



Policy and Procedure # 299

Respirator Program

Approval: /S/ Danielle Cook

Effective Date: 1/13/2022

POLICY:

Purpose

Respirator use and a written Respiratory Protection Program are required if employees perform high- or extremely-high risk tasks as described in the Appendix A table of DOSH Directive, 11.80, [Annual Fit-Testing, Respiratory Protection, and Face Coverings during COVID-19 Pandemic](#).

First-time respirator program administrators may refer to the Respirator Basics and Resources sections, found at the end of this template, to build familiarity with respirators and program elements.

Instructions and Limitations

This policy **covers only the use of filtering facepiece respirators (e.g. N95s, P100s)** approved by the National Institute for Occupational Safety and Health (NIOSH) or by an equivalent approval body from outside the United States. If you will use half- or full-facepiece elastomeric respirators equipped with air-purifying cartridges, or any other type of respirator, please use the standard template linked above.

Although cloth face coverings are required for “low” risk activities and face masks for “medium” risk activities, neither are classified as respirators (N95s), so they are **not** addressed in this template. You can learn more about mask requirements for “low” to “extremely-high” risk activities in the [Which Mask for Which Task](#) booklet.



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Respiratory Protection Program for COVID-19 Prevention at Exceptional Foresters Inc.

Our company recognizes that respirators, in addition to social distancing and other prevention measures, can help prevent the spread of the coronavirus (also called SARS-CoV-2) at work. This written program is necessary to guide our company’s respirator selection, medical evaluation, fit testing, and use processes so that respirators provide reliable protection.

Our respirator program administrator is: *Angel Gonzalez (Human Resource Director)*

Our administrator’s duties are to:

- oversee the development and implementation of this respiratory protection program
- ensure respirator use is monitored
- evaluate the program regularly to make sure procedures are appropriate and continue to provide adequate protection when job conditions change

Types of Respirators Used in Our Facility

We have evaluated our job tasks and activities to identify the ones that could present “high” or “extremely-high” risk for coronavirus transmission based on [L&I guidance](#). This table shows the types of respirators we provide (at no cost to employees) and require our employees to use when performing the tasks described.

Description of Activities or Tasks with High (or Extremely High) Risk for COVID-19 Transmission	Make and Model of NIOSH (or equivalent) Filtering Facepiece Respirator for COVID-19 Protection
Cleaning and sanitizing areas recently occupied by a person with known or potential COVID-19 illness.	<i>Full PPE: N95 Goggles Full gown</i>
Performing housekeeping, repairs, or other services in rooms occupied by	<i>Full PPE: N95</i>



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someone with known or potential COVID-19 illness.	<i>Goggles Full gown</i>
Engaging in any of the following tasks that require work within 3 feet of healthy (or asymptomatic) clients, coworkers, the public, and others for more than 10 minutes an hour: <ul style="list-style-type: none"> • Bathing clients • Feeding clients • Assisting with medications • Nurse delegated task 	<i>N95 and Gloves</i>
Engaging in any of the following activities that involve procedures on healthy (or asymptomatic) people that aerosolize saliva, mucous, or secretions from eyes; or that cause increased or forced breathing (e.g., breathing exercises), coughs, sneezes or yawning: <ul style="list-style-type: none"> • administering nebulizer treatments 	<i>N95 and Gloves</i>
Transporting someone with known or potential COVID-19 illness	<i>Full PPE: N95 Goggles Full gown</i>

Medical Evaluations

Every employee of this company who must wear an N95 or other filtering facepiece respirator will be provided with a medical evaluation, at no cost to them, before they are allowed to use the respirator. Here is our process:

Step 1: We provide employees with a free copy of L&I's medical questionnaire (found in Table 10 of the Respirators rule; [WAC 296-842-22005](#)) and have the employee fill it out in private during paid work time.



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Our non-readers or non-English-reading employees can be assisted by an individual they trust and who isn't part of company management.

Step 2: Completed questionnaires contain confidential medical information and will NOT be reviewed by management or others in our company. Instead, each employee will send or deliver their questionnaire, free of charge, directly to the following licensed health care professional:

- *3M Respiratory Online Medical Evaluation at www.respexam.com.*

Step 3: If the licensed health care professional determines that a medical exam is also necessary, this will be provided at no cost to the employee, during paid work time, by local medical professional

If no medical exam is indicated, the licensed health care professional will simply notify the employee and the company (at the same time) of their written recommendation as to whether or not the employee is medically able to wear a respirator with or without limitations. **No details about the employee's medical status will be revealed in the written recommendation due to confidentiality laws.**

Copies of written recommendations (but not completed questionnaires) will be kept at the following location for recordkeeping and access purposes:

- *HR will keep copies of written recommendations online and a copy will be printed and stored.*

Additional medical evaluations will be done if any of the following occur:

- The medical provider recommends it
- The respirator program administrator decides it is needed
- An employee shows signs of breathing difficulty
- Changes in work conditions occur that could increase an employee's physical stress (such as high temperatures or greater physical exertion).

