

## DRAFT July 1, 2022 Guidance for Employers

*The following guidance was drafted by the National Domestic Workers Alliance with input from Debbie Berkowitz, Former Chief of Staff and Senior Policy Advisor at OSHA and current fellow at the Kalmanovitz Initiative for Labor and the Working Poor at Georgetown University*

### Protecting Domestic Workers' Health and Safety on the Job

Domestic workers, including housekeepers, child care providers, homecare workers, and day laborers can face a number of workplace safety risks that can cause serious injuries. Employers can mitigate these risks by providing common sense safety measures, including training and education in a language that workers understand. Further, workers must be able to raise any safety concerns without fear of retaliation. This will assure that workplace safety risks can be addressed before workers are injured. Here are the most common hazards facing domestic workers and strategies to keep workers safe.

#### Back and other Musculoskeletal Disorders

Domestic work can involve repetitive lifting and pushing of heavy loads, as well as repetitive tasks that involve awkward postures, twisting and no muscle rest while working. These movements and postures can cause musculoskeletal injuries.

A work-related musculoskeletal disorder is an injury of the muscles, tendons, ligaments, nerves, joints, cartilage, bones, or blood vessels in the arms, shoulders, neck and back. Symptoms of musculoskeletal disorders include pain, stiffness, swelling, numbness, and tingling.

Ergonomics is the science of 'fitting the task to the worker' so that workers are more comfortable and don't get hurt. Good ergonomic practices will reduce stress on the body and prevent aches, pains and more serious injuries.

Steps to Control these Hazards for all domestic workers:

1. Vary a workers' tasks every day to vary the muscle groups they are using to prevent overexertion.
2. Allow workers to take rest breaks.
3. If the object is too heavy to lift, workers should not have to lift it alone
4. Workers should be trained in proper lifting
5. When doing tasks that involve lifting or vacuuming or doing other physically stressful activities worker should be able to keep their body in a neutral position and avoid twisting.
6. When cleaning, such as with bathtubs or showers, to help workers avoid twisting and reaching, provide tools to reach high or far away objects to clean. These include double-sided OSHA compliant stepladders (lean-to ladders) to reach high objects or to clean windows and walls. Workers must not be asked to stand on chairs or tables. Workers should be trained to use stepladders and never stand on the top of the ladder and always try to stay in the middle. Ladders should only be used on even surfaces. To reach or clean objects that might not warrant a step ladder, a low step and sturdy step stool (less than 24 inches) should be provided.

7. Allow time for stretching exercises for arms, forearms, and legs during the day.

### **Additional protections are needed to prevent back and other injuries for Homecare Workers:**

Lifting and moving clients create a high risk for back injury and other musculoskeletal disorders for homecare workers.

If the patient cannot move themselves, and a worker must lift the person from the bed or chair for example, the employer must conduct an analysis to determine if lifting equipment is necessary to prevent overexertion and injury to the worker. If such equipment is brought in, workers must be trained on their proper use. In addition, even with these devices, workers must be able to take breaks for resting and have varied tasks to prevent overexertion.

In almost all cases where patient lifting is required, employers should provide ergonomic assistive devices (such as slide boards, slip sheets, rollers, slings or gait belts). Workers will need to be trained on assistive ergonomic devices, their uses and the clinical situation requiring them (and how to order them in the plan of care.) Some lifting devices such as electronic hoists may require the use of two workers.

Equipment such as adjustable beds, raised toilet seats, shower chairs, and grab bars are also helpful for reducing musculoskeletal risk factors. This type of equipment keeps the patient at an acceptable lift height and allows the patient to help himself or herself during transfer when possible

Homecare workers must be trained in the use of proper body mechanics even when using assistive devices. Examples of such training, from the National Institute for Occupational Safety and Health, include: Even when assistive devices are used during client care, some amount of physical exertion may still be necessary. Move along the side of the client's bed instead of reaching while performing tasks at the bedside. When manually moving the client, stand as close as possible to the client without twisting your back, keeping your knees bent and feet apart. To avoid twisting the spine, make sure one foot is in the direction of the move. Using gentle rocking motions can also reduce exertion. Pulling a client up in bed is easier when the head of the bed is flat or down. Raising the client's knees and encouraging the client to push (if possible) can also help. Apply anti-embolism stockings by pushing them on while you are standing at the foot of the bed. You can use less force in this position than standing at the side of the bed

## **Health Risks from Chemicals Used in Cleaning Products**

Domestic workers can be exposed to a long list of toxic cleaning chemicals that [can cause problems ranging](#) from skin rashes and burns to eye irritation, coughing to asthma. These chemicals include:

- Ammonia
- Chloride
- Hydrochloric Acid
- Petroleum Solvents

- Phenol
- Sodium Bisulfate
- Sodium Hypochlorate

It is important for employers to read all labels of products to be used in the home and assure that the labels are made available to workers and that workers receive training in a language they understand so they can follow the labels directions.

