

March 6, 2025

AFSCME Council 36

AFSCME Council 57

AFSCME Local 1902
Metropolitan Water
District

AFSCME Local 1001
Metropolitan Water
District

AFSCME Local 206
Union of American
Physicians and Dentists

AFSCME Local 3299
University of California

AFSCME/UNAC-UHCP
United Nurses
Associations of
California - Union of
Health Care
Professionals

AFSCME Local 4911
United EMS Workers

TO: The Members of the Commission on Health and Safety and Workers' Compensation

RE: Solicitation for Requests for Proposals (RFPs) Related to Studying Risks of Exposure and Incidence of Cancer in Fire Mechanics

Dear Members of the Commission:

When AFSCME passed AB 1400 in 2019, it required that on or by January 1, 2021, that the Commission conduct a study on the risk of exposure to carcinogenic materials and incidence of cancer in mechanics who repair and clean firefighting vehicles. We are now four years overdue, and these same mechanics have just witnessed and have been a party to one of the most devastating and destructive fires in California's history – all with continued risks and lack of preventative measures to reduce their toxic exposure to known carcinogens.

We need to protect these workers by having a reliable and comprehensive study that provides accurate data to prevent further cancer deaths in this essential workforce. We know that in 2019, when we passed AB 1400, our members of Local 119 who work for the City and County of LA servicing and cleaning the fire trucks and helicopters received subpar PPE relative to their firefighting counterparts and were washing their uniforms in their own washing machines, increasing not only their risk of continued exposure to themselves but also to their families and the more time that lapses where we don't have a study to help improve these gaps in protection results in the ever increasing risk that these men and women face in developing cancer.

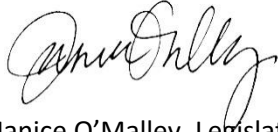
We do appreciate the consideration that the Commission is making to find an appropriate firm or organization to conduct this study and hope that as you screen the RFPs that have been submitted that the Commission prioritizes those who have experience working in the field of occupational safety and health or worked with occupational safety and health professionals, and must have experience with analyzing and evaluating employer safety standard operating procedures.

Our goal for this study is to ensure that it includes current and past union member interviews, identify the job tasks and activities that lead to exposure, and assure union participation throughout development and implementation of the study.

We also hope that research methods would include site-specific audits of the employer's OSHA regulatory compliance and risk management safety programs, reviews of employee safety training records, their content and frequency, and would include a thorough review of workers' compensation claims data and employee medical sick records to correlate workplace exposures to illness.

We appreciate CHSWC's commitment to preventing occupational illnesses.

Sincerely,

A handwritten signature in black ink, appearing to read "Janice O'Malley". The signature is fluid and cursive, with the first name "Janice" and last name "O'Malley" clearly distinguishable.

Janice O'Malley, Legislative Advocate



March 6, 2025

Carisa Harris, PhD, CPE
Director, Center of Occupational and Environmental Health

Commission on Health and Safety and Workers' Compensation's (CHSWC)

Dr. Harris, Commissioners Pedroza, Hamelin, Subers, Montoya, Kessler, Roxborough, Mitch Steiger Voorakkara,

On behalf of ISSA, The Worldwide Cleaning Industry Association, the leading trade association for the cleaning industry worldwide representing more than 11,000 members across the entire value chain of cleaning, we are writing to provide our technical response to your survey and time and motion study conducted on cleaning professionals.

We appreciate the Northern California Center for Occupational & Environmental Health and Commission on Health and Safety and Workers' Compensation's (CHSWC) efforts to collect more information about the cleaning industry to ensure essential front-line workers are able to do their job safely and effectively to protect human health. We recognize that the study may be limited by the scope and resources provided, in addition to the difficulty getting sufficient participation. We have some feedback we hope you will consider before filing your final report and welcome the opportunity to engage with your researchers and the commission on these important topics.

Background on ISSA and Cleaning Times

We are the authors of *[The Official ISSA Cleaning Times: The Cleaning Industry's Most Trusted Tasks, Tools & Workloading Resource](#)*, which was first published in the 1960s with the primary goal of helping service providers determine the amount of time it takes to perform specific tasks to maintain a facility. The cleaning times are built using five components: task, tool, time, total units, and training. *The Official ISSA Cleaning Times* has been adopted as the standard in government, health care, education, and other industry segments in the United States as well as incorporated into a wide variety of workloading and quality control programs as the standard default task times.

ISSA is also the industry leader when it comes to training and standards related to best practices, and particularly the ISSA Cleaning Industry Management Standard—or CIMS—which is the first consensus-based management standard that outlines the primary characteristics of a successful, quality cleaning organization. These certifications and trainings have been required by entities around the world including the Government Services Administration, school districts, colleges, cities, states, and many others. In total, ISSA has trained more than 500,000 cleaning professionals worldwide.

