



# Medical Environment, Inc.

*Health & Safety Training for Health Care Facilities*

April 1, 2001

To: All Medical Environment Subscribers

Subject: Another Government Requirement, the Ergonomics Standard

This is the first edition of the new Ergonomics Standard of January 16, 2001. There will be changes made, but probably not in the program that affects medical offices. We recommend that you establish your Ergonomics compliance this spring. Most facilities do not have MSDs and your work should be easy.

From time to time, updates about the ergonomics program will be sent to you. If you have questions about the program in the meantime, please call Medical Environment at 303-788-6240.

The first section of the enclosed documents is the table of contents and the Ergonomics Policy plus an addendum called "How To Perform Job Hazard Analysis and Control". Please file them in the "Ergonomics" section of your manual and throw away the old plans.

The last section of the enclosed ergonomics documents is a copy of the Ergonomics Program Standard 1910.900 and Table W-1--"A Basic Screening Tool". These should be filed in the Ergonomics section of your manual

An ergonomics poster required by OSHA to be permanently posted in a public place is enclosed. We suggest that the poster be placed next to the existing OSHA Health and Safety poster.

Sincerely,

  
George Hunt, Editor

## *Table of Contents – Ergonomics Policy*

*Prepared by Medical Environment, Inc.*

|  |        |
|--|--------|
| Purpose of the Ergonomics Policy                         | Page 1 |
| What is an MSD?  | Page 1 |
| Management-Employee Participation                        | Page 1 |
| Training and Written Information                         | Page 2 |
| • Ergonomics Information Sign                            | Page 2 |
| Sources of Medical help for Employees                    | Page 2 |
| Evaluation and Follow-up of MSD Incidents                | Page 2 |
| Temporary Work Restrictions                              | Page 3 |
| If Temporary Work Restrictions Are Needed                | Page 3 |
| The Health Care Professional's Opinion                   | Page 3 |
| What is an Action Trigger                                | Page 3 |
| Investigation of an MSD Action Trigger                   | Page 4 |
| How to Look for an Action Trigger                        | Page 4 |
| The "Problem Job"  | Page 4 |
| How Can a Facility Reduce MSD Hazards                    | Page 4 |
| The "Quick Fix"  | Page 4 |
| MSD Management   | Page 5 |
| Employee Rights Under the Ergonomics Plan                | Page 5 |
| Work Restrictions  | Page 5 |
| Training   | Page 6 |
| Keeping the Program Effective                            | Page 6 |
| Recordkeeping Obligations                                | Page 6 |
| Effective Date of Policy                                 | Page 7 |
| Table 1 – How to Perform Job Hazard Analysis and Control | Page 8 |

### *Addenda:*

- 1. OSHA Job Hazard Analysis and Control, Program Standard 1910.900.*
- 2. Required Ergonomics Poster*

## **Ergonomics Policy**

### **Purpose of the Ergonomics Policy** (1910.900 (a))

OSHA published the Ergonomics Program Standard on November 20, 2000 to show employers and employees how to avoid MSDs (musculoskeletal disorders). The program requires that every business implement the ergonomics standard and establish a working ergonomics program during 2001. The program is easy for medical facilities to accomplish and administer. The hard part is learning how the program works, discovering where and how to discover physical job risks, remembering to record program activities into the logbook, and creating the administrative environment to get the program started and completed.

Every business must protect their employees from work-related disorders, but not slips, trips and falls: this ergonomics program does not pertain to injuries caused by accidents. Only injuries that are a result of work are covered by this program.

### **What Is An MSD?** (1910.900 (e))

An MSD (musculoskeletal disorder) is the name given to a work-related disorder that is caused by an exposure to risk factors on the job. Office workers, file clerks and nurses occasionally have jobs that may generate MSDs if their repetitive work tasks continue in conflict with their bodies.

Only MSDs that are work-related fall under OSHA's jurisdiction. An MSD must cause lost time, restricted work activity, or medical treatment beyond first aid to be classed as an MSD.

If an MSD has continued for 7 days after a report has been made about a potential problem, the signs and symptoms of the MSD are work-related, and an inspection of the problem shows the MSD is an active problem, then the MSD requires a plan to repair it. The Ergonomics Program requires the workers and employer to fix the MSD on a local basis. OSHA believes that quick resolution of an "Action Trigger" problem will maintain the facility's ability to exist without a formal ergonomics program. The quick repair of an Action Trigger problem does not require formal analysis (1910.900, (f)).

### **Management and Employee Participation Required** (1910.900 (d))

Management must define everyone's responsibilities and keep the communication about ergonomics open among the employees.

Employees assist the program by learning how to recognize MSDs, how to report MSDs and how to locate other job hazards.

## **Training and Written Information (1910.900 (d) (3))**

Every current employee and new employee must receive written basic information about the facility's views on ergonomics within 14 days of hire, including:

- Common MSDs in their job specialty and signs and symptoms of MSD's,
- The importance of reporting MSDs and their signs and symptoms early,
- How to report MSDs and their signs and symptoms early,
- The consequences of failing to report MSD's early,
- The kinds of jobs, risk factors and work activities associated with MSD hazards, and
- A short description of the requirements of OSHA's ergonomics program standard.

## **Display an Ergonomics Information Sign (1910.900 (d)(3))**

A sign with the same basic information as the above paragraph about the ergonomics program must be permanently displayed in a conspicuous place, usually next to the OSHA poster or on the employee bulletin board.

## **What Sources of Help Does an Employee with an MSD Have? (1910.900 (p))**

- Access to a Health Care Professional if signs and symptoms warrant,
- Special work restrictions may be provided to the employee, including time off to recover, and
- Work restriction protection including maintenance of the employee's job, pay, rights and benefits at 100 percent

## **Evaluation and follow-up of MSD incidents**

### **The Health Care Professional (HCP) (1910.900 (q))**

An HCP is available to all employees who suffer from an MSD. The employee must provide a job description to the HCP, a list of potential MSD hazards at the job site, a copy of this ergonomics standard, plus other information the HCP needs, including:

- An assessment of the employees' medical condition as related to the sort of work the employee does, work restrictions, if any, and time off to recover and follow-up the injury.

- A statement is made by the HCP to the employee of the employee's results of the evaluation, including the process to follow to effect recovery, any medical conditions which might conflict with work and any MSD hazards in the employee's job.

### **What to Do if Temporary Work Restrictions Are Needed** (1910.900)

A written opinion is provided to the employee and to the employer by the HCP. It informs the employee about his condition, if any, and what work-related or other activities from which the employee should refrain.

NOTE: OSHA reminds the employer that it is important that the employee requests the HCP not to include any findings or information that is not related to workplace exposure to risk factors. Leave personal activities out of the analysis. Ask the HCP to not communicate information to the employer about risk factors on personal time, except when authorized to do so by State or Federal law.

