**Sample - Hotel Housekeeping Musculoskeletal Injury Prevention Program (MIPP)**

Key points:

* Cal/OSHA Title 8 §3345 Hotel Housekeeping Musculoskeletal Injury Prevention program requirement at <https://www.dir.ca.gov/title8/3345.html>.
* Applies to “lodging establishments,” in the State of California, which are defined as establishments that contain sleeping room accommodations that are rented or otherwise provided to the public, such as hotels, motels, resorts, and bed and breakfast inns.
* Effective July 1, 2018; an initial worksite evaluation must be conducted by October 1, 2018.
* 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).

For more information, visit the Loss Control section at [RepublicIndemnity.com](http://www.RepublicIndemnity.com) or contact the Loss Control Department at [RICALC@ri-net.com](mailto:RICALC@ri-net.com).

**Hotel Housekeeping Musculoskeletal Injury Prevention Program for**

**COMPANY NAME**

**EFFECTIVE DATE**

**RESPONSIBILITY**

The Musculoskeletal Injury Prevention Program’s (MIPP’s) program administrator, **(NAME/TITLE OF ADMINISTRATOR)** has the authority and the responsibility for implementing and maintaining this MIPP for **COMPANY NAME**. Managers and supervisors are responsible for implementing and maintaining the MIPP in their work areas and for answering worker questions about the MIPP. A copy of this MIPP is available from each manager and supervisor. The MIPP will be incorporated (or) maintained as separate program to our existing Injury and Illness Prevention Program (IIPP) and will be readily accessible each work shift to employees.

Note: Electronic access and other alternatives to maintaining paper copies of the MIPP are permitted as long as no barriers to employee access are created by such options.

**COMPLIANCE**

All **COMPANY NAME** workers, including managers and supervisors, are responsible for complying with the MIPP*,* following our safe workplace housecleaning practices, and using the housekeeping tools and equipment deemed appropriate for each housekeeping task. Our system of ensuring that all workers comply with these practices includes the following requirements:

* + Inform workers of the provisions of our MIPP;
  + Provide training to workers whose safety performance is deficient; and
  + Discipline workers for failure to comply with safe and healthful work practices (based on our organization’s disciplinary procedures).

Optional Best Practices:

* + Evaluate the safety performance of all workers.
  + Recognize employees who follow our safe workplace housekeeping practices and use the appropriate tools and equipment, training and retraining programs.

**COMMUNICATION**

All **COMPANY NAME** managers and supervisors are responsible for communicating with housekeepers in a form readily understandable by all housekeepers on matters relating to occupational safety and health. Our communication system is designed to encourage housekeepers to inform management of hazards at the worksite, and injuries or symptoms that may be related to such hazards without fear of reprisal. All workers will receive training on our MIPP in addition to the following items (*select one or more of the following sections*):

* New worker orientation including a discussion of safety and health policies and procedures;
* Regularly scheduled safety meetings;
* Management/Employee Safety Committee; and
* Posted and/or distributed safety information.

**WORKSITE EVALUATIONS**

**PERSON OR DEPARTMENT** will conduct an initial evaluation to identify and evaluate housekeeping hazards of all existing and new lodging establishment within the first three months. Evaluations will identify unsafe conditions and work practices in each housekeeping task, process, and operation of work with respect to potential causes of musculoskeletal injuries (MSI) to housekeepers.

Worksite evaluations shall be reviewed and updated:

* Whenever new processes, practices, procedures, equipment, or renovation of guest rooms are introduced that may change or increase housekeeping hazards;
* Whenever management 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.

Worksite evaluations shall be reviewed and updated annually and earlier if needed. The MIPP will also be evaluated annually, and will include a review of the Cal/OSHA Form 300 logs and other relevant records such as Cal/OSHA Form 301 and incident reports. Housekeepers and their union representative will be involved in designing and conducting worksite evaluations. Housekeepers and their Union (or) third party representative will 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 shall be in a language easily understood by our housekeepers.

