

INTRODUCTION

The California Association of Health Facilities (CAHF) has developed the “Just-In-Time Respiratory Protection Program” to assist Long-Term Care providers to respond to events or situations that will require them to implement a program for the respiratory protection of their employees. Although long-term care providers are not currently mandated by state or federal law to provide a respiratory protection program, there may come a time when circumstances (e.g. pandemic influenza) mandate the use of respiratory protection for your employees. Without preparation it will be very difficult to implement a respiratory protection program when the situation calls for one. CAHF encourages all long-term care providers to be ready for that time of need by preparing with the “Just-In-Time Respiratory Protection Program”.

The CAHF “Just-In-Time Respiratory Protection Program” will guide you through the set-up of a respiratory protection program that you will be able to implement on short notice to assure the protection of your employees. This step-by-step process allows you to follow a checklist of actions that will get you ready, and assist you in implementing the program.

The “Just-In-Time Respiratory Protection Program” is designed for use in response to a respiratory disease emergency. It is not a program designed for routine respiratory protection (e.g. working with patients with active tuberculosis or working with hazardous materials).

While the “Just-In-Time Respiratory Protection Program” follows both state and federal direction, it is not designed to represent an official or legal interpretation of OSHA or CalOSHA regulations. The steps of the program on the attached checklists will also include the references and links to the official federal and state documents (standards, guidelines and regulations) that govern employer respiratory protection programs.

As a companion piece to this “Just-In-Time Respiratory Protection Program” CAHF has produced a Fit-Test video to assist in preparing staff to use personal protective equipment (PPE-N95 respirators). This Fit-Test video can be found at:

www.cahfdisasterprep.com/PreparednessTopics/PandemicInfluenza/JustInTimeRPP.aspx

PROGRAM DESCRIPTION

All respiratory protection programs must contain certain elements to adhere to federal and state regulations, guidelines and standards. These elements are:

- 1) There must be a written Respiratory Protection program;
- 2) Each employee who uses personal protective equipment (PPE) must be medically evaluated to use the equipment;
- 3) Employees must be fit-tested and trained to use PPE; and
- 4) The employer must provide adequate PPE for their employees.

The “Just-In-Time Respiratory Protection Program” is divided into two(2) sections:

➡ SET-UP

➡ IMPLEMENTATION

Each section is presented in the format of a checklist of activities that will need to be completed.

SET-UP

The **SET-UP** section has four (4) checklists; *Policy, Medical Clearance, Training, and Purchasing*. The activities on these checklists need to be completed to have the plan ready to implement. As you will see, some of the items need to be reviewed and/or updated on a yearly basis.

IMPLEMENTATION

The **IMPLEMENTATION** section has three (3) checklists; *Medical Clearance, Fit-testing, and Purchasing*. Each activity is explained on the checklist so you will understand the purpose and importance of each item.

POLICY CHECKLIST

To use Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) at your facility you must have a written Respiratory Protection Program. CAHF has produced a Model Respiratory Protection Program (MRPP) for skilled nursing facilities and other long term care providers. To establish a written Respiratory Protection Program, complete the following checklist.

1. Download and print out CAHF's Model Respiratory Protection Program (MRPP) from: www.cahfdisasterprep.com/PreparednessTopics/PandemicInfluenza.aspx. It would be advantageous to read the MRPP manual which will provide a complete background of a respiratory protection program.
2. Download the CAHF Model Respiratory Protection Program Polices and Administrative Tools: www.cahfdownload.com/cahf/dpp/MRPP_PoliciesAdministrativeTools.doc
Insert your facility's name on page 1 of the MRPP.
3. Complete the Program Administrator section on page 1 of the MRPP. This person maybe the Administrator of the facility, the Director of Nursing (DON), Director of Staff Development (DSD) or whoever will be in charge of this Respiratory Protection Program.
4. Check the appropriate box or boxes on page 4 that identify the Personal Protective Equipment that your facility will utilize (The Powered Air Purifying Respirator (PAPR) can be used for those individuals with facial hair or who cannot be fitted for an N95 respirator).
5. Check the appropriate box on page 6 or 7 as it relates to the method of medical evaluation to be used by your facility:
 - Option A – Online Questionnaire, Page 6. You should identify the on-line provider and the process for medical evaluation. (Although the MRPP identifies RESP-EXAM as the provider, you may choose the on-line provider that best meets your situation). Identify who the Physician or other Licensed Health Care Professional (PLHCP) is for the on-line provider. Please see the medical evaluation checklist for more information.
 - Option B – Designate a Physician or other Licensed Health Care Professional (PLHCP), Page 7.
6. Insert the name of the name of the PLHCP or provider who will provide review of the medical questionnaire at the top and bottom of Page 7.
7. Set an annual evaluation and review date for the Respiratory Protection Program. The Respiratory Protection Program Administrator will review the program with feedback from employees. A review of potential hazards, case definitions and state and/or local guidance will be undertaken as part of this annual evaluation.

SET-UP

MEDICAL CLEARANCE CHECKLIST

For staff to use Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) they must first be medically cleared according to state and federal law. A mandatory medical evaluation must be used and reviewed by a Physician or other Licensed Health Care Professional (PLHCP). This medical evaluation is to determine if the employee is physically and psychologically able to perform the assigned work while wearing respiratory protective equipment.