The employee may hire their own HCP at no cost to themselves.

### **Temporary Work Restriction Policy** (1910.900 (r))

Employees placed on work restriction receive a 100 percent guarantee of earnings and benefits until the earliest of these events might occur: the employee gets better, an HCP determines the employee cannot resume duties, or 90 calendar days have passed since a work restriction was imposed.

### **The Health Care Professional's Opinion** (1910.900(q))

The HCP opinion must include an assessment of the employees' medical condition as related to the sort of work the employee does, plus any recommended work restriction or time off to recover and follow-up. A statement that the HCP has informed the employee of the results of the evaluation, the process to follow to effect recovery, any medical conditions which might conflict with work and any MSD hazards in the employee's job and a statement that the HCP has informed the employee about work-related or other activities that could impede healing from the injury is also included.

### **What is an "Action Trigger"?** (1900.900 (f) (o) and (p))

An Action Trigger occurs when a disorder has shown itself to be serious and an MSD has occurred on the job. It must be corrected quickly. Delays may require beureaucratic administrative work.

If the employee's work might expose the employee to one or more MSD risks on one or more days a week and there are one or more relevant MSD risks, the job must be appraised for MSDs. Using the analytical tools in Appendix One as an assist. If the employee's job does not meet the criteria for an Action Trigger, a facility need not take further action.

### **Investigation of an MSD Action Trigger (1900.900 (g))**

If an Action Trigger situation occurs, that is, if a serious MSD exists and must be corrected, then management and affected employees must investigate its signs and symptoms, learn how the MSD hazard is occurring and how the MSD might occur again. The Action Trigger investigation usually includes a demonstration of the job that has caused the MSDs. This will aid the analysis of the job's risks and to clearly understand the nature of the MSD. The magnitude, frequency and duration of exposures to those risks must be calculated and "what-if" extensions applied to learn the potential outcome of the MSD.

### **How to Look For An Action Trigger (1900.900 (j))**

One of these three OSHA-recommended tools must be employed to conduct an Action Trigger analysis:

- Use Job Hazard Analysis and Control, Appendix One to help identify hazard assistance tools.
- Use a professional ergonomics specialist.
- Use any other reasonable method with due consideration to the job and the risks.

### **The "Problem Job" (1900.900 (k))**

If an MSD hazard exists on the job, then the job is termed a "Problem Job" and work needs to be done to correct it. Problem job resolution must eliminate all MSDs. If a facility is unable to eliminate all MSD hazards and they have been reduced to the extent feasible, return to the problem at least every three years to assess the job and see if additional controls exist that would control or reduce MSDs. The facility may have to patiently reduce and control the problem job by removing the MSDs over a number of years.

If the MSD on the Problem Job is unique to only one employee, the job training can be reduced only to that employee and special considerations need only be confined to that employee. If an attempt to correct an MSD seems attainable, a "Quick Fix" can be used to repair the MSD without the complications of creating a formal ergonomics program occur.

## **How Can A Facility Reduce MSD Hazards? (1900.900) (m))**

OSHA requires that MSD problems must be discussed with employees familiar with the job site. Initial controls are applied within 90 days to reduce the hazards from there. In 180 days, two years, four years or more, the MSD problems may finally have been reduced or replaced.

## **The "Quick Fix" (1910.900) (o))**

If an MSD can be corrected easily, a fast repair process can be initiated on the MSD hazard. OSHA calls this fast repair process a Quick Fix . It is required that the Quick Fix repairs be initiated within 90 days after the MSD has been reported and the Quick Fix repaired within 30 days of initiation. The hazard identification tools listed in Appendix One have been included by OSHA to confirm if it is corrected.

## **MSD Management (1910.900 (p))**

Thirty days after a facility has resolved a "Quick Fix" MSD, its successful completion must be documented with the background facts and these facts filed in an "Ergonomics" file location. The documentation may be discarded after three years if no problems recur. No further action on the "Quick Fix" is necessary, but the facility must maintain control over the MSD with adequate maintenance. OSHA recordkeeping and training documentation by your facility that shows how you will follow the ergonomic standard will be inspected by OSHA.

If the MSD hazards after a Quick Fix have been tested but have NOT improved to the levels required in the hazard identification tools levels in appendix D, a formal ergonomics program must be installed. Instructions are in Appendix D.

## **Employee Rights Under the Ergonomic Plan (1910.900 (s))**

Every employee has the right to receive their ergonomic benefits:

- Access to a Health Care Professional (HCP),
- Necessary work reductions, including paid time off to recover,
- Evaluation and follow-up of the MSD incident, and
- Written opinion from the HCP for each evaluation.
- Second-opinion HCP

## **Work Restrictions** (1910.900 (r))

If an employee suffers an MSD, the employee must be maintained on Work Restriction Protection. This will maintain the employee's salary level at 90 to 100 percent of earnings for up to 90 days, or resumption of activities.

## **Training** (1910.900 (t))

Supervisors and Team Leaders. Every three years training must be given to each employee and their job supervisors and team leaders. This training shall include the Requirements of the standard, how the ergonomics standard works, signs and symptoms of MSDs; ways of reporting them, new risk factors in the employee's job as identified by both the Basic Screening Tool and the job hazard analysis.

Also included in ergonomics training is the OSHA hazard repair timetable and the controls used to address MSD hazards and their effectiveness.

Employees involved in setting up the program will be taught relevant topics from the above paragraph plus how to run an ergonomics program and how to identify, analyze and reduce MSD hazards.

New employees are taught the principles of the ergonomics plan within 15 days, but only if they're entering an Action Trigger job.

No training need be given to an employee who has received training within the past three years. Training must be in the language that the employee understands.

## **Keeping The Program Effective** (1910.900 (u))

Training is given every three years and the program's elements evaluated. The Safety Officer consults with the employees in the program on any problems and the effectiveness of the program. They determine if any MSD's have appeared. Has the program yielded positive results? Why or why not? Deficiencies can be garnered at the annual OSHA training meeting.

## **Recordkeeping Obligations** (1910.900 (u))

Facilities with 11 or more employees, including full and part-time, must keep written or electronic records of MSD reports for employees, job hazard analyses; hazard control measures; quick-fix process; ergonomic program evaluations; work restrictions, time off work and HCP opinions. OSHA may require HCP opinions about time off work. These HCP opinions do not need to be retained for employees who work for less than one year and to whom you provide the records at the end of their employment.



The review of the three-year ergonomics training program and all the facts about the facility's ergonomic administration must be saved. OSHA authorities may wish to retain exhibits for copying and examination. Quick Fix results, if successful, need to be retained for only three years.

### **Effective Date** *(1910.900 (x))*

This standard became effective on January 16, 2001 and is intended to be installed by June 1, 2001.

