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November 13, 2015

Juliann Sum, Chief
Division of Occupational Safety and Health
1515 Clay Street, Suite 1901
Oakland, CA 94612

Re: Hotel housekeeper musculoskeletal injury prevention standard

Dear Ms. Sum:

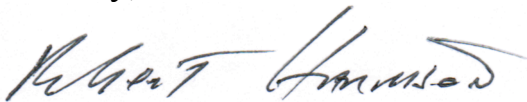
As occupational and public health professionals - many who are directly involved in the treatment and prevention of work-related injuries - we support the promulgation of the hotel housekeeper musculoskeletal injury prevention standard as proposed by Cal/OSHA in their draft of August 13, 2015. The basis for our support is as follows:

- Scientific and medical research conclusively shows that the type of ergonomic hazards faced by hotel housekeepers are associated with work-related musculoskeletal disorders (MSDs);
- The ergonomic hazards faced by hotel housekeepers include forceful exertions, lifting, awkward posture, repetition and excessive work pace;
- Studies performed among hotel housekeepers document that these ergonomic hazards increase the risk of work-related MSDs;
- Job hazard analyses (including the work rate) in the hotel and hospitality industry are important methods that can identify ergonomic risk factors and implement effective solutions to prevent further workplace injuries;

- Engineering and other solutions to prevent work-related MSDs in hotel housekeepers are feasible and in many instances can be implemented without significant cost to the employer;
- Early symptom reporting, training and program evaluation are essential elements of a comprehensive ergonomic program for hotel housekeepers. These elements can reduce the cost of medical care, disability and employee turnover.

The current CalOSHA standards are inadequate to prevent work-related MSDs among hotel housekeepers, and a specific standard is necessary to prevent these disabling injuries among an important part of our California workforce and lodging economy. We applaud the efforts of CalOSHA to develop this new and important standard.

Sincerely,



Robert Harrison, M.D., M.P.H.
Clinical Professor of Medicine

Co-signatories (name and affiliation)

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