Provide necessary protective equipment, such as gloves, masks and eye goggles when using these products.

Training for workers should include these safe practices when using chemicals:

- Warning workers not to mix cleaning products that contain bleach and ammonia (such as in glass and window cleaner). Mixing bleach and ammonia can produce harmful gases that can damage lungs and cause death;
- Making sure that workers know which cleaning chemicals must be diluted and how to correctly dilute the cleaners they are using;
- Thoroughly reviewing and training workers on the use, storage and emergency spill procedures for cleaning chemicals;
- Workers must also be trained to not use two drain cleaners together or one right after another and to not mix the following:
  - Vinegar and Hydrogen Peroxide
  - Chlorine and alcohol based gels
  - Chlorine and vinegar.
  - Baking soda and vinegar
  - Bleach and rubbing alcohol
- Because of dangerous fumes from products, especially those with bleach/chlorine, make sure the work space is well ventilated with exhaust fans or open doors and windows. Train workers to spray products on sponges, towels or rags rather than on surface areas. Always turn spray nozzles away from the face and eyes.
- Employers and workers must also be trained in any health effects caused by these products (and to report such health effect to employers) and the number to call in case of emergency: Poison Control Center: 1-800-222-1222

### Other Hazards Facing Domestic Workers:

**Electric:** Assure that all equipment used by workers is in proper working order, that electric cords are not frayed and that electric outlets and appliances are in good working order.

**Needle stick injuries:** For homecare workers where there may be exposure to needles or other sharps, follow CAL OSHA's Bloodborne Pathogens Standard. Needlestick and other sharps injuries are a serious hazard in any healthcare setting. Contact with contaminated needles, scalpels, broken glass, and other sharps may expose healthcare workers to blood that contains pathogens which pose a grave, potentially

lethal risk. Employers should eliminate the use of needle devices whenever safe and effective alternatives are available. If needles are used, provide needle devices with safety features; provide sharps containers for workers to dispose of needles safely; Investigate all sharps-related injuries and provide post-exposure medical evaluations.

**Risk of Infections from household members that may be sick:** Allow workers to wash hands frequently with soap; provide quality masks for airborne infections.

#### **Slips/ Trips/Falls:**

- Protect workers from falls from stepladders. Provide double-sided OSHA compliant stepladders (lean-to ladders) to reach high objects or to clean windows and walls. Workers must not be asked to stand on chairs or tables. Workers should be trained to use stepladders and never stand on the top of the ladder and always try to stay in the middle. Ladders should only be used on even surfaces. To reach or clean objects that might be close enough they might not warrant a step ladder, a low step and sturdy step stool (less than 24 inches) should be provided.
- Slips and falls are also caused by ice and slippery conditions outside an employer's home, and wet and uneven surfaces in a home. Assure that wet floors are dried promptly. If conditions are slippery from ice, use ice melt outside on steps and areas that workers must use/access to melt the ice.

**Sanitation:** Provide homes that are sanitary, access to potable drinking water and prompt access to clean bathrooms that are available when workers need to use them.

(<https://www.osha.gov/restrooms-sanitation>).

**Mold:** Mold is often found in homes after they have been flooded or have water damage from other sources. Mold grows on moist and wet surfaces and can be hazardous. Mold can cause infections, allergy symptoms and produce toxins. Workers involved in mold clean up from water damage or floods must be provided with special protective equipment – including N 95 respirators and disposable clothing, long gloves, goggles and more. [OSHA's fact sheet on mold provides](#) more information on required protections if a worker is involved in removing mold.

**Workplace violence:** Workplace violence is a known hazard facing health care workers, including homecare workers. Risk factors include working with persons with a known history of being violent or with unstable or volatile individuals. Other domestic workers may also be exposed to violence—including sexual harassment. According to [the National Institutes for Occupational Safety and Health](#) the spectrum of violence ranges from verbal abuse to staking to threats of assault to homicide. Train workers on potential risks to assure workers are protected – and have a zero-tolerance policy for any violence—including verbal abuse – to domestic workers.

**First Aid:** Assure that prompt first aid services are available to any worker that is injured.

**Emergency Preparedness:** Provide workers with the numbers to use for emergency services including, ambulance, and police. Instruct workers on what to do if there is a fire or health /safety emergency.

