## Advisory Committee Minutes of the 5th Cal/OSHA Advisory Meeting on Housekeeping in the Hotel and Hospitality Industry December 3, 2015 – Oakland, California

Meeting Chairs: Steve Smith, Amalia Neidhardt, Eric Berg

Minutes: Valerie Royo, Grace Delizo

**Attendees:** 

Name Affiliation

Estela Rivera Unite Here Local 2
Yong ping Wen Unite Here Local 2

Lynn Mohrfeld California Hotel & Lodging Association (CH&LA)

Baruch A. Fellner Gibson-Dunn (Partner)

Maria Martinez

David Glaser Unite Here

Josefina Soto

Isela MartinezUnite HereMarti FisherCal Chamber

Ed Klinenberg CIHC

Blanca Patricia Hernandez

Ana Ramirez

Unite Here Local 2

Unite Here Local 2

Ana Gutierrez

Maria Aguilar Unite Here

Norma Bravo Soto

Fabiola Benavidez Unite Here Pamela Vossenas Unite Here

Silvia Medrano Unite Here Local 2

Alexis Luna Torres Unite Here

Antonia Cortez

Yolanda Barron

Jose Lee

Unite Here Local 2

Unite Here Local 2850

Unite Here Local 2

Thunder Valley

Nicole Marquez

John Robinson

CAPA

Omar Diaz Cal OSHA (Spanish Interpreter)

Joan Lichterman University Professional & Technical EEs (UPTE-CWA)

Sergio Rangel Unite Here
Carissa Harris-Adamson UCSF
Carmelita Cotton Unite Here

Cynthia Perez

Anabel Ramirez Sami Gutierrez

Ana Lepe

Chris Middleton California Lodging Industry Association (CLIA)

Irma Perez Unite Here Local 2850

Charles D Unite Here Thunder Valley
Theresa Ramos Housekeeping/Thunder Valley

Martha Oregon Unite Here Local 49

Mike French Unite Here

Kevin Thompson Cal OSHA Reporter

David Kernazitskas OSHSB

Mitch Seaman CA Labor Federation

Sally Yip

Mary Deems CA Department of Public Health

Mary Kochie Cal OSHA Medical Unit Sandra Rodriguez Unite Here Local 19

Paul Leary US Department of Labor, Fed OSHA
Peter Wilsey US Department of Labor, Fed OSHA

Chizuko Calhoun

## **Welcome and Introductory Comments**

Steve Smith, DOSH Principal Engineer for Research and Standards welcomed the attendees and opened the meeting. He introduced the staff and noted that the Division had a Bilingual Inspector present for real-time Spanish translation during the meeting. He explained the pre-rulemaking process, gave a brief recap of the previous four advisory meetings and reminded attendees to sign-in. He noted that based on the last meeting, the Division posted a revised discussion draft and asked for additional comments. Seven comment letters were submitted and the current draft shows the response to the comments received back in September.

- S. Smith reiterated that this is an informal advisory meeting, which is still pre-rulemaking and not rulemaking. The Division is soliciting comments from all interested stakeholders, and this will be used to develop a discussion draft and eventually a proposed rulemaking document that best addresses the issues. A final rulemaking proposal will then be forwarded to the Standards Board. At that point, a formal public hearing will be held as part of the formal rulemaking process, and there will be another opportunity to comment.
- S. Smith explained that because input has been provided over the last four meetings, the first agenda items go over the discussion draft and focus on the most recent revisions. The floor would then be opened up to general comments that weren't related to these revisions or to additional comments on support or opposition of proposal. Input on alternatives to the proposal were also being requested. Information was also being sought on the potential impact of the proposal, such as cost and benefits. This information will be used to estimate the potential impact of the proposal on the regulated public. He asked if attendees had questions on the general process, but no comments came forward.

Amalia Neidhardt reminded attendees to state their name and affiliation along with their concerns or suggestions so that they could be properly recorded in the minutes.

A. Neidhardt asked if there were any comments on subsection (b), the updated definition for housekeeper. No comments.

A. Neidhardt asked if there were any concerns with the substitution of Job Hazard Analysis (JHA) with Worksite Evaluation.

Lynn Mohrfeld, California Hotel & Lodging Association, stated that the job hazard analysis is present in other Cal/OSHA regulations, and that the California Hotel & Lodging Association was fine with job hazard analysis. They want job hazard analysis instead of worksite evaluation.

