



Respirator Regulations: How Much Do You Really Know?

A host of industries require workers to wear some type of respirator, from a simple dust mask to fully enclosed SCBA equipment. Where your business falls in that continuum will determine your responsibilities according to OSHA's respirator regulations. But myths and misinterpretations often cloud employer implementation of respirator programs, leading to protocols that don't actually satisfy the regulations.

Understanding the minimum requirements and the best medical practice will help you develop a high quality respiratory surveillance program that keeps your employees safe and healthy without wasting time or incurring unnecessary medical expenses for your company

Myth #1: Everyone Needs a Pulmonary Function Test (PFT)

The PFT is the most commonly misunderstood component of OSHA's respirator use regulations. Many employers think that all employees subject to respirator use must have a pulmonary function test. Some employers take it further by conducting annual pulmonary function tests. The facts, however, are clear: **OSHA does not require a PFT for respirator certification.**

Physicians, on the other hand, may require a PFT as part of the respirator certification process. In fact, a physician (or physician assistant / nurse practitioner) is the only person who can order a PFT. The diagnostic test is used in conjunction with a medical exam to determine physical fitness of the respirator wearer's upper body systems, including lung and heart functions.

So how does this affect your respiratory program? Simply put, **conducting pulmonary function tests without physician oversight is not advisable.** Only a physician can interpret PFT results and determine how those results impact an employee's ability to wear a respirator at work. If no physician is reviewing your PFTs, you're throwing money out the window. In fact, if no physician ordered your PFTs, you shouldn't even be conducting them in the first place.

Myth #2: Completing the Questionnaire Satisfies My OSHA Requirements

OSHA requires that all employees who wear a respirator of any kind must complete the OSHA Respirator Questionnaire. The type of respirator worn will determine how much of the questionnaire must be completed, but at a minimum, all respirator wearers will complete Part A, Sections 1 and 2. However, simply completing the questionnaire is not enough.

OSHA clearly states that **questionnaires must be reviewed by a medical professional.** OSHA does not identify the licensure level of the medical professional, but industry-standard best practice is to have a physician, physician assistant, or nurse practitioner review the questionnaires. This does not necessarily mean that all employees must have a physical examination, but it does mean that the protocols must be in place to address any "red flag" questionnaire responses that should result in medical intervention. So whoever provides the medical oversight for your questionnaires must be ready to take employees through a thorough clinical exam when necessary.

Myth #3: Employees Must Complete Questionnaires Annually

Not necessarily... OSHA does not definitively require annual questionnaire completion, and frequency of medical evaluation is determined by four specific circumstances. Employees are required to complete questionnaires for initial certification and subsequently only if:

1. An employee reports medical signs or symptoms related to wearing the respirator
2. The medical professional determines that medical re-evaluation is necessary
3. Observations made during fit testing suggest the need for medical re-evaluation
4. A change occurs in the workplace conditions

Although not required by OSHA on an annual basis, questionnaire completion and review is a relatively low-cost, effective way to document employees' suitability to wear respirators and to potentially identify the need for further medical examination. Therefore, most high-quality respiratory surveillance programs require employees to complete questionnaires annually for review by medical professionals.

Myth #4: My Medical Clinic Will Handle the "Fit Test" Requirement

Not so fast. According to the OSHA regulations, fit testing of respirators is the responsibility of the employer. Making an assumption that medical examinations will satisfy this requirement could lead to some major problems. Although some medical clinics can perform fit testing, protocols for such services must be arranged in advance. Unless they are notified, most clinics won't fit test employees without specific request to do so.

A number of resources for fit testing are available, including local industrial hygiene companies and consultants. However, employers with high numbers of respirators should consider conducting their own respirator fit testing. It's more cost-effective and can help you manage the time and expense of fit testing better than outsourcing. OSHA provides some useful video resources to help you get started, and they are available on the U.S. Department of Labor's YouTube site.

Myth #5: My Employees Are Not Subject to OSHA Respirator Regulations

As most of us know, with OSHA, it's better to be over-prepared than under-prepared. So here's the litmus test: If your company has required employees to wear a dust mask (or more), you are subject to OSHA respirator regulations. Medical professionals know that when employees have "red flag" conditions, even the simplest mask can cause issues. Therefore, OSHA makes it clear that if you require employees to wear something to filter air, they need to complete the questionnaire and be included in an OSHA-compliant respiratory surveillance program.

Sources:

OSHA Respiratory Protection Guidelines

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=12716&p_table=standards

OSHA Respirator Medical Evaluation Questionnaire (Mandatory)

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9783