**Heat:** Working outdoors on hot days can cause heat stress and heat stroke. Train workers to recognize the signs of heat stress, such as confusion, dizziness, extreme thirst or nausea. Provide water, rest and

shade for workers working outside. Provide access to potable drinking water—at least one quart per hour. Access to shade must also be available to workers. Allow new workers or returning workers to gradually increase workloads and take more frequent rest breaks during the first week of work as they build tolerance of the heat. Monitor workers for signs of heat related illness.

**Protection from Wildfire Smoke:** Exposure to wildfire smoke can cause respiratory hazards. Smoke from wildfires contains many hazards that can harm health including chemicals, gasses and fine particles. On days when the current Air Quality Index (AQI) for PM 2.5 particulate is 151 or greater (unhealthy), allow domestic workers that may be exposed to wildfire smoke to work indoors. If air levels indoors become hazardous, work shall be relocated. Check air quality levels at <https://ww2.arb.ca.gov/>

## Additional Hazards Facing Domestic Day Laborer Construction Workers

Construction is one of the most dangerous industries. Workers in construction face serious risks to their health and safety that can result in permanent injuries and death. These hazards include exposure to loud noise that can cause permanent hearing loss, dangerous equipment (including nail guns) that can cause serious injuries, falls from heights, trench cave ins and heat stress. Falls are the leading cause of death for construction workers, with the majority of deadly falls resulting from work on roofs, scaffolds and ladders.

Employers need to be familiar with these hazards and assure workers are protected from injury. This includes:

- **Falls from ladders:**

To prevent worker injuries:

Maintain ladders free of oil, grease and other slipping hazards

Do not load ladders beyond their maximum intended load nor beyond their manufacturer’s rated capacity.

Use ladders only for their designed purpose.

Use ladders only on stable and level surfaces unless secured to prevent accidental movement.

Do not use ladders on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental movement. Do not use slip resistant feet as a substitute for exercising care when placing, lashing or holding a ladder upon slippery surfaces.

Train workers on safe ladder use. This app from the National Institute for Occupational Safety and Health can be used to train workers on the angles for placement and other measures to assure safe use of ladders: <https://www.cdc.gov/niosh/topics/falls/mobileapp.html>

- **Falls from heights, other than ladders**

Falls are the leading causes of death in the construction industry. See above for ladder safety measures. Employers must make sure that any holes in the floor where a worker can fall through or trip over are guarded /covered to prevent falls. Workers doing work on roofs must be provided with protection from falling --use guardrails, safety nets, or personal fall arrest systems to protect workers from falling.

- **Injuries from Tools and Equipment**

Workers who use hand and power tools and are exposed to the hazards of falling, flying, abrasive, and splashing objects, or to harmful dusts, fumes, mists, vapors, or gases must be provided with the appropriate personal protective equipment.

Workers should be trained in the proper use of all tools.

- **Dangerous Noise Levels**

Many tools and job sites expose workers to loud noise that can cause permanent hearing loss. If workers need to raise their voice to be heard more than three feet away, they could be exposed to noise levels that can cause permanent hearing loss. Provide workers with ear plugs or ear muffs to reduce high noise levels and to protect their hearing.

- **Heat Stress (see section above)**

- **Trench Cave Ins**

Trench collapses, or cave-ins, pose a great risk to workers' lives. To prevent cave-ins:

- SLOPE or bench trench walls
- SHORE trench walls with supports, or
- SHIELD trench walls with trench boxes

There must also be a safe way to enter and exit a trench. Look for standing water—that is a warning sign of dangerous conditions.

## REFERENCES

### Home Health Care Workers

- [Home Healthcare Workers: How to Prevent Exposure in Unsafe Conditions](#). U.S. Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication Number 2012-121, (February 2012). Home healthcare workers may encounter unsanitary homes, temperature extremes, homes without water that is safe to drink, or hostile pets.
- [Home Healthcare Workers: How to Prevent Driving-Related Injuries](#). U.S. Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication Number 2012-122, (February 2012). Driving from client to client, home healthcare workers are at high risk for car accidents that could result in injury or death. Distracted driving, aggressive driving, lack of seatbelt use, driving while tired or after having used alcohol or drugs, poor weather conditions, and poorly maintained vehicles can all contribute to car accidents.

