

Respiratory Program Assistant — Scope & Application Brief

CC-WP-RESP-001-001 · Rev 0.1 · Version v1.0 · 29 CFR 1910.134 · 1926.103 · Class B-1 Program Assistant — Documentation Framework Only

Tool	CC-RESP-PROGRAM-ASSISTANT-001 · v1.0	Authority	29 CFR 1910.134 · applied to construction through 29 CFR 1926.103
Class	B-1 Program Assistant — Documentation Framework Only	Publisher	Compliance Crucible LLC

Documentation framework only. This tool supports the documentation of an employer's written respiratory protection program record. It does not determine compliance, evaluate exposures, select or assign respirators, compute protection factors, make medical determinations, or authorize work. The employer retains sole and non-delegable responsibility under 29 CFR 1910.134 / 1926.103 and applicable state plans.

01 What Is the Respiratory Program Assistant?

The Respiratory Program Assistant is a structured documentation tool for employers who need to organize, assemble, and review a written respiratory protection program record. It is built around 29 CFR 1910.134 — applied to construction work through 29 CFR 1926.103 — and the practical documentation questions that arise when a respiratory protection program is prepared, maintained, reviewed, or audited:

- Who administers the program, and what is the documented basis for their qualification?
- What respiratory hazards does the program address, and what hazard basis is on file?
- What respirator types are in use at the program level, and are they NIOSH-certified?
- How are medical evaluation, fit testing, use procedures, maintenance, and training run and recorded?
- Where atmosphere-supplying respirators are used, how is breathing air quality documented?
- How is voluntary use handled, and is Appendix D information provided?
- What remains explicitly not yet determined, and what open items exist?

The tool does not replace the employer's responsibility. It helps the employer build a more complete record.

02 What the Tool Produces

A completed record can produce the following practical documentation outputs.

Written Respiratory Protection Program record

Assembles every documented program element in order — administration, scope and hazard basis, selection, medical evaluation, fit testing, use procedures, maintenance and care, breathing air quality, filter/cartridge identification, training, program evaluation, recordkeeping, and voluntary use — with section review dates and the employer attestation.

Open-Item and Not-Yet-Determined Roll-ups

Program-level registers surfacing every unresolved required input and every field explicitly marked not yet determined, listed with its element, plus a section review schedule ordered earliest first.

Authority Reference Panel

Verified federal authority citations for respiratory protection, retrieved live from the platform's reviewed authority library and attached to the record — pointers to the underlying standard, never a judgment about the program.

Machine Audit JSON

A machine-readable record of the program state, including identity and lock fields, all program elements, open items, and authority anchor provenance.

The Respiratory Program Assistant:

- does not determine compliance or state that a program is compliant, approved, certified, or safe;
- does not evaluate exposures or verify exposure levels;
- does not select or assign a respirator for a specific task or atmosphere;
- does not calculate assigned protection factors, maximum use concentrations, or cartridge change-out schedules;
- does not make or interpret medical findings, and does not replace PLHCP judgment;
- does not replace a safety professional, industrial hygienist, legal counsel, or employer decision-maker;
- does not make state-plan determinations;
- does not upload or validate evidence files in this release.

The tool documents what the employer enters and organizes the record around the required program elements. Task- and atmosphere-specific respirator selection, protection-factor computation, and cartridge service-life determination are field/task evaluation functions outside this program-assembly surface.

The Respiratory Program Assistant is a documentation framework organized around the elements of 29 CFR 1910.134 — program administration, hazard basis, respirator selection at the program level, medical evaluation, fit testing, use procedures, maintenance and care, breathing air quality, filter and cartridge identification, training, program evaluation, recordkeeping, and voluntary use — as applied to construction through 29 CFR 1926.103.

Verified federal authority references are retrieved live from Compliance Crucible's reviewed authority library (the Concordance Direct Adapter) and displayed with the record. These references reflect the federal OSHA baseline; where a State Plan applies, its requirements may differ and require separate verification. The references support the employer's documentation — they are pointers to the standard, not a judgment about the program.

The tool's strongest statement is that documentation fields are complete for an element. That does not mean:

- that the employer complies;
- that a respirator or selection is adequate for any exposure;
- that medical evaluation, fit testing, or training requirements are satisfied;
- that procedures are OSHA-approved;
- that work may proceed.

The employer retains sole responsibility for actual conditions, exposure evaluation, respirator selection and use, medical evaluation, fit testing, training, recordkeeping, and compliance.

The proper use case is an employer or authorized representative using the tool to build and preserve a structured written respiratory protection program record. Appropriate uses include:

- preparing or updating the written respiratory protection program record;
- documenting the program administrator and the qualification basis on file;
- recording the program-level hazard basis, including IDLH and oxygen-deficiency status;
- recording respirator types in use and the NIOSH-certification statement;
- recording the medical evaluation process, PLHCP designation, and confidentiality provisions;
- recording fit testing protocol, frequency, and re-test conditions;

- recording use procedures, including IDLH procedures where applicable;
- recording maintenance, care, storage, and inspection provisions;
- recording breathing air quality provisions where supplied-air or SCBA respirators are in use;
- recording filter/cartridge identification and change-schedule documentation;
- recording training timing, topics, and records locations;
- recording program evaluation and recordkeeping provisions;
- recording voluntary-use status and Appendix D provision;
- keeping unknowns explicit, reviewing open items, and locking a preserved record.

The tool is especially useful when an employer wants a program record that shows its own gaps honestly — with every not-yet-determined item surfaced — rather than a template that looks finished when it is not.

06 Improper Use Cases

Do not use the Respiratory Program Assistant:

- to decide that an employer or program is compliant;
- as a substitute for exposure assessment, air monitoring, or objective data;
- to select or assign a respirator for a task or atmosphere, or to compute APF, MUC, or change-out schedules;
- as a substitute for medical evaluation, fit testing, or PLHCP judgment;
- to approve or authorize work;
- to treat missing documentation as acceptable;
- as proof that actual field conditions were correct.

The tool helps organize documentation. It does not make the underlying safety or compliance decisions.

07 Platform Access

The Respiratory Program Assistant is part of the Compliance Crucible platform. It is available through member-gated access; active Compliance Crucible membership is required. With member access, records save to the organization's workspace under row-level access controls and can be reviewed, locked, and exported; a locked record is preserved as an immutable server-side snapshot with a content hash. Without member access, records are not persisted.

The Respiratory Program Assistant sits alongside the other live Compliance Crucible documentation tools — including the Silica Program Assistant, Confined Space (PRCS) Documentation Readiness, LOTO Procedure Builder, JHA / AHA Procedure Builder, Fatal Four Recognition, and HazCom / GHS — each tied to a defined regulatory scope with clear output boundaries. Additional program tools are in development.

The common purpose is simple: Compliance Crucible does not replace the employer's judgment — it helps the employer create a better record of that judgment.

This brief is a descriptive scope and application document only. It is not regulatory guidance, a legal opinion, an industrial-hygiene or engineering service, a certification, an approval, or an employer field decision. Respiratory protection requirements are complex and employer-, task-, and site-specific. Independent verification of applicable requirements is required for every project and every employer. Compliance Crucible LLC does not practice law, practice engineering, practice industrial hygiene, evaluate exposures, select or assign respirators, make medical determinations, certify conditions, authorize work, or make employer field decisions.

© Compliance Crucible LLC · CC-WP-RESP-001-001 Rev 0.1 · Public