

Subject: Part 451. Respiratory Protection

Topic: PLHCP (physician or other licensed healthcare professional)

Question: My question is in regard to the medical exam required by the Respiratory Protection Standard. In 1910.134(e)(2)(i) it says a PLHCP is to perform medical evaluations using a medical questionnaire or an initial medical examination. In the state of Michigan is an RN considered a PLHCP? I have a part-time RN who does not receive direction from a physician; she primarily performs first aid functions independently. Can she administer the questionnaire and send the employees to the local medical clinic for further evaluation if deemed necessary or is it a requirement to send the employees to the local occupational clinic from the start to complete the questionnaire? On one of the Q&A pages it says the PLHCP does not have to be a physician, but it doesn't specifically say who else qualifies as a PLHCP in the state of Michigan.

Answer: Per the Director of the Michigan Health Licensing Division, Michigan Department of Community Health, in the State of Michigan the only persons who can fulfill the role of a PLHCP are a physician; a nurse practitioner, working under the supervision of a physician; and a physician's assistant (PA), working under the supervision of a physician. Nurse practitioners and PAs can **NOT** fulfill the role of a PLHCP if they are acting independently. Registered nurses (RNs) or licensed practical nurses (LPNs) can not fulfill the role of a PLHCP.

Therefore your RN may handout and explain the medical questionnaire. She may not evaluate the results of the medical questionnaire; may not make a recommendation or medical determination concerning an employee's ability to use a respirator; and may not provide a PLHCP's written opinion.

Applicable Construction Safety Standard/Rule:

Applicable General Industry Safety Standard/Rule:

Applicable Occupational Health Standard/Rule: [Part 451. Respiratory Protection](#)

Additional Resources: [PUBLIC HEALTH CODE \(EXCERPT\) Act 368 of 1978, 333.16215 Delegation of acts, tasks, or functions to licensed or unlicensed individual; supervision; rules; immunity; third party reimbursement or worker's compensation benefits. Sec. 16215](#)

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