Helpful standard definitions and exhibits are attached.

### **Appendices to this Standard**

1. "OSHA Job Hazard Analysis and Control," Ergonomics Program Standard. 1910.900.
2. Required Ergonomics Poster

**Table 1**

**How to Perform Job Hazard Analysis and Control -The First Step To Seeking Out Job Hazards**

1. Job hazard analysis and control are the first steps to eliminate and reduce MSD hazards. Note: Employers who do not have MSD hazards in their facility are not required to perform an analysis and control in their facility.
2. If an analysis of a problem job is required and the employer is looking for MSD problems, the employer must ask the employees to obtain the information needed about the tasks and actions the job involves. When the actual job is being demonstrated, ideas about where MSD hazards could be occurring are usually obvious and able to be fixed.
3. OSHA requires that complicated hazard analysis/control of problem jobs be conducted by a person who has received training in the process of analyzing and controlling MSD hazards, such as an ergonomics specialist or industrial hygienist. OSHA notes that a "toolbox chat", talking with employees and looking at the problem together, often reveals an easy solution to the problem, saving the costs of outside assistance.
4. The employer must do the following for every MSD that occurs: Observe the employee doing the job and try to identify any troublesome physical and work activities that could be present in this list of risk factors:
  - Employee uses considerable force to complete a motion, causing awkward postures and stress.
  - Repetitious motions are made without breaks or pauses.
  - Tasks causing long reaches affect posture.
  - Working surfaces too high or too low cause poor posture.
  - Performing tasks in the same position.
  - Using hand and power tools causing vibration, stress, and bad posture.
  - Vibrating working surfaces, machinery or vehicles.
  - Gloves are bulky, too large or too small causing force and contact stress.
  - Manual lifting of awkward weights.
  - Horizontal reach is long causing awkward postures, force effects.
  - Vertical reach extends below knees causes force effects, awkward posture.
  - Bending or twisting during manual handling cause force effects, posture problems.
  - Slippery objects or objects without handles cause posture and repetitive effects.
  - Floor surfaces are uneven, slippery or sloped causing awkward postures.

**Observation Requirement:** The easiest way to document to OSHA that an employer has actually watched the employee(s) perform the physical work activities of a job is to record this information around the jobs follows:

- Tools or equipment used to perform the task,
- Materials used in the task,
- Amount of time performing each task,
- Workstation dimensions and layout,
- Weight of items handled,
- Environmental conditions,
- Vibration and its source,
- Personal protective equipment worn.

# OSHA Regulations (Standards - 29 CFR)

## Ergonomics Program Standard. - 1910.900

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- **Standard Number:** 1910.900
  - **Standard Title:** Ergonomics Program Standard.
  - **SubPart Number:** W
  - **SubPart Title:** Program Standards
- 

**(a) What is the purpose of this standard?** The purpose of this standard is to reduce the number and severity of musculoskeletal disorders (MSDs) caused by exposure to risk factors in the workplace. This standard does not address injuries caused by slips, trips, falls, vehicle accidents, or similar accidents.

**Note to paragraph (a):** Definitions of terms used in this standard are in paragraph (z) of this section.

**(b) Does this standard apply to all employers?** This standard covers all employers covered by the Act with the following exceptions:

This standard does not apply to employment covered by the following OSHA standards, or to employment such as office management and support services directly related to that employment:

**(b)(i)** OSHA's construction standards in Part 1926 of this chapter;

**(b)(ii)** OSHA's maritime standards in Part 1915, 1917, or 1918 of this chapter; or

**(b)(iii)** OSHA's agriculture standards in Part 1928 of this chapter.

**(b)(2)** This standard does not apply to railroad operations or to employment such as office management and support services directly related to the operation of a railroad.

**(c) How does this standard apply if I already have an ergonomics program in place when the OSHA ergonomics program standard becomes effective?**

**(c)(1)** You may continue to implement your program instead of complying with paragraphs (d) through (y) of this section, provided that your program is written, complies with the requirements of paragraph (c) of this section, has been implemented before November 14,

2000, and contains the following program elements:

**..1910.900(c)(1)(i)**

**(c)(1)(i)** Management leadership, as demonstrated by an effective MSD reporting system and prompt responses to reports, clear program responsibilities, and regular communication with employees about the program;

**(c)(1)(ii)** Employee participation, as demonstrated by the early reporting of MSDs and active involvement by employees and their representatives in the implementation, evaluation, and future development of your program;

**(c)(1)(iii)** Job hazard analysis and control, as demonstrated by a process that identifies, analyzes, and uses feasible engineering, work practice, and administrative controls to control MSD hazards or to reduce MSD hazards to the levels below those in the hazard identification tools in Appendix D to this section or to the extent feasible, and evaluates controls to assure that they are effective;

**Note to paragraph (c)(1)(iii):** Personal protective equipment (PPE) may be used to supplement engineering, work practice, and administrative controls, but you may only use PPE alone where other controls are not feasible. Where PPE is used, you must provide it at no cost to employees.

**(c)(1)(iv)** Training of managers, supervisors, and employees (at no cost to these employees) in your ergonomics program and their role in it; the recognition of MSD signs and symptoms; the importance of early reporting; the identification of MSD hazards in jobs in your workplace; and the methods you are taking to control them; and

**(c)(1)(v)** Program evaluation, as demonstrated by regular reviews of the elements of the program and of the effectiveness of the program as a whole, using such measures as reductions in the number and severity of MSDs, increases in the number of jobs in which MSD hazards have been controlled, or reductions in the number of jobs posing MSD hazards to employees; and the correction of identified deficiencies in the program. At least one review of the elements and effectiveness of the program must have taken place prior to January 16, 2001.

**(c)(2)** By January 16, 2002, you must have implemented a policy that provides MSD management as specified in paragraphs (p), (q), (r), and (s) of this section.

**(c)(3)** An employer who has policies or procedures that discourage employees from participating in the program or reporting the signs or symptoms of MSDs or the presence of MSD hazards in the workplace does not qualify for grandfather status under paragraph (c) of this section.

**(d) If the standard applies to me, what initial action must I take?**

**..1910.900(d)(1)**

**(d)(1)** You must provide each current and each new employee basic information about:

**(d)(1)(i)** Common musculoskeletal disorders (MSDs) and their signs and symptoms;

**(d)(1)(ii)** The importance of reporting MSDs and their signs and symptoms early and the consequences of failing to report them early;

**(d)(1)(iii)** How to report MSDs and their signs and symptoms in your workplace;

**(d)(1)(iv)** The kinds of risk factors, jobs and work activities associated with MSD hazards; and

**(d)(1)(v)** A short description of the requirements of OSHA's ergonomics program standard.

**(d)(2)** You must make available to the employee a summary of the requirements of this standard.

**..1910.900(d)(3)**

**(d)(3)** You must provide the information in written form or, if all employees have access, in electronic form. You must provide the information to new employees within 14 days of hiring. You must post the information in a conspicuous place in the workplace (e.g., employee bulletin board or, if all employees have access, electronic posting).