Fit-testing



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All employees required to wear filtering facepiece respirators for high- and extremely-high risk tasks must pass an **initial** fit-test before using their respirator; an employee's initial fit-test must be repeated when a different make or model of respirator is used.

During the pandemic, **annual** fit-testing is temporarily suspended by L&I; however, additional fit-testing will be repeated when there is a significant physical change in an employee's face that would affect fit or when an employee or medical provider notifies us that the fit is unacceptable.

No beard, stubble, or other facial hair that could interfere with the mask-to-face seal is allowed during fit testing (or during work use).

Fit testing is conducted by *an approved vendor from the Department of Health* as detailed in [Table 11 of WAC 296-842-22010](#) of the Respirators rule.

We use the Filtering Facepiece Respirator Fit Test Record form found at the end of this written program to document our fit-testing results. The most current fit test records for each employee is kept at the following location for recordkeeping and access purposes:

- *Fit testing documents will be stored in a filing cabinet with the HR generalist.*

After passing a fit-test, each employee will be trained on proper use and issued a respirator.

Use of Respirators

Donning, Seal Checks, & Doffing: We require all staff who use filtering facepiece respirators to watch this 2-minute video from OSHA that shows how to put on, seal check, and safely remove their respirator:

[Putting on and Taking off a Mask Correctly](#) (English)
[Como Ponerte y Quitarte una Mascarilla](#) (Spanish)

Facial Hair: No beard, stubble, or other facial hair that could interfere with the mask-to-face seal is allowed during use since the respirator will no longer providing effective protection from the coronavirus.

Glasses: If corrective glasses or other personal protective equipment is worn, they must be **put on after the respirator is situated** on the face. This is important to preserve an effective mask-to-face seal.



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Inspections: Staff will always check their respirator before putting it on to make sure the straps and other parts are intact.

Reuse: Filtering facepiece respirators are disposable and will not be reused beyond the period of time the respirator manufacturer's recommends or beyond the work shift, which ever ends first.

Storage and Replacement

Temporary Storage: Respirators may be removed and stored for short times only (e.g., when the employee goes on break) as long as the respirator is removed correctly (employees will have watched one of the videos under "Donning, Seal Checks, & Doffing" above) and stored in a way that doesn't contaminate surfaces or the inside of the facepiece (e.g., in a clean paper bag labeled with the employees name, date, and "front" or "back" to consistently situate the mask inside the bag). This method of storage will only be used if the supply of N95 respirators become limited and difficult to obtain. Otherwise the respirators will be discarded after one use.

Replacement: Users must discard and replace their respirator when it's damaged, visibly soiled, deformed, and according to the manufactures' recommendations.

Cleaning or disinfecting an N95 or other filtering facepiece respirator is NOT permitted.

Training

Our employees are trained by *Training coordinator and Licensed Practitioner Nurse* before they wear a respirator; and annually after that. Training must include staff who supervise respirator users since we rely on them to help monitor respirator use.

Training covers each of these areas:

- Why the respirator is necessary
- The respirator's capabilities and limitations
- How improper fit, use, or storage can make the respirator ineffective
- How to properly inspect, put on, seal check, use, and remove the respirator
- How to store the respirator



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- How to use a respirator in an emergency situation or when it fails
- Why medical evaluations are necessary
- Our obligations under the Respirators Rule

Training is done as follows:

Training will be completed by videos, online course, educational handouts, virtual methods, and in-person classes.

We use the Filtering Facepiece Respirator Training Record found at the end of this written program to document training and keep track of who has been trained.

Respirator Program Evaluation and Updates

We evaluate our respirator program for effectiveness by doing the following steps:

1. Talk with employees who wear respirators to get their feedback about their respirators – how they fit, do they feel they are adequately protecting them, do they notice any difficulties in breathing while wearing them, etc.
2. Periodically check employee job duties for changes that may require respirators other than a disposable filtering facepiece respirator.
3. Have staff who supervise respirator users do daily checks to ensure proper use, storage, and replacement.

