Respiratory Protection Policy

POLK COUNTY RESPIRATORY PROTECTION POLICY

Limited to use with N95 air-purifying respirators and Powered Air Purifying Respirator (PAPR) only

Purpose

This policy is designed to help reduce employee exposure to airborne disease hazards. Respiratory hazards are eliminated through the use of engineering controls where feasible. This policy addresses work-related activities requiring NIOSH approved N95 air purifying respirator and powered air purifying respirators (PAPRs).

This program shall be administered pursuant to the requirements of OSHA Respiratory Protection Standards.

Note: If utilizing a face mask not addressed in this policy, see Risk Management for further instructions.

APPLICABILITY

This policy is applicable to all Departments and Polk County employees whose job duties have the potential risk for exposure to airborne disease hazards requiring the wearing of an N95 or PAPR for personal protection.

Departments with the potential for exposure include the Health Department, Sheriff's Department, Medical Examiner, Community and Family Youth Services' Juvenile Detention and Youth Shelter Services, General Services, Public Works, and any other employee who is deemed by Polk County Risk Management, in consultation with Human Resources, for potential exposure to airborne disease hazards.

Polk County shall provide each employee required to use respiratory protection with a medical assessment, respiratory protection equipment, and training on the safe and proper way to use and care for their respirator. Each employee participating in the Polk County respiratory protection program shall have full responsibility for using respirators as instructed and in strict accordance with all provisions of this policy document.

GENERAL N95 AND POWERED AIR PURIFYING RESPIRATORY INFORMATION

- An N95 respirator is a mask that is approved by the National Institute for Occupational Safety and Health (NIOSH) and worn to filter out 95% of airborne particulate matter. The N95 provides protection against diseases that are both aerosols (fine particles suspended in air i.e., diseases such as TB that are transmitted by small droplet aerosols) and droplets (liquid drops sprayed into the air, but which do not remain suspended), whereas a surgical type facemask will protect only against droplets.

- A PAPR (or tight-fitting goggles and an N-95 respirator) should be worn for high-risk aerosol-generating situations. PAPRs are expensive, generally limited in supply and cumbersome to wear while conducting tasks. This is not a general practical solution. Loose-fitting full face piece PAPRs do not require fit testing but must be inspected prior to use for defects. A PAPR may be selected for use if:
  - individuals cannot be fitted and certified to use an N95;
  - the N95 respirator choice(s) does not fit;
  - an employee has facial hair or facial deformity that would interfere with mask-to-face seal;
  - the N95 respirator choice(s) are unavailable; or
  - there is a potential for exposure to high-risk aerosol-generating situations
ASSIGNMENT OF RESPONSIBILITY

Department Program Oversight

Each department shall manage the plan within their department by identifying at-risk employees, selecting appropriate respirators based on the potential risk for exposure to specific airborne disease agents, operating characteristics of the respirator, and the behaviors of employees using it. Additionally, each department will ensure at-risk employees wear N95 or PAPR when appropriate as well as ensuring that employees utilize, care, and store their equipment properly. Departments will ensure any employees using a respirator receive a medical assessment, training and fit testing before recurring respirator use as well as annual medical assessment, training and fit testing or whenever there are changes in workplace conditions, respirator selection or evidence of improper respirator use. See Training Section below.

If possible, applicable departments should identify at least two of their employees to be trained as a unit based Trainer/Fit-Tester. See Training Section below.

Each department will maintain or submit required reports as set out in this Policy.

Program Manager

Risk Management in collaboration with Human Resources shall manage the Respiratory Protection Policy. Polk County will provide certified NIOSH respirators that, when used properly, will minimize or eliminate exposure to airborne disease hazards. Polk County will provide respirators that are clean, sanitary and in good working order to ensure that equipment protects as designed. These shall be provided at no cost to the employees.

The Program Manager shall ensure that all departments assess their workplace to determine if hazards are present that require the use of respirators. The Program Manager shall ensure all departments are complying with the Respiratory Protection Policy including employees using an N95 respirator pass an appropriate qualitative and/or quantitative fit test as defined by 29 CFR 1910.134 on an annual basis or whenever a different respirator face piece (size, style, model, make) is used.

The Polk County Health Department will work with Risk Management and Human Resources to provide an annual review of the policy and provide recommended best practice updates or suggested changes.

Program Administrator and Medical Provider

The Polk County Health Department serves as the Program Administrator and Medical Provider. A nurse from the Communicable Disease Team is responsible for implementation of, and adherence to, the provisions of the respiratory protection policy.

The Program Administrator and Medical Provider will provide fit testing training to designated department representatives who can then serve as the designated department Trainer/Fit-Testers. The Trainer/Fit Tester trainings will be held annually in December. If a department cannot designate a person to conduct fit testing then the Program Administrator will provide annual training/fit testing for those departments. The Medical Provider will administer medical evaluation(s) and maintain medical records within the employee’s official medical record.

The Program Administrator will maintain a list of employees trained as Trainer/Fit Testers and a list of employees who have been fit tested. A copy of these lists will be provided to the applicable Department, Risk Management and Human Resources.

The Program Administrator and Medical Provider will conduct an annual evaluation of the policy in conjunction with the Program Manager and Human Resources.

Departments

Departments will assess the workplace to determine if hazards are present that require the use of respirators. See Appendix E. Each department shall designate a supervisor and/or administrative to ensure employees are trained in the use of N95 masks and/or PAPR masks, proper cleaning and any other risk reduction strategies. Supervisors will respond to employee concerns and can consult with Program Administrator and Medical Provider. Departments will ensure proper adherence to this plan through periodic audits.

