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Respiratory Protection Program Evaluation Checklist & Instructions for Use

- 1** Y N Is there a written policy which acknowledges employer responsibility for providing a safe and healthful workplace?
- 2** Y N Has a suitably trained individual been designated as the respiratory protection program administrator (RPA) with overall responsibility for development and implementation of the respiratory protection program?
- Does the written respiratory protection program include the following required elements? (items 3-12)
- 3** Y N written designation of a program administrator;
- 4** Y N an evaluation of hazards and identification of appropriate respirators for specific job classifications and/or tasks;
- 5** Y N procedures for medical evaluations of employees required to use respirators;
- 6** Y N fit testing procedures for tight-fitting respirators;
- 7** Y N procedures for proper use of respirators;
- 8** Y N procedures and schedules for storage, inspection, and maintenance of respirators;
- 9** Y N procedures for training employees regarding the respiratory protection program;
- 10** Y N a description of the training curriculum;
- 11** Y N procedures for voluntary use of respirators; and
- 12** Y N procedures for regular evaluation of the program.
- 13** Y N Is the written program readily available to any employee included in the program?
- 14** Y N Is there a record of medical clearance for each employee required to wear a respirator?
- 15** Y N Is there a record of a fit test or fit test screening for each respirator user from within the last year?
- 16** Y N Have users been trained in the proper use, maintenance, and inspection of respirators?
- 17** Y N Have workers been trained on the respiratory hazards to which they are potentially exposed during routine and emergency situations?
- 18** Y N Are workers prohibited from wearing respirators with a tight-fitting facepiece if they have facial hair or other characteristics which may cause face seal leakage?

- 19 Y N Are respirators stored appropriately so as to prevent them from becoming damaged or deformed?
- 20 Y N Are the users wearing the respirator for which they have passed a fit test?
- 21 Y N Are N95, or more protective, respirators always worn by employees in areas occupied by a suspected or confirmed case of airborne infectious disease?
- 22 Y N Are PAPRs always worn by employees in areas where a high hazard procedure is being performed on a suspected or confirmed case of airborne infectious disease?
- 23 Y N Are N95, or more protective, respirators always worn by employees in areas where a high hazard procedure is being performed on a suspected or confirmed case of seasonal influenza?
- 24 Y N Are respirators inspected by the users before each use?
- 25 Y N Are respirators being donned and doffed correctly?
- 26 Y N Are PAPRs and any other reusable respirators cleaned and disinfected as often as necessary, including before being worn by a different individual?
- 27 Y N Is there a mechanism for users to report problems with respirator use?
- 28 Y N Is there a mechanism for users to provide feedback about the effectiveness of the program?

Checklist Instructions

This checklist should be completed and used to update any deficiencies in the program on a regular basis. Any changes made to the program should be documented and kept on file with the written program, which must be available to all employees. List the changes or improvements that need to be made to the program.

1. In California, every employer has a legal obligation to provide and maintain a safe and healthful workplace for employees, according to the California Occupational Safety and Health Act of 1973. This obligation should be stated in writing as a reason for developing and implementing a respiratory protection program (RPP), and can serve as the opening paragraph of your written RPP. If you do not have such a policy in writing for your facility, it would be a good idea to develop one as a preface to all of your health and safety programs.

2. Asks whether management has designated an appropriate person to be held accountable for implementing the respiratory protection program. The Cal/OSHA standard requires the Respirator Program Administrator (RPA) to be “suitably trained.” The RPA should have an understanding of the principles of respiratory protection and of the requirements of the Cal/OSHA respiratory protection standard (Title 8 section 5144). If your RPA is not a health and safety professional, he/she might need some additional training to effectively carry out their responsibilities.

The Cal/OSHA respiratory protection standard (Standard) requires all employers with employees who are required to use respiratory protection to have a written RPP. Items **3–12** refer to the written program. Check the written RPP to be sure each of the required elements is present and in compliance with the Standard.

3. One individual should be identified either by name or job title as the RPA. If additional people have key responsibilities for the RPP, their names and roles may be listed as well.

4. The hazard evaluation/respirator selection section of the RPP should include a list of job titles and/or tasks and identify the type of respirator required for each. This should just be general type (e.g., N95 or PAPR), not specific make and model.

5. Written procedures should address how employees are to obtain and complete the questionnaire, who will evaluate the questionnaire, who will do exams when necessary, how clearance will be reported and how records will be kept. You may attach or copy and paste the questionnaire from the standard.

6. Written fit test procedures should address the following questions. Who will do the fit test? What protocol will be used? You may copy and paste or attach the protocol from the standard. What will happen if someone fails the fit test? How are records kept?

7. Procedures for use should include policies for prohibition of use (e.g., facial hair), procedures for proper use including inspection of the respirator, seal checks, proper donning and doffing technique, etc.

8. Procedures should address appropriate storage, maintenance, disposal and/or cleaning and disinfecting of all types of respirators used at the facility.

9. The training section of the RPP should include the procedures for training (e.g., who will do it and how often)

10. The training section should also include the training curriculum, which must include: the hazards to which employees are exposed; the procedures for proper use and maintenance of respirators; and the limitations of the respirators being used.

11. In instances when respirators are not required by Cal/OSHA or the RPP, the Standard allows employers to provide respirators to employees who choose to wear them voluntarily.

12. Procedures for periodic evaluation of the RPP must be in writing and must include procedures for obtaining feedback from employees as part of the evaluation process.

13. Addresses the requirement that the written RPP must be available for review to anyone in the program. It may be in a central file accessible to employees, or it may be available in electronic format, but users must know where to find it.

In order to answer questions **14** and **15**, you will need to pull the records on medical evaluations and fit tests and make sure that they are comprehensive. If records are missing for any employees wearing respirators, you must determine immediately whether the records are simply missing, or if the person has really not been evaluated or fit tested. Any time you discover missing records, you should rectify this immediately.

Questions **16** and **17** may also be answered by pulling records if your facility is tracking who has been trained. If there is not an easy way to obtain this information, you should consider either tracking this electronically, or keeping a training roster in a file so that you can easily determine who has and has not been trained. If there is anyone wearing a respirator who has not been trained, this should also be rectified immediately.

In order to answer questions **18–26**, you will need to go to the units and observe the program in action. Watch carefully to ascertain whether or not the procedures in the written program are being followed. If they are not, you will need to determine whether additional training is needed or whether your procedures should be revised.

Questions **27** and **28** address procedures for communication and feedback that should be in place for employees covered by the RPP.

27. Addresses whether or not there is a way for users to report any specific problems they are having on a day-to-day basis. Is their model and size of respirator unavailable? Are the straps of their N95 breaking during donning? Are they experiencing discomfort or difficulty breathing when wearing respirators for required time periods? Are they unable to get a good seal when they perform a seal check? Do they know who to report these problems to?

28. Addresses whether or not employees are involved in the periodic evaluation of the program. Is there a way for them to communicate general problems or ideas for improvement to the RPA so that appropriate changes to the program will be considered when the program is evaluated?