

July 28, 2016

DIRECTIVE:	JOB CORPS PROGRAM INSTRUCTION NO. 16-06
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TO: ALL JOB CORPS NATIONAL OFFICE STAFF
ALL JOB CORPS REGIONAL OFFICE STAFF
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS

FROM: LENITA JACOBS-SIMMONS
National Director
Office of Job Corps

SUBJECT: Occupational Safety and Health Administration (OSHA) Respirator
Medical Evaluation Questionnaire and Respirator Fit Testing

1. Purpose. To provide guidance on administering the OSHA Respirator Medical Evaluation Questionnaire and proper Respirator Fit Testing.
2. Background. Students in certain trades may need to wear a respirator to protect them from breathing in hazardous contaminants. When respiratory protection is required as determined by a Job Hazard Analysis, the center must implement a written respiratory protection program in accordance with 29 Code of Federal Regulations (CFR) 1910.134, OSHA's Respiratory Protection Standard, and Job Corps' Policy and Requirements Handbook (PRH) Section 5.20 R9.

Prior to using a respirator, OSHA requires that the employee ("student" for the purposes of Job Corps) undergo a medical evaluation to determine his or her ability to use it. Those with heart conditions, lung disease, and psychological conditions like claustrophobia may not be able to safely wear one.

3. Guidance. Centers must provide a medical evaluation for each student participating in training activities that require respiratory protection.

A center-designated a physician or other licensed health-care professional must perform the medical evaluation. If the employed or subcontracted Health and Wellness staff member is unable to provide this service, an outside provider must.

The medical evaluation assesses the student's health, work tasks, the type of respirator to be used, and workplace conditions. Questions that must be included in the evaluation are found

in 29 CFR 1910.134, Appendix C. The OSHA Respirator Medical Evaluation Questionnaire is designed to identify general conditions that could cause health consequences if a respirator were used. Find the questionnaire at:

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

The licensed health-care professional may either review responses to the questionnaire or conduct an in-person examination that obtains the same information. The center must also provide a follow-up exam for any student who gives a positive response to any questions; Questions 1 through 8 of Part A, Section 2; or if the initial examination demonstrates the need for a follow-up. A follow-up exam must include any tests, consultations, or diagnostic procedures the practitioner deems necessary.

The questionnaire and examinations must be administered confidentially during the student's normal training hours, or at a time and place convenient to the student. Responses should be documented in the Student Health Record, and the center must allow a student the opportunity to discuss the questions and examination results.

Prior to the medical evaluation, the trade instructor, or other center representative must provide the health-care professional with information on:

- the type and weight of the respirator
- how long and how often the student will be wearing the respirator
- how hard the student will be working
- other protective clothing, or other equipment during respirator use
- temperature and humidity extremes at work

The health-care professional should also receive the center's written respiratory protection program and a copy of the OSHA Respiratory Protection Standard. The center is responsible for the costs of all evaluations and any follow-up examinations, including any medical tests, consultations, or diagnostic procedures that the physician or other licensed health-care professional deems necessary.

After reviewing the questionnaire or conducting an initial medical examination or follow-up medical examination, the health-care professional must provide the student and trade instructor (or other center representative) with a written recommendation that includes:

- whether the student is medically able to wear the respirator, and if the student has any medical limitations for using it
- the need, if any, for the student to have follow-up medical evaluations
- a statement that the doctor or other licensed health-care professional has provided the student with a copy of his/her written recommendation

This written recommendation **cannot** include any of the student's confidential information.

The student must be medically reevaluated when:

- he/she reports medical signs or symptoms related to his/her ability to use a respirator, such as a heart condition, lung disease, or claustrophobia
- a physician or other licensed health-care professional, trade instructor, or the respiratory protection program administrator recommends that the student be reevaluated
- information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for the student to be reevaluated
- a change occurs in conditions that increase the burden on the student while using the respirator; for example, the training becomes more physically demanding, or the student must wear additional protective clothing, or the student must work in extreme temperatures

Fit Testing

Before a student may be required to use a respirator with a negative or positive pressure tight-fitting facepiece, the student must be fit tested with the same make, model, style, and size of respirator that will be used. Fit testing must be performed by someone with specialized training, usually the respiratory protection program administrator(s) (trade instructors/safety officer). The center is responsible for any costs associated with the fit test. The center must:

- ensure that students using a tight-fitting facepiece respirator pass an appropriate Qualitative Fit Test (QLFT) or Quantitative Fit Test (QNFT). Fit-testing procedures are outlined in 29 CFR 1910.134 Appendix A:
https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9780
- ensure that a student using a tight-fitting facepiece respirator is fit tested prior to initial use of a respirator, whenever a different respirator facepiece (size, style, model, or make) is used, and at least annually thereafter
- conduct an additional fit test whenever the student reports, or the center, physician or other licensed health-care professional, trade instructor, or respiratory program administrator makes visual observations of changes in the student'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, the student subsequently notifies a responsible party that the fit of the respirator is unacceptable, the student must be given a reasonable opportunity to select a different respirator facepiece and to be retested (i.e., fit tested again).

4. Resources.

- OSHA, *Safety & Health Topics: Respiratory Protection*,
<https://www.osha.gov/SLTC/respiratoryprotection/index.html>

- OSHA, *OSHA InfoSheet, Respirator Medical Evaluation Questionnaire*, <https://www.osha.gov/Publications/OSHA3789info.pdf>
- OSHA, *The Occupational Health Professional's Services and Qualifications: Questions and Answers*, <https://www.osha.gov/Publications/osh3160.pdf>
- OSHA, *Small Entity Compliance Guide for the Respiratory Protection Standard*, <https://www.osha.gov/Publications/3384small-entity-for-respiratory-protection-standard-rev.pdf>

5. Action. Addressees are to ensure this Program Instruction Notice is distributed to all appropriate staff.

6. Expiration Date. Until superseded.

7. Inquiries. Inquiries should be directed to Johnetta Davis at (202) 693-8010 or davis.johnetta@dol.gov; or Heather Edmonds at (202) 693-3774 or edmonds.heather@dol.gov.