



IN-DEPTH RESEARCH REPORT

# PPE PAIN POINTS

ADDRESSING YOUR COMPLIANCE ISSUES  
WITH STRATEGIC SOLUTIONS



J. J. Keller®

COMPLIANCE  
**NETWORK**



# INTRODUCTION

OSHA's annual "Top 10 most frequently cited standards" always includes personal protective equipment (PPE) noncompliance. Keep in mind, these are only violations that OSHA cited; they are not reflective of the many other PPE challenges safety professionals face every day.

The J.J. Keller Center for Market Insights became curious about these PPE challenges and wanted to learn more. We conducted an online survey in July 2022, focusing on four topics:

- ▶ Designing PPE programs,
- ▶ Purchasing PPE,
- ▶ PPE training, and
- ▶ PPE compliance.

We heard from safety professionals who work in a variety of industries, including manufacturing, transportation, utilities, construction, oil and gas, and agriculture. These individuals know the importance of PPE and how it protects the worker. But our research uncovered that so often, they experience pushback from management during the procurement process. Despite their best efforts, choosing the appropriate PPE becomes more challenging with a one size fits all mentality that plagues many employers. Ineffective training and not knowing why PPE is required adds to the frustration.

Join us as we help to understand your current PPE needs, knowing what those needs might be in the long term, and how to plan and execute an effective PPE program - all of which is crucial for successful PPE compliance.





## FINDINGS

WE LEARNED THAT THERE ARE THREE SIGNIFICANT PAIN POINTS REGARDING PPE:

1.



**CREATING AND MAINTAINING AN EFFICIENT PPE PROGRAM**

2.



**AVAILABILITY OF PPE**

3.



**EMPLOYEE COMPLIANCE**

### WHO IS OUR SAMPLE?

An online survey was conducted from July 7th through July 22nd, 2022.

**172 PARTICIPANTS** started the survey.

89% of those participants were eligible to complete the full survey.

Not everyone in that 89% necessarily received all survey questions.

Question categories included:

#### **DESIGNING PPE PROGRAMS**

- ▶ 71 participants

#### **PURCHASING PPE**

- ▶ 125 participants

#### **PPE TRAINING**

- ▶ 110 participants

#### **PPE COMPLIANCE**

- ▶ 111 participants

Some characteristics of the sample:

- ▶ They most commonly work as a **SAFETY MANAGER** (or director/coordinator)
- ▶ 90% work at a company that has **AT LEAST ONE PERSON DEDICATED** to safety/compliance
- ▶ 80% work at a company with **FEWER THAN 500 EMPLOYEES**



PAIN POINT 1:

**CREATION AND  
MAINTENANCE OF  
AN EFFICIENT PPE  
PROGRAM**



## CONDUCTING A HAZARD ASSESSMENT

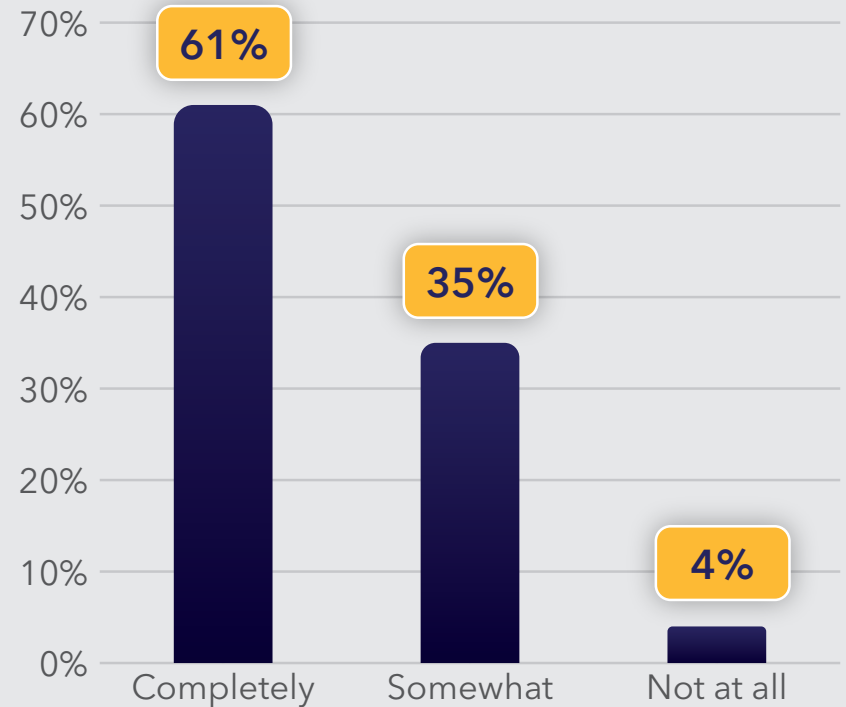
PPE compliance starts with a hazard assessment. A hazard assessment uncovers the information that allows safety professionals to estimate and determine the type, level of risk, and seriousness of potential injury from each hazard found in the workplace.

We asked participants to react to this statement: *My company gives the time and resources needed to conduct thorough hazard assessments.*

While more than half of survey participants responded “Completely,” almost 40% of safety managers did not fully agree with the statement. This suggests that a fair number of **safety professionals feel they could be given more assistance** in conducting hazard assessments.



**MY COMPANY GIVES THE TIME AND RESOURCES NEEDED TO CONDUCT THOROUGH HAZARD ASSESSMENTS.**



n=71



## WHAT DO OUR EXPERTS SUGGEST?

### CONDUCTING A HAZARD ASSESSMENT

Conducting a thorough hazard assessment should be supported by all levels of an organization because **it's written in the OSHA standards; it's required and must be done.**

But we all know in this profession that full compliance isn't always the case. We need to sometimes be creative with how we work toward our common goal, which is to **keep people safe.**

Successful safety programs are founded on:

- ▶ Communicating openly in a positive, proactive safety environment,
- ▶ Involving affected employees at all levels in the hazard assessment process, and
- ▶ Building a collaborative safety culture that helps propel your safety program in the right direction.



