

OSHA Respirator Medical Evaluation Procedures

Overview:

Persons assigned to tasks that require the use of a respirator must be physically able to perform the work while using the respirator. Accordingly, employers have the responsibility of ensuring that employees are medically fit to tolerate the physical and psychological stress imposed by respirator use, as well as the physical stress originating from job and workplace conditions.

Employees must be medically evaluated and found eligible to wear the respirator selected for their use prior to fit testing or first-time use of the respirator in the workplace. Medical eligibility is to be determined by a physician or other licensed health care professional (referred to as a “PLHCP”). A variety of qualified health care providers, besides physicians, including occupational health nurses, nurse practitioners, and physician assistants, can perform the medical evaluations provided they are licensed to do so in the state in which they practice.

Questionnaire:

In assessing the employee’s medical eligibility to use a respirator, the PLHCP must perform a medical evaluation using a medical questionnaire (Appendix C to 1910.134) or provide a medical examination that obtains the same information as the medical questionnaire. The medical evaluation must be administered confidentially and at a time and place, during working hours, that is convenient to the employee. Employers are free to provide respirator users with a medical examination in lieu of the medical questionnaire if they chose to do so, but they are not required by the standard to administer a medical examination unless the employee gives a positive response to specific questions on the questionnaire.

Medical Factors and Conditions:

The purpose of a medical evaluation program is to determine if employees can tolerate the physiological burden associated with respirator use, including: the burden imposed by the respirator itself (e.g., its weight and breathing resistance during both normal operation and under conditions of filter, canister, or cartridge overload); musculoskeletal stress (e.g., when the respirator to be worn is a SCBA); limitations on auditory, visual, and olfactory sensations; and isolation from the workplace environment. Since certain jobs and workplace conditions in which a respirator is used can also impose a physiological burden on the user, the medical evaluation must also consider the following factors: type and weight of the respirator to be worn; duration and frequency of respirator use; expected physical work effort; use of protective clothing and equipment to be worn; and temperature and humidity extremes that may be encountered. This information must be provided to the PLHCP before the PLHCP makes a recommendation regarding an employee’s ability to use a respirator.

The medical evaluation is designed to identify general medical conditions that place employees who use respirators at risk of serious medical consequences. Medical conditions known to compromise an employee’s ability to tolerate respirator-, job-, and workplace-related physiological stress include: cardiovascular and respiratory diseases (e.g., a history of high blood pressure, angina, heart attack, cardiac arrhythmias, stroke, asthma, chronic bronchitis, emphysema); reduced pulmonary function caused by other factors (e.g., smoking or prior exposure to respiratory hazards); neurological or musculoskeletal disorders (e.g., ringing in the ears, epilepsy, lower back pain); impaired sensory function (e.g., perforated ear drums, reduced or absent ability to smell); and psychological disorders (e.g., claustrophobia and severe anxiety).

Standard of Evaluation:

The employer must obtain a written recommendation from the PLHCP on whether the employee is medically able to wear a respirator. The recommendation must identify any limitations on the employee’s use of the respirator, as well as the need for follow-up medical evaluations that are needed to assist the PLHCP in making a recommendation. The employee must also receive a copy of the PLHCP’s written recommendations. A powered air-purifying respirator (PAPR) must be provided to an employee if information from the medical evaluation indicates that the employee can use a PAPR but not a negative pressure respirator. If, subsequent to this evaluation, the PLHCP determines that the employee is able to wear a negative pressure respirator, the employer is no longer required to provide a PAPR to that employee.

Standard of Evaluation Continued:

In addition, the standard requires the employer to medically re-evaluate an employee when:

- That employee reports medical signs or symptoms that are related to the employee's ability to use a respirator;
- A PLHCP, supervisor, or the respirator program administrator observes that the employee is having a medical problem during respirator use and they inform the employer of their observation;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, type of respirator used, protective clothing, temperature) that may result in a substantial increase in the physiological burden placed on an employee.

If the above questionnaire is not filled out with a physician or other licensed health care professional (PLHCP), the employee must place it in a sealed envelope and the employer will provide to a PLHCP for review.