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March 14, 2016

Juliann Sum, Chief
Cal/OSHA/Division of Occupational Safety and Health
1515 Clay Street, Suite 1901
Oakland, CA 94612**Re: Hotel housekeeper musculoskeletal injury prevention standard**

Dear Ms. Sum:

In November of 2015, we wrote to you to express our support for the hotel housekeeper musculoskeletal injury prevention standard proposed by Cal/OSHA. Among other things, this support was based on scientific and medical research that show that ergonomic hazards faced by hotel housekeepers are associated with work-related MSDs. Further, there continues to be a high incidence and prevalence of work-related MSDs among hotel room cleaners. As occupational and public health professionals - many who are directly involved in the treatment and prevention of work-related injuries - we support the promulgation of the hotel housekeeper musculoskeletal injury prevention standard as proposed in the February 23, 2016 draft. However, we respectfully request that Cal/OSHA include in the language of the standard the specific recommended controls such as adjustable/long-handled cleaning tools, mops, fitted sheets, light-weight vacuum cleaners and light-weight or motorized carts. These tools should not only be made available but should be implemented as deemed appropriate following the required worksite evaluation. The described tools are highlighted in CalOSHA publications as possible solutions to reducing housekeeper injuries. Including them in the hotel housekeeper musculoskeletal injury prevention standard would encourage the implementation of such controls.

Again, we applaud the efforts of CalOSHA to develop and implement this new and important standard and ask you to consider our recommendation.

Sincerely,

Robert Harrison, M.D., M.P.H.
Clinical Professor of Medicine***Co-signatories (name and affiliation)***

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