Departments are encouraged to designate at least two staff to be trained as Trainer/Fit-Testers. If departments are unable to designate staff to serve as Trainer/Fit Testers, the Program Administrator will provide fit testing to the department.
Departments in conjunction with the Program Manager and Human Resources will identify all job classifications and locations in which employees may have potential risk for exposure to airborne disease hazards warranting the wearing of an N95 or PAPR for personal protection. The Job Classification/Expected Exposure List as set out in Appendix A shall be updated as job classifications or work and employee situations change.

Departments will assure that employees whose job duties have potential risk for exposure to airborne disease hazards wear an appropriate face piece. If the PPE is an N95 or PAPR departments will ensure applicable employees participate in the annual January training/fit testing including completion of the Medical Evaluation Form (See Appendix B) and submit the completed form to the Program Administrator and Medical Provider between November 1st and December 1st. Note: The designated months for annual medical evaluation and fit testing can only be changed upon consensus with the Program Administrator and Medical Provider.

**Employees**

Employees shall wear respirators when and where required (as determined by their Department, Risk Management, Human Resources, and the Program Administrator/Medical Provider) and in the manner in which they were trained.

Employees shall inspect respirators prior to each use. If a defect is discovered, the respirator shall be disposed of immediately. Employees are responsible to check their respirators for user seal and fit by performing positive checks as described in Appendix D. If these checks are not successful, the respirator should not be used.

If a defect develops during use, the wearer shall remove themselves from the contaminated area and notify the proper authority of potential exposure. Employees shall care for and store their respirator as instructed. Employees shall inform their direct Supervisor and Program Manager should they have difficulty when wearing or using a respirator.

Employees shall inform their direct supervisor of any concerns that may impact their use of a respiratory face piece including a change in physical condition. PCHD Program Administrator/Medical Provider will be available to the Supervisor for consultation during regular business hours.

Employees shall properly maintain and store respirators pursuant to training.

**Contractors**

Contract employees shall be responsible for complying with this policy, and shall be provided the training described herein by the responsible person within the department.

**EXPOSURE DETERMINATION**

All job classifications and locations in which employees may have potential risk for exposure to airborne disease hazards, based on the nature of the job or collateral duties, regardless of frequency, shall be identified and evaluated by each affected department in conjunction with Risk Management and Human Resources. This list shall be updated as job classifications or work and employee situations change. Exposure determination shall be made without regard to the use of personal protective equipment. See Appendix A, Job Classification/Expected Exposure List.

**Record Keeping**

29 CFR 1910.34 requires the employer to establish and maintain documentation of this plan, medical examination and fit testing. This information will be maintained by the Program Administrator/Medical Provider as well as all medical assessments and follow-up care in the official employee medical record maintained at the Polk County Health Department.

PCHD will maintain an Excel spreadsheet by department of those employees fit tested and whether they passed, passed with restrictions or failed. Copies will be shared with the applicable department, Program Manager and Human Resources.

**Medical Evaluation**

All employees subject to exposure requiring respiratory protection shall complete a medical questionnaire. (See attached Appendix B.) This questionnaire must be reviewed by a Physician or Licensed Health Care Professional (PLHCP) before issuance of an N95 respirator. Medical examinations may be given to an employee at the discretion of the PLHCP.

Physician or other licensed health care professional (PLHCP) means an individual whose legally permitted scope of practice (i.e., license, registration, or certification) allows them to independently provide, or be delegated the responsibility to provide, some or all of the health care services required by paragraph (e) of 29 CFR 1910.134.
The medical examination shall be administered confidentially by the PCHD PLHCR. The employee shall also be given the opportunity to discuss with the health care professional the results of the medical evaluation. Examinations will be provided at the PCHD clinic during regular business hours.

Based on the results of the medical evaluation and examination, the PHCLR will determine whether wearing a mask is appropriate for each individual employee and their job duty.

**Fit Testing**

Before any employee is allowed to wear an N95 or PAPR respirator, the employee shall have a medical evaluation and if necessary a follow-up medical examination. The employee shall receive training and be fit tested with the same make, model, style and size of respirator that will be used. The fit test shall be administered using OSHA accepted protocols (See Appendix C).

The Program Administrator/Medical Provider or the department Trainer/Fit Tester shall conduct additional fit tests whenever an employee reports a problem, or when it is recognized that a change has occurred in the employee’s physical condition that could affect respirator fit. Additional medical evaluation and assessment may be conducted based on changes in medical status.

Note: If respirators other than N95 or PAPRS are required, fit testing specific to these other respirators may be required and Risk Management should be consulted.

**Training**

The Program Administrator/Medical Provider will provide training and refresher training that is comprehensive, understandable and practical. Departments are responsible for identifying at least two staff to complete the training to become Trainer/Fit Testers within their department. If Departments are unable to assign internal fit testers, the PCHD will provide said training/fit testing. Annual fit and refresher training will occur in January and at any time that it becomes apparent that additional training will prove beneficial.

All employees serving as Trainers/Fit Testers must provide training to include, but is not limited to the following:

- Why a respirator is necessary and how improper fit or usage can compromise the protective effect of the respirator.
- Limitations and capabilities of the respirator.
- How to effectively use the respirator.
- What to do if the respirator malfunctions.
- Procedures 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 specific requirements of the respiratory protection plan and OSHA 29 CFR 1910.134.

Note: Refresher training must be conducted whenever there are changes in workplace conditions, respirator selection, evidence of improper respiratory use, or change has occurred in the employee’s physical condition that could affect respirator fit.

**Program Evaluation**

The fit testing program will be evaluated annually in the month of April to determine if it is still effective and current. As part of this evaluation, all applicable federal and state standards will be reviewed to ensure that this plan is in compliance. Program review will be conducted by the Program Manager, Program Administrator/Medical Provider and Human Resources.

Contact: Polk County Health Department
515-286-3759

Adopted: 11/1/11