Should Washington State experience a severe shortage in the availability of filtering facepiece respirators and cause our company to take measures to conserve our supply, the respirator program administrator will update our program to address any changes in use or other practices (and make sure we follow the appropriate [DOH](#) and L&I specifications).

We keep this written program updated and make it available for review when requested by an employee or their representative.

This program was last updated on: *1/13/2022*



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Filtering Facepiece Respirator Fit Test Record

Attention: A medical evaluation must be completed before fit-testing.

Date:

Name of employee:

Has this employee been medically cleared for filtering facepiece respirator use? If not, then do not proceed with the fit test.

Yes ___ No ___

Is this employee clean shaven (i.e., no facial hair or stubble) in the mask-to-face seal area? If not then do not proceed with the fit test.

Yes ___ No ___

The employee was shown how to properly put on, seal check, and remove the respirator and was able to demonstrate this correctly. If not, provide additional instruction until the employee succeeds.

Yes ___ No ___

Fit-testing procedure/protocol used: Bitrex™ ___ Saccharin ___ Other:



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Filtering Facepiece Make, Model, & Approval #	Size	Result: Pass or Fail? (circle one)
<i>(complete this row of information based on each fit test for this employee)</i>		P F
		P F
		P F

Person conducting this fit test:

NOTES:



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Filtering Facepiece Respirator Training Record

Employee Name (printed)

I certify that I have been trained in the use of filtering facepiece respirators, including:

- How the respirator protects me from the coronavirus and when I need to wear it.
- The respirator's capabilities and limitations
- Why I needed to get medical clearance for respirator use
- How improper fit, use, or storage can make it ineffective
- How to properly inspect, put on, seal check, use, and remove it
- When and how to temporarily store it so it doesn't get damaged, contaminated inside, or spread contamination at work
- What to do if my respirator is defective, gets damaged, or somehow doesn't perform as it should
- The company's obligations under the Respirators Rule, Chapter 296-842 WAC and where to review a copy of the company's written respirator program.

I now feel confident to use my respirator. If I have a problem with comfort or other use issue or if I could benefit from additional respirator user training I can contact my supervisor or the Respirator Program Administrator for assistance.

Employee Signature

Instructor Signature

Date



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Respirator Basics

An Overview for New Respirator Program Administrators in Long Term Care During the COVID-19 Pandemic

Overview Purpose & Limitations

Due to the current COVID-19 pandemic, many small employers who have never had to consider respirator use in the past, must now do so. This overview can help with that effort by providing “first-time” Respirator Program Administrators with information to get started right away; but they are still expected to read, become familiar with, and follow requirements in the [Respirators rule, Chapter 296-842 WAC](#).

The Respirators rule requires every employer to create and implement a Respiratory Protection Program when respirator use is required. During the COVID-19 pandemic, respirators are required if employees perform high- or extremely-high risk tasks as described in the Appendix A table of DOSH Directive, 11.80, *Annual Fit-Testing, Respiratory Protection, and Face Coverings during COVID-19 Pandemic*.

Each section in this overview explains a required respirator program element and provides useful information and resources for further learning. The company’s Respirator Program Administrator is responsible for ensuring all required program elements are adequately addressed and the company’s written program is tailored to accurately reflect current practices.

This overview covers only the use of disposable filtering-facepiece respirators (e.g. N95s, P100s, KN95s) approved by NIOSH (or a foreign equivalent).

Respirator Program Administrator



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This is a person selected and designated by the company to have overall responsibility for the development, implementation, and ongoing evaluation of the written respirator program.

Respirator Selection

The Respirator Program Administrator, or their designee, must ensure appropriate respirators are selected for and provided to employees. Learning about the different types of respirators, their capabilities and limitations are key to fulfilling those responsibilities.

Respirators come in a variety of models and sizes. Any model designed to filter out harmful particles from the air is considered appropriate for COVID-19 prevention during high-risk or extremely high-risk tasks.