**Note to paragraph (d):** You may use the information sheet in non-mandatory Appendix A to this section to comply with paragraphs (d)(1) of this section and the summary sheet in non-mandatory Appendix B to this section to comply with paragraph (d)(2) of this section.

**(e) What must I do when an employee reports an MSD or the signs or symptoms of an MSD?**

**(e)(1)** You must promptly determine whether the reported MSD or MSD signs or symptoms qualify as an MSD incident. You may request the assistance of a Health Care Professional (HCP) in making this determination. A report is considered to be an MSD incident in the following two cases:

**(e)(1)(i)** The MSD is work-related and requires days away from work, restricted work, or medical treatment beyond first aid; or

**(e)(1)(ii)** The MSD signs or symptoms are work-related and last for 7 consecutive days after the employee reports them to you.

(e)(2) If the employee has experienced an MSD incident, you must determine whether the job meets the standard's Action Trigger. See paragraph (f) of this section.

(e)(3) If the employee has not experienced an MSD incident, you do not need to take further action.

**..1910.900(f)**

**(f) How do I determine whether the employee's job meets the Action Trigger?**

(f)(1) A job meets the Action Trigger if:

(f)(1)(i) An MSD incident has occurred in that job; and

(f)(1)(ii) The employee's job routinely involves, on one or more days a week, exposure to one or more relevant risk factors at the levels described in the Basic Screening Tool in Table W-1.

(f)(2) If the employee's job does not meet the Action Trigger, you do not need to take further action.

See Table W-1 Basic Screening Tool

**..1910.900(g)**

**(g) What actions must I take if the employee's job meets the Action Trigger?** For the employee's job and all jobs in the establishment that are the same as that job, you must either:

(g)(1) Comply with the Quick Fix option in paragraph (o) of this section, or

(g)(2) Develop and implement an ergonomics program that includes the following elements:

(g)(2)(i) Management leadership as specified in paragraph (h) of this section;

(g)(2)(ii) Employee participation as specified in paragraph (i) of this section;

(g)(2)(iii) MSD management as specified by paragraphs (p), (q), (r), and (s) of this section;

(g)(2)(iv) Job hazard analysis as specified by paragraph (j) of this section;

(g)(2)(v) Hazard reduction and control measures as specified in paragraphs (k), (l), and (m) of this section, and evaluations as specified in paragraph (u) of this section, if the job hazard analysis determines that the job presents an MSD hazard;

(g)(2)(vi) Training as specified in paragraph (t) of this section.

**..1910.900(d)**

**(h) What must I do to demonstrate management leadership? You must:**

**(h)(1)** Assign and communicate responsibilities for setting up and managing the ergonomics program;

**(h)(2)** Provide designated persons with the authority, resources, and information necessary to meet their responsibilities;

**(h)(3)** Ensure that your policies and practices encourage and do not discourage:

**(h)(3)(i)** The early reporting of MSDs, their signs and symptoms, and MSD hazards; and

**(h)(3)(ii)** Employee participation in the ergonomics program;

**(h)(4)** Communicate periodically with employees about the ergonomics program and their concerns about MSDs.

**(i) What must I do to ensure employee participation in my program? You must ensure that employees and their representatives:**

**..1910.900(i)(1)**

**(i)(1)** Have ways to promptly report MSDs, MSD signs and symptoms, and MSD hazards in your workplace;

**(i)(2)** Receive prompt responses to their reports of MSDs, MSD signs and symptoms, and MSD hazards;

**(i)(3)** Are provided with a summary of the requirements of this standard, as specified in paragraph (d)(2) of this section, and have ready access to a copy of this standard and to information about MSDs, MSD signs and symptoms, MSD hazards, and your ergonomics program; and

**(i)(4)** Have ways to be involved in the development, implementation, and evaluation of your ergonomics program.

**(j) What must I do to determine whether a job that meets the Action Trigger poses an MSD hazard to employees in that job?**

**(j)(1)** You must conduct a job hazard analysis for that job. You may rely on an analysis previously conducted in accordance with this section to the extent it is still relevant.

**(j)(2)** Your job hazard analysis must include all employees who perform the same job, or a sample of employees in that job who have the greatest exposure to the relevant risk factors,

and include the following steps:

(j)(2)(i) Talk with those employees and their representatives about the tasks the employees perform that may relate to MSDs; and

(j)(2)(ii) Observe the employees performing the job to identify the risk factors in the job and to evaluate the magnitude, frequency, and duration of exposure to those risk factors.

(j)(3) You must use one or more of the following methods or tools to conduct this analysis:

(j)(3)(i) One or more of the hazard identification tools listed in Appendix D-1 to this section, if the tools are relevant to the risk factors being addressed;

..1910.900(j)(3)(ii)

(j)(3)(ii) The occupation-specific hazard identification tool in Appendix D-2 to this section;

(j)(3)(iii) A job hazard analysis conducted by a professional trained in ergonomics; or

(j)(3)(iv) Any other reasonable method that is appropriate to the job and relevant to the risk factors being addressed.

(j)(4) If you determine that there is an MSD hazard in the job, the job will be termed a "problem job."

**Note to paragraph (j):** If you determine that the MSD hazards pose a risk only to the employee who reported the MSD, you may limit your job controls, training and evaluation to that individual employee's job.

**(k) What is my obligation to reduce MSD hazards in a problem job?**

(k)(1) You must:

(k)(1)(i) Control MSD hazards; or

(k)(1)(ii) Reduce MSD hazards in accordance with or to levels below those in the hazard identification tools in Appendix D to this section; or

(k)(1)(iii) If you cannot reduce MSD hazards in accordance with paragraphs (k)(1)(i) or (k)(1)(ii) of this section, you must do the following:

(k)(1)(iii)(A) Reduce MSD hazards to the extent feasible;

(k)(1)(iii)(B) At least every 3 years, assess the job and determine whether there are additional feasible controls that would control or reduce MSD hazards; and



**..1910.900(k)(1)(iii)(C)**

**(k)(1)(iii)(C)** If such controls exist, implement them until you have reduced the MSD hazards in accordance with paragraphs (k)(1)(i) or (k)(1)(ii) of this section:

**(k)(2)** If a work-related MSD occurs in a job whose hazard(s) you have reduced to the levels specified in paragraph (k)(1) of this section, you must:

**(k)(2)(i)** Ensure that appropriate controls are still in place, are functioning, and are being used properly, and

**(k)(2)(ii)** Determine whether new MSD hazards exist and, if so, take steps to reduce the hazards as specified in paragraph (m) of this section.