Baruch Fellner, California Hotel & Lodging Association, noted that the definition for job analysis should be retained instead of worksite evaluation. He stated that the current draft is a step backwards. A job hazard analysis allows for analyzing two issues: the potential hazard and, the potential causes of musculoskeletal injuries. Worksite evaluation eliminates one of those and only identifies causes. He suggested using job hazard analysis as opposed to worksite evaluation. Mr. Mohrfeld concurred and said that it would provide more consistency.

Pamela Vossenas, UNITE HERE, stated that worksite evaluation should only be included if the definition stayed the same. Worksite evaluation should pertain specifically to housekeeping tasks, and they would be okay with the worksite evaluation definition.

B. Fellner said that job hazard analysis makes sense as opposed to worksite evaluation because it does not assume that the hazard exists. Worksite evaluation assumes that all hazards have been found, and is more a matter of finding causation of those hazards. He also stated that another significant change from the original definition was the myriad of housekeeping tasks, and that major hotel chains and B&BS had not yet calculated the economic costs for each housekeeping task.

Nicole Marquez, Worksafe, stated that she was in agreement with keeping the definition of worksite evaluation as long as it remained tied to housekeeping tasks and housekeepers.

P Vossenas said that housekeeping tasks throughout the industry were common and largely focused on bathroom cleaning, bed making, and room cleaning, and these tasks have been measured by ergonomists. She noted that it is possible to evaluate risks of potential injury. Workplace hazard is a broad term, and as long as it was tied to housekeeping tasks, they would be okay with the language.

- L. Mohrfeld stated that they were fine with the definition for housekeeping tasks.
- P. Vossenas asked for clarification from the California Hotel & Lodging Association on their previous comment as to how a job hazard analysis would be very expensive to implement. She asked why industry would change the recommendation to keep the job hazard analysis now.
- B. Fellner stated that they were fine with the job hazard analysis because it is classically defined as "find-and-fix" and not "found-and-fix." He inquired if a generic job hazard analysis that deals with all common housekeeping tasks could be used, as opposed to every bed & breakfast doing their own, and whether the economic consequences associated with that had been considered.
- L. Mohrfeld said that they had no issues with the definition for job hazard analysis.

The discussion moved on to the definition for union representative.

N. Marquez said that in the previous draft the word "union" was not included, and they wanted the definition of representative to be consistent with Labor Code 6309. As it is now, it would exclude non-

unionized hotels, and would limit the definition of representative. She recommended deleting the word union.

- L. Mohrfeld and B. Fellner both agreed on deleting the word "union."
- N. Marquez added that the definition would be consistent with 6309, with representatives from bargaining units, and not limited to attorneys. B. Fellner agreed with this recommendation. [NOTE: P. Vossenas later sent a letter stating that the term "union representative" is appropriate as used and should not be changed, because neither employers nor the Division would know when and under what circumstances employers must involve certain non-union representatives in the particular activities specified in the draft regulation.]
- L. Mohrfeld referred back to definitions on lodging establishments and recommended that short-term rentals, vacation rentals, and B&B inns like air B&BS be added.
- P. Vossenas inquired about the request to now include individual homes when the Association has said for the past four years that this regulation would put B&BS out of business. She stated that this would be an unusual reach for Cal/OSHA. Guest services and runners were taken out of the language because those jobs did not have the same hazards as hotel housekeepers. These new lodging establishment terms wouldn't have hotel housekeepers in them and would not have the hazards that have been discussed.
- L. Mohrfeld noted that the numbers for air BnB and vacation rentals have become a significant part of the industry, and that these entities are hiring housekeepers. He reiterated that these are commercial accommodations with the same housekeeping tasks, so they would like to see them included in the language. B. Fellner agreed and noted that it would level the playing field.
- P. Vossenas stated that the original words were in terms of hotels, and not vacation rentals by owner, air BnB, and the like. B. Fellner asked if the housekeeping tasks were different in hotels as opposed to in an air BnB.
- A. Neidhardt said that his comments had been noted, and if there were any additional concerns, the floor would be opened for general comments later on in the meeting.

The discussion moved on to the next agenda item, the revised prevention program and worksite evaluation in section (c)(2), where "cleaning" was deleted and replaced with "housekeeping" task.

- B. Fellner stated that he had concerns with the provision that involves a mandatory process for a system that ensures housekeepers and supervisors comply and use tools and follow safe cleaning practices. He said that the problem was that housekeepers would be disciplined if they did not use the sequence and type of tools in which they do their housekeeping tasks, and that this was an intolerable revision as far as the hotel industry was concerned. He stated that they were not in the business of disciplining the housekeepers if they chose to clean a room in a manner that had been done for 30 years, or would not follow a mandatory MIPP or safe cleaning practices.
- L. Mohrfeld suggested that under (c)(2), after "housekeeping practices", the words "and use the housekeeping tools or equipment deemed appropriate for each housekeeping task" be deleted. He noted that everyone likes to do things differently and should be allowed to do so.