In addition to using filtering respirators, all respirators used by employees must be NIOSH-approved (or meet a foreign standard recognized as similar to NIOSH). Without NIOSH approval, employers have no way of knowing whether a mask can provide adequate protection. To learn more about NIOSH-approval and how to spot counterfeit or altered respirators visit [NIOSH's Trusted-Source Information page](#) and watch this OSHA [OSHA video: Counterfeit and Altered Respirators: The Importance of NIOSH Certification](#)

Below are photos of several types of NIOSH-approved respirators that LTC facilities can choose from for COVID-19 prevention. *The models shown below are for educational purposes only.* All types, except for the loose-fitting PAPR shown on the far right, rely on a tight mask-to-face seal to work effectively. These models belong to one of 2 categories of respirators: the air-purifying category. The other category is atmosphere-supplying respirators (not shown) and includes SCBAs and airline models that aren't typically used for COVID-19 prevention due to expense and complexity of use. *If you use air-purifying respirators equipped with filter cartridges, you'll need more information than this overview and template provides ([contact your local L&I consultant](#) for assistance).*

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Photos (left to right): a cup-shaped filtering facepiece respirator (N95), a surgical N95, an elastomeric half-facepiece respirator with HEPA (High Efficiency Particulate Air) cartridge filters, an elastomeric full-facepiece respirator with HEPA cartridge filters, and a loose-fitting PAPR (Powered-Air-Purifying Respirator) with a fabric chin bib and HEPA cartridge filters.

Any filtering respirator used for COVID-19 protection must have a filter efficiency rating of at least 95 (e.g., N95). Filtering respirators with higher efficiencies (e.g., N99, P100 or HEPA) are also acceptable.

Medical Evaluations

The Respirator Program Administrator, or designee, needs to ensure each employee who will use a respirator, including a disposable N95, is cleared by a medical evaluation before fit-testing or actual use.

Medical evaluations are necessary to determine whether respirator use could pose a negative health risk to the employee.

Only licensed health care professionals (LHCPs) are allowed to perform these evaluations. You can use LHCPs from outside services or, if available, LHCPs you have on staff at your facility.

Some outside services that offer medical evaluations also offer fit-testing and basic user training as part of their service.

You have 2 possibilities: you can either have the employee fill out the questionnaire found in WAC 296-842-22005 (Table 10, Parts 1, 2, and any additional questions the LHCP might want to add from Part 4) or send the employee in for a medical exam that obtains at least the same information as in



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the questionnaire. Regardless of which you choose follow the steps outlined in WAC 296-842-14005.

If you use the questionnaire, ensure employees feel comfortable providing complete and correct health information for the LHCP. Here are some options to consider:

- Make arrangements to have the LHCP administer the questionnaire at the workplace or at their health care facility.
- Allow the employee to self-administer and mail a paper questionnaire (postage paid) to the LHCP.
- Have the employee fill out an on-line questionnaire. Preview that questionnaire before the employee uses it to make sure it includes the mandatory questions listed in Table 10 Parts 1 and 2. It's acceptable for online questionnaires to have additional questions like the ones in Part 4 of Table 10, as long as the mandatory questions are included.

Employees must have opportunity to get questions about medical issues answered while filling out the questionnaire. Take steps to arrange for the LHCP to be available in person or electronically during questionnaire administration.

If you decide to have an individual administer the questionnaire who isn't the LHCP, take steps to ensure privacy and confidentiality for the employee, for example:

- Instruct the individual administering the questionnaire to not look at the employee's questionnaire at any time.
- Provide pre-addressed, stamped envelopes for completed questionnaires. Instruct employees to place their completed questionnaires in the envelope, seal it, and mail or forward it to the LHCP.



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If an employee could need reading or language translation help when using the questionnaire, make arrangements ahead of time for an individual trusted by the employee to assist (e.g., a professional or co-worker, friend, or family member); and instruct the individual to maintain confidentiality and privacy.

Fit-Testing

Fit testing is required to ensure N95s and other filtering facepiece respirators can maintain an adequate seal to the wearer's face during use.

The Respirator Program Administrator, or designee, will need to choose the fit testing protocol/s that will be used and, if fit-testing is done "in house", secure the necessary supplies. They will also need to ensure "initial" fit testing is set up, conducted, and documented per requirements in the Respirators rule.

No specific training or certification is required for those who conduct fit tests, but the Respirators rule outlines some basic capabilities.

If the company hires a mobile fit-testing service or has their industry association conduct fit testing; check first to make sure they will follow required protocols, have appropriate supplies, prohibit facial hair that can interfere with mask to face seal and provide appropriate documentation for each employee.

Certain **qualitative** (i.e, pass or fail results) fit-testing methods are appropriate for N95s and other disposable filtering facepiece respirators. These include the Bitrex™ aerosol protocol and Saccharine aerosol protocol outlined the Respirators rule. The Banana oil protocol (also called Isoamyl acetate or IAA) uses a vapor so it isn't an appropriate protocol for fit testing N95s or other filtering facepiece respirators. The Irritant Smoke protocol is also a possibility.