**Note to paragraph (k):** The occurrence of an MSD in a problem job is not in itself a violation of this standard.

**(l) What kinds of controls must I use to reduce MSD hazards?**

**(l)(1)** For each problem job, you must use feasible engineering, work practice or administrative controls, or any combination of them, to reduce MSD hazards in the job. Where feasible, engineering controls are the preferred method of control.

**(l)(2)** You may use personal protective equipment (PPE) to supplement engineering, work practice or administrative controls, but you may use PPE alone only where other controls are not feasible. Where you use PPE, you must provide it at no cost to employees.

**..1910.900(m)**

**(m) What steps must I take to reduce MSD hazards? You must:**

**(m)(1)** Ask employees in the problem job and their representatives to recommend measures to reduce MSD hazards;

**(m)(2)** Identify and implement initial controls within 90 days after you determine that the job meets the Action Trigger. Initial controls mean controls that substantially reduce the exposures even if they do not reach the levels specified in paragraph (k)(1) of this section.

**(m)(3)** Identify and implement permanent controls that meet the levels specified in paragraph (k)(1) of this section within 2 years after you determine that a job meets the Action Trigger, except that initial compliance can take up to January 18, 2005 whichever is later.

**(m)(4)** Track your progress and ensure that your controls are working as intended and have not created new MSD hazards. This includes consulting with employees in problem jobs and their representatives. If the controls are not effective or have created new MSD hazards, you must use the process in paragraphs (m)(1) and (m)(2) of this section to identify additional

control measures that are appropriate and implement any such measures identified.

(n) [Reserved].

**(o) May I use a Quick Fix instead of setting up a full ergonomics program?**

(o)(1) You may use a Quick Fix for a job if your employees have experienced no more than one MSD incident in that job, and there have been no more than two MSD incidents in your establishment, in the preceding 18 months.

(o)(2) To use a Quick Fix, you must:

**..1910.900(o)(2)(i)**

(o)(2)(i) Provide the MSD management required by paragraphs (p), (q), (r), and (s) of this section, as appropriate, to the employee promptly after you determine that the employee's job meets the Action Trigger;

(o)(2)(ii) Talk with employees in the job and their representatives about the tasks the employees perform that may relate to the MSD incident; and

(o)(2)(iii) Observe employees performing the job to identify which risk factors are likely to have caused the MSD incident;

(o)(2)(iv) Ask the employee(s) performing the job and their representatives to recommend measures to reduce exposure to the MSD hazards identified;

(o)(2)(v) Within 90 days of your determination that the job meets the Action Trigger in paragraph (e) of this section, implement controls in the job in accordance with paragraph (l) of this section that control the MSD hazards or reduce MSD hazards in accordance with or to levels below those in the hazard identification tools in Appendix D to this section, and train the employee(s) in the use of these controls;

(o)(2)(vi) Within 30 days after you implement the controls, review the job to determine whether you have reduced the MSD hazards to the levels specified in paragraph (o)(2)(v) of this section; and

(o)(2)(vii) Keep a record of the Quick Fix process for each job to which it is applied. You must keep the record for 3 years.

(o)(3) If you determine that you have reduced the MSD hazards to the levels specified in paragraph (o)(2)(v) of this section, you need take no further action except to maintain controls, the training related to those controls, and recordkeeping.

**..1910.900(o)(4)**

(o)(4) If you have not reduced MSD hazards to the levels specified in paragraph (o)(2)(v) of this section, you must implement an ergonomics program, as specified in paragraph (g) of this section.

**(p) What MSD management process must I implement for an employee who experiences an MSD incident in a job that meets the Action Trigger?**

(p)(1) You must provide the employee with prompt and effective MSD management at no cost to the employee. MSD management must include:

(p)(1)(i) Access to a Health Care Professional (HCP);

(p)(1)(ii) Any necessary work restrictions, including time off work to recover;

(p)(1)(iii) Work restriction protection; and

(p)(1)(iv) Evaluation and follow-up of the MSD incident.

(p)(2) You must obtain a written opinion from the HCP for each evaluation conducted under this standard, and provide a copy to the employee. You must instruct the HCP that the opinion may not include any findings or information that is not related to workplace exposure to risk factors, and that the HCP may not communicate such information to the employer, except when authorized to do so by State or Federal law.

(p)(3) Whenever an employee consults an HCP for MSD management, you must provide the HCP with the following:

(p)(3)(i) A description of the employee's job and information about the physical work activities, risk factors and MSD hazards in the job;

(p)(3)(ii) A copy of this standard; and

(p)(3)(iii) A list of information that the HCP's opinion must contain.

**Note to paragraph (p):** MSD management under this standard does not include medical treatment, emergency or post-treatment procedures.

**(q) What information must the HCP's opinion contain? The HCP's opinion must contain:**

**..1910.900(q)(1)**

(q)(1) The HCP's assessment of the employee's medical condition as related to the physical work activities, risk factors and MSD hazards in the employee's job;

(q)(2) Any recommended work restrictions, including, if necessary, time off work to recover,

and any follow-up needed;

**(q)(3)** A statement that the HCP has informed the employee of the results of the evaluation, the process to be followed to effect recovery, and any medical conditions associated with exposure to physical work activities, risk factors and MSD hazards in the employee's job; and

**(q)(4)** A statement that the HCP has informed the employee about work-related or other activities that could impede recovery from the injury.

**(r) What must I do if temporary work restrictions are needed?**

**(r)(1)** If an employee experiences an MSD incident in a job that meets the Action Trigger, you must provide the employee with any temporary work restrictions or time off work that the HCP determines to be necessary, or if no HCP was consulted, that you determine to be necessary.

**(r)(2)** Whenever you place limitations on the work activities of the employee in his or her current job or transfer the employee to a temporary alternative duty job in accordance with paragraph (r)(1) of this section, you must provide that employee with Work Restriction Protection, which maintains the employee's employment rights and benefits, and 100% of his or her earnings, until the earliest of the following three events occurs:

**(r)(2)(i)** The employee is able to resume the former work activities without endangering his or her recovery; or

**..1910.900(r)(2)(ii)**

**(r)(2)(ii)** An HCP determines, subject to the determination review provisions in paragraph (s) of this section, that the employee can never resume his or her former work activities; or

**(r)(2)(iii)** 90 calendar days have passed.

**(r)(3)** Whenever an employee must take time off from work in accordance with paragraph (r)(1) of this section, you must provide that employee with Work Restriction Protection, which maintains the employee's employment rights and benefits and at least 90% of his or her earnings until the earliest of the following three events occurs:

**(r)(3)(i)** The employee is able to return to the former job without endangering his or her recovery;

**(r)(3)(ii)** An HCP determines, subject to the determination review provisions in paragraph (s) of this section, that the employee can never return to the former job; or

**(r)(3)(iii)** 90 calendar days have passed.

(r)(4) You may condition the provision of WRP on the employee's participation in the MSD management that this standard requires.

