

<p style="text-align: center;"><b>STATE OF VERMONT</b> <b>AGENCY OF HUMAN SERVICES</b> <b>DEPARTMENT OF CORRECTIONS</b></p>	<p><b>Respiratory Protection</b></p>		<p><b>Page 1 of 5</b></p>						
<p><b>CHAPTER:</b> SECURITY AND SUPERVISION</p>	<p><b>#404.02</b></p>	<p><b>Supersedes:</b> 404.02 Respiratory Protection Program – Self-Contained Breathing Apparatus, dated 3-12-07</p>							
<p><b>Local Procedure(s) Required:</b> Yes (specific to Storage and Inspection.)  <b>Applicability:</b> All staff (including contractors and volunteers)  <b>Security Level: “B”</b> – Anyone may have access to this document.</p>									
<p><b>Approved:</b></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; border: none;"> <p>_____ SIGNED</p> </td> <td style="width: 33%; border: none;"> <p>_____ May 26, 2021</p> </td> <td style="width: 33%; border: none;"> <p>_____ 6/10/2021</p> </td> </tr> <tr> <td style="border: none;"> <p><b>James W. Baker, Commissioner</b></p> </td> <td style="border: none;"> <p><b>Date Signed</b></p> </td> <td style="border: none;"> <p><b>Date Effective</b></p> </td> </tr> </table>				<p>_____ SIGNED</p>	<p>_____ May 26, 2021</p>	<p>_____ 6/10/2021</p>	<p><b>James W. Baker, Commissioner</b></p>	<p><b>Date Signed</b></p>	<p><b>Date Effective</b></p>
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**PURPOSE**

The purpose of this policy is to develop and implement a respiratory protection program in accordance with OSHA’s respirator standard, which provides clear guidance for correctional staff who encounter situations requiring respiratory system protection. These protections are intended to prevent injury and transmission of airborne infections and enable staff to safely perform essential duties. This policy identifies the equipment used for this purpose and provides direction on its maintenance, preparation, and deployment by Department of Corrections (DOC) staff.

**AUTHORITY**

29 CFR § 1910.134

**POLICY**

This policy on Respiratory Protection intends to provide staff with information on the appropriate equipment and guidance for protecting their respiratory systems from foreseeable hazards. It recognizes OSHA standards designed to ensure the safety of individuals during situations that jeopardize their respiratory health.

**GENERAL GUIDELINES**

**A. Equipment Selection**

DOC Facility leadership selected the respiratory protection equipment listed below in consideration of reasonably foreseeable hazards so that staff may safely fulfill their

essential duties. DOC staff shall clean, disinfect, store, inspect, repair, discard, and otherwise maintain all equipment per the manufacturer's instructions, unless otherwise provided in this document.

1. IEVAC. A safety device worn over the head to protect the wearer from fire, smoke, and gases in an evacuation or escape during a fire and/or smoke emergency.
2. N95. A respiratory protection device designed to achieve a close facial fit and efficient filtration of airborne particles. The N95 designation means that when subjected to careful testing, the respirator blocks at least 95 percent of very small (0.3 micron) test particles.
3. Other protective masks. Any mask used to protect the wearer from inhaled airborne pollutants, toxic gases, or chemical agents. The mask forms a sealed cover over the nose and mouth, but may also cover the eyes and other vulnerable soft tissues of the face. The protective mask only protects the user from digesting, inhaling and contact harmful substances through the eyes.

#### **B. IEvac Hoods**

1. The DOC shall provide, or make available, training on the use of IEvac hoods to all uniformed staff.
2. The DOC shall establish and conduct an annual IEvac recertification process.
3. All trained staff shall use IEvac hoods for self-protection during an evacuation situation in which air quality is compromised.
4. A Correctional Officer's priority during circumstances that jeopardize respiratory safety is to notify the Correctional Facility Shift Supervisor (CFSS) of the emergency; extinguish, or contain, the danger at its source; and evacuate all personnel and incarcerated individuals while maintaining security.
5. The DOC reasonably expects staff to avoid assuming the role of a trained firefighter; staff shall, therefore, not attempt a rescue or to suppress a fire beyond its initial, containable phase.
6. Designated DOC Fire Safety Officers shall inspect IEvac hoods as part of their monthly inspections.
7. Staff shall ensure IEvac hoods are present and sealed during weekly fire equipment and door inspections.
8. Staff shall check expiration dates of IEvac hoods and replace as necessary.
9. Each facility shall have mock IEvac hoods that may be used during fire drills. Staff shall not use new, sealed, IEvac hoods for fire drill purposes. However, the Fire Safety Officer may authorize the use of near-expiration hoods scheduled for removal from service.

#### **C. N95 Respirators (N95s)**

1. General
  - a. OSHA requires DOC's respiratory protection program to include guidelines on how to medically evaluate staff who require respiratory protection, how to carry out respirator fit testing, and how to evaluate the program.

