

Housekeeping MIPP

Musculoskeletal Injury Prevention Program CCR Title 8, Section 3345

Housekeeping MIPP Background

January 2012

Petition (No. 526) was filed by UNITE HERE, requesting the Board for a safety and health standard to address the occupational hazards faced by housekeepers in the hospitality industry.

January 18, 2018

Proposed standard was adopted by Occupational Safety and Health Standards Board (OSHSB) after six years of research, analysis, and advisory committee meetings.

July 1, 2018

The standard will become effective and enforced by Cal/OSHA.



Office of Administrative Law in California has approved the new standard requiring hotels and other lodging establishments to establish, implement, and maintain an effective, written, musculoskeletal injury prevention program (MIPP) that addresses hazards specific to housekeeping.

The standard will take effect on July 1, 2018.

This publication is provided for informational purposes only. Please consult with a licensed attorney on how this information relates to your specific business.

Housekeeping Musculoskeletal Injury Prevention Program (MIPP)

According to Cal/OSHA, hotel housekeepers frequently suffer musculoskeletal injuries from lifting mattresses, pulling linens, pushing heavy carts, and slipping, tripping or falling while cleaning bathrooms.

The program must include the following:

- Procedures to identify and evaluate housekeeping hazards through worksite evaluations that include housekeeper input
- Procedures to investigate musculoskeletal injuries to housekeepers
- Methods to correct identified hazards
- Training of employees and supervisors on safe practices and controls, and a process for early reporting of injuries to the employer

Drafting an MIPP

Summary of the requirements of the MIPP, including training and recordkeeping requirements, have been laid out in the subsequent pages. The information has been obtained from the standard filed by Cal/OSHA as of March 9, 2018.

The standard can be accessed at the following link:
<http://www.dir.ca.gov/title8/3345.html>

*California Code of Regulations
Title 8, Section 3345*

**Housekeeping Musculoskeletal
Injury Prevention Program (MIPP)**

Each employer covered by Section 3345 shall **establish, implement, and maintain** an effective, written, **musculoskeletal injury prevention program (MIPP)** that addresses hazards specific to housekeeping.

The written MIPP may be incorporated into the written Injury and Illness Prevention Program (IIPP), or may be maintained as a separate program, and must be readily accessible during each work shift to employees when they are in the lodging establishment where they work.

Summary of the Requirements of the MIPP

1. Responsibility

Name and title of **persons with responsibility** for implementing the MIPP

2. Compliance

A **system for ensuring that staff comply with the MIPP**, follow the employer's safe workplace housecleaning practices and use the housekeeping tools or equipment deemed appropriate for each housekeeping task

3. Communication

A system for communication with housekeepers in a **form readily understandable by all housekeepers**, including provisions to encourage housekeepers to inform the employer of hazards at the worksite, and injuries or symptoms **without fear of reprisal**

4. Worksite Evaluation

The worksite evaluation should **identify and address potential injury risks** to housekeepers including, but not limited to: (1) slips, trips and falls; (2) prolonged or awkward static postures; (3) extreme reaches and repetitive reaches above shoulder height, (4) lifting or forceful whole body or hand exertions; (5) torso bending, twisting, kneeling, and squatting; (6) pushing and pulling; (7) falling and striking objects; (8) pressure points where a part of the body presses against an object or surface; (9) **excessive work-rate**; and (10) inadequate recovery time between housekeeping tasks.

Procedures for identifying and evaluating housekeeping hazards through a worksite evaluation should include:

- **Initial worksite evaluation should be completed within three months** after the effective date or within three months after the opening of a new lodging establishment
- An effective means of **involving housekeepers and their union representative** in designing and conducting the worksite evaluation
- Housekeepers should be **notified of the results of the worksite evaluation** in writing or by posting it in a location readily accessible to them. The **results of the worksite evaluation should be in a language easily understood by housekeepers**
- The worksite evaluation should be reviewed and updated:
 1. Whenever **new processes, practices, procedures, equipment or renovation of guestrooms** are introduced that may change or increase housekeeping hazards
 2. Whenever the employer is made aware of a **new or previously unrecognized housekeeping hazard** based on information such as, but not limited to, the findings and recommendations of injury investigations
 3. At least **annually** for each worksite

5. Accident/Exposure Investigations

Investigation of musculoskeletal injuries to housekeepers should address:

- The procedures or housekeeping **tasks being performed at the time of the injury and whether any identified control measures were available and in use**
- If required tools or other control measures were not used, or not used appropriately, **a determination of why those measures were not used or were not used** appropriately
- **Input** of the injured housekeeper, the housekeeper's union representative, and the housekeeper's supervisor as to **whether any other control measure, procedure, or tool would have prevented the injury**



6. Hazard Correction

Methods or procedures for correcting, in a timely manner, hazards identified in the worksite evaluation or in the investigation of musculoskeletal injuries to housekeepers, including procedures for determining whether identified corrective measures are implemented appropriately. These procedures should include:

- An effective means of involving housekeepers and their union representative in identifying and evaluating possible corrective measures
- A means by which appropriate equipment or other corrective measures will be identified, assessed, implemented, and then reevaluated after introduction and while used in the workplace
- A means of providing and making readily available appropriate housecleaning equipment, protective equipment, and tools to each housekeeper, including procedures for procuring, inspecting, maintaining, repairing, and replacing appropriate housecleaning tools and equipment

7. Training

The employer shall provide training to housekeepers and their supervisors in a language easily understood by these employee.