(r)(5) Your obligation to provide WRP benefits to a temporarily restricted or removed employee is reduced to the extent that the employee receives compensation for earnings lost during the work restriction period from either a publicly or an employer-funded compensation or insurance program, or receives income from employment made possible by virtue of the employee's work restriction.

**Note to paragraph (r):** The employer may fulfill the obligation to provide work restriction protection benefits for employees temporarily removed from work by allowing the employees to take sick leave or other similar paid leave (e.g., short-term disability leave), provided that such leave maintains the worker's benefits and employment rights and provides at least 90% of the employee's earnings.

**(s) What must I do if the employee consults his or her own HCP?**

**..1910.900(s)(1)**

(s)(1) If you select an HCP to make a determination about temporary work restrictions or work removal, the employee may select a second HCP to review the first HCP's finding at no cost to the employee. If the employee has previously seen an HCP on his or her own, at his or her own expense, and received a different recommendation, he or she may rely upon that as the second opinion;

(s)(2) If your HCP and the employee's HCP disagree, you must, within 5 business days after receipt of the second HCP's opinion, take reasonable steps to arrange for the two HCPs to discuss and resolve their disagreement;

(s)(3) If the two HCPs are unable to resolve their disagreement quickly, you and the employee, through your respective HCPs, must, within 5 business days after receipt of the second HCP's opinion, designate a third HCP to review the determinations of the two HCPs, at no cost to the employee;

(s)(4) You must act consistently with the determination of the third HCP, unless you and the employee reach an agreement that is consistent with the determination of at least one of the HCPs;

(s)(5) You and the employee or the employee's representative may agree on the use of any expeditious alternative dispute resolution mechanism that is at least as protective of the employee as the review procedures in paragraph (s) of this section.

**(t) What training must I provide to employees in my establishment?**

(t)(1) You must provide initial training, and follow-up training every 3 years, for:

(t)(1)(i) Each employee in a job that meets the Action Trigger;

(t)(1)(ii) Each of their supervisors or team leaders; and

..1910.900(t)(1)(iii)

(t)(1)(iii) Other employees involved in setting up and managing your ergonomics program.

(t)(2) The training required for each employee and each of their supervisors or team leaders must address the following topics, as appropriate:

(t)(2)(i) The requirements of the standard;

(t)(2)(ii) Your ergonomics program and the employee's role in it;

(t)(2)(iii) The signs and symptoms of MSDs and ways of reporting them;

(t)(2)(iv) The risk factors and any MSD hazards in the employee's job, as identified by the Basic Screening Tool in Table W-1 and the job hazard analysis;

(t)(2)(v) Your plan and timetable for addressing the MSD hazards identified;

(t)(2)(v) The controls used to address MSD hazards; and

(t)(2)(vii) Their role in evaluating the effectiveness of controls.

(t)(3) The training for each employee involved in setting up and managing the ergonomics program must address the following:

(t)(3)(i) Relevant topics in paragraph (t)(2) of this section;

(t)(3)(ii) How to set up, manage, and evaluate an ergonomics program;

..1910.900(t)(3)(iii)

(t)(3)(iii) How to identify and analyze MSD hazards and select and evaluate measures to reduce the hazards.

(t)(4) You must provide initial training to:

(t)(4)(i) Each employee involved in setting up and managing your ergonomics program within 45 days after you have determined that the employee's job meets the Action Trigger;

(t)(4)(ii) Each current employee, supervisor and team leader within 90 days after you determine that the employee's job meets the Action Trigger;

(t)(4)(iii) Each new employee or current employee prior to starting a job that you have already determined meets the Action Trigger;

(t)(5) You do not have to provide initial training in a topic that this standard requires to an employee who has received training in that topic within the previous 3 years.

(t)(6) You must provide the training required by paragraph (t) of this section in language that the employee understands. You must also give the employee an opportunity to ask questions about your ergonomics program and the content of the training and receive answers to those questions.

**(u) What must I do to make sure my ergonomics program is effective?**

(u)(1) You must evaluate your ergonomics program at least every 3 years as follows:

(u)(1)(i) Consult with your employees in the program, or a sample of those employees, and their representatives about the effectiveness of the program and any problems with the program;

(u)(1)(ii) Review the elements of the program to ensure they are functioning effectively;

**..1910.900(u)(1)(iii)**

(u)(1)(iii) Determine whether MSD hazards are being identified and addressed; and

(u)(1)(vi) Determine whether the program is achieving positive results, as demonstrated by such indicators as reductions in the number and severity of MSDs, increases in the number of problem jobs in which MSD hazards have been controlled, reductions in the number of jobs posing MSD hazards to employees, or any other measure that demonstrates program effectiveness.

(u)(2) You must also evaluate your program, or a relevant part of it, when you have reason to believe that the program is not functioning properly.

(u)(3) If your evaluation reveals deficiencies in your program, you must promptly correct the deficiencies.

**Note to paragraph (u):** The occurrence of an MSD incident in a problem job does not in itself mean that the program is ineffective.

**(v) What is my recordkeeping obligation?**

**(v)(1)** If you have 11 or more employees, including part-time or temporary employees, you must keep written or electronic records of the following:

**(v)(1)(i)** Employee reports of MSDs, MSD signs and symptoms, and MSD hazards,

**(v)(1)(ii)** Your response to such reports,

**(v)(1)(iii)** Job hazard analyses,

**(v)(1)(iv)** Hazard control measures,

**(v)(1)(v)** Quick fix process,

**(v)(1)(vi)** Ergonomics program evaluations, and

**(v)(1)(vii)** Work restrictions, time off of work, and HCP opinions.

**..1910.900(v)(2)**

**(v)(2)** You must provide all records required by this standard, other than the HCP opinions, upon request, for examination and copying, to employees, their representatives, the Assistant Secretary and the Director in accordance with the procedures and time periods provided in § 1910.1020(e)(1), (e)(2)(i), (e)(3), and (f).

**(v)(3)** You must provide the HCP opinion required by this standard, upon request, for examination and copying, to the employee who is the subject of the opinion, to anyone having the specific written consent of the employee, and to the Assistant Secretary and the Director in accordance with the procedures and time periods provided in § 1910.1020(e)(1), (e)(2)(ii), (e)(3), and (f).

**(v)(4)** You must keep all records for 3 years or until replaced by updated records, whichever comes first, except the HCP's opinion, which you must keep for the duration of the employee's employment plus 3 years.

**(v)(5)** You do not have to retain the HCP opinion beyond the term of an employee's employment if the employee has worked for less than one year and if you provide the employee with the records at the end of his or her employment.

