer questions (from employees, L&I, etc.)
 - Select a Licensed Health Care Provider (LHCP) for medical evaluations
 - Be sure employees complete the medical questionnaire
 - Create and update your training program
 - For tight-fitting respirators, conduct respirator fit testing (or contract with a vendor)
 - Monitor the type of N95 respirators you buy to be sure there has not been a change
 - Evaluate the RPP on a regular basis, as determined by your facility's policy

Provide Respirators

- For fit testing, have more than one type of respirator to choose from
 - Purchase different styles and sizes of respirators
 - Style example: cup shape, duckbill, tri-fold
 - Size example: small, regular, universal
- If tight-fitting respirators do not fit, provide another type of respirator (e.g., powered air-purifying respirator)

Getting N95 Respirators

- Provide your employees with N95 respirators
 - Tips for purchasing N95s:
 - Order the same make/model/size respirator(s) that employees are fit tested to
 - ◆ If you purchase a different 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
 - Monitor your supply often:
 - Be sure to re-order N95s before your stock gets low

Respirator Supply Considerations

- Be sure to have an ample supply of PPE for resident care
 - Use a [burn-rate calculator](#) to help determine how much stock supply you will need
- Follow current Center for Disease Control and Prevention (CDC) Personal Protective Equipment (PPE) Guidance

In case of respirator shortages: If you have no or low supply:

- Check with your local agencies* (e.g., local Health Department, Emergency Management Agency (EMA))
- Contact DSHS* when local agencies cannot assist ([Website](#))

*These agencies may be able to assist with urgent, 7-day supply.

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 which may cause a problem. The medical evaluation helps determine if an employee can safely wear a respirator.

- Respirator fit issues:

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

Accommodation

If your staff are not able to pass the medical evaluation or the respirator fit test, you must provide some alternative work options.

Example Accommodation:

- Assign staff such that they do not work with a resident/client who has a known or suspected respiratory hazard
 - e.g., COVID-19 positive or suspect positive resident/client, aerosol-generating procedures (AGPs), etc.

Note: WAC 296-842 does not require a job accommodation. However, it states you must protect employees from hazards. Other federal and state regulations govern obligations for job accommodation (e.g., American Disability Act, Workplace Anti-Discrimination, etc.).

Employer's Tasks

TASK #2 PROGRAM DEVELOPMENT

Written Respiratory Protection Program (RPP)

[WAC 296-842-12005](#)



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- The purpose of the written RPP is to let employees know:
 - What the hazards are
 - How you are protecting the employees
 - How to use the respirator
 - 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

NOTE: See L&I's [written program template \(link\)](#)

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 (i.e., test method - Qualitative or Quantitative; name of vendor if one is used, etc.).
5. Where staff will find respirators at the facility (location)
6. How respirators will be:
 - a. Provided
 - b. Inspected
 - c. Discarded

Note: Be sure to update your RPP with current practices (e.g., CDC, L&I, 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 respirator program.

Medical Evaluation

[WAC 296-842-14005](#) and [WAC 296-842-22005](#)



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- The purpose of the medical evaluation is to be sure the employee can safely wear a respirator
- A Licensed Health Care Provider (LHCP) must review the medical evaluation
 - The employer will need to identify the LHCP
- Answers to the questions on the medical questionnaire are **confidential** and should not be accessed by the employer
- Employees must complete the medical questionnaire during paid working hours
- Provide it at no cost to the employee

Medical Evaluation

(continued)

[WAC 296-842-14005](#) and [WAC 296-842-22005](#)



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1. Complete the medical evaluation before the first fit test, and...
2. Repeat the medical evaluation when:
 - LHCP indicates to repeat it (on the written recommendation)
 - There are 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

Medical Evaluation (continued)

[WAC 296-842-14005](#) (Step 6, & Table 7)



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- The written recommendation from the LHCP should only contain the following:
 - A statement if the worker is medically capable of using the N95
 - Description of any limitations the worker may have while using the N95
 - When a future medical evaluation is due
 - A statement that the worker has been provided a copy of the written recommendation

Medical Evaluation (continued)

There are three options to complete the medical evaluation requirement:

1. Use an Online Respirator Medical Evaluation program.
 - DOH covers the cost of 3M online medical evaluations as our funding allows:
 - If interested, email the following information to HAI-FitTest@doh.wa.gov
 - Subject line ****Medical Evaluation****
 - Agency Name, DSHS License #, and Address:
 - Number of medical evaluations:
 - Contact person and e-mail address:
2. Hire or contract with a local Occupational Medicine clinic.
3. Use your own Licensed Health Care 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 11 languages](#)

Training

WAC [296-842-16005](#)



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- The person providing the training must be qualified
- Train employees if they:
 - Use respirators (all types)
 - Supervise respirator users
- The training must be done *before* staff use the respirator for the first time
- Training must be repeated within 12-months of the previous training
 - If the employee does not remember how to use the respirator correctly, repeat the training right away.
- 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:

- When and why the N95 respirator is necessary
- What the N95 can and cannot do to keep the employee safe
- The importance of proper fit and use
- How to inspect, put on, seal check, use, and take off the N95
- How and where to store the N95 respirator
- What to do if there is an emergency situation
 - Examples: the employee's N95 gets pulled off by a resident, the employee feels sick while using N95, etc.
- Medical signs and symptoms that may interfere with using the N95 respirator

See WAC [296-842-16005](#), Provide Effective Training.

Respirator Fit Testing

[WAC 296-842-15005](#) and [WAC 296-842-22010](#)

Respirator fit testing must be done:

- *Before* wearing a respirator for the first time to care for residents/clients that have or potentially have a respiratory hazard.
- Within 12-months from the previous fit test
- 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/Dental structure changes
- If the employee or their supervisor/RPA says the respirator fit is not acceptable



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Respirator Fit Testing

- When Respirator fit testing must be done:
 - Before an employee uses a specific tight-fitting respirator in an area that has respiratory hazards
 - Example hazard area: Room with COVID-19 positive resident/client
 - Within 12-months of the last fit test date
 - When the model of respirator used changes
 - When there are significant changes (e.g., physical, medical, job changes)
- For N95 qualitative fit testing (QLFT):
 - Use either a bitter or sweet solution

Respirator Fit Testing (continued)

- The respirator fit test conductor must be able to:
 - Select the correct sensitivity and fit test solutions
 - 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 record (keep current)
 - Training record (keep yearly)
 - LHCP written recommendation letter
 - For the medical questionnaire, the LHCP keeps it 30-years after end of employment (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 test performed (e.g., quantitative, or qualitative with the type of solution used - sweet or bitter)
 - Manufacturer, model, and size of the respirator tested
 - Result of the fit test (e.g., pass/fail)
 - Who did the fit testing (name of test conductor and company)
- Training records must include:
 - The employee's name
 - The date(s) training was done
 - Feedback of understanding the content (such as score or pass/fail)
- The written recommendation from the LHCP should not include any PHI

Employer's Tasks

TASK #3 IMPLEMENTATION

Recommended Steps for the Employer

1. Identify and assign who will be the RPA.
2. Decide how you will get the medical evaluations done.
3. Allow the RPA to develop the written RPP and the training component.
 - Training can be any format you choose (example: in-person, online, printed self-paced module, etc.)
 - **Note:** *The initial and annual **fit test** does not qualify as training!*
4. Inform your employees of the requirements they must complete (i.e., medical evaluation, training, and fit testing).
5. Allow the RPA to manage the medical evaluation, training, and fit testing process.

Employer's 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 respiratory hazards (see WAC [296-842-12005](#))

Evaluation 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 completed their medical evaluation, training, and fit test *before* they started using the N95 respirator
- Review the recordkeeping requirements

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 **before** getting fit tested
- Complete the training before worksite respirator use begins
- Come prepared to do the fit test and demonstrate their knowledge of respirator use
- Inspect, put on, do a seal check, use, and take off the respirator 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 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 the program.

Questions?

Use the resources listed on the Resource page

HAI-FitTest@doh.wa.gov

www.doh.wa.gov/lcrpp

Resources

- L&I – Request for 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 \(wa.gov\)](#)
- Respiratory Protection Program for LTC Facilities webpage, <https://www.doh.wa.gov/ltrcpp>
- 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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