

## **Respiratory Protection Program Instructions for use**

### **COVID-19 Hazard Assessment**

The American Dental Association has created a COVID-19 Hazard Assessment available to ADA members. This guide and checklist are modeled after the Occupational Safety and Health Administration's (OSHA's) Hazard Identification and Assessment, one of the elements of the Recommended Practices for Safety and Health Programs. The ADA COVID-19 Hazard Assessment can be accessed here: <https://www.ada.org/resources/coronavirus/update-to-office-procedures-during-covid-19>.

The Hazard Risk Assessment may help determine whether your office will utilize NIOSH-certified respirators. While dental offices are not mandated to utilize N95 (or their equivalent) respirators simply because they are a dental office, some offices may still decide to require their use and others may make their use optional. Dental offices that either require their use or make their use optional must create a Respiratory Protection Program and can do so by completing complete the section of this document that is applicable to their office. A respiratory protection program is not mandated by OSHA for dental offices that do not utilize respirators.

#### **If your office utilizes NIOSH-certified respirators:**

Ohio dental offices that utilize NIOSH-certified respirators (i.e., N95 masks or their approved equivalent) must have a written respiratory protection program that is specific to their office. If a dental office requires its employees to wear N95 or equivalent respirators then the office may want to consider using the language titled Respiratory Protection Program (respirators required).

#### **If your office does not require NIOSH-certified respirators but makes them available:**

If a dental office does not require its employees to wear N95 or equivalent respirators but only makes them available for use at the employee's discretion, then the office may use the language titled Respiratory Protection Program (respirators available).

## Respiratory Protection Program (respirators required)

Respiratory Protection Program for the dental office of \_\_\_\_\_.

### Introduction and Exposure Determination

Airborne pathogens, such as COVID-19, SARS, MERS and TB, are serious diseases. In our continuing commitment to ensure a safe working environment for all of our staff, our office has developed this respiratory protection program. These policies apply to all employees of this dental office who are at risk of coming into contact with airborne pathogens. The specific action steps each employee is expected to take will vary depending on the specific task they are performing.

It is the policy of this practice to not treat patients who are either positive for respiratory diseases (like COVID-19, SARS, MERS, TB, etc.) or who have COVID-19 signs or symptoms of these diseases. This practice will consider asymptomatic patients as being potential carriers of COVID-19.

This office requires employees to wear NIOSH-certified N95 or equivalent respirators when performing tasks that create aerosol conditions. Our office will provide appropriate respirators, training, and medical evaluations at no cost to employees directly involved with aerosol creating procedures on asymptomatic patients.

Before wearing a respirator for the first time, this office will provide and the employee must:

- Undergo an appropriate medical evaluation;
- Undergo fit testing procedures;
- Understand procedures for the proper use of respirators in routine and reasonably foreseeable emergency situations;
- Understand procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;
- Receive training in the respiratory hazards to which they are potentially exposed during routine and emergency situations;
- Receive training in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance; and
- Understand procedure for regularly evaluating the effectiveness of the program.

### Medical Evaluation

Using a respirator may place a physiological burden on employees that varies with the type of respirator worn, the job and workplace conditions in which the respirator is used, and the medical status of the employee. As such, this office will arrange for a medical evaluation by a physician or other licensed health care professional using a medical questionnaire (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppC>, Sections 1 and 2, Part A) or an initial medical examination that obtains the same information as the medical questionnaire 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. These medical evaluations may be discontinued when the employee is no longer required to use a respirator.

The medical questionnaire and examinations will be administered confidentially during the employee's normal working hours or at a time and place convenient to the employee. The medical questionnaire shall be administered in a manner that ensures the employee understands its content. The employee shall have an opportunity to discuss the questionnaire and examination results with the physician or health care professional who performs their evaluation. The physician or licensed health care professional who performs the evaluation must be provided with the following information concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee;
- The duration and frequency of respirator use;
- The expected physical work effort;
- Additional protective clothing and equipment to be worn;

- Temperature and humidity extremes that may be encountered; and
- A copy of this office's written respiratory protection program and a copy of the applicable section of the OSHA Respiratory Standard.