**(w) When does this standard become effective?**

This standard becomes effective January 16, 2001.

**(x) When must I comply with the provisions of the standard?**



(x)(1) You must provide the information in paragraph (d) of this section to your employees by October 15, 2001. After that date you must respond to employee reports of MSDs and signs and symptoms of MSDs.

(x)(2) You must meet the time frames shown in Table W-2 for the other requirements of this section, when you have determined that an employee has experienced an MSD incident, in accordance with paragraph (e) of this section.

**TABLE W-2. -- COMPLIANCE TIME FRAMES**

| Requirements and related recordkeeping  | Time frames  |
|---|--|
| Paragraph (e), (f): Determination of Action Trigger.  | Within 7 calendar days after you determine that the employee has experienced an MSD incident.  |
| Paragraphs (p), (q), (r), (s): MSD Management.  | Initiate within 7 calendar days after you determine that a job meets the Action Trigger.   |
| Paragraphs (h) & (i): Management Leadership and Employee Participation.                           | Initiate within 30 calendar days after you determine that a job meets the Action Trigger.  |
| Paragraph (t)(4)(i): Train Employees involved in setting up and managing your ergonomics program. | Within 45 calendar days after you determine that a job meets the Action Trigger.   |
| Paragraph (j): Job Hazard Analysis.   | Initiate within 60 calendar days after you determine that a job meets the Action Trigger.  |
| Paragraph (m)(2): Implement Initial Controls.   | Within 90 calendar days after you determine that a job meets the Action Trigger.   |
| Paragraph (t)(5)(ii): Train current employees, supervisors or team leaders.                       | Within 90 calendar days after you determine that the employee's job meets the Action Trigger.  |
| Paragraph (m)(3): Implement Permanent Controls.   | Within 2 years after you determine that a job meets the Action Trigger, except that initial compliance can take up to January 18, 2005 whichever is later. |
| Paragraph (u): Program Evaluation.  | Within 3 years after you determine that a job meets the Action Trigger.  |

**Note to paragraph (x):** Refer to paragraph (o) of this section for Quick Fix timeframes.

**(y) When may I discontinue my ergonomics program for a job?** You may discontinue your ergonomics program for a job, except for maintaining controls and training related to

those controls, if you have reduced exposure to the risk factors in that job to levels below those described in the Basic Screening Tool in Table W-1.

**(z) Definitions.** The following definitions apply to this standard:

**Administrative controls** are changes in the way that work in a job is assigned or scheduled that reduce the magnitude, frequency or duration of exposure to ergonomic risk factors. Examples of administrative controls for MSD hazards include:

- (1) Employee rotation;
- (2) Job task enlargement;
- (3) Alternative tasks;
- (4) Employer-authorized changes in work pace.

**Assistant Secretary** means the Assistant Secretary of Labor for Occupational Safety and Health, or designated representative.

**Control MSD Hazards:** means to reduce MSD hazards to the extent that they are no longer reasonably likely to cause MSDs that result in work restrictions or medical treatment beyond first aid.

**Director** means the Director of the National Institute for Occupational Safety and Health, U.S. Department of Health and Human Services, or designated representative.

**Employee representative** means, where appropriate, a recognized or certified collective bargaining agent.

**Engineering controls** are physical changes to a job that reduce MSD hazards. Examples of engineering controls include changing or redesigning workstations, tools, facilities, equipment, materials, or processes.

**Follow-up** means the process or protocol an employer or HCP uses to check on the condition of an employee after a work restriction is imposed on that employee.

**Health care professionals (HCPs)** are physicians or other licensed health care professionals whose legally permitted scope of practice (e.g., license, registration or certification) allows them to provide independently or to be delegated the responsibility to carry out some or all of the MSD management requirements of this standard.

**Job** means the physical work activities or tasks that an employee performs. This standard considers jobs to be the same if they involve the same physical work activities or tasks, even if the jobs have different titles or classifications.

**Musculoskeletal disorder (MSD)** is a disorder of the muscles, nerves, tendons, ligaments, joints, cartilage, blood vessels, or spinal discs. For purposes of this standard, this definition only includes MSDs in the following areas of the body that have been associated with

exposure to risk factors: neck, shoulder, elbow, forearm, wrist, hand, abdomen (hernia only), back, knee, ankle, and foot. MSDs may include muscle strains and tears, ligament sprains, joint and tendon inflammation, pinched nerves, and spinal disc degeneration. MSDs include such medical conditions as: low back pain, tension neck syndrome, carpal tunnel syndrome, rotator cuff syndrome, DeQuervain's syndrome, trigger finger, tarsal tunnel syndrome, sciatica, epicondylitis, tendinitis, Raynaud's phenomenon, hand-arm vibration syndrome (HAVS), carpet layer's knee, and herniated spinal disc. Injuries arising from slips, trips, falls, motor vehicle accidents, or similar accidents are not considered MSDs for the purposes of this standard.

**MSD hazard** means the presence of risk factors in the job that occur at a magnitude, duration, or frequency that is reasonably likely to cause MSDs that result in work restrictions or medical treatment beyond first aid.

**MSD incident** means an MSD that is work-related, and requires medical treatment beyond first aid, or MSD signs or MSD symptoms that last for 7 or more consecutive days after the employee reports them to you.

**MSD signs** are objective physical findings that an employee may be developing an MSD. Examples of MSD signs are:

- (1) Decreased range of motion;
- (2) Deformity;
- (3) Decreased grip strength; and
- (4) Loss of muscle function.

**MSD symptoms** are physical indications that an employee may be developing an MSD. For purposes of this Standard, MSD symptoms do not include discomfort. Examples of MSD symptoms are:

- (1) Pain;
- (2) Numbness;
- (3) Tingling;
- (4) Burning;
- (5) Cramping; and
- (6) Stiffness.

**Personal protective equipment (PPE)** is equipment employees wear that provides a protective barrier between the employee and an MSD hazard. Examples of PPE are vibration-reduction gloves and carpet layer's knee pads.

**Problem job** means a job that the employer has determined poses an MSD hazard to employees in that job.

**Risk factor** means, for the purpose of this standard: force, awkward posture, repetition, vibration, and contact stress.

**Work practice controls** are changes in the way an employee performs the physical work activities of a job that reduce or control exposure to MSD hazards. Work practice controls involve procedures and methods for safe work. Examples of work practice controls for MSD hazards include:

- (1) Use of neutral postures to perform tasks (straight wrists, lifting close to the body);
- (2) Use of two-person lift teams;
- (3) Observance of micro-breaks.

**Work-related** means that an exposure in the workplace caused or contributed to an MSD or significantly aggravated a pre-existing MSD.

**Work restriction protection (WRP)** means the maintenance of the earnings and other employment rights and benefits of employees who are on temporary work restrictions. Benefits include seniority and participation in insurance programs, retirement benefits and savings plans.