- b. Medical evaluations, training and fit testing are required for staff to use N95 respirators.
  - c. N95 respirators, or OSHA-approved alternatives, shall be used when recommended by the appropriate medical authorities. In response to specific infectious threats, the DOC may provide additional guidance on N95 use.
  - d. Training and fit testing for N95 respirators will be provided to:
    - i. Any Facility or Field staff designated to require a respirator; and
    - ii. All new Correctional Officers as part of the Vermont Correctional Academy.
  - e. Staff who are required to wear an N95 respirator must be able to physically perform their tasks while wearing it.
  - f. The DOC shall ensure that staff are medically evaluated, and found eligible to wear the N95, prior to fit testing.
  - g. A DOC-approved physician or other qualified healthcare professional (e.g., occupational health nurse, nurse practitioner, physician assistant), shall determine staff medical eligibility for N95 use.
  - h. Staff shall complete the OSHA-required medical questionnaire for N95 use.
    - i. The DOC shall allow staff time in their schedules during working hours to complete the medical questionnaire and shall provide a location for questionnaire completion that ensures confidentiality.
    - ii. To ensure confidentiality, the DOC shall provide staff with direction on how to submit the questionnaire directly to the designated health care professional.
    - iii. The DOC shall ensure the confidentiality of staff OSHA N95 questionnaires unless otherwise provided by staff members themselves.
  - i. The DOC shall next fit test for N95 use staff who pass the medical evaluation (e.g., questionnaire or follow-up evaluation).
  - j. The DOC shall allow staff who do not pass the medical evaluation, and whose medical condition could improve with intervention (per the medical provider), to re-test within 120 days per the protocol provided in this document.
    - i. During this period, the individual shall not use an N95.
    - ii. The DOC reserves the right to adjust the staff member's shift and/or post assignment to ensure proper facility coverage.
  - k. The DOC reserves the right to require further medical review if necessary.
  - l. The DOC shall not allow staff who do not pass the second medical review to be fit tested for N95 respirators and shall adjust work schedules/locations as necessary.
2. Fit Testing
- a. Fit testing ensures proper fit (i.e., seal) of N95 respirators since; without a proper seal, protection is compromised.
  - b. Each facility shall designate a staff member as a Respiratory Protection Administrator.
  - c. The DOC shall provide, or make available, training to complete fit testing in accordance with standards for this individual fit test.

- d. Sites shall offer N95 respirators in various sizes and models, as available, to accommodate staff facial composition.
  - e. The DOC may adjust work areas to accommodate staff who cannot be fit tested with available mask sizes.
  - f. Standards require that a tight-fitting seal be attained before a staff person is fit tested or wears an N95 in the workplace.
  - g. The DOC shall not permit respirators to be worn by staff who have any condition that interferes with the seal, including facial hair.
  - h. The DOC shall arrange for staff to be shown how to don an N95 respirator before their fit test.
  - i. The DOC shall provide staff with a description of the fit test and exercises they will perform during the test.
  - j. The DOC shall ensure that fit testing is administered using an OSHA-accepted protocol.
  - k. Each site shall be responsible for maintaining a record of staff fit testing, including testing dates.
  - l. The DOC shall ensure that refresher training is provided annually.
  - m. The DOC shall ensure that medical certification is updated annually or as recommended by OSHA standards.
  - n. The DOC reserves the right to retest staff in the event of a reported, or observed, change in their physical condition that could affect respirator fit (e.g., the integrity of the respirator's seal when worn by the staff member in question).
3. Storage
- a. The DOC shall store respirators only in ways that prevent damage from: contamination, dust, sunlight, extreme temperatures, excessive moisture, or chemicals.
  - b. The DOC shall ensure that respirators are stored with enough space to prevent deformity or compromised shape.
  - c. The DOC shall ensure that respirators are immediately accessible to work areas and clearly marked as "N95s."
  - d. The DOC shall ensure that storage is inspected every month.
  - e. The DOC shall document monthly inspections of N95s with the following information:
    - i. Date;
    - ii. Inspector name and signature;
    - iii. Inspection findings; and
    - iv. Recommended remedial action.

**D. Other Protective Masks**

- 1. Some chemical agents [e.g., oleoresin capsicum (OC), orthochlorobenzalmalononitril (CS), and chloroacetophenon (CN)], are non-toxic, but can temporarily impair vision and cause coughing or other impediments to staff performance of essential functions.

2. Correctional facilities shall maintain protective masks for use when chemical agent use is anticipated or for staff working in areas where chemical agents have been recently deployed.
3. Fit testing is not required for all protective masks, but a proper seal is necessary to ensure protection in any protective mask.
  - a. A proper seal requires the absence of facial hair against the sealing surface of the mask.
  - b. A proper seal requires the use of the appropriate mask size.
4. The Special Response Team (SRT) Leader or designee shall provide protective mask training.
5. The DOC will provide, or arrange for, protective mask training for SRT members at minimum, and other facility staff, as appropriate.
  - a. Protective mask training shall include instruction and practicum enabling the trainee to achieve a proper seal after donning the mask.
  - b. Protective mask training shall provide trainees with the opportunity to determine which size mask fits them best.
6. The DOC shall review protective mask training annually and update as necessary.
7. The DOC shall ensure that protective masks are stored in a secure location and inventoried monthly.
8. The DOC shall ensure that protective masks are inspected quarterly as well as immediately prior to, and immediately following, use.
  - a. The DOC shall ensure that protective mask inspections assess mask overall integrity, especially the straps and filter.
  - b. The DOC shall ensure that any mask found to be deficient is removed from service until repaired or replaced.