

SAMPLE Respiratory Protection Plan for Health Professionals and Unlicensed Assistive Personnel for COVID-19

1.0 PURPOSE

To protect employees from occupational respiratory exposure to COVID-19.

2.0 OVERVIEW OF RESPIRATORY PROTECTION PROGRAM

The Respiratory Protection Program is coordinated by the [school district position or department]. [School district position or department] shall review work areas and nursing procedures performed in the school to identify hazards that may warrant the use of respiratory equipment. The purpose of the work area and nursing procedure review is to identify the nature of potential hazards, employees that may be exposed, and control measures to protect employees.

As hazards are identified, efforts shall be focused on identifying and developing engineering control measures to reduce exposure so that respiratory equipment will not be necessary. Where this is not possible and in emergency situations, respiratory equipment may be required.

Equipment selection and purchase shall be conducted by [school district position or department]. Selection shall be based on the specific nature and magnitude of the hazard. Employees shall be provided training in the proper selection, use, and care of the particular respiratory equipment that they may be required to wear. Before an employee is assigned equipment, a qualitative fit test must be performed by [school district position or department or outside agency] to assure that the equipment fits properly. **A respirator will be effective only if it fits properly.**

Employees are expected to care for equipment assigned to them and to inspect it before each use. The Respiratory Protection Program shall be periodically evaluated by [school district position or department] to assure that employees are provided necessary equipment and training, and that the program complies with federal regulations.

3.0 RESPONSIBILITIES

3.1 Employees

Employees shall:

- a) Know how to properly select, care for, and use respiratory equipment necessary for their work;
- b) Inspect and maintain equipment they use;
- c) Successfully complete respiratory protection and other required training where necessary; and
- d) Inform their supervisor of personal changes potentially influencing the respirator fit.

3.2 Supervisors

Supervisors shall:

- a) Provide respirators when employees request;
- b) Insure that employees know how to properly select, use, and care for respiratory equipment needed for their work;
- c) Provide access to medical evaluations for employees required to use respirators;
- d) Periodically survey work areas and nursing procedures requiring respiratory equipment no less than once per year;
- e) Procure necessary respiratory equipment;
- f) Coordinate attendance of employee training sessions;

- g) Maintain files of inspection results, training, fit test results, and other pertinent information; and
- h) Evaluate contractor work for respiratory protection needs and designate a departmental liaison if necessary.

3.3 [School district position or department]

[School district position or department] shall:

- a) Develop respiratory protection guidelines for in routine and reasonably foreseeable emergency situations for **[School District]**;
- b) Know how to properly select, use and care for respiratory equipment;
- c) Advise workers and departments on equipment selection and purchase;
- d) Inspect work areas and nursing procedures where respiratory equipment is used to assure proper selection and use;
- e) Ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators;
- f) Permit employees to use their own respirators, if such respirator use will not in itself create a hazard;
- g) Provide the respirator users with the "Information for Employees Using Respirators When Not Required Under the Standard" ([29CFR 1910.134 - Appendix D](#));
- h) Ensure that any employee using a respirator voluntarily is medically able to use that respirator;
- i) Evaluate the respiratory protection program annually; and
- j) Assist in providing respiratory protection training and fit testing for tight-fitting respirators.

4.0 RESPIRATORY EQUIPMENT SELECTION

The primary reason for a respiratory protection program is to maintain employee health. Therefore, using proper respiratory equipment for the task is imperative. Selection of a respirator shall be based on the specific activity or the nursing procedure the individual is performing.

Respiratory protection equipment shall be chosen and assigned for a specific activities or nursing procedures upon the assurance that:

- a) the respirator and cartridge are appropriate for COVID-19.

NIOSH Certification

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification.

Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

5.0 MEDICAL EVALUATION

The use of any type of respirator may impose some physiological stress on the user. Federal regulations require that all potential users are required to have a medical evaluation to determine

the employee's ability to use a respirator; before the employee is fit tested or required to use the respirator in the workplace.

[School District] employees will complete the questions outlined in the questionnaire found in [1910.134 - Appendix C](#) and submit completed questionnaire to [enter health care professional who will review questionnaire].