- B. Fellner agreed and said that the MIPP should be sufficiently flexible so that housekeepers do not have to follow the exact same sequence.
- N. Marquez said that they did not envision housekeepers being penalized for not complying with the MIPP. She noted that what would be effective would be to have a memo that outlines illegal safety disincentive programs. Workers should be encouraged to report near-misses or encouraged to report hazards and incentivized to identify new ways to make work safer instead of being penalized. This would ensure a safe work environment.
- B. Fellner inquired if an employer would be responsible if DOSH inspects and a housekeeper chose not to use the equipment.
- N. Marquez said that one would have to take a step back and find out why the housekeeper wasn't using a particular tool.
- B. Fellner stated that the hotel industry has concerns with respect to this particular provision.
- S. Smith pointed out that the whole section is similar to the language in 3203 to ensure that people are complying. Employers already have this obligation. He stated that it does not say what that system has to be or how employers are supposed to do it, so it is performance oriented.
- L. Mohrfeld stated that he believes that they are all in agreement that housekeepers should not be reprimanded for using tools.
- P. Vossenas said that it was important to include housekeeping tools as deemed appropriate, and that Cal/OSHA already has experience making decisions when inspecting hotel properties. The language is acceptable as is, and if there were concerns, the word "housekeepers" could be taken out, but that supervisors had to comply.
- L. Mohrfeld said that regarding the housekeeping tools part, both sides would be needed. He stated that if this just takes existing language from 3203, then the tools are what they have an issue with as they are not sure what tools are deemed appropriate for each hotel, and do not want to limit housekeepers on tools.
- B. Fellner stated that if this section was supposed to be an IIPP, then it should go no further than what is specifically written in the IIPP.

The discussion moved on to the next agenda item, subsection (c)(4).

John, shop steward at Thunder Valley, asked for clarification on (4)(B), and whether "union" representative included someone like a shop steward. S. Smith replies yes.

Mitch Seaman, California Labor Federation, noted that in subsection (c)(4)(C), where it says "...in a language easily understood by housekeepers", that "housekeepers" should be replaced with "employees as covered by the MIPP" or something similar.

B. Fellner noted that all of Mr. Mohrfeld's previous comments regarding worksite evaluation also applied to (4)(A-C).

Mary Deems, California Department of Public Health, Occupational Health Branch, asked if people were not going to repeat their comments on the change of the definition for representative. Yes.

N. Marquez suggested including a posting requirement in the notification process where employers inform employees, something similar to other standards like the lead standards.

Pamela Vossenas, echoed Ms. Marquez's comment, and said that there should be a timeline. She would like to add that this information be posted in a location within fourteen days.

- A. Neidhardt asked for comments regarding Procedures to Investigate Injuries.
- B. Fellner was concerned with (c)(5) and how far reaching the addition could be and noted that this could be a very expensive undertaking. He asked if a housekeeper complained about back pain and gets Motrin, would an employer be required to conduct an investigation from those kinds of injuries in accordance with (c)(5).
- A. Neidhardt replied yes, that this requirement was taken from the IIPP, and uses the same language. She explained that the Division wants to make sure that information obtained in those investigations be considered.
- B. Fellner commented that it would be very expensive if every minor back pain triggers an investigation under (c)(5).
- N. Marquez suggested that a timing requirement be included in (c)(4)(D). P. Vossenas echoed this comment.
- L. Mohrfeld suggested minor wordsmithing on (D)(1) to delete "or increase" from the language.

Joan Lichterman, UPTE-CWA 9119, suggested that subsection (E)(2) on page 3 be changed to include "prolonged, awkward, or static postures."

Carisa Harris Adamson, UC Berkeley, suggested that "forceful exertion" be added to (E), and N. Marquez agreed with these suggestions.

- B. Fellner commented that language like "extreme reaches, repetitive reaches," and others were precisely the words that led Congress to reject the ergonomic standard in 2000. He stated that these terms were incapable of definition and measurement, and attempts were made to get the Federal Occupational Safety and Health Administration to define what repetitive motion meant, and they replied that it meant doing the same thing twice in one minute. Mr. Fellner said that it was impossible to define these terms and that the attempt to conduct a job hazard analysis in context of these terms and definitions was doomed to failure.
- C. Harris Adamson said that there are a few assessments that have been validated in studies between physical exposure and musculoskeletal injuries, and that we have come a long way since 2001. She suggested that these terms be kept.

