

This is a draft of possible language regarding Occupational Safety and Health Standards Board Petition 526. This draft is for discussion purposes only, and is not a rulemaking proposal.

Hotel Housekeeping Musculoskeletal Injury Prevention

(a) Scope and Application. This section is intended to control the risk of musculoskeletal injuries and disorders to housekeepers in hotels and other lodging establishments. It does not preclude the application of other sections of Title 8.

(b) Definitions.

“Housekeeper” means an employee who performs housekeeping tasks and may include employees referred to as housekeepers, guest room attendants, room cleaners, maids, guest services runners, and housepersons.

“Housekeeping tasks” means tasks related to cleaning and maintaining sleeping room accommodations including bedrooms, bathrooms, kitchens, living rooms, and balconies. Housekeeping tasks include, but are not limited to, the following: (1) sweeping, dusting, cleaning, scrubbing, mopping and polishing of floors, tubs, showers, sinks, mirrors, walls, fixtures, and other surfaces; (2) making beds; (3) vacuuming; (4) loading, unloading, pushing, and pulling linen carts; (5) removing and supplying linen and other supplies in the rooms, (6) collecting and disposing of trash; and (7) moving furniture.

“Job hazard analysis” means an assessment that focuses on job tasks as a way to identify potential hazards. It examines the relationship between the worker, the task, the tools, and the work environment. For purposes of this section, a job hazard analysis is an assessment to evaluate housekeeping tasks with respect to potential causes of musculoskeletal injury to housekeepers.

“Lodging establishment” means an establishment that contains sleeping room accommodations that are rented or otherwise provided to the public, such as hotels, motels, resorts, and bed and breakfast inns. For the purposes of this section, “lodging establishment” does not include hospitals, nursing homes, residential retirement communities, prisons, jails, homeless shelters, boarding schools, or worker housing.

“Musculoskeletal injury” means acute injury or cumulative trauma of the muscles, tendons, ligaments, bursa, peripheral nerves, joints, bone or blood vessels.

“Representative” means a recognized or certified collective bargaining agent representing housekeepers.

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(c) Housekeeping musculoskeletal injury prevention program. As part of the Injury and Illness Prevention Program (IIPP) required by Section 3203, each employer covered by this section shall establish, implement, and maintain an effective, written, musculoskeletal injury prevention program (MIPP) that addresses hazards specific to housekeeping. The written MIPP may be incorporated into the written IIPP, or may be maintained as a separate program. The MIPP shall include:

- (1) Names or job titles of the persons with authority and responsibility for implementing the MIPP at each worksite;
- (2) A system for ensuring that supervisors and housekeepers comply with the MIPP, follow the employer's safe workplace housecleaning practices, and use the housekeeping tools or equipment deemed appropriate for each cleaning task;
- (3) A system for communicating with housekeepers in a form readily understandable by all housekeepers on matters relating to occupational safety and health, as required in Section 3203, including provisions designed to encourage housekeepers to inform the employer of hazards at the worksite, and injuries or symptoms that may be related to such hazards, without fear of reprisal;
- (4) Procedures for identifying and evaluating housekeeping hazards through a job hazard analysis:
 - (A) The initial job hazard analysis shall be completed within three months after the effective date of this Section or within three months after the opening of a new lodging establishment.
 - (B) The procedures shall include an effective means of involving housekeepers and their representative in designing and conducting the job hazard analysis.
 - (C) Housekeepers shall be notified of the results of the job hazard analysis in writing or by posting it in a location readily accessible to them. The results of the job hazard analysis shall be in a language easily understood by housekeepers.
 - (D) The job hazard analysis shall be reviewed and updated:
 1. Whenever new processes, practices, procedures, or renovation of guest rooms or equipment are introduced that may change or increase housekeeping hazards;
 2. Whenever the employer becomes aware of a new or previously unrecognized housekeeping hazard;
 3. At least annually for each worksite.

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(E) The job hazard analysis shall address at a minimum:

1. An assessment of the potential injury risks to housekeepers including but not necessarily limited to: (1) slips, trips and falls; (2) prolonged or awkward static postures; (3) extreme reaches and repetitive reaches above shoulder height, (4) torso bending, twisting, lifting, kneeling, and squatting; (5) pushing and pulling; (6) falling and striking objects; (7) pressure points where a part of the body presses against an object or surface; (8) excessive work-rate; and (9) inadequate recovery time between tasks; and
2. A safe work-rate for housekeepers expressed in the number of rooms cleaned per shift. The safe work-rate may vary depending on the number of checkout rooms cleaned and other factors.

NOTE: Additional information regarding job hazard analyses can be found in publications listed in Appendix A.