1. Select the method of how your organization will conduct the medical evaluation of employees who will use personal protective equipment; on-line questionnaire or written questionnaire evaluated by PLHCP. (See Policy Checklist, item # 5)
2. Indicate the name of the provider of your medical clearance process (on-line Company or PLHCP) in your written Respiratory Protection Program. (See Policy Checklist, item #6)
3. If you have selected an on-line process, set-up the on-line process with the provider. They will assist you. (You can find on-line providers by doing an internet search of “on-line respiratory protection medical clearance”).
4. If you have selected to do a written questionnaire evaluated by a PLHCP, prepare a process by which the employee will be able to complete the medical questionnaire:
www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9783
 This medical questionnaire can also be found in CAHF’s MRPP at:
www.cahfdownload.com/cahf/dpp/MRPP_PoliciesAdministrativeTools.doc
5. The employee is provided work time to complete the confidential medical evaluation questionnaire. (If necessary and to the extent possible, the questionnaire should be provided in alternate languages to the employee.)
6. The employee shall submit the completed questionnaire directly to the PLHCP who will review the document. Additionally the employee shall have direct access to the PLHCP, if they have any questions concerning the medical evaluation.
7. A re-evaluation of the employee shall occur if:
 - employee reports physical symptoms related to the ability to use the respirator
 - it is identified that the employee is having medical problems during respirator use
 - the PLHCP determines the need to be re-evaluated
 - workplace conditions change resulting in increased physiological burdens on the employee
8. Document that the employee has completed the medical evaluation process. This should include the result of the process. Specific Information, regarding the medical evaluation questionnaire, should be kept in a confidential medical file. It should not be kept in the employees regular employee file.

TRAINING CHECKLIST

Employees who will be using Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) must be trained on the use and limitations of the equipment. Training should be done in coordination with the fit testing procedure. A facility should set-up a training program that includes the following elements:

1. Explanation of why the Respiratory Protection Program is being implemented and the hazards that workers will be potentially exposed during routine and emergency situations. This explanation should include the health effects of such hazards.
2. Instruction on the uses and limitations of all respirators to be utilized at the facility. This instruction should include recognition of medical signs and symptoms that may limit or prevent effective use of respirators.
3. Purchase a Fit-Test kit. These are available for supplier of the N95 respirators. The Fit-Test kits come with detailed instruction on fit testing (Consider purchasing multiple fit test hoods and collar assemblies. As this will allow you to fit test multiple individuals at one time).
4. Instruction on the inspection, maintenance, and storage of Personal Protective Equipment. This includes the proper disposal of damaged or contaminated respirators and the cleaning of reusable respiratory equipment.
5. Instructions on how to correctly wear the Personal Protective Equipment, including donning (putting on) and doffing (removal). This part of the training should also include the information on seal check procedures and proper respiratory etiquette and hand hygiene.
6. Allow sufficient time for the employees to practice donning, doffing respirators and conducting a seal check. It is important to offer and allow employees different styles and sizes of respirators. This will assure that each employee will find a respirator that is appropriate for them and passes the fit testing procedure.
7. Documentation that the employee has completed the respiratory protection training. This should include the date, time, location (including city and state), and instructor/tester. Both training and fit testing must be repeated yearly or upon implementation of the Respiratory Protection Program. If the Respiratory Protection Program remains in effect for more than one year, employees will have to be re-trained and fit tested.

A Training/Fit Testing Program Curriculum is available as the last attachment to CAHF's the MRPP at: www.cahfdisasterprep.com/PreparednessTopics/PandemicInfluenza.aspx

SET-UP

PURCHASING CHECKLIST

Employees must be provided with Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) by their employer. The employer should purchase N95 respirators to assure the safety of their staff, patients, and visitors. Remember only use NIOSH Approved N95 (or above) respirators. These are the only respirators that meet the standards established by OSHA. To obtain N95 respirators and arrange for the purchase of additional respirators when needed follow the following steps:

1. Locate a supplier and set up an account that you will be able to use when needed. Arrange for the purchase of small supply of N95 respirators. You will want to have a small supply on hand at all times in case there is an immediate need (You can easily find a supplier by doing an on-line search for N95 respirators).
2. Purchase a variety of sizes and models of respirators. There is no one model or size that fits all people. (Consider single shape facepieces and tri-fold facepieces.) Additionally, you should think about purchasing a few elastomeric facepiece respirators. These reusable respirators can be used by multiple staff in case of an emergency.
3. Purchase a Fit-Test kit. These are available from N95 respirator suppliers. The fit-test kits come with detailed instructions on fit testing. (Consider purchasing multiple fit test hoods and collar assemblies, as this will allow you to fit test multiple individuals at one time).
4. Additionally you will want to locate local suppliers who will be able to assist your facility if an immediate need arises for respirators. These local suppliers should be able to get respirators to you within 24 hours and will be beneficial in a surge situation when N95 respirators are in short supply.
5. Arrange a space at your facility for the storage of the respirators. Storage of respirators should be in a space that is protected from extreme heat or cold, moisture, and damaging chemicals. Some respirators have a shelf life of 5 years. Please check with the manufacturer for specific information regarding the shelf life of the makes and models.