- B. Fellner stated that "association" is opposed to "causality." He said that there is some connection, but that the only study of those tools in context of NIOSH levels was conducted by Dr. Steve Wiker, who found that housekeeper activities were well within NIOSH guidelines.
- P. Vossenas stated that they were repeating the same recommendation made in their August comments on item (4)(E). Lifting should not be part of (E)(5) as it is not a posture. Lifting should be a separate risk factor and should be in item 1. She also suggested adding forceful exertion to item 1, because it is a musculoskeletal risk factor and an important hazard seen in hotel housekeeping. She mentioned a 1995 scientific review on the forceful exertion used for lifting beds that are close to walls and night tables, which create awkward postures and make it difficult for housekeepers to lift beds safely. She noted that it was important to mention forceful exertion with lifting.

Ana Gutierrez, 14-year worker at the Hilton Garden Inn Emeryville, Local 2850, related about an incident where she had used too much force to push a heavy cart which had gotten caught between a rug and a plastic seal at the bottom of the rug. Carts can slide, and she had to force the cart onto the rug, which resulted in the cart flipping over. She mentioned that she was not injured, but that the constant pushing of the cart made it harder for her to do her job, and requested that forceful exertion be added.

- A. Neidhardt asked if there were any concerns with the deletion of (4)(E)(2) on page 3 of the draft discussion.
- N. Marquez stated that they had concerns, that safe work rate should be included and that the amount of time allotted to clean guest rooms should be taken into consideration.
- B. Fellner said that they did not have any concerns with the deletion. He noted that their concern was whether or not the deletion of requiring a safe work rate was more cosmetic or real, or would it be imported through the back door. He noted that (5)(C) requires input of housekeepers and (6)(A) already requires effective means of involving housekeepers and representatives. If housekeepers have a bad back, and they're doing too many rooms per shift, that's what they will attribute it to. If management disagrees, they will not adjust rooms per shift, and the housekeeper will contact DOSH to see if that bad back was associated with the number of rooms. This particular MIPP, if enforced, will allow the housekeepers to veto the number of rooms assigned. He applauded the deletion of the paragraph, and noted that the requirements were still part of the MIPP through this process of housekeeper input. He stated that if the Division could say that the MIPP was not about requiring businesses to mandate specific tools or specific sequences, then they could live with it.
- L. Mohrfeld inquired if it were to be included, and the safe work rate was higher than the one in the collective bargaining contract, then which one would be valid.
- S. Smith replied that employers could go beyond the Division's regulations in order to protect their employees.
- P. Vossenas stated that this was about safe work rate and that this was something that would be considered as part of the worksite evaluation. She recommended adding language that as part of the worksite evaluation they would consider the number of rooms cleaned per shift and type of rooms, to enable the employer to evaluate quickly if the work could be done safely or not. Work rate language

should be part of the worksite evaluation.

- A. Neidhardt asked for input on page 3 of the discussion draft items (5)(A) and (B).
- M. Seaman stated that subsection (5)(A) should clarify that it applies whether or not a workers compensation claim had been filed.
- B. Fellner pointed to (5)(B), which states that if required tools or other required control measures were used or not used appropriately, and said that it implied mandatory use of tools and equipment. He said that this should be revised to accommodate hotels.
- L. Mohrfeld suggested deleting the word "required" from (5)(B).
- P. Vossenas said that as previously recommended in their September comment letter, (5)(A) should specify what control measures are to be considered. There is no list or required tools in this version, but it is pretty well known what the options are. She recommended including control measures like the tools identified in the Cal/OSHA 2005 publication. This Cal/OSHA document, which covers the hazards that are being discussed, shows the unsafe and safe postures with the right tool for the job. Since these tools have been identified by Cal/OSHA, then they should be named. She noted that if tools are not named, they won't be considered, and since appendices are non-mandatory, then the tools should be referenced in the document.
- B. Fellner stated that as Ms. Vossenas indicated, if these were non-required, as in a true MIPP, then they would have no objection to the 2005 document. He noted that this is why this entire exercise was unnecessary as that 2005 document laid out very nicely the non-mandated operations.

