



September 11, 2015

TO: Division of Occupational Safety and Health (Cal-OSHA)

FROM: California Lodging Industry Association

RE: Occupational Hazards Regarding Housekeepers

Thank you for allowing us an opportunity to provide feedback on Occupational hazards regarding housekeepers in the hotel and hospitality industry.

The California Lodging Industry Association is the only association in California that represents the interests of independent hotels. The vast majority of our members own hotels that have less than 50 rooms. We are small business owners. We have over 1000 members statewide and have represented our members for almost 70 years.

The one size fits all solution is not feasible for our members. Not all hotels are created equally. We represent small independent hotel owners are operators and many of the proposals have been deemed excessive. Adding a new Musculoskeletal Injury Prevent Program (MIPP) poses a burdensome and excessive new regulation for small businesses to observe.

The safety work rate identified in the proposal is not a workable solution. All hotels are different and most of our members are not chain hotels. Standardizing the number of rooms cleaned does not relate to causes of injuries.

A number of items in the proposal makes assumptions on hazards faced by hotel housekeepers. What about hotels that do not have work related injuries? This assumes that every lodging property has unsafe work areas and lack of training.

Our members have partnerships with their Worker's Comp carriers. Many carriers inspect properties annually, observe workers performing various tasks and provide up to date training videos. The goal for having the program is to reduce injuries and keep the cost of worker's compensation insurance down.

The job hazard analysis is very broad and assessing the possible causes of injuries is vague.

The training section poses some concerns. Is there an expectation that the “housekeeping” industry go through some certification process and are deemed “experts”? Many of the housekeepers that make up our membership are family members and the lodging establishment is a family owned business. The additional training requirements seem excessive and again assumes hotels with 25 rooms operate in the same manner as hotels with over 100 rooms.

The additional record keeping proposal is also excessive. Our members are small business operations and any new proposals will be difficult to implement. Many of the proposals would require our small businesses to add additional staff to manage the MIPP.

Generally, musculoskeletal health is directly related to overall good health. Different body types have different measures of performance during different tasks. CLIA is concerned that the proposals excludes individuals of certain stature, strength and age with predisposed conditions. The added injury program leads to lifestyle education which can lead to discrimination and harassment.

CLIA members pride themselves in taking care of their housekeepers proactively. Most of our members do not have in house safety managers as they are small business owners. They rely heavily on associations and their workers compensation providers to educate them and provide up to date training and resources.

CLIA sends out weekly e-blasts to members educating them on new laws, regulations, legal support, safety resources and more to reduce work place injuries.

While we appreciate your diligence in improving workplace safety for housekeepers, the proposed changes are difficult to implement because they are burdensome for small business owners. We already have an Injury Illness Prevention Program. We do not need two programs. The one size fits all solution burdens small independent hotels with new regulations and standards that are difficult to implement and do not guarantee a reduction in worker injuries.