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cc: Deborah Gold
Deputy Director of Health Standards and Engineering
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Dear Ms. Neidhardt and Mr. Smith,

I am writing in response to the proposed Hotel Housekeeper Injury Prevention Program Standard discussed at the Cal OSHA meeting earlier this year. During my time at an onsite injury prevention and treatment company, I had the privilege of working with many Hotel Housekeepers from a variety of hotels. I completed job analyses, designed trainings, and helped to implement various interventions such as long handled mops, scrub brushes and bed making lift and tuck tools. Based on my experience and my concern for the health and safety of hotel room cleaners, I would like to propose the following suggestions on the revised Injury Prevention Program Standard.

Section 0004 Safe Housekeeping Plan to Reduce Injuries

(b) The standard would benefit from having some examples of safe housekeeping equipment. “Examples of safe housekeeping equipment include long handle tools such as mops, scrub brushes and dusters, bed making lift & tuck tool, and light-weight or motorized carts.”

(d) Housekeeping employees should also be asked to provide input on the adequacy and effectiveness of the current training. They should also be asked to provide feedback on the feasibility, challenges and suggestions for effective implementation of safe practices and equipment.

Section 0009 Communication and Training

One of the primary barriers that I observed when training hotel room cleaners was the parameters allowed for the training. Trainings often consisted of 10-15 minutes of discussion or demonstration at morning meetings. Successful implementation of best practices, equipment and tools occurred when management allowed in room trainings in small groups that included hands on participation by each housekeeper with professional feedback/ advice on appropriate technique and/or equipment or tool

usage. In addition, management who temporarily reduced productivity expectations (typically over a 1 week period) while the new technique and or tool was being implemented saw greater success and adoption rates. Therefore, I highly recommend some training parameters to be provided in the Injury Prevention Standard.

The recommendations for successful training should include:

- i. Small group training in the actual hotel rooms where the new technique, equipment, or tool will be used
- ii. Demonstration followed by hands on learning activities in the primary language of the hotel room cleaner with individualized feedback provided to each hotel room cleaner.
- iii. Strategies for gradual implementation of the new technique, equipment or tool.
- iv. Temporary (3 to 7 days) productivity reductions to allow adequate time for the new technique, equipment, or tool to be properly implemented. New hires may require a longer period of temporary productivity reductions.
- v. 1-2 month follow up to assess implementation of the new technique, tool or equipment and address any challenges or barriers to successful implementation.

Finally, in my opinion, the Appendix B materials that are currently listed as non-mandatory should be included as mandatory materials. They provide excellent information that could be useful to all stakeholders as they prepare to follow the Injury Prevention Standard.

Thank you for your time and consideration. Please let me know if you have any questions or concerns about the recommendations included.

With Regards,



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