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While **quantitative** fit testing methods (e.g. using ambient aerosol counters or controlled negative pressure devices) are also acceptable, they aren't recommended due to N95 shortages.

The person conducting fit tests will need to follow preparation and other instructions in WAC 296-842-22010. For filtering facepiece respirators, this includes:

- Table 11 to get the employee ready for their fit test
- Table 13 if the Saccharin Aerosol protocol will be used; **or** Table 14 if the Bitrex™ Aerosol protocol will be used; or Table 15 if the Irritant Smoke protocol will be used.
- Table 19 fit test exercises for all protocols

An “initial” fit test is required each time an employee switches to a different make, model, or size of respirator. During the pandemic, “annual” fit-testing is suspended (i.e., for employees who don't switch). But any employee who passes an initial fit test will need an “additional” fit test if they later reports the fit has become unacceptable or when someone notices a significant physical change in their face that could affect fit.

User Education & Training

Informed employees are essential to an effective respirator program. Along with a general understanding of what their respirator can and can't do, employees need practical instruction on how to properly put on, use (i.e., how to prevent mask-to-face seal problems), safely take off, store (temporarily only), and dispose of their N95s.

When planning for employee education and training, remember to include anyone who supervises respirator users since they will need to readily recognize and resolve improper use situations and other issues that can reduce respirator effectiveness.



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Plan for how you will accomplish education and training. Companies may use a combination of methods to educate employees. For example, short videos or online training may work well for addressing basic concepts (e.g., why respirators are necessary and what they can/can't do) while in-person instruction is better for ensuring employees demonstrate correct technique for putting on, seal checking, and removing their respirator. Other planning considerations include addressing any language limitations (for example, provide training in the language employees understand best).

Outside services used for fit-testing can often provide training on the basics, but the company will still need to provide its own on-the-job instruction to ensure employees know how the company issues respirators, specific job tasks that require respirator use, how/where to temporarily store respirators (e.g., when going on break), etc.

Include a review of any written procedures or policies on use, such as facial hair limitations, when educating employees. Also, make sure employees know what to expect based on the company's written respirator program.

Posters and even occasional safety talks or texts can help reinforce consistency for certain use practices.

Document your company's education & training methods in your respirator program and keep records of each employee's training.

Proper Use

Supervisors are required to periodically check employee respirator use.

Set up a plan to accomplish this task; you may want to create your own checklist to ensure respirator effectiveness isn't compromised.



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Ensure corrective follow up, such as additional training for employees who don't consistently, correctly, and safely use their respirator.

Program Evaluation

Job tasks and conditions may change and the company's respirator program needs to get updated when such changes could impact respirator selection and other aspects of the respirator program.

Set up a way to get employee feedback on respirator use to identify any individual or staff-wide problems with use and any ideas to improve effectiveness.



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Resources

for New Respirator Program Administrators in Long-Term Care (LTC) Facilities

See the [Respirators rule, Chapter 296-842 WAC](#) to learn requirements and find a copy of the medical questionnaire and fit testing procedures.

Compliance guidance specific to COVID-19 prevention can be found in [DOSH Directive 11.80, Annual Fit-Testing, Respiratory Protection and Face Coverings during the COVID-19 Pandemic.](#)

[Respiratory Protection Program - Template and Guide](#) is another template in case you want to use elastomeric respirators; it's not specific to LTC facilities but it can be adapted.

The handout, [COVID-19: Review of Respiratory Protection for Long-Term Care Workers provides an overview of requirements.](#)

OSHA's video, [Respiratory Fit Testing in English \(12 minutes\) or Spanish \(15 minutes\)](#) isn't specific for LTC, but gives good background on the types of protocols and considerations during a fit test.

Here's a two-minute video, [Putting on and Taking off a Mask Correctly, that shows](#) how to properly put on, seal check, and remove a filtering facepiece respirator.

The Power Point, [Using face masks at work: Including dust masks, surgical masks and N-95 masks](#) (26 slides), [isn't specific to LTC but it covers general capabilities and limitations, some Dos and Don'ts, and why medical evaluation, fit testing, seal checks are important to ensure effectiveness. If you use it as part of your employee training, you'll still need to provide facility-specific training to meet the requirements in the Respirators rule.](#)

Ask an L&I Safety & Health Consultant

Call [your local Industrial Hygienist consultant](#) if you need assistance when using the respirator program template.