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California Department of Occupational Safety & Health
Research & Standards Occupational Health Unit
2424 Arden Way
Sacramento, CA 95825

September 21, 2015

Dear Ms. Neidhardt,

I am writing in response to the Hotel Housekeeping Musculoskeletal Injury Prevention Draft dated 8/13/15. First, I want to thank you and the CalOSHA's Advisory Committee for this draft. I have worked with Hotel Housekeepers for over 10 years, first a physical therapist and ergonomist, then as a researcher. I appreciate the Committee's work and, overall, this draft is an excellent start to reducing injuries among Hotel Housekeepers. However, I respectfully submit the following comments on Cal OSHAs revised discussion draft of the hotel housekeeper musculoskeletal injury prevention standard:

Section (c) Housekeeping musculoskeletal injury prevention program

Regarding Section 4e. The job hazard analysis shall....

- A safe work rate should be discussed in more detail, specifically regarding the pace that a guest room is cleaned. A reasonable pace should be encouraged; a pace that minimizes cardiovascular strain and allows for safe work practices to be used. For example, the work pace (dictated by the amount of time allotted per room) should allow hotel housekeepers to walk around the bed for successive removal and replacement of sheets thereby preventing the yanking of sheets off the bed, and the fluffing of sheets when replacing them.
- A requirement for hotels to document the logic of how the safe work rate has been determined should be required and include the best practices it accommodates.

Regarding Section 5a: The procedures or tasks....

- It would be helpful if the control measures were specified by referring to resources such as the CalOSHA 2005 publication, "Working Safer and Easier for Janitors, Housekeepers and Custodians."

Regarding Section 5c: Opinions of the

- Please consider changing the word "Opinions" to "Solicit input of the injured housekeeper...."

Section (d) Training

Regarding Section 2.

- Add: The signs, symptoms and risk factors of MSDs with specific examples pertinent to housekeeping tasks.

Regarding Section 2b.

- The process for reporting all safety and health concerns, including signs and symptoms of MSDs without fear of reprisal.

Regarding Section 2d.

- Adequate practice using the types and models of equipment that the housekeeper will be expected to use. Practice should include explanation, demonstration, an opportunity for interactive question and answers and best practices specifically with the goal of preventing musculoskeletal signs, symptoms and disorders.

Regarding Section 2e.

- Practice should be with a person knowledgeable about hotel housekeeping equipment and procedures and take place in small groups (less than 6 to 8 individuals) so as to encourage questions and interaction, in the environment that the tool will be used (such as the hotel room being cleaned). A phase in period that allows the hotel housekeeper to practice using the new tool, procedure or technique without fear of penalty for not achieving standard productivity requirements should be provided, preferably over a minimum duration of one work week.

Regarding Section 2f.

- Add: Training should also include an overview of signs, symptoms and risk factors for MSDs, the importance of early reporting of signs and symptoms of MSDs, the importance of early intervention and proper responses to the reporting of signs and symptoms.

Thank you for your consideration of these comments. If you have any questions or concerns, please feel free to contact me.

With Regards,



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