Please note that your local county and the State of California have caches of personal protective equipment and may be able to supply you with respirators to meet your need. However, this resource can only be utilized after you have exhausted all other methods of obtaining respirators.

IMPLEMENTATION

MEDICAL CLEARANCE CHECKLIST

For staff to use Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) they must first be medically cleared according to state and federal law. When you implement your Respiratory Protection Program during an emergency you will want to get your staff medically cleared so that they can be trained and fit tested as soon as possible. Please assure that the following steps are completed as part of the implementation of your Respiratory Protection Program:

1. Contact your Physician or other Licensed Health Care Professional (PLHCP) that will be reviewing the medical questionnaire and inform them that you are implementing the facility's Respiratory Protection Program. Let them know that they will be receiving medical questionnaires to review. Request their immediate attention to these questionnaires.
2. If you have arranged for an on-line service as your medical evaluation process, review the protocols and processes that will be followed by staff for medical evaluation. Review the number of available questionnaire evaluations that your company/facility has purchased or arranged with the on-line provider.
3. Provide the medical questionnaire to the employees you plan to have trained and fit-tested for use of a respirator. When necessary and to the extent possible, the questionnaire should be provided in alternate languages to the employee.
4. Allow staff to complete the confidential medical questionnaire on work time. The completed medical questionnaire should be sent directly to PLHCP and the staff member should have direct access to the PLHCP to ask questions regarding the questionnaire.
5. Document that the employee has completed the medical evaluation process. This should include the result of the process. Specific Information, regarding the medical evaluation questionnaire, should be kept in a confidential medical file. It should not be kept in the employees regular employee file.

If the emergency requires immediate action by staff to provide services to patients, staff should don respirators even without medical clearance, training or fit testing and conduct the services needed. This may only occur if the situation is critical and no other qualified and fit-tested staff is available to perform the services. Medical clearance, training and fit-testing should be done as soon as possible thereafter.

IMPLEMENTATION

FIT-TESTING CHECKLIST

For staff to use Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) they must be fit- tested for the respirator that they will use. The fit-testing procedure is mandated by OSHA and can be found at:

www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9780

This fit-testing procedure assures that the respirator fits properly and will provide an adequate level of protection for the worker. Upon implementation of the Respiratory Protection Program you will need to conduct the following steps while fit-testing staff:

1. Check to assure that individuals to be fit-tested have been medically cleared to wear respirators in this work setting. (See the SET-UP medical clearance checklist for information)
2. Before conducting the fit-testing, check to assure that the individuals have been trained on the use and limitations of the respirators. (See the SET-UP training checklist for more information)
3. Provide the respirators to the individuals to be fit-tested.
4. Conduct fit-testing in accordance with OSHA policy and procedures. The fit-test kit that you will use should have step by step procedures that adhere to OSHA guidelines. Additionally the CAHF - Model Respiratory Protection Program (MRPP) has a step by step guide on training and fit-testing available at: www.cahfdownload.com/cahf/dpp/CAHF_MRPP.pdf. CAHF has also completed the “CAHF Just-In-Time Fit-Test Video” that gives you a review of the fit testing process. It can be found at: www.cahfdisasterprep.com/PreparednessTopics/PandemicInfluenza/JustInTimeRPP.aspx
5. Document that the employee has completed the fit-testing. This should include the result, respirator model, date, time, location (including city and state), and instructor/tester. Both training and fit testing must be repeated yearly or upon implementation of the Respiratory Protection Program. If the Respiratory Protection Program remains in effect for more than one year, employees will have to be re-trained and fit tested.

IMPLEMENTATION

PURCHASING CHECKLIST

Employees must be provided with Personal Protective Equipment (PPE [N95 respirators, and elastomeric respirators]) by their employer. The employer should purchase N95 respirators to assure the safety of their staff, patients, and visitors. Remember only use NIOSH Approved N95 (or above) respirators. These are the only respirators that meet the standards established by OSHA. In the event of an emergency arrange for the purchase of additional respirators. Take the following steps:

1. Distribute the current supply of respirators for staff safety and protection.
2. Contact your regular supplier and place an immediate order for additional respirators. Ascertain the arrival date of the new order.
3. Determine if your current supply of respirators will be sufficient until the new order arrives.
4. If your current supply of respirators will not be sufficient until the new order arrives, contact your local supplier of respirators and purchase the needed quantity (NOTE respirators could be in short supply during a pandemic situation).
5. If you are not able to purchase or acquire needed respirators, you should contact local (county health department) officials to request assistance in obtaining the respirators (your county and the State of California have caches of personal protective equipment and may be able to supply you with respirators to meet your need).
6. If respirators are in short supply and you are not able to acquire additional respirators for your staff, you will need to implement respirator re-use procedures. Please contact your local health department for instructions on the re-use of respirators.
7. Document your efforts to obtain additional respirators. Identify the companies/suppliers that you have contacted, the results of that contact, time, date, and person you talked or communicated with.