



UPDATE - Cal/OSHA Hotel Housekeeping Injury Standard Effective July 1, 2018

Insights

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As we reported in [January](#), after nearly six years of discussion and debate, the Cal/OSHA Standards Board (Board) approved a [standard](#) on “Hotel Housekeeping Musculoskeletal Injury Prevention.” The final regulation was recently approved by the Office of Administrative Law and will be effective July 1, 2018.

Check out our [post](#) from April of last year for more background on this history of the new standard.

Recap - What’s In the Proposed Rule?

As a preliminary matter, the new standard applies to “lodging establishments, “ which it defines as establishments that contains sleeping room accommodations that are rented or otherwise provided to the public, such as hotels, motels, resorts, and bed and breakfast inns.

Under the new rule, each covered employer is required to establish and maintain a written musculoskeletal injury prevention program (MIPP) that addresses hazards specific to housekeeping. The standard specifies that the MIPP may be incorporated into an existing injury and illness prevention program (IIPP) or maintained as a separate program, and must be readily accessible each work shift to employees (including electronic access).

Required elements of the MIPP include:

- **Worksite evaluations** for identifying and evaluating housekeeping hazards. The initial evaluation must be completed within three months of the effective date of the standard, and shall be reviewed and updated annually (or earlier if needed). The MIPP must include an effective means of involving housekeepers and their union representative in designing and conducting the worksite evaluation.
- **Specific Risks Identified** – The worksite evaluation must identify and address potential risks to housekeepers including (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.

- **Injury Investigations** - Procedures to investigate musculoskeletal injuries to housekeepers including whether required tools or control measures were being used appropriately.
- **Corrective Measures** – Methods for correcting hazards identified in the worksite evaluation or injury investigation (again including housekeepers and their union representative).
- **Training** – Required when the MIPP is first established, to new hires, to all housekeepers given new job assignments, when new equipment or practices are introduced, and at least annually thereafter.
- **Recordkeeping** – Including the MIPP, worksite evaluations, and training records.

Next Steps

The Board approved the new standard on January 18, 2018. The Office of Administrative Law reviewed it for compliance with the Administrative Procedures Act, and approved the regulation on March 9, 2018. As a result, the new standard will become effective July 1, 2018.

How to Comply

Hotel employers will need to begin conducting worksite evaluations, drafting MIPPs and training their housekeeping staff. Fisher Phillips attorneys are available to assist with these activities or to provide guidance and advice to hotel clients that will use consultants or in-house staff to carry out these functions.

Related People



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