

RESPIRATOR USE REQUIRES PRIOR MEDICAL EVALUATION

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Appropriate respirators should be used to protect the health of employees when it is not feasible for an employer to implement effective engineering controls, or while controls are being instituted.

Before a worker is allowed to be fit tested for a respirator, a medical evaluation conducted by a physician or another licensed healthcare professional (PLHCP) is required by OSHA's Respiratory Protection standard (1910.134).

This fit test is required in order to determine an employee's ability to use a respirator, which can potentially affect a worker's health. For example, negative pressure respirators can restrict breathing, hoods and full-face respirators can cause claustrophobia and self-contained breathing respirators are heavy. Some specific medical conditions that can increase an employee's risk include cardiovascular disease, asthma, musculoskeletal disorders, and psychological conditions.

According to OSHA, medical evaluations are required for both negative and positive pressure respirators (except for filtering face pieces [dust masks] used on a voluntary basis). A worker who refuses medical evaluation cannot conduct job duties that require the use of a respirator.

The medical evaluation can be conducted using a medical questionnaire or by an initial medical examination that obtains the same information as the medical questionnaire. The standard allows any PLHCP to administer the questionnaire or examination if it is within the scope of their license. Make sure the PLHCP you choose is licensed to perform this type of medical evaluation. An employer can also check with the state licensing board to identify a suitable medical provider.

If the medical questionnaire is used for the medical evaluation, the medical questionnaire found in Appendix C of the Respiratory Protection Standard is required. The questionnaire cannot be altered. The PLHCP will administer Part B of the questionnaire if necessary and is permitted to alter the questions in Part B as appropriate.

If an affirmative answer is given for any question numbered 1 through 8 in Section 2, Part A, of the medical questionnaire, the employer must provide follow-up examinations for the employee. Follow-up examinations must be provided to workers who will be using a self-contained breathing apparatus (SCBA) or full-face respirators if there are affirmative answers given for any question 10 through 15. The PLHCP may determine that a follow-up examination is necessary while administering the medical questionnaire or initial medical examination.

The employer must pay for the medical evaluation and related expenses incurred by the employee. The confidentiality of the employee being evaluated must be protected. The evaluation (and subsequent examinations if necessary) must be given during the employee's normal work hours or at a time and place convenient to the employee. Provisions must be made for non-English speaking employees.

The standard requires that the PLHCP be provided with specific information for evaluation of a worker's ability to use a respirator. This information includes:

- The type and weight of the respirator
- Duration and frequency of respirator use (including use for rescue and escape)
- Level of physical effort that the worker will be exerting while wearing a respirator
- Additional personal protective clothing and equipment that the employee will be wearing
- The temperature and humidity extremes that may be encountered in the work environment where respirator use is required.

The PLHCP must also be provided with a copy of your written respiratory protection program and a copy of the Respiratory Protection standard.

OSHA requires the employer to obtain a recommendation from the PLHCP with regard to the worker's ability to use a respirator. The recommendation must be written and include:

- A determination of whether or not the worker is medically able to use a respirator
- Any limitations on respirator use related to the medical condition of the wearer or to the workplace conditions that the respirator will be used
- The need for follow-up medical evaluations if necessary
- A statement that the PLHCP provided the worker with a copy of the written recommendation

Once the written recommendations are obtained, the final decision about a worker's ability to wear a respirator rests with the employer. However, the PLHCP's opinion is an important factor that must be considered in making the decision.

Additional medical evaluations are required when: An employee reports medical signs or symptoms that are related to the ability to use a respirator A PLHCP, supervisor or the program administrator informs the employer that a worker needs to be re-evaluated Information from the respiratory protection program (including observations made during fit testing and program evaluation) indicates a need for another evaluation A change occurs in workplace conditions (such as physical work effort, PPE use, temperature, etc.) that may result in a substantial increase in the physiological burden placed on the worker.

For more detailed information on this subject, visit the Occupational Safety and Health Administration (OSHA) website at

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.134>

https://www.osha.gov/SLTC/etools/respiratory/respirator_basics.html

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