**§ 1910.132(d)(1)** — The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE)

*“Training your employees about proper use is the best thing you can do for their safety.”*

Survey Participant





## PROVIDING THE EQUIPMENT

After conducting a hazard assessment, employers are obligated to **provide equipment to employees at no cost**, with a few exceptions identified in §1910.132(h)(2) through (h)(6).

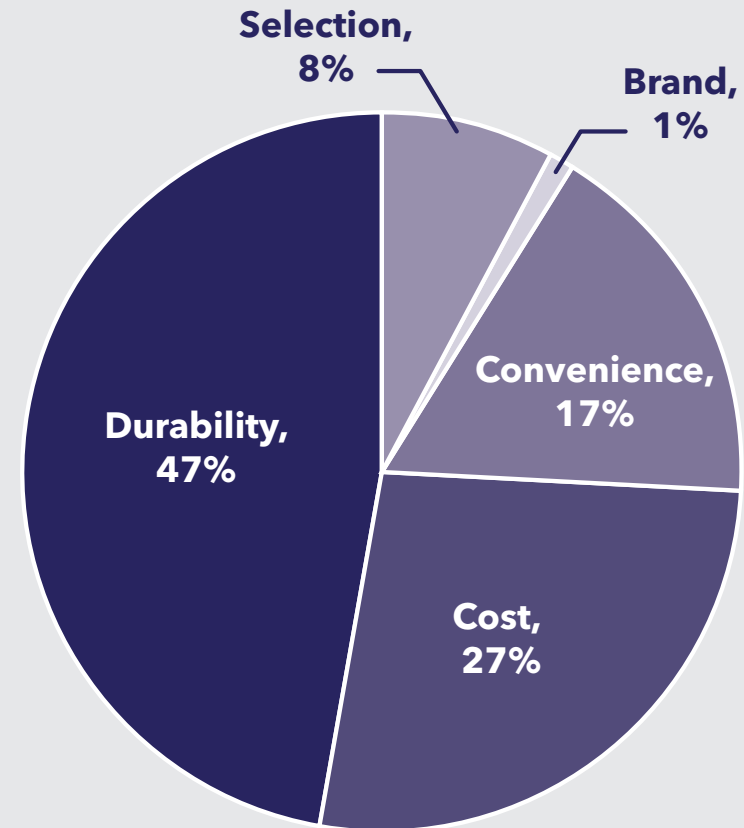
But when it comes to purchasing PPE, cost can be a challenge. Safety managers want to make sure they have high-quality PPE that protects their employees while still staying within budget.

When asked to choose which PPE feature was most important in terms of brand, convenience, cost, durability, and selection, almost half of the participants **(47%) chose durability** as the most important factor.

The second most important factor was **cost (27%)**.



WHICH OF THE FOLLOWING ASPECTS IS MOST IMPORTANT WHEN PURCHASING PPE?



n=125



## WHAT DO OUR EXPERTS SUGGEST?

### PROVIDING THE EQUIPMENT

Of the 172 participants, 89% reported that their job includes buying PPE. Safety professionals care about getting a good product that will keep employees safe, but they are also mindful of the company's budget.

**Cost and durability often work harmoniously together.** The more durable a product, the less likely you will need to replace that product over time. You may spend more for a higher quality item, but your low replacement rates will lead to overall savings.

There is a delicate balance that must come into play to make this work:

- ▶ Involve your employees in the selection process and discuss their PPE concerns so that you can make informed purchases,
- ▶ Take the time to review your company's injury and near miss reports for trends, and
- ▶ Based on the trends, consider whether additional or different PPE may be necessary to keep your employees safe.

If such hazards are present, or likely to be present, the employer must:

**§1910.132(d)(1)(i)** — Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the hazard assessment



*“For what our business does, some of the PPE is costly. When the owner comes to me and asks me to figure out a less expensive way to get this done, it is super challenging. I try to ensure the employees are safe above anything — even cost. So, I’m in a lose-lose situation. If I go cheap, I feel like I can put the employees in a situation where they may not feel as safe. If I go expensive, I’m afraid the budget for PPE may get cut tighter than what it already is.”*

Survey Participant

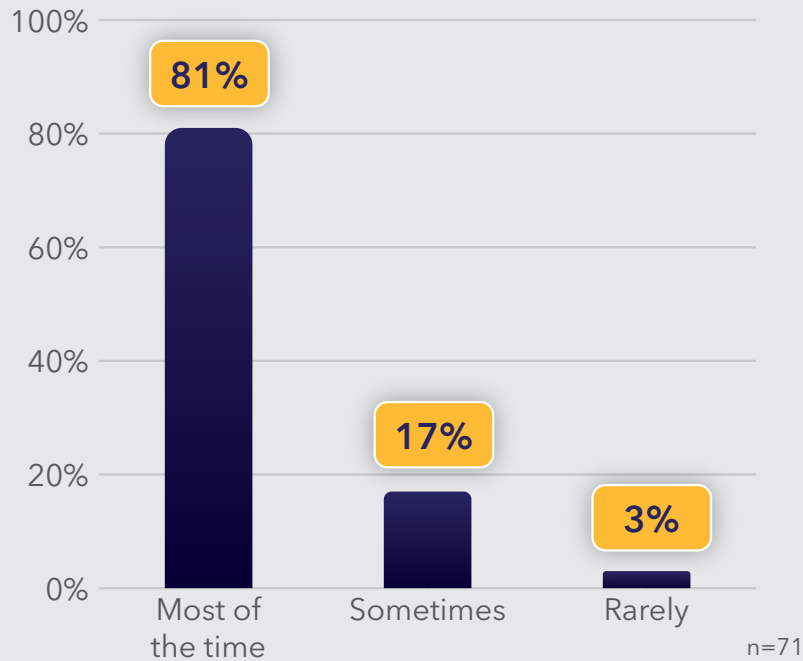




## MAINTAINING YOUR PROGRAM

Overwhelmingly, study participants told us that they are expected to **re-evaluate their company's PPE program on an annual basis**. Additionally, over 80% of participants told us that they meet that yearly time frame most of the time.

