



CAL-OSHA APPROVES HOTEL HOUSEKEEPING SAFETY RULES

California's Division of Occupational Safety and Health ("Cal-OSHA") has approved new regulations to prevent workplace injuries to those working in the housekeeping and hospitality industry.¹

In 2012, UNITE HERE! petitioned Cal-OSHA to create regulations that address occupational housekeeping hazards. These recently approved regulations require hotels to create and implement a housekeeping safety program and conduct periodic trainings that involve room attendants and, where applicable, their Union representatives.

What does this mean for you? While California has not yet finalized the proposed regulations, hotels will likely need to comply with the following requirements in the near future:

- (1) **Musculoskeletal Injury Prevention Program ("MIPP")**: Employers must develop a written program that evaluates each housekeeping task to identify potential hazards. The MIPP may be incorporated into the hotel's existing written Injury and Illness Prevention Program ("IIPP"), or may be maintained as a separate program, and must be accessible to employees.

What does the MIPP include?

- (1) Names or job titles of those responsible for implementing the MIPP;
- (2) system that ensures supervisors and employees comply with the MIPP;
- (3) system for employee communication, including provisions designed to encourage employees to inform the hotel of hazards without fear of reprisal; and
- (4) procedures to investigate injuries in a timely manner, which will require the input of the employee's supervisor and union representative, if any.

¹ California Code of Regulations, Title 8, Section 3345.



- (2) **Annual Worksite Evaluations:** Employers must conduct annual evaluations that assess housekeeping tasks and safe practices, to minimize injuries including, but not limited to, slip, trips, and falls, prolonged or awkward static postures, extreme reaches and repetitive reaches above shoulder height, lifting or forceful body exertions, etc.

Hotels are required to involve housekeepers and their union representative, if any, in designing and conducting this worksite evaluation.

When?

Hotels must conduct the worksite evaluation within 3 months after the effective date of this law or after the opening of a new hotel.

Updates?

The worksite evaluation must be updated annually thereafter or whenever new practices, procedures, equipment, or renovations of guest rooms are introduced such that it will change or increase housekeeping standards.

Notice?

Hotels must then post the results of the evaluation in a conspicuous location or notify room attendants of the results in writing.

- (3) **Trainings:** Hotels must train employees and supervisors on the MIPP. This training must be provided in a language easily understood by those employees. Trainings must include an explanation of the employer's MIPP, process for reporting safety and health concerns, practice regarding the use of equipment and tools, and an opportunity for questions and answers.

When?

The Hotel must conduct trainings when the MIPP is first established and annually thereafter. The Hotel must also conduct trainings when new room attendants or supervisors are hired, when room attendants are given new job assignments, and when new equipment, workplaces, or new potential hazards are introduced.



(4) Notice and Record Retention:

- a. Hotels must keep a copy of the MIPP and evaluation results available for review by employees and their Union representatives, where applicable.
- b. Hotels must create a record of the steps taken to implement and maintain the MIPP.

Stokes Wagner will notify you when these regulations are finalized and the date the regulations become effective. Given that Cal-OSHA has already approved these regulations, we recommend that you start to review your current safety housekeeping practices and determine what new steps are necessary to comply with the above requirements.

As always, Stokes Wagner is here to review your written safety programs or answer any questions that you may have.