From our experience in producing industry recognized cleaning times and the most widely adopted cleaning standard, we want to address some of the issues this study critiqued.

The most important aspect of workloading and cleaning times you should understand is that square footage is just one component of our cleaning times. The times also consider the standard of cleaning being pursued, the scope of work to meet the standard, and the amount of time it would reasonably take workers to do specific tasks given the tools, equipment, and cleaning systems employed. Plus, the times factor in the type of space being cleaned and if the work is daily, interim, or restorative. This complexity has prevented the industry from having been able to design accurate universal workloading metric(s)/calculators. Instead, ISSA (and others) offers workloading times, training, and expertise to help empower employees and employers accurately access their case-by-case workloading.

According to *The Official ISSA Cleaning Times*, “Different industries may have different soil types, unique regulations, and expectations, and often require different training, equipment, tools, and knowledge to complete the job properly. The hazards of cleaning in an industry environment can be different than cleaning a commercial building.”

Specifically, you mentioned the following critiques of ISSA’s cleaning times, which we would like to respond to:

- “ISSA Time Allocations were not very accurate or easy to apply.” We stand by our time allocations as a baseline standard for the industry that has been developed based on 60 years of real-world data and feedback from the industry. For those who have never actually cleaned or conducted workloading for a facility, it might seem that the time it takes to mop a floor or disinfecting a counter should be easily measured. However, the level of soil, type of product/equipment, level of training, type of space, and square footage are all variables in producing a reliable workload estimate. ISSA teaches courses on how to accurately apply our cleaning times in the field and would welcome your experts to participate in such a course to better inform this and future studies.
- “The accuracy of the ISSA time estimates varied widely by workspace and work task, across venues.” The actual cleaning times vary widely based on the variables mentioned above. Additionally, when cleaning a space oftentimes tasks are bundled into a specific sequence which may adjust the time that it takes to complete work. Also, access to the resources needed to clean and if they are staged correctly will impact performance levels. Even state to state cleaning times can differ due to soil types, building materials used, weather, etc. Our cleaning times are meant to serve as an average time adjusting for these many variables and are based on 100 years of expertise and more than 60 years of experience developing cleaning times for the industry based on real-world feedback from the industry.
- “Some tasks did not have a corresponding category in the ISSA handbook, making a direct comparison impossible.” We do not offer cleaning times for every category or space because we value our accuracy and want to ensure we have enough real-world feedback before offering an industry recognized cleaning time. Also, we updated our cleaning times in 2023 and want to make sure you were referencing/comparing your study to the most recent version of our cleaning times.
- “Interpretation and application of ISSA standards led to challenges with accurately predicting cleaning times some tasks.” For those who clean for a living, these standards are very straightforward and we invite you or your team to participate in a future workloading class so that you can educate yourself on how these cleaning times are meant to be used.

Additional concerns we have about your study include:

- The study does not use a statistically reliable sample size for its time and motion study or its survey. For the survey, it is unclear if you counted workers twice if they cleaned multiple times of facilities. For the types of facilities, you only have real data for one office building cleaner, three in airports, seven in malls, and 13 in event centers.
- We would value reviewing the full data and report to better understand how these reviews were conducted. Also, limiting your review to two, four-hour shifts is not significant enough to extrapolate cleaning time conclusions.
- We would have advised that you reached out and sought representation from entities like ISSA that have an expertise in proper workloading, ergonomics, cleaning standards, and their complexity.

Different Spaces Have Different Needs

- Properly cleaning 2,500 square feet of a surgery wing of a hospital is very different than properly cleaning a 250,000-square-foot college campus. It is incredibly important to public health and safety that each space is cleaned correctly, with the right products and equipment, and by a properly trained and certified workforce.
- According to *The Official ISSA Cleaning Times*, “The cleaning of manufacturing plants has its own set of techniques and specialty areas that requires deep and correct cleaning to maintain tolerance of manufacturing. This includes specialty machinery and equipment. Disinfection and extra attention to detail are key to properly ensuring a health care environment is safe, healthy, and free of contaminants.”
- As a result of the differences in tasks and needs of various spaces, *The Official ISSA Cleaning Times* separate out tasks that are done by product type. We categorize our cleaning times by vertical market (e.g., corrections; health care; dorms & residence halls; hotel & hospitality; house and home; manufacturing; retail, grocery, and banking; higher education; K-12 schools; transportation, et al.). Additional tasks related to infection control exist as well.

Thank you for your consideration. We appreciate the Northern California Center for Occupational & Environmental Health and the Commission on Health and Safety and Workers' Compensation's (CHSWC) efforts to collect more information about the cleaning industry to reduce injuries to our essential front-line workers.

Respectfully,

John Nothdurft
Director of Government Affairs
ISSA, the Worldwide Cleaning Industry Association
johnn@issa.com