HOW OFTEN ARE YOU, AS A SAFETY MANAGER,  
ABLE TO MEET YEARLY  
RE-EVALUATION TIMELINES FOR PPE?





## WHAT DO OUR EXPERTS SUGGEST?

### MAINTAINING YOUR PROGRAM

Part of maintaining a PPE program is **making changes to it as needed**. Whether your annual assessment reveals that different PPE is needed or that new hazards have been introduced into the workplace, there is likely to be **resistance to change** in response to new protocols, regulations, and standards.

This is expected — change is difficult!

It's up to the employer to communicate with employees about:

- ▶ The identified workplace hazards,
- ▶ Which PPE was chosen to protect against those hazards, and
- ▶ Why employees need to wear the PPE to protect themselves.



*“We are in the process now of changing historically-used gloves that had a zero-cut rating to an A2 rating.”*

Survey Participant

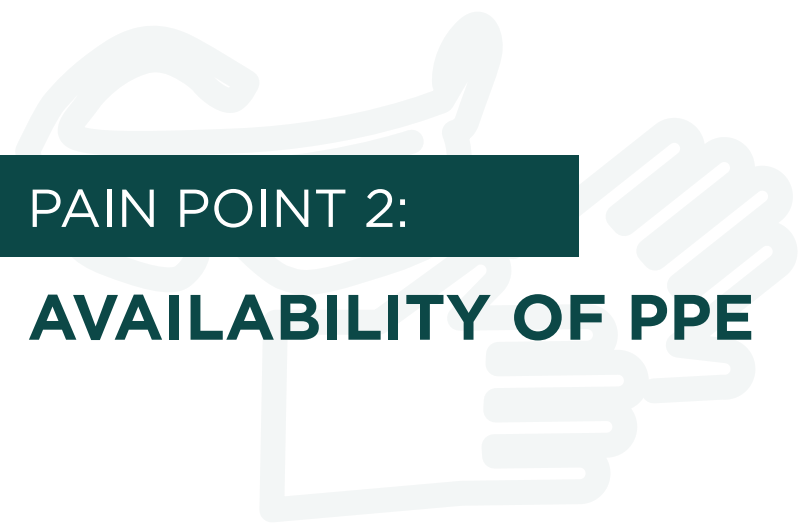






PAIN POINT 2:

**AVAILABILITY OF PPE**



## FINDING APPROPRIATE SIZES

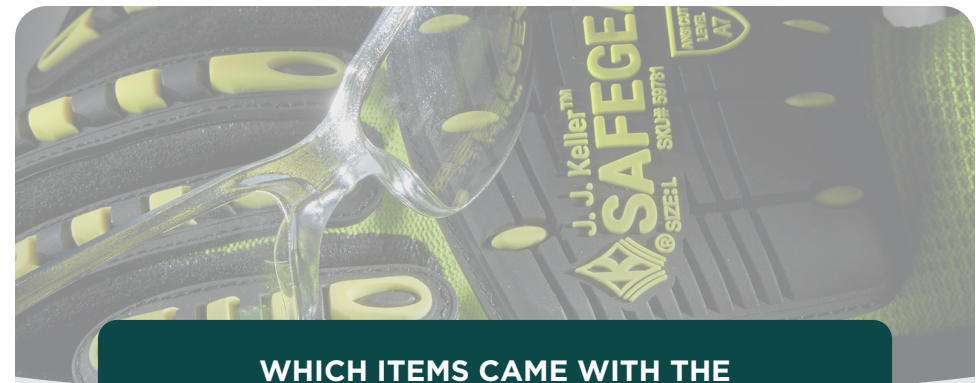
A common theme when discussing challenges with purchasing PPE is related to finding the **right size PPE**.

- ▶ 34% of respondents had **trouble buying PPE in the sizes they need**: 55% needed larger sizes and 41% needed smaller sizes.
- ▶ 35% of respondents struggled to purchase PPE that fits their **female employees**.

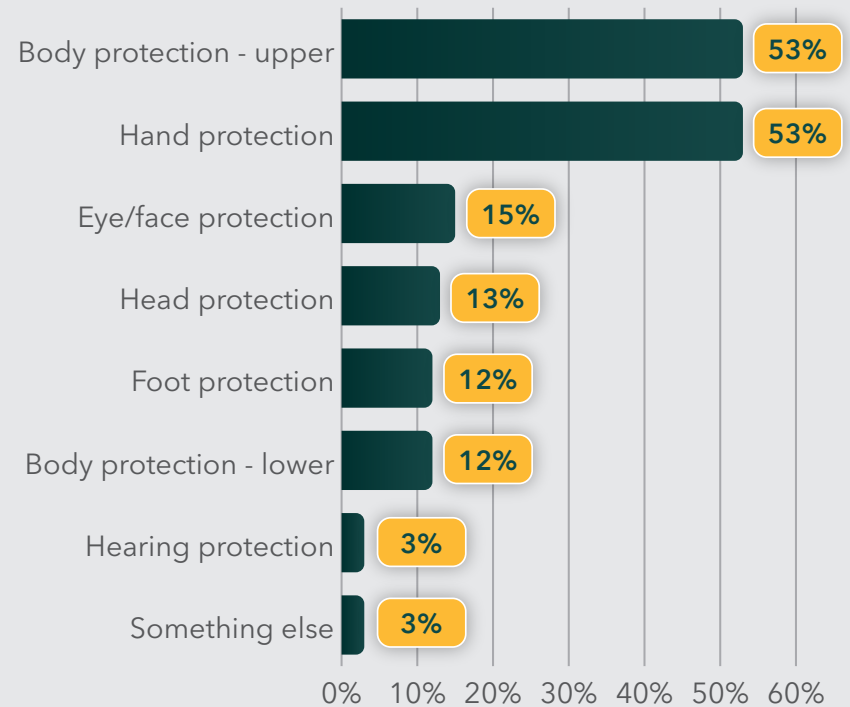
PPE that doesn't fit properly can lead to:

- ▶ Excess material getting caught in machinery;
- ▶ Gaps in coverage, leading to reduced protection;
- ▶ Not wearing the PPE at all; and
- ▶ Loss of dexterity, which can cause incidents.

