

Ergonomics Program

Purpose

The purpose of this company program is to effectively eliminate or control Work-related Musculoskeletal Disorders (WMSD) and hazards by providing management leadership, recognition & control of hazards and employee involvement in the identification and resolution of hazards and by providing training, medical management and evaluation as an on-going process.

Ergonomics: is the science of fitting jobs to people. Ergonomics encompasses the body of knowledge about physical abilities and limitations as well as other human characteristics that are relevant to job design. Ergonomic design is the application of this body of knowledge to the design of the workplace (i.e., work tasks, equipment, environment) for safe and efficient use by workers. Good ergonomic design makes the most efficient use of worker capabilities while ensuring that job demands do not exceed those capabilities.

Ergonomics program is a **systematic process** for anticipating, identifying, analyzing and controlling WMSD hazards.

A **process** is the activities, procedures, and practices that you set up to control WMSD hazards.

Systematic means these actions are ongoing and conducted on some routine basis that is appropriate to the workplace conditions.

Program Goals

The Primary permanent goals of this program are:

- Reduction in injuries & illnesses
- Reduction in absenteeism
- Reduction in employee turnover
- Increased productivity & quality

Short term goals may be established as a means of meeting the permanent goals

Program Elements

- A. Management Leadership & Employee Participation
- B. Hazard Identification & Information
- C. Job Hazard Analysis & Control
- D. Training
- E. MSD Medical Management
- F. Program Evaluation
- G. Records

Element 1: Management Leadership & Employee Involvement

Policy: Employees are highly encouraged to bring their concerns to supervisors and management. Feed back from employees is an important means of identifying ergonomic hazards. When a WMSD is identified, the Ergonomic Program Coordinator will provide a response and recommended action within 48 hours of receiving notification of the hazards or condition.

Management leadership element must be initiated within 30 calendar days after a determination that a job meets the Action Trigger. Action items include

- A. Assign and communicate responsibilities for setting up and managing the ergonomics program so managers, supervisors and employees know what is expected of them and how they are held accountable for meeting those responsibilities. The assignment of specific responsibilities are published under a separate memorandum.
- B. Provide those persons with the authority, resources, information and training necessary to meet their responsibilities.
- C. Examine existing policies and practices to ensure they encourage reporting and do not discourage the early reporting of MSDs, their signs and symptoms, and MSD hazards; and employee participation in the ergonomics program;
- D. Identify at least one person to:
 - 1. Receive and respond promptly to reports about signs and symptoms of MSDs, MSD hazards and recommendations
 - 2. Take action, where required, to correct identified problems
- E. Communicate regularly with employees about the program and their concerns about MSDs. This shall be accomplished through safety and health committees, postings on employee bulletin boards and routine safety training meetings.

Employee Participation element must be initiated within 30 calendar days after a determination that a job meets the Action Trigger. Employee Participation action items include providing Employees and their designated representative:

- A. A way to promptly report signs and symptoms of WMSDs and WMSD hazards, and to make recommendations about appropriate ways to control them. Reporting procedures include notification of immediate supervisor, ergonomic suggestion forms and medical management forms. Any one of these methods constitute a means of reporting and will require action on the part of the Program Administrator.
- B. Prompt responses to their reports and recommendations. 48 hour response will be provided for all reports of WMSDs and WMSD hazards..

- C. Method for providing employees a summary of the OSHA requirements, and ready access to a copy of the OSHA standard and to information about MSDs, MSD signs and symptoms, MSD hazards, and access to the company ergonomics program
- D. Ways to become involved in developing, implementing and evaluating:
 - 1. Job hazard analysis and control. This is accomplished by participation on safety & health committees, suggestions for supervisors & management, review and comment on existing job hazard analysis and other appropriate means of communication.
 - 2. Training. Feedback from employees on the quality and usefulness of ergonomic training will be reviewed by the program administrator to be used for training modifications to improve effectiveness.
 - 3. The effectiveness of the program and control measures. Safety & Health Committees are the primary means of employee involvement in this area. Additionally, all comments, recommendations and suggestions will be forwarded to the program administrator for action and response comment.

Element 2: Hazard Identification

MSD hazard determination process - A Job Hazard Analysis must be initiated within 60 calendar days after determination that a job meets the Action Trigger. Conduct a job hazard analysis for that job – the 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:

- A. Talk with those employees and their representatives about the tasks the employees perform that may relate to MSDs; and
- B. 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.
- C. Use one or more of the following methods or tools to conduct this analysis:
 - 1. Use one or more of the hazard identification tools
 - 2. Use the occupation-specific hazard identification tool
 - 3. Have a professional trained in ergonomics conduct a job hazard analysis

Determining the Action Trigger - Determination of Action Trigger must be completed within 7 calendar days after determination that the employee has experienced an MSD incident. A job meets the Action Trigger if:

An MSD incident has occurred in that job; and

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

Problem Jobs - For each job for which an MSD hazard has been identified, determine if the MSD hazards pose a risk only to the employee who reported the MSD. If so controls, training and evaluation need only be applied to that individual employee's job.