#### **Follow-up Medical Examination (if applicable)**

This office will ensure that a follow-up medical examination is provided for an employee who gives a positive response to any question among questions 1 through 8 in Section 2, Part A of the OSHA Respirator Medical Evaluation Questionnaire (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppC>) 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 physician or other licensed health care professional deems necessary to make a final determination.

#### **Medical Determination**

In determining an employee's ability to use a respirator, this office shall obtain a written recommendation regarding the employee's ability to use the respirator from the physician or other licensed health care professional which must address:

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the physician or other licensed health care professional has provided the employee with a copy of the practitioner's written recommendation.

Additional medical evaluations will be provided if the employee reports medical signs or symptoms that are related to ability to use a respirator; a physician or other licensed health care professional or supervisor informs this office that the employee needs to be reevaluated; information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or a change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature) that may result in a substantial increase in the physiological burden placed on an employee.

#### **Fit Testing**

All employees who this office requires to wear a respirator must first be fit tested with the same make, model, style, and size of respirator that will be used. During the time of the COVID-19 crisis, subsequent fit testing will not be required utilizing the same make, model, style, and size of respirator that was initially fit tested if that particular respirator is not available, though we shall try to utilize a respirator that is as close to the one that was initially used as possible.

Employees using a tight-fitting facepiece respirator must pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this paragraph.

Any employee using a tight-fitting facepiece respirator must be fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter. This annual fit testing requirement is waived during the time of the current COVID-19 public health crisis.

An additional fit test will be conducted whenever an employee reports, or the employer, physician or licensed health care professional, supervisor, or program administrator makes visual observations of, changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

If after passing a QLFT or QNFT, an employee subsequently notifies this office, or a physician or licensed health care professional that the fit of the respirator is unacceptable, then we shall give that employee a reasonable opportunity to select a different respirator facepiece and to be retested.

The fit test will be administered using an OSHA-accepted QLFT or QNFT protocol. The OSHA-accepted QLFT and QNFT protocols and procedures (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppA>).

QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half facepieces, or equal to or greater than 500 for tight-fitting full facepieces, the QNFT has been passed with that respirator.

Qualitative fit testing of these respirators will be accomplished by temporarily converting the respirator user's actual facepiece into a negative pressure respirator with appropriate filters, or by using an identical negative pressure air-purifying respirator facepiece with the same sealing surfaces as a surrogate for the atmosphere-supplying or powered air-purifying respirator facepiece.

Quantitative fit testing of these respirators shall be accomplished by modifying the facepiece to allow sampling inside the facepiece in the breathing zone of the user, midway between the nose and mouth. This requirement shall be accomplished by installing a permanent sampling probe onto a surrogate facepiece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the facepiece.

Any modifications to the respirator facepiece for fit testing shall be completely removed, and the facepiece restored to NIOSH-approved configuration, before that facepiece can be used in the workplace.

### **Use of respirators**

**Facepiece seal protection.** Employees who have facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function; or any condition that interferes with the face-to-facepiece seal or valve function are not permitted to wear respirators with with-fitting facepieces.

Any employee who wears corrective glasses or goggles or other personal protective equipment must wear such equipment in a manner that does not interfere with the seal of the facepiece to their face.

All employees must perform a user seal check each time they put on the respirator using the OSHA approved procedures (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppB1>) or procedures recommended by the respirator manufacturer that this office has demonstrated are as effective as the OSHA approved procedures (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppB1>).

### **Maintenance and care of respirators**

**Cleaning and disinfecting.** This office will provide each employee who is required to wear a respirator with a respirator that is clean, sanitary, and in good working order. All respirators will be cleaned and disinfected using OSHA approved procedures (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppB1>) or procedures recommended by the respirator manufacturer that this office has demonstrated are as effective as the OSHA approved procedures (<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134AppB1>).

Respirators issued for the exclusive use of an employee must be cleaned and disinfected as often as necessary to be maintained in a sanitary condition.

Respirators issued to more than one employee must be cleaned and disinfected before being worn by different individuals.

Respirators maintained for emergency use only respirators must be cleaned and disinfected after each use.

Respirators used in fit testing and training must be cleaned and disinfected after each use.