The most common items managers had sizing issues with were **upper body protection** (examples include safety vests, jackets, or sweatshirts) and **hand protection** (such as gloves).



### WHICH ITEMS CAME WITH THE MOST SIZING ISSUES?



List of "something else" responses: Respirators, Tyvek Suits

n=60





## WHAT DO OUR EXPERTS SUGGEST?

### FINDING APPROPRIATE SIZES

Employees may be less likely to wear PPE if the only items available don't fit well or if they require a lot of modifications. So, when purchasing PPE for employees, avoid selecting unisex sizing or purchasing small/medium/large in bulk.

You need to provide your employees, both male and female, with a selection of PPE that will **fit their body appropriately** so that it provides the highest level of protection.

To help with this, look for suppliers that offer PPE in a variety of sizes. A willingness to work with more than one vendor may increase your ability to find the range of sizes you need for your employees.

If such hazards are present, or likely to be present, the employer must:

**§1910.132(d)(1)(iii)** — Select PPE that properly fits each affected employee

**OSHA:** “Careful consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of PPE is more likely if it fits the wearer comfortably.”



*“When I buy upper and lower protection, it never fails that the lower protection are either too long or too short. The upper wear is either too tight or swallows them. So I end up buying more expensive things that are tailored to specific sizes.”*

Survey Participant



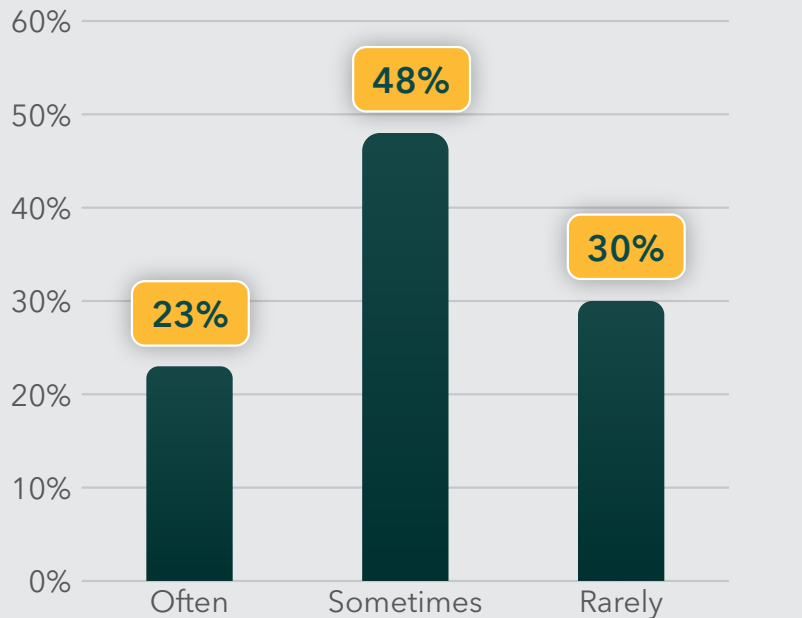
## OVERCOMING SUPPLY CHAIN ISSUES

Recent economic struggles have had an impact on just about every industry. Knowing that **supply chain delays** have affected so many, we asked safety professionals how often they experienced supply chain delays in the past year.

71% of participants said they “Often” or “Sometimes” experienced supply chain delays in the past year.

When we asked participants, “What is the biggest challenge you’re seeing with PPE at your company?”, supply chain issues were reported there, as well. The answers included **items being out of stock, high cost, and products on backorder.**

FREQUENCY OF SUPPLY CHAIN DELAYS



n=125







## WHAT DO OUR EXPERTS SUGGEST?

### OVERCOMING SUPPLY CHAIN ISSUES

If supply chain delays negatively impact your ability to acquire necessary PPE, you may expose yourself or your employees to additional hazards. So even if you are prepared to purchase PPE, when it's in the budget, the supply chain issues in the last few years compound the struggles felt by safety professionals and businesses.

Some strategies you can employ to offset supply chain disruptions include:

- ▶ Having a strong inventory program,
- ▶ Offering a wide range of sizes,
- ▶ Holding employees accountable for taking care of their equipment,
- ▶ Purchasing from a reputable supplier that has a decent return or exchange policy, and
- ▶ Doing your due diligence to ensure the PPE you are supplying will hold up to the job tasks at hand.

**§1910.132(h)(1)** — Except as provided by paragraphs (h)(2) through (h)(6) of this section, the protective equipment, including personal protective equipment (PPE), used to comply with this part, shall be provided by the employer at no cost to employees



*"It's difficult to find items in stock right now, and when you do find them, the cost is astronomical."*

Survey Participant





PAIN POINT 3:

**EMPLOYEE  
COMPLIANCE**





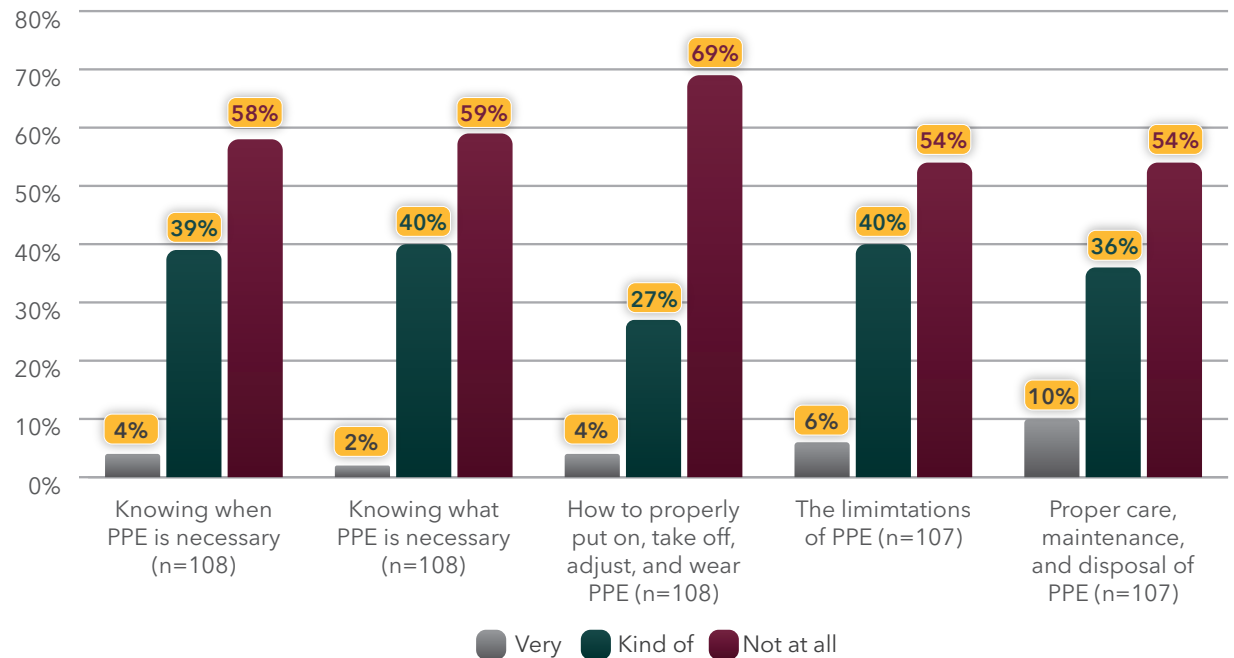


## TRAINING EMPLOYEES ON PPE

In terms of training, 81% of participants reported that their job includes training staff on proper PPE use. §1910.132(f)(1) requires employers to train employees on:

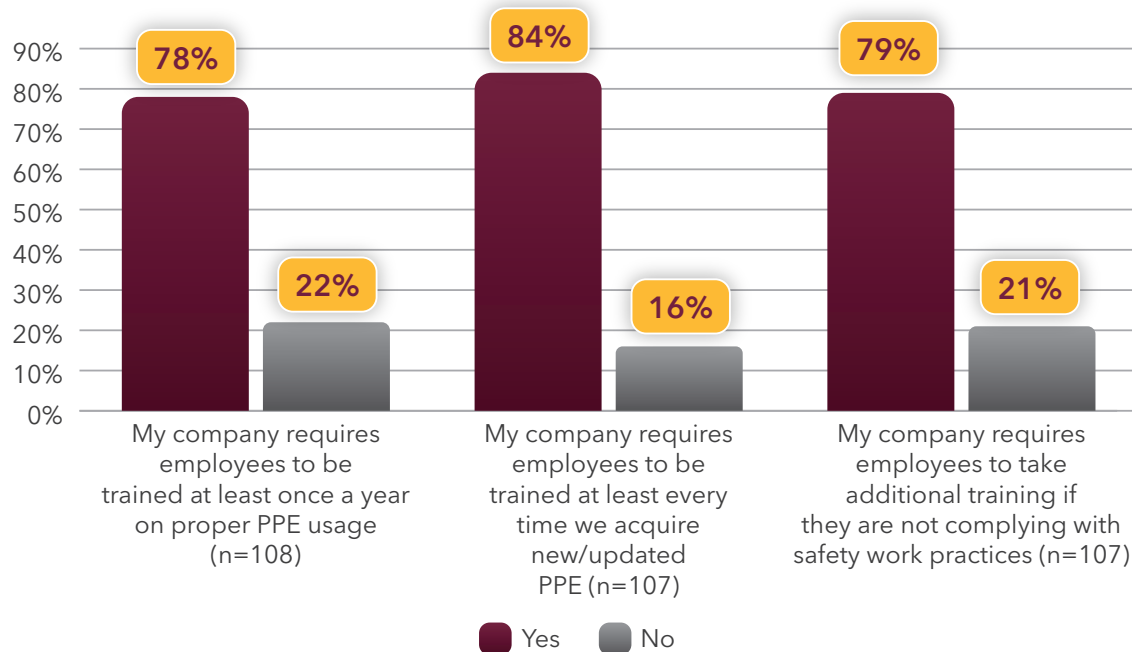
- ▶ When PPE is necessary;
- ▶ What PPE is necessary;
- ▶ How to properly don, doff, adjust, and wear PPE;
- ▶ The limitations of the PPE; and
- ▶ The proper care, maintenance, useful life, and disposal of the PPE.

### HOW CHALLENGING DO YOU FIND IT TO TRAIN EMPLOYEES ON EACH OF THESE FIVE ASPECTS OF PROPER PPE TRAINING?





### FREQUENCY OF PPE TRAINING



It appears that, for the most part, safety professionals don't feel that conducting the training itself involves many challenges, yet **nearly one third have some sort of struggle with proper PPE training.**

Overwhelmingly, participants told us that their companies have PPE training requirements that are expected to be conducted on both a scheduled and unscheduled/as needed basis.





## WHAT DO OUR EXPERTS SUGGEST?

### TRAINING EMPLOYEES ON PPE

Not all employees understand the **why of PPE**, even with appropriate training, and we received several comments expressing that many safety professionals are seen as overprotective to the point that it frustrates the employee.

Employers must make training specific, depending on which type of PPE employees use. In selecting the type of equipment, employers should:

- ▶ Train employees on how to use, care for, and inspect their PPE; and
- ▶ Ensure that each employee demonstrates an understanding of the PPE training, as well as the ability to properly wear and use PPE, before they are allowed to perform work requiring the use of PPE.

**§1910.132(f)(1)** — The employer shall provide training to each employee who is required by this section to use PPE. Each such employee shall be trained to know at least the following:

- (f)(1)(i) When PPE is necessary;
- (f)(1)(ii) What PPE is necessary;
- (f)(1)(iii) How to properly don, doff, adjust, and wear PPE;
- (f)(1)(iv) The limitations of the PPE; and
- (f)(1)(v) The proper care, maintenance, useful life and disposal of the PPE.