Element 3: Job Hazard Analysis & Control

Reducing MSD hazards process

- A. Control MSD hazards; or
- B. Reduce MSD hazards in accordance with or to levels below those in the hazard identification tools; or
- C. If the MSD hazard cannot be reduced, do the following:
 1. Reduce MSD hazards to the extent feasible
 2. At least every 3 years, assess the job and determine whether there are additional feasible controls that would control or reduce MSD hazards; and
 3. If such controls exist, implement them until MSD hazards have been reduced
- D. Do the following if a work-related MSD occurs in a job whose hazard(s) have been reduced:
 1. Ensure that appropriate controls are still in place, are functioning, and are being used properly, and
 2. Determine whether new MSD hazards exist and, if so, take steps to reduce the hazards

MSD Hazard Controls

For each problem job, must use feasible engineering, work practice or administrative controls, or any combination, to reduce MSD hazards in the job. Engineering controls are the preferred method of control. Use personal protective equipment (PPE) to supplement engineering, work practice or administrative controls only where other controls are not feasible. Where PPE is used, it will be provide it at no cost to employees.

Steps to reduce MSD hazards

Ask employees in the problem job and their representatives to recommend measures to reduce MSD hazards

Identify and implement initial controls within 90 days after determination that the job meets the Action Trigger. Initial controls mean controls that substantially reduce the exposures.

Identify and implement permanent hazard controls within 2 years after determination that a job meets the Action Trigger, except that initial compliance can take up to January 2005 whichever is later.

Track progress and ensure that 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, the hazard control process to identify additional control measures that are appropriate and implement any measures identified.

Control Methods

Engineering Controls, where feasible, are the preferred method for controlling WMSD hazards. Engineering controls are the physical changes to jobs that control exposure to WMSD hazards. Engineering controls act on the source of the hazard and control employee exposure to the hazard without relying on the employee to take self-protective action or intervention. Examples of engineering controls for WMSD hazards include changing, modifying or redesigning the following:

- Workstations
- Tools
- Facilities
- Equipment
- Materials
- Processes

Work Practice Controls are controls that reduce the likelihood of exposure to MSD hazards through alteration of the manner in which a job or physical work activities are performed. Work practice controls also act on the source of the hazard. However, instead of physical changes to the workstation or equipment, the protection work practice controls provide is based upon the behavior of managers, supervisors and employees to follow proper work methods. Work practice controls include procedures for safe and proper work that are understood and followed by managers, supervisors and employees. Examples of work practice controls for MSD hazards include:

- Safe and proper work techniques and procedures that are understood and followed by managers, supervisors and employees.

- Conditioning period for new or reassigned employees.

- Training in the recognition of MSS hazards and work techniques that can reduce exposure or ease task demands and burdens.

Administrative Controls are procedures and methods, typically instituted by the employer, that significantly reduce daily exposure to MSD hazards by altering the way in which work is performed. Examples of administrative controls for MSD hazards include:

- Employee rotation
- Job task enlargement
- Adjustment of work pace (e.g., slower pace)
- Redesign of work methods
- Alternative tasks
- Rest breaks

Element 4: Training

Employee Training - Employee training must be completed within 45 calendar days after determination of a job that meets the Action Trigger. Training must be provided in language that the employee understands. During each training session, employees must be given an opportunity to ask questions about the ergonomics program and the content of the training and receive answers to those questions. The company will provide initial training, and follow-up training every 3 years, for:

Each employee in a job that meets the Action Trigger

Each of their supervisors or team leaders, and

Other employees involved in setting up and managing the ergonomics program.

Employee Training topics include:

The requirements of the OSHA Standard

The ergonomics program and the employee's role in it

The signs and symptoms of MSDs and ways of reporting them;

The risk factors and any MSD hazards in the employee's job, as identified by the Basic Screening Tool and job hazard analysis

Company plan and timetable for addressing the MSD hazards identified

The controls used to address MSD hazards

Employee's role in evaluating the effectiveness of controls .

Program management training - for employee involved in setting up and managing the ergonomics program must address the following:

Relevant employee training topics

How to set up, manage, and evaluate an ergonomics program

How to identify and analyze MSD hazards and select and evaluate measures to reduce the hazards.