**Storage.** All respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they shall be packed or stored to prevent deformation of the facepiece and exhalation valve.

*The following paragraph is only applicable if the dental office provides respirators for use in emergency situations only. If an office does not provide emergency use only respirators, then do not include the following paragraph:*

Emergency use only respirators must be: kept accessible to the work area; stored in compartments or in covers that are clearly marked as containing emergency respirators; and stored in accordance with any applicable manufacturer instructions.

**Inspection.** All respirators used in routine situations must be inspected before each use and during cleaning. This inspection will include:

- A check of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- A check of elastomeric parts for pliability and signs of deterioration.

**Repairs.** Respirators that fail an inspection or are otherwise found to be defective must be removed from service, and are discarded or repaired or adjusted. Only appropriately trained individuals are permitted to make repairs or adjustments to respirators and these repairs or adjustments must be made utilizing the respirator manufacturer's NIOSH-approved parts designed for the respirator. Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed. Reducing and admission valves, regulators, and alarms shall be adjusted or repaired only by the manufacturer or a technician trained by the manufacturer.

**Identification of filters, cartridges, and canisters.** All filters, cartridges and canisters used in the office must be labeled and color coded with the NIOSH approval label and that the label is not removed and remains legible.

### **Training and information**

This office will provide training to those employees who are required to use respirators. This training will be done prior to requiring the employee to wear a respirator, annually and more often if necessary (e.g., when changes in the workplace or the type of respirator render previous training obsolete, the employee demonstrates inadequacies in their knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill, when other situations arise in which retraining appears necessary to ensure safe respirator use). Employees who are required by this office to wear a respirator must be able to demonstrate knowledge as to:

- 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.
- *Do not include this sentence if it is not applicable to the dental office:* 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.
- The general requirements of the OSHA Respirator Standard.

### **Program evaluation**

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance);
- Appropriate respirator selection for the hazards to which the employee is exposed;
- Proper respirator use under the workplace conditions the employee encounters; and
- Proper respirator maintenance.

Medical evaluation – Records of medical evaluations required by this program will be retained and made available in accordance with 29 CFR 1910.1020.

- The name or identification of the employee tested;
- Type of fit test performed;
- Specific make, model, style, and size of respirator tested;
- Date of test; and
- The pass/fail results for QLFTs or the fit factor and strip chart recording or other recording of the test results for QNFTs.
- Fit test records shall be retained for respirator users until the next fit test is administered.

The following staff members have read, understand and will comply with this document:

[illegible]

## Respiratory Protection Program (respirators available)

Respiratory Protection Program for the dental office of \_\_\_\_\_.

### Introduction and Exposure Determination

Airborne pathogens, such as COVID-19, SARS, MERS and TB, are serious diseases. In our continuing commitment to ensure a safe working environment for all of our staff, our office has developed this respiratory protection program. These policies apply to all employees of this dental office who are at risk of coming into contact with airborne pathogens. The specific action steps each employee is expected to take will vary depending on the specific task they are performing.

It is the policy of this practice to not treat patients who are either positive for respiratory diseases (like COVID-19, SARS, MERS, TB, etc.) or who have COVID-19 signs or symptoms of these diseases. This practice will consider asymptomatic patients as being potential carriers of COVID-19.

This office does not require our employees to wear N95 or equivalent respirators when performing tasks that create aerosol conditions but we do make them available at no charge for use by employees at their discretion. Employees are also permitted to utilize their own respirators at their expense providing such an action does not itself create a hazard.

Before wearing a respirator for the first time in this office, the employee must first read and acknowledge receipt of the following:

#### Appendix D to Sec. 1910.134 (Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

Any employee who uses a respirator voluntarily must certify that that they are medically able to use that respirator, and that the respirator is cleaned, stored, and maintained so that its use does not present a health hazard to the user.

### Recordkeeping

A copy of this respiratory protection program may be accessed at \_\_\_\_\_ and the OSHA Respiratory Protection Standard (CFR 1910.134) and its accompanying Appendices may be

accessed at <https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>. They are available to any employee. Employees are expected to be thoroughly familiar with and in compliance with this document.

The following staff members have read, understand and will comply with this document:

[illegible]