*“Most of the time, the employees get frustrated because I over protect them. I get it, but I’d rather them be safe with extra protection rather than get hurt with not enough protection.”*

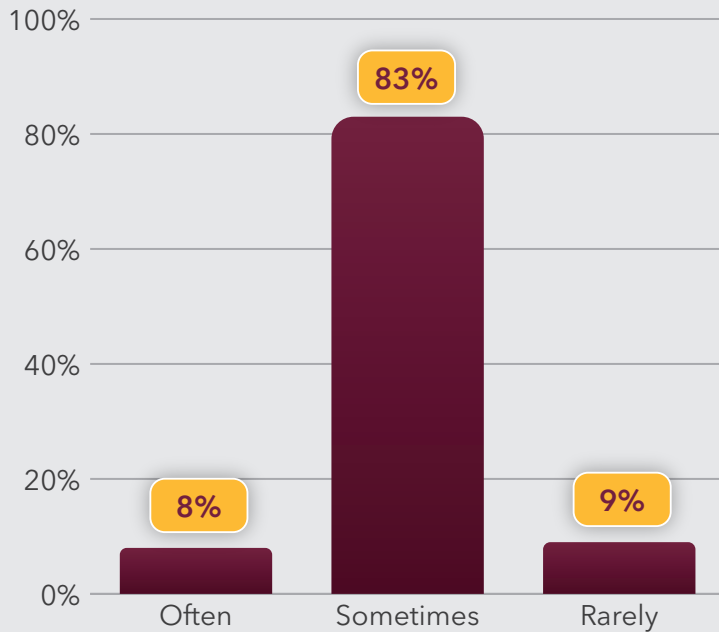
Survey Participant



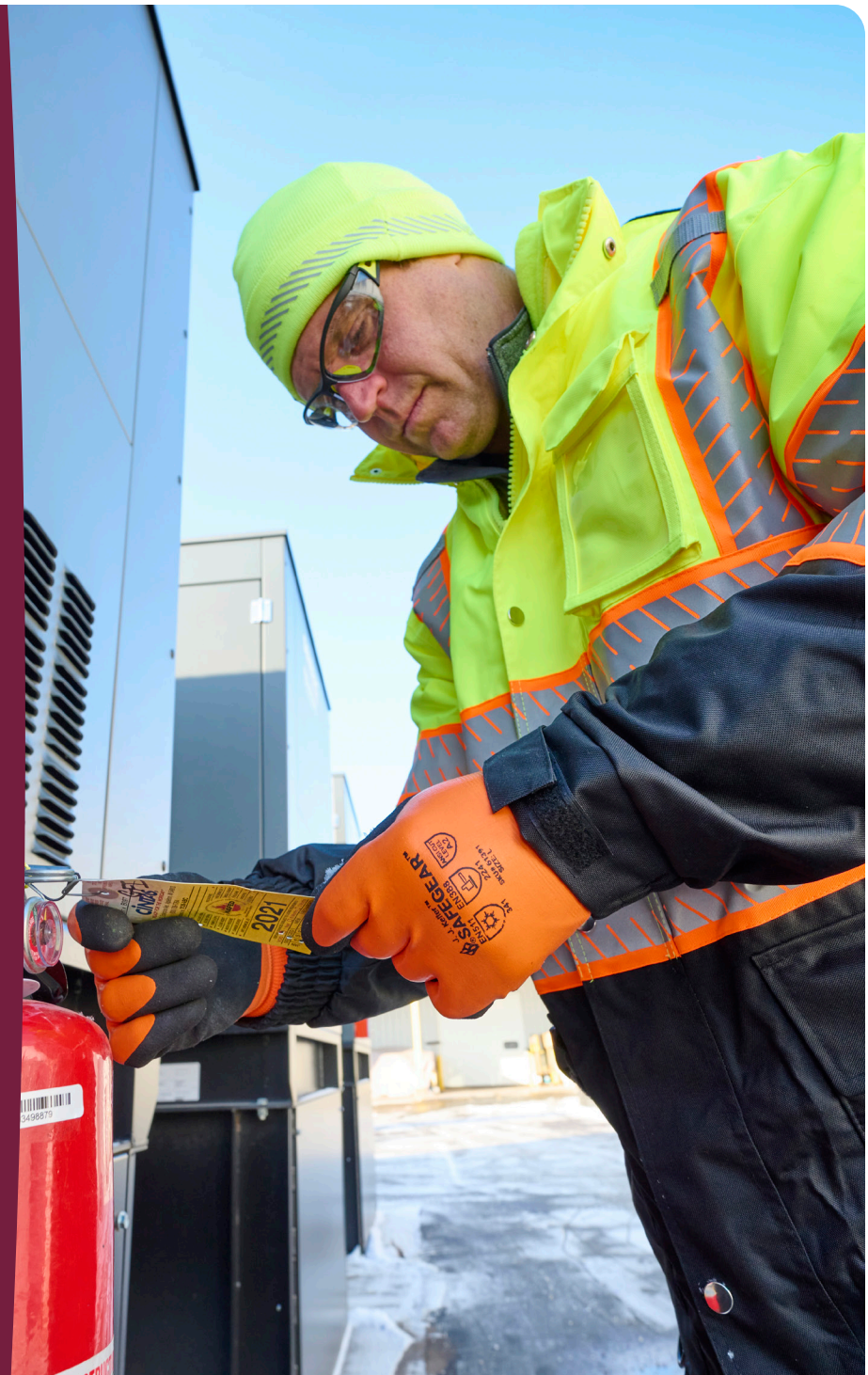
## EARNING EMPLOYEE BUY-IN

PPE **only works when it's worn** — and worn correctly. But over 90% of the survey participants “Sometimes” or “Often” experience issues with employees following proper PPE protocol.

