

The Employer's Hotel Housekeeper Musculoskeletal Injury Prevention Program

Hotel housekeepers, including guest room attendants, room cleaners, maids, and housepersons are at increased risk of developing musculoskeletal injuries due to exposure to hazards present in housekeeping tasks. This fact sheet provides an overview of a Cal/OSHA standard — T8CCR section 3345 — designed to prevent these musculoskeletal injuries.

What is a musculoskeletal injury?

Acute injury or cumulative trauma of a muscle, tendon, ligament, bursa, nerve, joint, bone, spinal disc, or blood vessel that can occur when housekeepers perform their job tasks, such as

- cleaning bathrooms — scrubbing, mopping;
- making beds;
- loading, unloading, and pushing/pulling carts;
- removing and supplying linens;
- trash collecting/disposing;
- moving furniture;
- vacuuming.



Which employers must comply with the standard?

Lodging establishments, such as hotels, motels, resorts, and bed & breakfast inns.

What do employers need to do?

Lodging establishments must reduce the risk of housekeepers experiencing musculoskeletal injuries by effectively implementing relevant Cal/OSHA requirements, including two regulations in particular:

1. www.dir.ca.gov/Title8/3203.html: [Injury & Illness Prevention Program \(IIPP\)](#)
2. www.dir.ca.gov/Title8/3345.html: [Musculoskeletal Injury Prevention Program \(MIPP\)](#)

What is an IIPP?

The IIPP is a written plan for how an employer is going to effectively prevent and control all of the workplace hazards their employees might be exposed to, and must cover

- the identity of the person responsible for implementing the program;
- workplace safety policies and how they will be effectively implemented;
- effective communication between employees, supervision, and management;

- looking for hazards before they result in an injury and taking measures to eliminate or control those hazards;
- reviewing incidents and injuries to determine why they happened and figure out how to prevent them from happening again;
- providing employees with the necessary training and equipment to be able to do their job tasks more safely.

What is an MIPP?

Lodging establishments need to build onto their IIPP to better address the specific musculoskeletal hazards their housekeepers are exposed to. This can be done by modifying, in writing, an existing IIPP or creating a separate written MIPP that addresses the following:

- **Making the MIPP readily available** to housekeepers during their shift;
- **Identifying** the person with the authority and responsibility for implementing the MIPP;
- **Ensuring safe housecleaning workplace** policies, practices, and tools are effectively implemented. This includes recognizing the employees and supervisors who consistently comply with the MIPP.
- **Encouraging housekeepers** to inform their supervisor of hazards at the worksite, including injuries or symptoms that may be related to such hazards, without fear of reprisal.
- **Soliciting input from employees** and their union representative on the design and conduct of housekeeping worksite hazard evaluations, and notifying them of the results of the evaluation in writing. This can be done by posting in a language they understand at a readily accessible location. The focus needs to include
 - > slips, trips, falls;
 - > prolonged or awkward static posture;
 - > repetitive extreme reaching above shoulder;
 - > lifting and forceful whole body or hand exertions;
 - > pushing and pulling;
 - > pressure points where a part of the body presses against an object or surface;
 - > excessive work rate and inadequate recovery time between tasks.

The initial housekeeping hazard evaluations must be

- > within 3 months after the opening of a new lodging establishment;
- > updated, with housekeeper input, to address any changes in process or equipment;
- > annual.

- **Investigating injuries** to housekeepers, looking at:
 - > the housekeeping task 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 - why those measures were not used or not used appropriately;
 - > input of the injured housekeeper, their union representative, and supervisor during the investigation and on whether any other control measure, procedure, or tool would have prevented the injury.



Incorrect

- **Correcting hazards** identified during workplace evaluations and incident investigations in a timely manner, including

- > determining if identified corrective measures are properly implemented;
- > ensuring effective means of involving housekeepers and their union representative;
- > assessing, implementing, and providing equipment or other corrective measures, with follow-up to ensure their effective implementation;



Correct

- > providing and making readily available to each housekeeper appropriate equipment, protective equipment, and tools, as well as inspecting, maintaining, repairing, and replacing as needed.

- **Reviewing the MIPP** and any history of injuries, with housekeeper and union representative involvement, at least annually to ensure overall effectiveness.
- **Providing the housekeepers** and their designated representative a copy of the MIPP, or making it readily accessible to them, along with any of the records of the steps taken to implement it, such as hazard evaluations and measurements taken.
- **Training.** The employer needs to train the housekeepers and their supervisors in a language easily understood by all
 - > when the MIPP is first established and annually thereafter;
 - > to all new housekeepers and supervisors;
 - > to all housekeepers given new job assignments, when new equipment or work practices are introduced, and whenever they become aware of a new or previously unrecognized hazard.

The training needs to include the following:

- > **The signs, symptoms, and risk factors** commonly associated with musculoskeletal injuries;
- > **A review of the MIPP** and how the written plan and all records will be made readily available to the housekeepers;
- > **Safety and health concerns** — the process for reporting 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;
- > **Early reporting of symptoms and injuries** — the importance of, and process for, reporting to supervisors;
- > **Practice** using the types and models of equipment and tools that housekeepers will be expected to use;
- > **An opportunity for interactive** employee questions and answers — in a language they fully understand — with a person knowledgeable about hotel housekeeping equipment and procedures;
- > **Training of managers and supervisors** on how to identify hazards and 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.

How can employers access the standard and obtain further information?

This fact sheet only provides an overview, so you need to refer to Cal/OSHA's [section 3345](http://www.dir.ca.gov/Title8/3345.html) www.dir.ca.gov/Title8/3345.html for the details.

Cal/OSHA Publications: www.dir.ca.gov/dosh/PubOrder.asp

- [Model Injury and Illness Prevention Program for High Hazard Employers](#)
- [Sample Musculoskeletal Injury Prevention Program](#)
- [Working Safer and Easier for Janitors, Custodians and Housekeepers](#)

Other Resources: www.dir.ca.gov/Title8/3345a.html

- [Ergonomic Resources for Housekeeping](#)
- [Tips for Hotel Room Attendants](#)
- [Tourism and Hospitality — Accommodation](#)
- [Ergonomics Study — University of California](#)
- [Accommodation Industry newsletter](#)

For assistance regarding this topic, employers may contact
Cal/OSHA Consultation Services at 1-800-963-9424 or InfoCons@dir.ca.gov

For Consultation information, publications, and e-tools, access the following link or copy the site address:
[DOSH Consultation](http://www.dir.ca.gov/dosh/consultation.html) www.dir.ca.gov/dosh/consultation.html