Evaluations will identify and address potential risks to housekeepers including at a minimum the following areas:

* Slip, trip, and fall injuries;
* Prolonged or awkward static postures;
* Extreme reaches and repetitive reaches above shoulder height;
* Lifting or forceful whole body or hand exertions;
* Torso bending, twisting, kneeling, and squatting;
* Pushing and pulling;
* Falling and striking objects;
* Pressure points where a part of the body presses against an object or surface;
* Excessive work-rate; and
* Inadequate recovery time between housekeeping tasks.

**ACCIDENT/INJURY INVESTIGATIONS**

All musculoskeletal injuries to housekeepers will be investigated by **(PERSON OR DEPARTMENT)** as soon as feasibly possible. Procedures to investigate injuries to housekeepers will at a minimum evaluate the following factors:

* 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 measures, procedures, or tools would have prevented the injury;
* Corrective action to prevent the accident/exposure from reoccurring; and
* Recording the findings and actions taken.

**HAZARD CORRECTION**

Unsafe or unhealthy work conditions, practices, or procedures identified in the worksite evaluation or injury investigation shall be corrected in a timely manner based on the severity of the hazards. Housekeepers and their Union (or) third party representative will be involved in determining the corrective actions. Hazards shall be corrected according to the following procedures:

* 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; and
* 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.
* When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition; and
* Workers who are required to correct hazardous conditions shall be provided with the necessary protection.

**TRAINING AND INSTRUCTION**

All housekeepers, including their managers and supervisors, shall have training and instructions on general and musculoskeletal safety and health practices. Housekeepers and their supervisors shall receive training as follows:

* When the 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; and
* When new equipment or work practices are introduced, or whenever the employer becomes aware of a new or previously unrecognized hazard. This additional training may be limited to addressing the new equipment or work practices.

Training will include, at a minimum, the following elements as applicable to the housekeeper’s assignment:

* The signs, symptoms, and risk factors commonly associated with MSI,
* The elements of the employer’s MIPP and how the written MIPP and all relevant 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; and
* Training of managers and supervisors on the following sections:
  + - How to identify hazards;
    - Our 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 communicate effectively with housekeepers regarding any problems needing correction.

**RECORDKEEPING**

The maintenance of MIPP records includes the following:

* + Records of the steps taken to implement and maintain the MIPP including:
    - Any measurements taken; and
    - Evaluations conducted in the worksite evaluation process.
* Records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified; and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form; and maintained at for at least for one year.
* Documentation of safety and health training for each worker, including:
* The worker’s name or other identifier;
* Training dates; and
* Type(s) of training, and training providers.

Records will be maintained for one year except for training records of employees who have worked for at least one year and have been provided to the employee upon termination of employment.

**APPENDIX A – Job Safety Analysis; Worksite Evaluation Summary**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **JOB SAFETY & HAZARD ANALYSIS** | | | | | | **Work Area:**  **Site:**  **Company:** | |  | | |
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|  | | |
| **Activity or Task:** |  | | | | | | | | **Date:** |  |
| **Completed By:** |  | | | | | | | |
| **­­Work Steps and Tasks**  *Describe the tasks/steps involved in the job, in the order in which they occur* | | **Identify Hazard(s) in each Task / Step** | | **Risk Level**  (*Low, Med, High*) | **Controls- Procedures for each Task / Step**  *(Engineering/Administrative Controls to be implemented; use PPE as last option)* | | | | | |
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| **Hazards Checklist** | | | | | | | | | | |
| Can someone be struck or contacted by anything while doing this job? | | | Can someone slip, trip, or fall? | | | | Can someone fall into anything? | | | |
| Can someone strike against or make contact with any physical hazards? | | | Can someone strain or overexert? | | | | Can damage to equipment occur? | | | |
| Can someone be exposed to any hazardous conditions? | | | Can someone be caught in anything? | | | | Can someone injure someone else? | | | |
| **Safety Officers/Managers/Supervisors Comments** | | | | | **Date:** | |  | | | |
|  | | | | |
|  | | | | | **Employee Signature:** | | | | | |

