

HBI OSHA Respiratory Protection Update

The COVID-19 pandemic is not slowing down OSHA inspectors when it comes to inspecting America's workplaces. In fact, OSHA inspectors are now more likely to inspect operations with pandemic related injuries and illnesses. An example would be the recent citing of the Ohio based skilled nursing facility for missing respiratory protection program requirements. Respiratory protection has come to the forefront of all our minds, especially in healthcare. OSHA officers will continue to complete inspections in the name of injury and illness reduction.

Below are the findings from the investigation at the facility in Ohio:

- Failing to develop a comprehensive written respiratory protection program; and
- Failing to provide medical evaluations to determine employees' ability to use a respirator in the workplace.
- Fines totaled \$40,482 for the workplace violations.

The agency also issued a Hazard Alert Letter regarding the company's practice of allowing N95 respirator use for up to seven days and not conducting initial fit testing. N95 respirators are typically intended to be replaced often and not used multiple days in a row. During the first phases of the pandemic shortages of masks required a reuse strategy to maximize the supply available. The CDC is now recommending an extended use approach. Extended use means not changing the mask through the day and leaving it on for multiple clients. Fit testing continues to be mandatory to assure a proper seal is created to adequately protect the wearer.

Respiratory programs have several requirements to comply with the OSHA standard. These elements are required to not only avoid citation, but to ensure employees understand the hazards associated with working in environments requiring the use of respirators and the hazards associated with wearing them.

They are:

- Written program specific to the facility or location requiring respiratory protection.
- Procedure for respirator selection.
- Medical evaluations by a medical professional to ensure the wearer is capable to do so.
- Fit testing for tight fitting respirators (N95, Half face, Full face respirators)
- Procedures and schedules for cleaning/replacing tight fitting respirators
- Training on proper use, wearing, potential limitations and maintenance of respirators

For additional information and best practices please contact your Risk Control representative or contact riskcontrol@hendersonbrothers.com