- (5) Procedures to investigate musculoskeletal injuries to housekeepers, including the following:
- (A) The procedures or tasks being performed at the time of the injury and whether any identified control measures were available and in use;
 - (B) If required tools or other control measures were not used appropriately, a determination of why those measures were not used or were not used appropriately; and
 - (C) Opinions of the injured housekeeper, the housekeeper's representative, and the housekeeper's supervisor regarding whether any other control measure, procedure, or tool would have prevented the injury.
- (6) Methods or procedures for correcting, in a timely manner, hazards identified in the job hazard analysis or in the investigation of musculoskeletal injuries to housekeepers, including procedures for determining whether identified corrective measures are used appropriately. These procedures shall include:
- (A) An effective means of involving housekeepers and their representative in identifying and evaluating possible corrective measures;
 - (B) A means by which appropriate equipment or other corrective measures will be identified, assessed, implemented, and then reevaluated after introduction and while used in the workplace; and
 - (C) A means of providing appropriate housecleaning equipment, protective equipment, and tools to each housekeeper, including procedures for procuring, inspecting, maintaining, repairing, and replacing appropriate housecleaning tools and equipment.

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- (7) Procedures for reviewing, at least annually, the MIPP at each worksite, to determine its effectiveness and make any corrections when necessary, including an effective procedure for obtaining the active involvement of housekeepers and their representative- in reviewing and updating the MIPP. The procedures shall include a review of the Cal/OSHA Form 300 log and other relevant records such as Cal/OSHA Form 301 incident reports.

(d) Training. The employer shall provide training to housekeepers and their supervisors in a language easily understood by housekeepers.

- (1) Frequency of training. Housekeepers and their supervisors shall be trained as follows:
 - (A) When the MIPP is first established;
 - (B) To all new housekeepers and supervisors;
 - (C) To all housekeepers given new job assignments for which training was not previously provided;
 - (D) At least annually thereafter; and
 - (E) Employers shall provide additional training when new equipment or work practices are introduced. The additional training may be limited to addressing the new equipment or work practices.
- (2) Training shall include at least the following elements as applicable to the housekeeper's assignment:
 - (A) The elements of the employer's MIPP and how the written MIPP will be made available to housekeepers;
 - (B) The process for reporting safety and health concerns without fear of reprisal;
 - (C) Body mechanics and safe practices including: identified hazards at the work place, how those hazards are controlled during each task, the appropriate use of cleaning tools and equipment, the importance of following safe work practices and using appropriate tools and equipment to prevent injuries, and the importance of reporting symptoms and injuries to the employer;
 - (D) Practice using the types and models of equipment that the housekeeper will be expected to use;
 - (E) An opportunity for interactive questions and answers with a person knowledgeable about hotel housekeeping equipment and procedures; and
 - (F) Training of managers and supervisors on how to identify hazards, the employer's hazard correction procedures, how defective equipment can be identified and

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replaced, how to obtain additional equipment, how to evaluate the safety of housekeepers' work practices, and how to effectively communicate with housekeepers regarding any problems needing correction.

(e) Records.

- (1) Records of the steps taken to implement and maintain the MIPP, including any measurements taken or evaluations conducted in the job hazard analysis process, shall be created, maintained, and made available in accordance with Section 3203(b).
- (2) A copy of the MIPP and all records required by Subsection (1) shall be available at the worksite for review or copying by housekeepers and their representatives in accordance with Section 3204(e)(1).
- (3) All records shall be made available to the Chief or designee within 72 hours of request.
- (4) Records of occupational injuries and illnesses shall be created and maintained in accordance with Division 1, Chapter 7, Subchapter 1 of these orders.

Appendix A (Non-Mandatory)
Reference Materials for Job Hazard Analysis

The following are examples of materials that can be used in performing a job hazard analysis for housekeeping:

Ohio State University. Ergonomic Resources for Housekeeping.

<https://ergonomics.osu.edu/Housekeeper%20Training%20Materials>

State Fund. Tips for Hotel Room Attendants.

<http://www.statefundca.com/safety/ErgoMatters/RoomAttendants.asp>

Department of Industrial Relations. Working Safer and Easier for Janitors, Custodians and Housekeepers, 2005. www.dir.ca.gov/dosh/dosh_publications/janitors.pdf

British Columbia, Injury Prevention Resources For Tourism and Hospitality- Accommodation.

<https://www2.worksafebc.com/Portals/Tourism/Prevention-Accommodation.asp>

Ergonomics Study of Custodial, Housekeeping and Environmental Services Positions at University of California. May 2011. The UC System-wide Ergonomics Team.

<http://ucanr.org/sites/ucehs/files/97141.pdf>

Appendix B (Non-Mandatory)

Reserved for Model IIPP Developed by HESIS Stakeholders

[Possible new addition if all stakeholders collaborate with HESIS to create a Model IIPP]