**Interim COVID-19 Respiratory Protection**

[*Insert Facility Name*]

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# Interim COVID-19 Respiratory Protection Plan

## Purpose:

This Interim COVID-19 Respiratory Protection Plan (“Interim Plan”)is being implemented during an emergency to address the use of filtering facepiece respirators where required by the facility’s policies and procedures, as defined by a Federal or State regulating agency. A respiratory protection plan has not been historically needed in the facility because other controls limited employee exposure to respiratory hazards—such as discharging residents to the hospital that are known to present a risk of airborne infection.

## Description of the Interim Plan:

1. The Interim Plan is based on current CDC, CMS, OSHA, and similar guidance for COVID-19 as that guidance relates to the potential hazards created by COVID-19 in the facility.
2. The Interim Plan is intended to be flexible due to changing guidance on COVID-19, shortages in supplies, reallocation of personnel, and other circumstances that may cause certain aspects of the plan to be infeasible or require additional precautions.
3. To the extent circumstances arise, exposures change, agency guidance is amended that is unaccounted for by the Interim Plan, the Program Administrator, can alter the Interim Plan to account for then-existing circumstances or exposure through verbal notification and, as needed, on the job training. The Program Administrator will update the Interim Plan within a reasonable period of time.

## Respiratory Protection Program Administrator:

The Respiratory Protection Program Administrator (“Program Administrator”) is the Infection Control Preventionist or Clinical Designee. Program Administrators are responsible for overseeing implementation of this Program, performing hazard or job safety evaluations, and updating the Interim Plan as needed.

## Respirator Selection:

When a respirator is required by policy or exposure, employees should use a NIOSH-approved filtering facepiece respirator rated at N95 or greater. The inventory and availability of respirators will be monitored by the Program Administrator, and where the supply of respirators is limited, in the judgment of the Program Administrator, alternate precautions may be taken based on relevant guidance, such as CDC “crisis capacity strategies for N95 Respirators” or any relevant Emergency Use Authorization (EUA). Additionally, the hazard evaluation and guidance on which this respirator selection is based may be updated as the exposure, or guidance related to the exposure, changes.

## Medical Evaluation:

Employees whose work activities require the use of a respirator should receive medical clearance prior to the use of a respirator and prior to being fit tested for a respirator. Because of the unique circumstances presented by COVID-19, including the dramatic increase in need for respiratory protection, the need for a formal medical evaluation may be suspended or delayed. As the circumstances allow, a limited form of evaluation may be performed by the facility medical director or other licensed health care professional. The evaluator will complete the medical clearance form and maintain the original questionnaire in a sealed file to maintain confidentiality from any other company employees. The medical clearance form and any associated restrictions will be provided to the Program Administrator or designee and kept in the employee’s confidential health file. An additional medical evaluation may be required when the employee presents with signs or symptoms that indicate a need for reevaluation, observations during a fit test, where feasible, or other monitoring indicate a need for reevaluation, or a change in circumstances indicates a need for reevaluation.

## Fit Testing:

Before an employee is required to use any respirator with a tight-fitting facepiece, they will be fit tested by the Program Administrator, or a designee thereof, with the same make, model, style, and size of respirator to be used, when available. If an employee’s respirator model is out of stock or in short supply, in the judgment of the Program Administrator, the employee may use a different model that fits similarly to the model used previously by the employee. Employees who use tight-fitting respirators are not permitted to have facial hair that interferes with the facepiece seal or valve function.

Fit tests will be provided at the time of initial assignment and annually thereafter. Additional fit tests will be provided whenever the employee experiences or the supervisor or Program Administrator observes physical changes that could affect respirator fit. These changes include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

Because fit-testing kits may be in limited supply or unavailable, reallocation of personnel, and other unique circumstances presented by the COVID-19 pandemic, annual fit testing may be suspended and initial fit testing may be shortened to include instruction, negative or positive pressure user seal check, and visual inspection, as necessary in the judgment of the Program Administrator. When fit testing kits become available and their use is feasible in the judgment of the Program Administrator, individuals who have not undergone an initial fit test with a fit testing kit will be re-tested with a fit test kit.