Initial Training is required for

Each employee involved in setting up and managing the ergonomics program within 45 days after a determination that an employee's job meets the Action Trigger

Each current employee, supervisor and team leader within 90 days after determination that an employee's job meets the Action Trigger

Each new employee or current employee prior to starting a job that has a determination that an employee's job meets the Action Trigger

Employee Notification

Ergonomic program information will be posted in a conspicuous place such as employee bulletin boards. Each Employee, within 14 days of hiring, will be provided, in writing, basic information about:

A. Common musculoskeletal disorders (MSDs) and their signs and symptoms

- B. The importance of reporting MSDs and their signs and symptoms early and the consequences of failing to report them early
- C. How to report MSDs and their signs and symptoms
- D. The kinds of risk factors, jobs and work activities associated with MSD hazards
- E. A short description of the requirements of OSHA's ergonomics program standard
- F. The requirements of the OSHA Ergonomic standard.

Element 5: MSD Medical Management

Employee report of an MSD or signs or symptoms

Action: Promptly determine whether the reported MSD or MSD signs or symptoms qualify as an MSD incident. A report is considered to be an MSD incident in the following two cases:

The MSD is work-related and requires days away from work, restricted work, or medical treatment beyond first aid; or

The MSD signs or symptoms are work-related and last for 7 consecutive days after the employee reports them.

MSD Management process - MSD Management must be initiated within 7 calendar days after determination that a job meets the Action Trigger.

A. Provide the employee with prompt and effective MSD management at no cost to the employee. MSD management does not include medical treatment, emergency or post-treatment procedures. MSD management includes:

1. Access to a Health Care Professional (HCP);
2. Any necessary work restrictions, including time off work to recover;
3. Work restriction protection; and
4. Evaluation and follow-up of the MSD incident.

B. Obtain a written opinion from the HCP for each evaluation and provide a copy to the employee. 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.

C. Whenever an employee consults an HCP for MSD management, the company will provide the HCP with the following:

1. A description of the employee's job and information about the physical work activities, risk factors and MSD hazards in the job
2. A copy of this standard
3. A list of information that the HCP's opinion must contain.

Information the HCP's opinion must contain

- A. 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
- B. Any recommended work restrictions, including, if necessary, time off work to recover, and any follow-up needed
- C. 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
- D. A statement that the HCP has informed the employee about work-related or other activities that could impede recovery from the injury.

Temporary work restrictions

- A. If an employee experiences an MSD incident in a job that meets the Action Trigger, the employee will be provided with temporary work restrictions or time off work that the HCP determines to be necessary, or if no HCP was consulted, apply those that are determine to be necessary.
- B. Whenever limitations are placed on the work activities of an employee in his or her current job or an employee is transferred to a temporary alternative duty job, provide the 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:
- C. The employee is able to resume the former work activities without endangering his or her recovery, or
- D. 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
- E. 90 calendar days have passed.

Whenever an employee must take time off from work under this program, the employee will be provided 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:

The employee is able to return to the former job without endangering his or her recovery
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
90 calendar days have passed.

Participation in WRP - For an employee to participate in the provision of WRP, the employee must participate in the company MSD management program. Providing 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. The company 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.

Second HCP Opinions & Resolutions

If the company selects 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.

If the company selected HCP and the employee's HCP disagree, the company 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

If the two HCPs are unable to resolve their disagreement quickly, the company and the employee, through the 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

The company must act consistently with the determination of the third HCP, unless the company and the employee reach an agreement that is consistent with the determination of at least one of the HCPs;

The company 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 paragraphs above.

The company will make available prompt and effective medical management whenever an employee has a MSD. (This means that when an employee reports signs or symptoms of a MSD. All reports will be processed to determine whether medical management is necessary). Medical management, including recommended work restrictions, will be provided at no cost to the employee. Medical treatment protocols for MSDs will be established by the health care professions.

Element 6: Program Evaluation

If evaluation reveals deficiencies in the program, the deficiencies must be promptly corrected. Program evaluation is required:

- A. Within 3 years after determination that a job meets the Action Trigger
- B. When there is reason to believe that the program is not functioning properly.
- C. At least every 3 years as follows:
 - Consult with 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
 - Review the elements of the program to ensure they are functioning effectively
 - Determine whether MSD hazards are being identified and addressed
 - 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 other measure that demonstrates program effectiveness.

Element 7: Recordkeeping

The following written or electronic records will be kept

- A. Employee reports of MSDs, MSD signs and symptoms, and MSD hazards
- B. Company response to such reports
- C. Job hazard analyses
- D. Hazard control measures
- E. Quick fix process
- F. Ergonomics program evaluations
- G. Work restrictions, time off of work, and HCP opinions

All records required by the OSHA standard, other than the HCP opinions, upon request, for examination and copying, will be provided to employees, their representatives.

All HCP opinions required by the OSHA standard will be provided to the subject employee or to anyone having the specific written consent of the employee, upon request, for examination and copying.

All records will be kept for 3 years or until replaced by updated records, whichever comes first, except the HCP's opinion, which must keep for the duration of the employee's employment plus 3 years.

HCP opinions need not be retained beyond the term of an employee's employment if the employee has worked for less than one year and if the employee is provided with the records at the end of his or her employment.

Definitions

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.

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.

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.