The medical evaluation includes a questionnaire to establish the employee's baseline health status and to determine whether or not the employee is capable of wearing a respirator. Only those individuals who are medically able to wear respiratory protective equipment will be issued a respirator. Medical tests to be considered by a physician or other licensed health care professional (PLHCP) may include: pulmonary function tests, chest x-rays, or other tests deemed appropriate by the PLHCP. Medical factors to be considered by the PLHCP may include: emphysema, asthma, chronic bronchitis, heart disease, anemia, hemophilia, poor eyesight, poor hearing, hernia, lack of use of fingers or hands, epileptic seizures, and other factors that might inhibit the ability of an employee to wear respiratory equipment.

A follow-up medical examination shall be provided for an employee who gives a positive response to any question among questions 1 through 8 in Section 2, Part A of 1910.134 - Appendix C or whose initial medical examination demonstrates the need for a follow-up medical examination. The follow-up medical examination shall include any medical tests, consultations, or diagnostic procedures that the PLHCP deems necessary to make a final determination.

5.1 Supplemental Information for the PLHCP

A copy of the written respiratory protection program and the following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning an employee's ability to use a respirator:

- a) The type and weight of the respirator to be used by the employee;
- b) The duration and frequency of respirator use (including use for rescue and escape);
- c) The expected physical work effort;
- d) Additional protective clothing and equipment to be worn; and
- e) Temperature and humidity extremes that may be encountered.

5.2 Medical determination

To determine the employee's ability to use a respirator, a written recommendation shall be obtained from the PLHCP. This recommendation shall provide:

- a) Any limitations on respirator use related to the medical condition of the employee,
- b) Any need for follow-up medical evaluations; and
- c) A qualified occupational health professional must initially and at least annually thereafter evaluate employees who wear respirators to determine if the employee is medically capable to use a respirator. The medical evaluation questionnaire contained in [Appendix C of 29 CFR 1910.134](#) will be utilized.

6.0 FIT TESTING

Qualitative fit testing shall be performed for each employee and for each respirator the employee may wear. The employee must be fit tested (prior to initial use of the respirator) with the same make,

model, style, and size of respirator that will be used and at least annually thereafter. Fit testing shall be performed by an authorized trainer and shall follow the procedures outlined later in this section. Testing shall occur before a respirator is assigned. Self tests shall be performed by the employee in accordance with this section each time before a respirator is worn. Anything that may compromise the seal of the facepiece may render the respirator useless. For this reason, persons with facial characteristics that prevent a good seal must either be provided a positive pressure respirator with hood or helmet or be prohibited from work requiring a respirator.

In cases where workers voluntarily maintain characteristics that interfere with the face seal, the department shall determine whether to provide suitable protection or to keep the employee out of the work site. Employees that wear eyeglasses or contact lenses shall be provided with eyeglass inserts designed to fit within a full face mask when required. The department shall be responsible for providing both respirators and eyeglass inserts. All employees shall also obtain a physical in accordance with section 7.0 Medical Evaluation and a physician's written approval to wear a respirator prior to the initial fit test. See [1910.134 App A](#) for OSHA fit testing procedure.

6.1 Self Fit Test Procedures

Workers shall check the fit of their respirators before each use according to the procedures outlined below. [School district position or department] trainer shall train workers in these procedures during qualitative fit testing sessions.

6.1.1 Negative Pressure Test

The user closes the inlet of the cartridge or filters by covering them with the hands or squeezing the breathing tube so air is not allowed to pass. The user inhales gently so the facepiece collapses slightly, while breath is held for about 10 seconds. If the facepiece remains slightly collapsed and no inward leakage is detected, the respirator probably has a good fit. This test should only be used for snug fitting respirators. It also has potential drawbacks such as hand pressure affecting the facepiece seal and causing false results.

6.1.2 Positive Pressure Test

The user closes or covers the exhalation valve and gently exhales into the facepiece. The respirator fit is considered acceptable if slight positive pressure can be built up inside the facepiece without any evidence of outward leakage on the outside. For some respirators, this test requires that the wearer remove the exhalation valve cover. This removal often disturbs the respirator fit if not done before the respirator is put on. The test is simple for respirators that have a valve cover with a single small port that can be covered with the hand or a finger.