- **Frequency**
 - When MIPP is first established
 - To all new housekeepers and supervisors
 - To all housekeepers given new job assignments for which training was not previously provided
 - At least annually thereafter
 - When new equipment or work practices are introduced or whenever the employer becomes aware of a new or previously unrecognized hazard; the additional training may be limited to addressing the new equipment or work practices
- **Training should include the following elements:**
 - The signs, symptoms, and risk factors commonly associated with musculoskeletal injuries
 - The elements of the employer's MIPP and how the written MIPP and records will be made available to housekeepers
 - The process for reporting safety and health concerns without fear of reprisal
 - **Body mechanics and safe practices including:** identified hazards at the workplace, how those hazards are controlled during each housekeeping task, the appropriate use of cleaning tools and equipment, and the importance of following safe work practices and using appropriate tools and equipment to prevent injuries
 - The importance of, and process for, early reporting of symptoms and injuries to the employer
 - Practice using the types and models of equipment and tools that the housekeeper will be expected to use
 - An opportunity for interactive questions and answers with a person knowledgeable about hotel housekeeping equipment and procedures
 - Training of managers and supervisors on how to identify hazards, the employer's hazard correction procedures, how defective equipment can be identified and replaced, how to obtain additional equipment, how to evaluate the safety of housekeepers' work practices, and how to effectively communicate with housekeepers regarding any problems needing correction

Questions? We have answers.

For more information on this new standard, talk to your Zurich representative today or contact us in one of the following ways:

By phone: 800-982-5964

Email: risk.engineering@zurichna.com

Visit Risk Engineering online:
www.zurichna.com/riskengineering

8. Recordkeeping

The MIPP should be reviewed annually at each worksite, to **determine its effectiveness** and make any corrections when necessary, including an effective procedure for obtaining the active involvement of housekeepers and their union representative in reviewing and updating the MIPP. The procedures should include a review of the Cal/OSHA Form 300 **log and other relevant records** such as incident reports (Cal/OSHA Form 301 or similar).

Records include:

- Records of the steps taken to **implement and maintain the MIPP**, including any measurements taken or evaluations conducted in the worksite evaluation process and the training shall be created and maintained
- **A copy of the MIPP and all worksite evaluation records** shall be available at the worksite for review and copying by housekeepers and their designated representative
- **All records shall be made available** to the Chief of the Division or **designee within 72 hours of request**

References

1. Code of California Regulations, Hotel Housekeeping Musculoskeletal Injury Prevention. Title 8, sec. 3345, <http://www.dir.ca.gov/title8/3345.html>

Resources

The following are examples of materials (provided under Section 3345 Appendix A) that can be used in performing a worksite evaluation for housekeeping:

Ohio State University. Ergonomic Resources for Housekeeping.

<https://ergonomics.osu.edu/Housekeeper%20Training%20Materials>

State Fund. Tips for Hotel Room Attendants.

<https://content.statefundca.com/safety/ErgoMatters/RoomAttendants.asp>

Department of Industrial Relations. Working Safer and Easier for Janitors, Custodians and Housekeepers, 2005.

www.dir.ca.gov/dosh/dosh_publications/janitors.pdf

British Columbia, Injury Prevention Resources For Tourism and Hospitality-Accommodation.

<https://www2.worksafefbc.com/Portals/Tourism/Prevention-Accommodation.asp>

Ergonomics Study of Custodial, Housekeeping and Environmental Services Positions at University of California. May 2011. The UC System-wide Ergonomics Team.

<http://ucanr.org/sites/ucehs/files/97141.pdf>

Government of Western Australia, Checklist and information-Accommodation industry.

https://www.commerce.wa.gov.au/sites/default/files/atoms/files/accommodation_2016.pdf

The Zurich Services Corporation
Risk Engineering
1299 Zurich Way, Schaumburg, IL 60196-1056
800 982 5964 www.zurichna.com

The information in this publication was compiled from sources believed to be reliable for informational purposes only. All sample policies and procedures herein should serve as a guideline, which you can use to create your own policies and procedures. We trust that you will customize these samples to reflect your own operations and believe that these samples may serve as a helpful platform for this endeavor. Any and all information contained herein is not intended to constitute advice (particularly not legal advice). Accordingly, persons requiring advice should consult independent advisors when developing programs and policies. We do not guarantee the accuracy of this information or any results and further assume no liability in connection with this publication and sample policies and procedures, including any information, methods or safety suggestions contained herein. We undertake no obligation to publicly update or revise any of this information, whether to reflect new information, future developments, events or circumstances or otherwise. Moreover, Zurich reminds you that this cannot be assumed to contain every acceptable safety and compliance procedure or that additional procedures might not be appropriate under the circumstances. The subject matter of this publication is not tied to any specific insurance product nor will adopting these policies and procedures ensure coverage under any insurance policy.

©2018 The Zurich Services Corporation. All rights reserved.

A1-112010986-A (05/18) 112010986