## Training:

All employees have been trained, either in school, new-hire orientation, or on-the-job training in the use of respirators. Further, annual training should include the following:

* The general requirements of the OSHA Respiratory Protection standard.
* The specific circumstances under which respirators are to be used.
* Respiratory hazards to which employees are potentially exposed during routine and emergency situations.
* Why the respirator is necessary and how proper fit, usage, and maintenance can ensure the protective effect of the respirator as well as how improper fit, usage or maintenance can compromise the protective effect of the respirator.
* The limitations and capabilities of the respirators that will be used.
* How to effectively use the respirators, including emergency situations and situations in which the respirator malfunctions.
* How to inspect, put on, remove, use, and check the seals of the respirator (for tight-fitting respirators such as N95 filtering facepiece respirators).
* The procedures outlined in this program for maintenance, storage, and cleaning or disposal of respirators.
* How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators.
* How and when to decontaminate (or safely dispose of) a respirator that has been contaminated with chemicals or hazardous/infectious biological materials.

## Respirator Use:

Respirators are to be used under the conditions outlined in the facility’s COVID-19 policies and procedures. Employees are expected to be diligent in observing practices pertaining to ensuring the safe use of respirators. To ensure proper protection, the wearer will perform a user seal check, in accord with manufacturer’s instructions and the training provided each time he or she puts on a tight-fitting respirator.

## Disposal:

When the supply allows, disposable filtering facepiece respirators will be discarded after each use (i.e., patient encounter). Where the supply is limited, however, reuse by the same wearer is acceptable as long as the filtering facepiece respirator is not damaged, contaminated, or soiled. The respirator may be decontaminated in compliance with CDC or OSHA guidance. The respirator must be discarded when it is no longer in its original working condition, whether that condition results from contamination, structural defects, or wear. Any defective respirators shall be removed from service. Defective disposable respirators will be discarded and replaced.

**Voluntary Use:**

Under the relevant agency guidance, respirators are neither required nor necessary for certain tasks or in certain parts of the facility. In those circumstances, employees will be permitted to wear a filtering facepiece respirator (dust mask) on a voluntary basis. If an employee chooses to wear a respirator voluntarily, they will review and sign the form entitled *Employee Training and Certification*

*For Voluntary Use of Filtering Facepiece Respirators*. The employee will be responsible for inspecting and maintaining their own respirator. No other requirements under this Interim Plan apply when a respirator is used voluntarily, such that fit testing and medical evaluations are not required.

## Program Evaluation:

The Program Administrator will conduct a periodic evaluation of this respiratory protection program to ensure that all aspects of the program meet the requirements of the OSHA Respiratory Protection standard and that the program is being implemented effectively to protect employees from respiratory hazards.

## Record keeping:

All records related to this program shall be kept by the Program Administrator, except that confidential medical evaluations and questionnaires will be maintained in the employee’s confidential personnel file.

# Medical Evaluation Materials

### Medical Evaluation Questionnaire



### Medical Evaluation Clearance Form



# Training Materials

*[These are initial training materials that may be added to as determined by the Program Administrator]*

### Potential Training Videos

Donning & Doffing Respirator:

OSHA (2:02) - <https://www.youtube.com/watch?v=oU4stQgCtV8>

US (1:37) - <https://youtu.be/HluIkTbTBIw>

Singapore (2:36) - <https://youtu.be/zoxpvDVo_NI>

Donning & Doffing all PPE:

CDC (12:01) - <https://youtu.be/YYTATw9yav4>

Additional Training:

OSHA (33:14) - <https://www.youtube.com/watch?v=6qkXV4kmp7c>

### Potential Training Documents

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| --- | --- | --- | --- |
| *User Seal Check* | *Difference between facemask and respirator* | *Key Factors for Respirator Effectiveness* | *7 Key Steps* |
|  |  |  |  |

### Voluntary Use



# Fit Testing Materials

### Fit Test Form



### Fit Test Procedures



# OSHA Respiratory Protection Standard

29 C.F.R. § 1910.134 - Current Standard Available at: <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>