7.0 RESPIRATOR USE

Employees are responsible for:

- a) Using their respirators under conditions specified by this program, and according to the training they receive on the use of each particular model.
- b) Not using the respirator in a manner for which it is not certified by NIOSH or by its manufacturer.
- c) Conducting user seal checks each time that they wear their respirator.
- d) Using either the positive or negative pressure check (depending on which test works best for them) specified in [Appendix B-1](#) of the Respiratory Protection standard.
- e) Leaving the work area to reevaluate the continued effectiveness of the respirator for the following reasons:

- i. to wash their faces and respirator face pieces if necessary to prevent eye or skin irritation associated with respirator use;
- ii. If they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the face piece; (if this happens, the respirator must be replaced or repaired before allowing the employee to return to the work area);
 - to change filters or cartridges, or replace parts; or
 - to inspect the respirator if it stops functioning as intended.
- f) Notifying their supervisor before leaving the area.
- g) Not wearing tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good
- h) Not wearing headphones, jewelry, or other articles that may interfere with the face piece-to-face seal.

8.0 MAINTENANCE AND CARE OF RESPIRATORS

8.1 Cleaning and Disinfecting

Respirators provided are clean, sanitary and in good working order.

Respirators are cleaned and disinfected using the procedures specified in [Appendix B-2 of the Respiratory Protection Standard](#).

8.2 Storage

When not in use, respiratory equipment shall be sealed and stored per manufacturer's instructions. The respirator should be stored with nothing lying on top of it. Each employee is responsible for their respirator. Respirators shall be stored in a location protected against dust, sunlight, extreme heat and cold, excessive moisture, or damaging chemicals, fumes, or vapors.

9.0 INSPECTION

Users shall inspect their respirators for defects and elasticity before and after each use.

10.0 EMERGENCY USE EQUIPMENT

N/A for Respiratory Protection Program for COVID-19.

11.0 TRAINING AND INFORMATION

All workers using respiratory equipment shall successfully complete the training identified in this section prior to use a respirator. Lack of the employee's knowledge or use of the respirator indicate that the employee has not retained the required understanding or skill. In addition, training must also be successfully completed as necessary for confined space work, emergency response, or other regulated activity.

Employee training should be conducted annually and more often if necessary.

The employee shall demonstrate knowledge of at least the following:

- Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator;
- What the limitations and capabilities of the respirator are;

- How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;
- How to inspect, put on and remove, use, and check the seals of the respirator;
- What the procedures are for maintenance and storage of the respirator;
- How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators

All attendant personnel shall also be trained in first aid and cardiopulmonary resuscitation (CPR). Personnel who choose to wear respirators, must be provided with a copy [1910.134 App D](#) - Information for Employees Using Respirators When not Required Under Standard.

12.0 PROGRAM EVALUATION

The respiratory protection program shall be reviewed annually. Corrections, additions, or deletions which will improve the program shall be made. If changes are realized or needed at any other time, they can be adopted then as well as during the review. Respirator fit, appropriate respirator selection, proper respirator use, and maintenance are some of the factors that shall be assessed during the evaluation.

13.0 RECORDKEEPING

Written information regarding to medical evaluations, fit testing, and the respirator program shall be kept on file.

Fit testing results, as discussed in Section 8.1, shall be kept on file for a minimum of [xx years]. Originals shall be kept in [XXX].

Resources:

OSHA Fit testing of Respirators <https://www.youtube.com/watch?v=D38BjgUdL5U>

OSHA Respirator Safety: <https://www.youtube.com/watch?v=Tzpz5fko-fg>

OSHA The Difference Between Respirators and Surgical Masks:
<https://www.youtube.com/watch?v=ovSLAuY8ib8&t=26s>

OSHA Respiratory Protection for Healthcare Workers Training Video:
<https://www.youtube.com/watch?v=6qkXV4kmp7c&t=100s>

This sample policy is offered by the Wisconsin Department of Public Instruction based upon the template from the Wisconsin Department of Safety and Professional Services.

<https://dsps.wi.gov/Documents/Programs/PublicSafety/TemplateRespiratoryProtection.pdf>