November 6, 2012

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Dear Amalia:

It was a pleasure to meet you last week and thank you for coordinating the CalOSHA Advisory Committee last week in Oakland. Your facilitation is very much appreciated, as is CalOSHA's commitment to provide data-driven solutions to the original petition.

As mentioned in comments at the meeting, shortly, there will be a new ergonomic analysis on housekeeping, tentatively scheduled for completion by the end of the year. The analysis is aimed at full compliance of the National Institutes for Occupational Safety and Health (NIOSH) assessment protocol.

To date, the conclusion is that housekeeper jobs are compliant with extant ergonomic design guidance.

Highlights of the findings to date are:

1. Housekeepers are not performing mattress lifting as claimed. Instead, they are pushing sheets in between the mattress and box springs with periodic small lifts of the mattress corners to the degree sufficient to provide space for the bedding material being swiped in with their hand and arms. There is a lift component to that activity, but biomechanical analyses showed that the biomechanical strain falls below the NIOSH Action Limit and is deemed safe by NIOSH.

2. Heart rate analysis showed that physical demands of the tasks oscillation between light and moderate physical activity. That level of activity falls within ergonomic design guidelines for 8 hour work periods (i.e., less than a third of the physical work capacity).

3. Pushing forces for fully-loaded carts are less than recommended limits published by Liberty Mutual (to the extent of the assumptions on these limits).

4. Vacuuming push and pull forces averaged less than 5 pounds of force and are acceptable per ergonomic strength demands.

5. Lifting vacuums onto carts required on average about 10 pounds of lifting force—this is compliant with NIOSH recommendations for safe lifts.

6. Scrubbing sinks, commodes, and bathtubs produced average hand forces that were less than 20 percent of population strength capacity—making the activity compliant with ergonomic design guidelines.

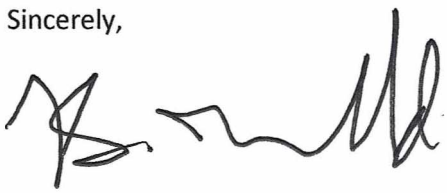
7. Moving a 58 pound living room chair (heaviest furniture in the rooms tested) produced an upper 95 percent confidence limit for push forces of less than 25 pounds of push force. That level of effort is infrequent and falls within recommended population design limits.

8. Exposures to all tasks with putative risk factor exposure are separated by relatively long epochs of walking, standing or sitting (breaks, lunch). Thus, the types of duration and frequency of repetition of housekeeper exposures to tasks that contain some putative risk factors for musculoskeletal disorders fall below thresholds where NIOSH advocates ergonomic intervention.

As mentioned in writing prior to the previous meeting as well as in the meeting, it would be the California Hotel & Lodging Association's desire to present these findings at an upcoming Advisory Committee meeting, along with other medical, scientific and economic data. Additionally, the industry would hope to be able to fully present data-driven findings prior to any proposed rulemaking in the interest of worker safety.

Finally, please know that the lodging industry is committed to the health and safety of our employees and will continue to endeavor to ensure this commitment.

Sincerely,



Lynn S. Mohrfeld, CAE
President & CEO

cc: Chief Ellen Widess