**JOB SAFETY ANALYSIS TRAINING GUIDE**

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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **JOB SAFETY & HAZARD ANALYSIS** | | | | | | **Work Area: Site: Company:** | |  | | |
|  | | |
|  | | |
| **Activity or Task:** |  | | | | | | | | **Date:** |  |
| **Completed By:** |  | | | | | | | |
| **­­Work Steps and Tasks**  *Describe the tasks/steps involved in the job, in the order in which they occur* | | **Identify Hazard(s) in each Task / Step** | | **Risk Level**  (*Low, Med, High*) | **Controls- Procedures for each Task / Step**  *(Engineering/Administrative Controls to be implemented; use PPE as last option)* | | | | | |
| Break down the job into its basic job steps. (e.g., what is first, what is next, and so on)  You can do this by:   1. Observing the job; 2. Discussing it with the operator; 3. Drawing on your knowledge of job; or 4. A combination of the three.   Record the steps in their normal order of occurrence. Describe what is done, not the details of how it is done. Usually three or four words are sufficient to describe each basic job step.  For example, the first basic job step in mopping by hand would be:  *1. Obtain mop from the Housekeeping cart.* | | For each job step, ask yourself what accidents could happen to the employee doing the job.  You can get the answers by:   1. Observing the job; 2. Discussing it with the operator; 3. Recalling past accidents; or 4. A combination of the three.   Ask yourself; can he/she sustain:   * Upper and lower back injuries from using inadequate length handles? * Repetitive motion injuries to upper extremities from frequent mopping tasks? * Slip, trip, or fall injuries from working on and around wet floors? | | Examine the jobs, tasks, and processes in the company with the ***highest potential*** to cause a severe injury. | For each potential accident, ask yourself what safeguards should be provided for the employee and how should the employee do the job to avoid potential injury.  You can get your answers by:  Observing the job for leads;  Discussing precautions with experienced housekeepers;  Drawing on your experience; or  A combination of the three  Be sure to describe the provided safeguards and precautions an employee must use. Number each separate recommended precaution with the same number you gave the potential accident that the precaution seeks to avoid. Use simple ‘do’ or ‘don’t’ statements to explain recommended precautions as if talking to the employee. For example:   1. Provide adjustable handle mops to accommodate different workers. 2. Provide training on how to properly adjust and safely use the mops. 3. Provide rest breaks and/or rotate repetitive tasks.   Avoid generalities, such as, ‘Be Careful’, ‘Stay Alert’, ‘Take Caution’, etc. | | | | | |
| **Hazards Checklist** | | | | | | | | | | |
| Can someone be struck or contacted by anything while doing this job? | | | Can someone slip, trip or fall? | | | | Can someone fall into any thing? | | | |
| Can someone strike against or make contact with any physical hazards? | | | Can someone strain or overexert? | | | | Can damage to equipment occur? | | | |
| Can someone be exposed to any hazardous conditions? | | | Can someone be caught in anything? | | | | Can someone injure someone else? | | | |
| **Safety Officers/Managers/Supervisors Comments** | | | | | **Date:** | |  | | | |
|  | | | | |
|  | | | | | **Employee Signature:** | | | | | |

**WORKSITE EVALUATION SUMMARY**

**Company name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Evaluators: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

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| **MSI RISK** | **SOURCE OF HAZARD** | **CONTROLS IN PLACE** | **CONTROLS RECOMMENDED** | **ACTIONS TAKEN** |
| Slips, trips, and falls |  |  |  |  |
| Prolonged or awkward static postures |  |  |  |  |
| Extreme reaches and repetitive reaches above shoulder height |  |  |  |  |
| Lifting or forceful whole body or hand exertions |  |  |  |  |
| Torso bending, twisting, kneeling, and squatting |  |  |  |  |
| Pushing and pulling |  |  |  |  |
| Falling and striking objects |  |  |  |  |
| Pressure points where a part of the body presses against an object or surface |  |  |  |  |
| Excessive work-rate |  |  |  |  |
| Inadequate recovery time between housekeeping tasks |  |  |  |  |
| Other |  |  |  |  |