- [Home Healthcare Workers: How to Prevent Needlestick and Sharps Injuries](#). U.S. Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication Number 2012-123, (February 2012). Needlestick and other sharps injuries are a serious hazard in any healthcare setting. Contact with contaminated needles, scalpels, broken glass, and other sharps may expose healthcare workers to blood that contains pathogens which pose a grave, potentially lethal risk.
- [Home Healthcare Workers: How to Prevent Latex Allergies](#). U.S. Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication Number 2012-119, (February 2012). Latex products are made from natural rubber, and sensitivity can develop after repeated exposure. Limiting exposure to latex can help prevent allergic reactions for both home healthcare workers and their clients.
- [Home Healthcare Workers: How to Prevent Musculoskeletal Disorders](#). U.S. Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication Number 2012-120, (February 2012). A work-related musculoskeletal disorder is an injury of the muscles, tendons, ligaments, nerves, joints, cartilage, bones, or blood vessels in the arms, legs, head, neck, or back that is caused or aggravated by work tasks such as lifting, pushing, and pulling. Symptoms include pain, stiffness, swelling, numbness, and tingling. Lifting and moving clients create a high risk for back injury and other musculoskeletal disorders for home healthcare workers.
- [Home Healthcare Workers: How to Prevent Violence on the Job](#). U.S. Department of Health and Human Services (DHHS), National Institute for Occupational Safety and Health (NIOSH) Publication Number 2012-118, (February 2012). Home healthcare workers can be vulnerable as they face an unprotected and unpredictable environment each time they enter a client's community and home. The spectrum of violence ranges from verbal abuse, to stalking or threats of assault, to homicide.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6125748/> : Slips, Trips and Falls among Home Care Aides

<https://blogs.cdc.gov/niosh-science-blog/2010/04/16/homehealthcare/> : Strains, Sprains and Pains in Home Healthcare: Working in an Uncontrolled Environment

<https://www.cdc.gov/niosh/docs/2006-117/pdfs/2006-117.pdf?id=10.26616/NIOSH PUB2006117Safe>  
Lifting and Movement of Nursing Home Residents

#### Housekeepers

<https://www.osha.gov/harwoodgrants/grantmaterials/fy2010/sh-20998-10> Housekeepers: Practices to Improve Health and Safety and Ergonomics

[https://www.osha.gov/sites/default/files/2018-12/fy10\\_sh-20998-10\\_Housekeeper\\_Ergo\\_Handout-English.pdf](https://www.osha.gov/sites/default/files/2018-12/fy10_sh-20998-10_Housekeeper_Ergo_Handout-English.pdf) Housekeepers: Practices to Improve Health and Safety Using Ergonomics

<https://www.osha.gov/sites/default/files/publications/OSHA3512.pdf> : Protect Workers Who Use Cleaning Chemicals

#### Hazards in Construction

<https://www.osha.gov/residential-construction/hazards-solutions>

<https://www.dir.ca.gov/dosh/construction-guide-summary.html>

#### CAL OSHA Standards for Reference

Aerosol Transmissible Disease in Health Care: <https://www.dir.ca.gov/title8/5199.html>

Bloodborne Pathogens Standard : <https://www.dir.ca.gov/title8/5193.html>

Chemicals: Hazard Communication: <https://www.dir.ca.gov/title8/5194.html>

COVID-19 Emergency Temporary Standard: <https://www.dir.ca.gov/dosh/coronavirus/ETS.html>

Electrical Hazards: <https://www.dir.ca.gov/Title8/sub5.html>

Fall protection from heights: <https://www.dir.ca.gov/title8/1670.html>

Heat: <https://www.dir.ca.gov/title8/3395.html>; <https://www.dir.ca.gov/dosh/heatillnessinfo.html>

Injury and Illness Overall Prevention: <https://www.dir.ca.gov/title8/3203.html>

Ladder safety: <https://www.dir.ca.gov/title8/3276.html>

Medical and First Aid: <https://www.dir.ca.gov/title8/3400.html>

Musculoskeletal and Back injury Prevention for Health Care Workers:  
<https://www.dir.ca.gov/title8/5120.html>;

Musculoskeletal Injury Prevention in Hotel Housekeepers: <https://www.dir.ca.gov/title8/3345.html>

Noise: <https://www.dir.ca.gov/title8/5097.html> ; <https://www.osha.gov/noise>

Powered Hand Tools: <https://www.dir.ca.gov/title8/sb7g3a20.html> ;  
<https://www.dir.ca.gov/title8/3556.html>

Trenching: <https://www.dir.ca.gov/title8/1541.html>

Sanitation: ; <https://www.osha.gov/restrooms-sanitation>

Wildfire smoke: [https://www.dir.ca.gov/title8/5141\\_1.html](https://www.dir.ca.gov/title8/5141_1.html)

Workplace Violence Prevention for Health Care Workers: <https://www.dir.ca.gov/title8/3342.html>