Maria Martinez, 10-year worker at the Hilton Garden Inn, Emeryville, stated that Cal/OSHA should include tools like mops because the hotel she works in does not provide mops. Workers have to make mops out of towels, and the workers have to bend or kneel to clean. She commented that they have to clean 14 rooms a day as union workers, and that non-union workers clean 20 rooms per day. Mops should be included in the list of tools that the employer must have, and employers should consider which tools are safe or not.

- N. Marquez noted that she was in agreement with listing tools and control measures. C. Harris Adamson echoed this recommendation.
- A. Neidhardt solicited input on (5)(C). No comments were received.
- A. Neidhardt asked for comments on (6). None were received.
- A. Neidhardt solicited input on page 4, (d) Training.
- P. Vossenas asked for clarification on (d) as to what did "these employees" referred to. A. Neidhardt replied that it referred to housekeepers and supervisors.
- P. Vossenas commended the Division for this section. Referring to (d)(1)(E), she recommended adding "or when new or previously unrecognized hazard has been identified." The addition would make it more

consistent with the Safe Patient Handling standard, as well as with the current version of the Workplace Violence proposed standard.

- L. Mohrfeld stated that (d)(1)(A) seemed to be misplaced and didn't apply there.
- B. Fellner noted that the whole issue with this element, as applied to housekeepers, is that it would end up training people on how to be sick. He noted that many people experience musculoskeletal injuries which are as common as headaches, and many learn to cope with it. He suggested that instead of training people how to be sick, the Division should look at the data driven medicine and rethink this section.
- L. Mohrfeld stated that he looked at this section from a more operational, general manager point of view. The concern was that it will get lost somewhere, and then an owner wouldn't know how to talk about it. He stated that this was more for medical professionals.
- C. Harris Adamson disagreed that this was training people to be sick, and stated that there is plenty of literature that supports that early identification of signs and symptoms is better for both the employee and the employer. She stated that this section should include the early identification of signs and symptoms which should be taught to supervisors in order to teach employees if needed. She suggested that supplemental information be provided on the early recognition of signs and symptoms that lead to musculoskeletal injuries.
- M. Seaman seconded the suggestion and stated that these signs and symptoms need to be caught early. He noted that if left untreated, the injuries could become more serious, leading to more expensive injuries and to workers not being able to recover. This creates open workers compensation claims that will never close, and this is not something anyone wants. He said that there needs to be something in the training section that tells employees what to look for, because employees don't want to stop working, and they will work through their injuries. This is the exact opposite of what workers compensation would want employees to do.
- A. Neidhardt asks for clarification if the suggestion was to add identification of early signs of injuries. The response was yes.
- B. Fellner stated, with regard to the two previous commenters, that the 7<sup>th</sup> circuit decision noted in Caterpillar the difficulties of easy descriptions. He added that these descriptions do not amount to medical causation related to the workplace.
- P. Vossenas thanked Cal/OSHA for including (d)(2)(A), requiring that both workers and supervisors be trained on signs and symptoms. Ms. Vossenas stated that housekeepers have talk about not getting training on this, and not being part of their regular training. This is something that specifically applies to housekeepers, so she appreciates including it in the language.

Marti Fisher, Cal Chamber, stated that the language in (d)(2)(A) implied that the person doing the training needs to be an expert and recommended clarifying the language so that an ergonomic expert or a doctor would not be required. Ms. Fisher understands the need for employees to recognize symptoms, and suggested that the Division change the language so that it dials back a bit so that employers are not required to bring in an ergonomist or a doctor.

- N. Marquez stated that they are also appreciative of Cal/OSHA including the signs and symptoms of musculoskeletal injuries, and that it is important to include early recognition and a process for detecting these injuries.
- B. Fellner noted that the early process for reporting was already covered in (d)(2)(E). He stated that as long as employees could be informed based on data-driven medicine, then it would be acceptable.
- A. Neidhardt asked if there were any concerns with splitting (d)(2)(D) and (d)(2)(E) into two parts. They were one paragraph before.
- P. Vossenas appreciated the clarification on (d)(2)(D) and the stressing of the process of early reporting in (d)(2)(E). She also applauded the language on page 5, (d)(2)(F), but wanted to repeat their earlier suggestion to add "to include practice in the guest room." She noted that housekeepers say that training is done in the morning meetings and they're just told to do their tasks, or someone comes up to them and tells them something, then they are told to sign a piece of paper that they've been trained. She said that housekeepers would like training in the rooms because that's where their jobs are.