**Work restrictions** are limitations, during the recovery period, on an employee's exposure to MSD hazards. Work restrictions may involve limitations on the work activities of the employee's current job (light duty), transfer to temporary alternative duty jobs, or temporary removal from the workplace to recover. For the purposes of this standard, temporarily reducing an employee's work requirements in a new job in order to reduce muscle soreness resulting from the use of muscles in an unfamiliar way is not a work restriction. The day an employee first reports an MSD is not considered a day away from work, or a day of work restriction, even if the employee is removed from his or her regular duties for part of the day.

**You** means the employer as defined by the Occupational Safety and Health Act of 1970 (29 U.S.C. 651 et seq.)

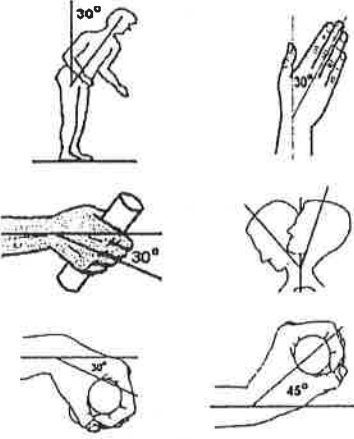
Table W-1 - Basic Screening Tool

You need only review risk factors for those areas of the body affected by the MSD incident.

|   |   | Body Part Associated With<br>MSD Incident |                        |                        |                        |
|---|---|---|------------------------|------------------------|------------------------|
| Risk Factors<br>This Standard<br>Covers | Performing job or<br>tasks that involve:  | Neck/<br>Shoulder                         | Hand/<br>Wrist/<br>Arm | Back/<br>Trunk/<br>Hip | Leg/<br>knee/<br>Ankle |
| <b>Repetition</b>                       | (1) Repeating the same motions every few seconds or repeating a cycle of motions involving the affected body part more than twice per minute for more than 2 consecutive hours in a workday.  | √   | √                      | √                      | √                      |
|   | (2) Using an input device, such as a keyboard and/or mouse, in a steady manner for more than 4 hours total in a workday.  | √   | √                      |                        |                        |
| <b>Force</b>                            | (3) Lifting more than 75 pounds at any one time; more than 55 pounds more than 10 times per day; or more than 25 pounds below the knees, above the shoulders, or at arms' length more than 25 times per day;                        | √   | √                      | √                      | √                      |
|   | (4) Pushing/pulling with more than 20 pounds of initial force (e.g., equivalent to pushing a 65 pound box across a tile floor or pushing a shopping cart with five 40 pound bags of dog food ) for more than 2 hours total per day; | √   | √                      | √                      | √                      |
|   | (5) Pinching an unsupported object weighing 2 or more pounds per hand, or use of an equivalent pinching force (e.g., holding a small binder clip open) for more than 2 hours total per day;   |   | √                      |                        |                        |
|   | (6) Gripping an unsupported object weighing 10 pounds or more per hand, or use of an equivalent gripping force (e.g., crushing the sides of an aluminum soda can with one hand), for more than 2 hours total per day.               |   | √                      |                        |                        |

Table W-1 - Basic Screening Tool - continued

You need only review risk factors for those areas of the body affected by the MSD incident.

| Risk Factors<br>This Standard<br>Covers | Performing job or<br>tasks that involve:  | Body Part Associated With<br>MSD Incident |                        |                        |                        |
|---|---|---|------------------------|------------------------|------------------------|
|   |   | Neck/<br>Shoulder                         | Hand/<br>Wrist/<br>Arm | Back/<br>Trunk/<br>Hip | Leg/<br>knee/<br>Ankle |
| <b>Awkward<br/>Postures</b>             | (7) Repeatedly raising or working with the hand(s) above the head or the elbow(s) above the shoulder(s) for more than 2 hours total per day;  | √   | √                      | √                      |                        |
|   | (8) Kneeling or squatting for more than 2 hours total per day;  |   |                        | √                      | √                      |
|   | (9) Working with the back, neck or wrists bent or twisted for more than 2 hours total per day (see figures:)<br>          | √   | √                      | √                      |                        |
| <b>Contact Stress</b>                   | (10) Using the hand or knee as a hammer more than 10 times per hour for more than 2 hours total per day;  |   | √                      |                        | √                      |
| <b>Vibration</b>                        | (11) Using vibrating tools or equipment that typically have high vibration levels (such as chainsaws, jack hammers, percussive tools, riveting or chipping hammers) for more than 30 minutes total per day; | √   | √                      | √                      |                        |
|   | (12) Using tools or equipment that typically have moderate vibration levels (such as jig saws, grinders, or sanders) for more than 2 hours total per day.   | √   | √                      |                        |                        |

## **What you need to know about Ergonomics and Musculoskeletal Disorders**

**OSHA Requirements.** OSHA requires that all employees receive basic information in ergonomics and the science of reducing work-related musculoskeletal disorders (MSDs). Common MSDs and symptoms can include painful joints; shooting pains; numbness in fingers or toes; back or neck pain; digits turning white; pains in wrists, shoulders, forearms, or knees; stiffness or swelling in arms, legs, or other anatomy.

**Common MSD Diagnoses.** If injuries are work-related, common MSD diagnoses are carpal tunnel syndrome, trigger finger tendonitis, rotator cuff syndrome, sciatica, herniated spinal disk, lower back pain, hand-arm vibration syndrome and carpet layers' knee.

**Reporting MSDs.** Report MSD signs and symptoms early to avoid greater MSD problems later on. Permanent disability may result if the sources of the ailments are not diagnosed. Your employer is required to respond promptly to MSD reports.

*Contact your Safety Officer (Clinic Nurse Coordinator) to report MSD signs, symptoms, or MSD hazards.*

**Some Causes of MSDs.** MSDs are caused by exposure to risk factors such as doing the same motions over and over; forceful exertions to lift or maintain control of heavy objects; awkward postures including bending, kneeling, and repeated or prolonged reaching. Another MSD area, contact stress, may be caused by pressing the body against a hard or sharp edge, placing too much pressure on nerves, tendons, and blood vessels. Vibrating tools can also create MSD nerve damage.

**Response to MSDs.** Employers are required to respond to a work-related MSD within seven days of the employee report. If it is valid, your employer must provide an HCP (health care professional) and reduce work if necessary.

**Ergonomics Information.** A copy of the full Ergonomics Standard 1910.900 and a summary of its requirements for this facility are available from the Safety Officer (Clinic Nurse Coordinator) or the Human Resources Department. It is also available at [www.osha.gov](http://www.osha.gov).

*This information is required by the U.S. Government to be permanently posted in a public place.*

**Prepared by Medical Environment, Inc., April 2001, 800-788-6240.**