HOW OFTEN DO YOU EXPERIENCE ISSUES WITH EMPLOYEES FOLLOWING PROPER PPE PROTOCOL?



n=111



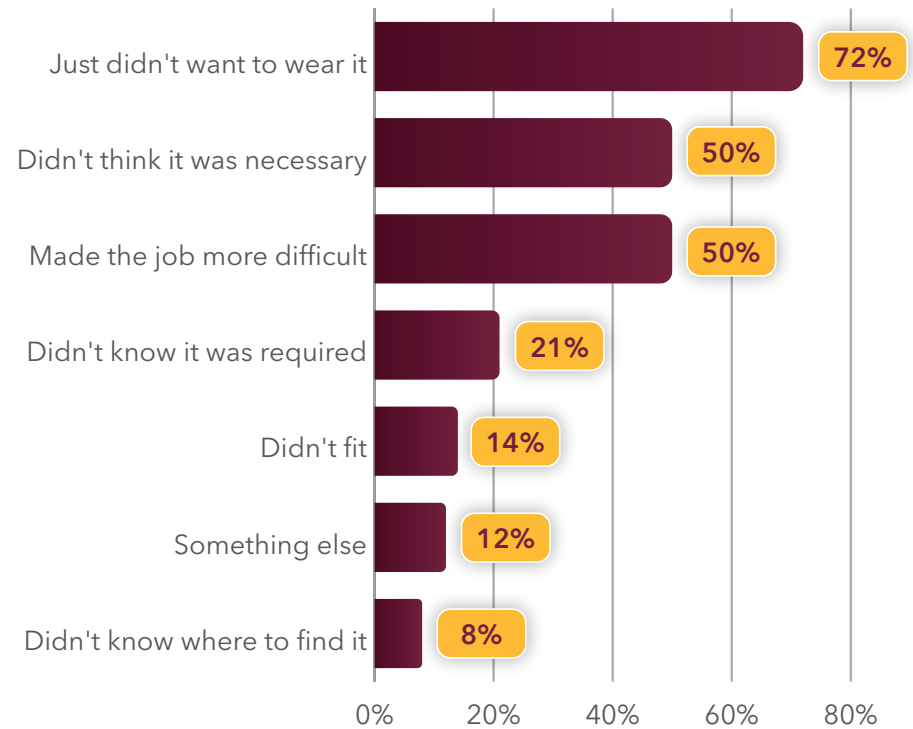


PAIN POINT 3:  
EMPLOYEE COMPLIANCE



When we asked participants to select the reasons employees give for not using PPE correctly, the most common response was that the employee just didn't want to wear it.

### WHAT REASONS DO EMPLOYEES GIVE FOR NOT USING PPE CORRECTLY?

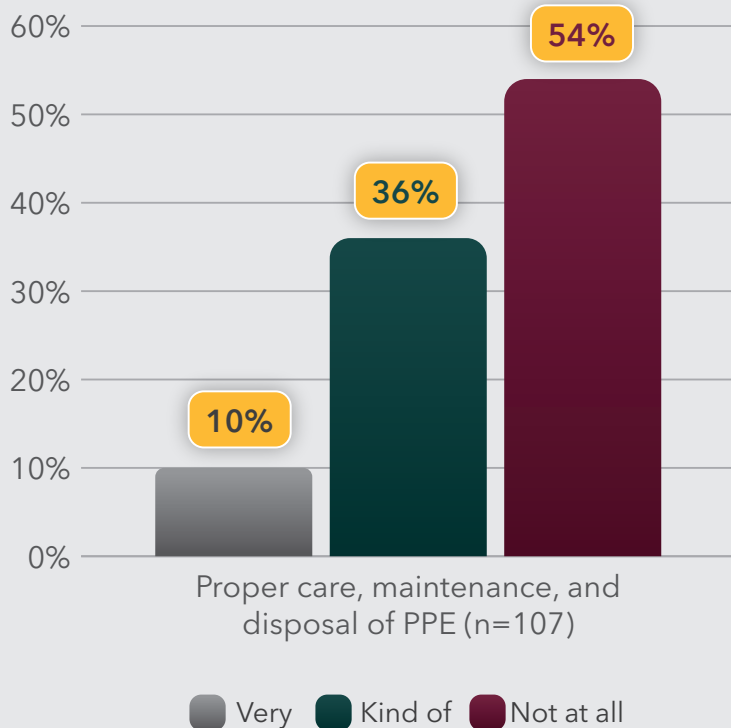


n=111

We found that participants also struggle with employees **not taking proper care** of their PPE.

The work is sometimes dirty, and since employees are given required PPE, they don't place as much value on the equipment because they can just get a free replacement.

### HOW CHALLENGING DO YOU FIND IT TO TRAIN EMPLOYEES ON THE PROPER CARE, MAINTENANCE, AND DISPOSAL OF PPE?

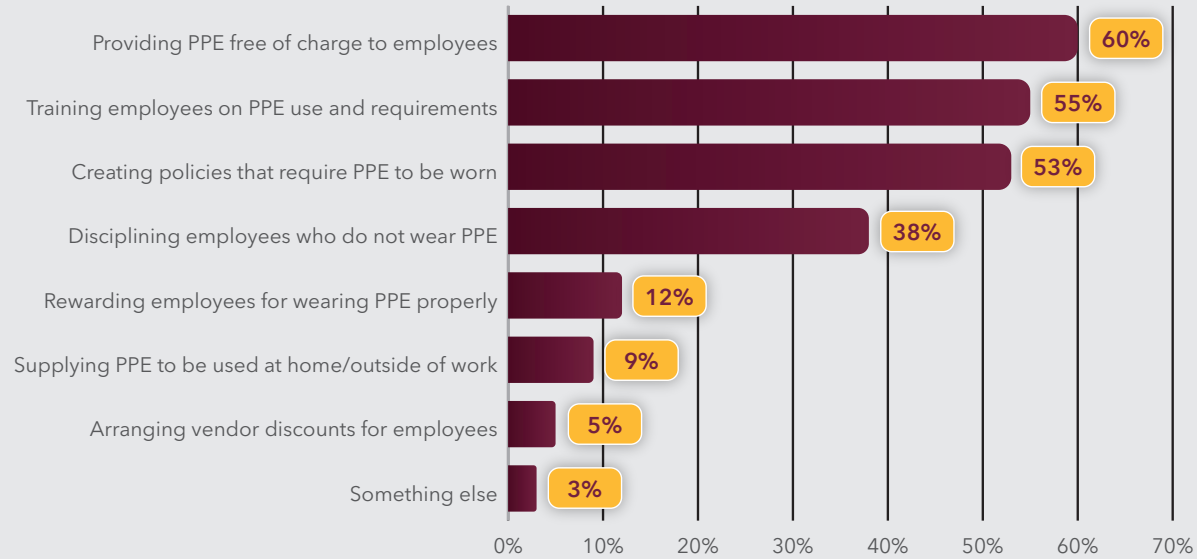




We also asked safety managers about how they encourage their employees to wear PPE properly.