Irma Perez, 15-year worker at the Marriott Courtyard, Downtown Oakland, said that hotel workers do not have proper training, nor are they taught proper techniques or how to use the tools that the hotel provides. She gave an example of how she was given a wedge tool to lift a mattress, but the problem was that no one used it because no one was taught how to properly use it. All that workers are given are the manufacturer instructions that come with the tool, but no training on how to use it.

- C. Harris Adamson stated that it would be helpful to put in an adequate time to practice using a tool in a room. She said that one opportunity to learn how to use a tool doesn't necessarily transfer to them using the tool efficiently and productively, so workers need adequate time to practice using the tools.
- F. Benavidez, 13-year worker at Park Central San Francisco, said that they are never given actual training, but are made to sign a sign-in sheet. They are given a yellow Cal/OSHA book, but it is never explained to workers. Workers are not told how to use liquids, and housekeepers work the way they do because there is no proper training on what to use, which makes it hard to clean.

Yolanda Barron, 5-year worker at the Hyatt Emeryville, thanked the Division for the opportunity to speak, and emphasized the importance of being taught how to clean as opposed to just hearing about how to clean. She noted that they are given tools, but no training on how to use the tools. Training is also needed when rooms are remodeled, and newer rooms have crystal and glass. Workers are injured while cleaning 10-11 bathrooms because it is a repetitive job, so it is important to get training on the tools that they are given.

Cynthia Perez, Housekeeper, also stated that most housekeepers do not get proper training. She commented that her workplace does provide training in the rooms and workers are shown the proper ways to do tasks like how to pick up mattresses and clean bathrooms. Because of this, she believes that it should be regulated. She was taught how to do things safely but many housekeepers do not know how to do that. She also participates as part of a safety and green committee at her workplace where they are able to discuss concerns, and help train others, which makes a difference.

- N. Marquez echoed all the comments regarding the room training and all comments in respect to training.
- A. Neidhardt asked for any concerns regarding (e) Records (1) or (2).
- P. Vossenas stated that on (e)(1), they would recommend adding at the end the names and qualifications of persons conducting the training so that the language would be identical to the Safe Patient Handling language, as well as the current Workplace Violence proposal. In the section where it states, "made available in accordance with 3203," she suggested that instead of "made available to all employees," it should be kept consistent with the language in the Safe Patient Handling standard, and the current Workplace Violence proposed standard.
- S. Smith called for a lunch break, and noted that the discussion would continue after the break.

Lunch Break taken at noon. Meeting Resumed at 1:15 p.m.

- S. Smith resumed the meeting and opened the floor for additional comments or input.
- P. Vossenas recommended that in subsection (5)(B), the word "appropriately" be deleted and that the words "correct use of equipment" be used instead. She noted that just like in the Safe Patient Handling regulation, they would like to require ensuring availability to encourage its use.

Mike French, attorney and research analyst with Unite Here said that the hotel industry is doing great. She read off numbers related to income and profit increases, and stated that there was an all-time high use and occupancy rate. Assets price is on the rise and there has been record hotel transactions. She said that in California, in 4 of the top 5 lodging markers (which include SF, Santa Ana and LA) there has been an increase of revenue per available room.

M. Seaman thanked the Division and noted that this was a big undertaking. He inquired as to what the expected timeline for submitting a proposed standard was, and whether another meeting would be necessary.

Yuriko Hammond, a hotel worker, noted that she would be having knee replacement surgery and wished that she would have had those tools before.

Susan Martinez, a Unite Here member and hotel worker from a Sacramento Casino, said that there was strong support for a housekeepers regulation. She noted that still today many housekeepers do not have it any easier or safer and fear repetitive injuries. She recommended that the language which requires that these most vulnerable workers be trained in a language easily understood, be kept. She supported posting requirements to avoid housekeepers putting themselves at risk. She mentioned that the week before she had attended a Coalition Labor Union Meeting for women where they collected signatures to support this regulation. She was there to support her Unite Here sisters who seek a safer job.

Anna Leppe, a worker for the Anaheim Disney Grand Hotel in CA, said that they too have many trainings but that they are worthless due to heavy mattresses, heavy duvets and too many add-ons. They get 13 rooms which are too much for them and some have bunk-beds. Bunks are too low and large and require too much bending. Carts weigh too much and their hallway is carpeted.

- P. Vossenas thanked the Division for their efforts and noted that it should now move into rulemaking. She added that serious injuries are still happening. She also stated that she was in the process of updating a 10 year old reference-book chapter on this subject.
- S. Smith reiterated that further input was welcomed and requested that it be submitted by the end of the month. He thanked all attendees for coming and then the meeting was closed.