

## Neidhardt, Amalia@DIR

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**From:** Mitch Seaman <MSeaman@calaborfed.org>  
**Sent:** Thursday, December 31, 2015 2:58 PM  
**To:** Neidhardt, Amalia@DIR  
**Subject:** California Labor Federation comments re: hotel housekeeper musculoskeletal injury standard

December 31, 2015

Amalia Neidhardt MPH, CIH, CSP  
Senior Safety Engineer  
Cal/OSHA Research and Standards Occupational Health Unit  
2424 Arden Way, Suite #495  
Sacramento, CA 95825

RE: Discussion Draft for 12/3/15 Advisory Meeting

Dear Ms. Neidhardt,

The California Labor Federation writes in support of the proposed hotel housekeeper musculoskeletal injury standard. The 12/3/2015 advisory meeting version, with a few amendments, would make a world of difference for affected workers, and we applaud Cal/OSHA's commitment to submit language to the Standards Board by June of 2016.

First, we believe both workers and employers would benefit from a definition of the phrase "control measures" used in sections (c)(5)(A) and (c)(5)(B). Our history with the issue of hotel housekeeper safety would suggest that employers often resist using control measures identified by workers as most helpful; adding a list of such measures to this section would help employers to comply and workers to stay safe.

UNITE HERE has recommended—and we also support—the following definition: "...control measures to be considered include, but are not limited to: fitted bed sheets; mops; long-handled and adjustable length tools for dusting and scrubbing walls, showers, tubs, and other surfaces; and light-weight or motorized carts and those identified in the Cal/OSHA2005 publication, *Working Safer and Easier for Janitors, Housekeepers and Custodians.*"

In addition, we believe it's critically important to preserve section (d)(2)(A), which mandates that training include information regarding "[t]he signs, symptoms, and risk factors for musculoskeletal injuries." The nature of these injuries is such that early detection and subsequent risk reduction can often mean a far more treatable and manageable condition. Ignoring these symptoms, however, can cause more severe and often permanent injuries down the line. This training will reduce both the frequency and severity of these injuries and should be included in the final language.

Along those lines, we also urge Cal/OSHA to preserve section (d)(2)(E) as written, which will help workers understand the process for dealing with such early signs and symptoms.

Finally, in section (c)(4)(E), "lifting" should be separated from the risk factors regarding postures and supplemented with the phrase "forceful exertion." The amended risk factor for musculoskeletal injuries would then include "lifting and forceful exertion" as one of the factors. We also request that "excessive work-rate" remain as one of the risk factors. These amendments would better align the listed risk factors with the most common hazards, strengthening the standard and further reducing the likelihood of injury.

We applaud Cal/OSHA's work in producing this proposal and look forward to continued collaborative efforts on this landmark standard.

Sincerely,



Mitch Seaman  
ms/tng39521/afl-cio

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Mitch Seaman  
Legislative Advocate  
California Labor Federation, AFL-CIO  
1127 11th Street, Suite 425  
Sacramento, CA 95814

office (916) 444-3676 ext. 14  
cell (916) 524-5182  
fax (916) 444-7693  
[mseaman@calaborfed.org](mailto:mseaman@calaborfed.org)  
[www.calaborfed.org](http://www.calaborfed.org)