**HOW DO YOU ENCOURAGE YOUR EMPLOYEES TO WEAR PPE PROPERLY? CHOOSE ALL THAT APPLY.**

n=110





## WHAT DO OUR EXPERTS SUGGEST?

### EARNING EMPLOYEE BUY-IN

If employees refuse to wear PPE, they're essentially choosing to accept the risk of not wearing it. However, employees don't have the authority to make that choice. The employer requires PPE not only because it prevents injuries, but because federal regulations require the employer to provide PPE and enforce its use.

To encourage employees to make the right choice, employers might try one or more of the following approaches:

- ▶ **Review the impact on others:** Explain that **an injury has consequences** for the employee, the employee's family, the company, and even the employee's coworkers. By choosing to accept the risk of personal injury, they're imposing the consequences of that choice on others.
- ▶ **Illustrate risk and reward:** Acknowledge that, while the injury risk may be low, working carefully further reduces that risk. Then, describe the potential injuries that could occur (like loss of an eye) and ask the employee to **consider the impacts of those life-changing injuries**.
- ▶ **Clarify the benefits:** Ask the employee what benefit they get by not wearing PPE. Reasons might include comfort, fit, heat, loss of dexterity, or limited vision. Ask if the risk is worth whatever benefit they get from not wearing PPE. The employee may realize that they're taking a big risk for a minimal reward. Employers can usually **offer something to mitigate or reduce PPE problems**.

**§1910.132(f)(2)** — Each affected employee shall demonstrate an understanding of the training specified in paragraph (f)(1) of this section, and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

**§1910.132(f)(3)** — When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by paragraph (f)(2) of this section, the employer shall retrain each such employee.

*“Despite the pushback that we get from the employees, PPE is necessary and prevents accidents and injury.”*

Survey Participant





# WHAT'S THE STORY OF THESE FINDINGS?

This is a story about PPE compliance and the struggle to get employees to wear all necessary PPE.

- ▶ Sometimes the issue comes from employees not wanting to wear PPE because it's hot out, the PPE makes the job harder to do, or they just plain don't want to.
- ▶ Other times the issue is sizing - one-third of participants told us that they've had trouble getting PPE in the right sizes and 70% said they've experienced supply chain delays in the past year, which means employees may feel disinterested in wearing PPE if the only items available don't fit well or require a lot of modifications.
- ▶ The problem does not seem to stem from a lack of training. A wide majority of participants told us that their company makes safety a priority and requires many different types of training.

However, it is also a story about safety managers: how seriously they take their role, how much they care for employees' safety, and what additional support they need to do their job well.

- ▶ Almost 50% of participants chose durability as the most important factor when buying PPE, as they want **high quality gear that will protect their employees.**
- ▶ Participants also acknowledge that doing their job sometimes means employees see the safety manager role as overbearing or micromanaging, but they do it anyway to protect the team.
- ▶ Safety managers acknowledged that the job can feel tough because there is so much to do.
- ▶ Safety managers are looking to be backed up by leadership and given the resources to build comprehensive PPE plans so they can purchase PPE that fits their company's needs.

Compliance is THE issue - over 90% of participants told us that they experience some issues with employees wearing necessary PPE.



# HELP IS JUST A CLICK AWAY

PPE compliance starts with the creation and maintenance of an efficient PPE program founded on communication and collaboration. When purchasing PPE, select equipment that fits the body appropriately for each worker, not just the apparent majority. Workers need to be able to demonstrate why PPE is necessary, and effective training will help to ensure its appropriate use. Lastly, achieving full PPE compliance results in the worker acknowledging the risk vs. reward, and leading by example when wearing the appropriate PPE.

It comes as no surprise that our research indicates that the majority of safety professionals take their roles seriously. What is disheartening is that they don't always receive the support from upper management or respect from employees that allows them to perform their jobs effectively.

If you find yourself in a situation where you are struggling with any of these pain points or have other compliance questions, reach out to one of our subject matter experts via J.J. Keller's Expert Help, part of J.J. Keller's Compliance Network.





# ABOUT THE AUTHOR

Robin Marth, CSP, joined J.J. Keller & Associates, Inc. in 2021 as an Editor on the Environmental, Health & Safety Publishing Team. She is an experienced EHS Specialist with a demonstrated history of working in the management consulting and manufacturing industry. Robin's professional skill set includes Workplace Safety Administration, Ergonomics, Environmental Management, and Motor Vehicle/Fleet Safety. Her editorial responsibilities include researching and creating content for several publications, including Employee Safety Management Today and the OSHA Compliance for California manual.

Robin holds a CSP designation from the Board of Certified Safety Professionals and is also an OSHA Outreach General Industry Trainer.



## ABOUT J. J. KELLER CENTER FOR MARKET INSIGHTS

The J. J. Keller Center for Market Insights is the collaborative research arm of J. J. Keller & Associates, Inc. The center originated in 2019 with a focus on sharing, with the public, trends and insights from an abundance of safety and compliance data gathered by J. J. Keller over decades serving more than 700,000 customers across the United States. Through historical data, new proprietary studies and partnerships with reputable, research-focused third-party organizations, the center publishes ongoing reports to spur discussion and advancements in safe, respectful workplaces, job sites and highways. To contact the J. J. Keller Center for Market Insights, contact [sbaranczyk@jjkeller.com](mailto:sbaranczyk@jjkeller.com).



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