OSHA's Ergonomics Program Standard

Work-related musculoskeletal disorders (MSDs) result when there is a mismatch between the physical capacity of workers and the physical demands of their jobs. Each year 1.8 million workers in the United States report work-related MSDs such as carpal tunnel syndrome, tendonitis and back injuries. About 600,000 MSDs are serious enough to result in workers having to take time off work to recover. The solution to these injuries lies with ergonomics, the science of fitting the job to the worker. OSHA's final ergonomics program standard will significantly reduce the number and severity of MSDs caused by exposure to risk factors in the workplace.

Who's Covered?

- All general industry employers are covered by the standard.
 - However, the standard does not apply to employers covered by OSHA's construction, maritime or agricultural standards, or employers who operate a railroad.

What are the Benefits?

- 4.6 million MSDs will be prevented in the first ten years.
- 102 million workers at 6.1 million worksites will be protected.
- \$9.1 billion average savings annually.
- \$27,700 savings in direct costs for each MSD prevented.

What are the Costs?

- Employers will pay \$4.5 billion annually.
- Fixing an individual workstation averages \$250 per year.

What is a Musculoskeletal Disorder?

An MSD is a disorder of the muscles, nerves, tendons, ligaments, joints, cartilage, blood vessels, or spinal discs. Workplace MSDs are caused by exposure to the following risk factors: repetition, force, awkward postures, contact stress, and vibration.

• The ergonomics standard 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.

• The standard does not address injuries caused by slips, trips, falls, vehicle accidents, or similar accidents.

What does the standard require?

- All employers must provide employees basic information about:
 - Common MSDs and their signs and symptoms.
 - The importance of reporting MSDs, and signs and symptoms, as soon as possible.
 - How to report MSDs in the workplace.
 - Risk factors, job and work activities associated with MSD hazards.
 - A brief description of OSHA's ergonomics standard.
- No further action is needed until/unless an employee reports an MSD or persistent signs or symptoms of an MSD.

Employer requirements once an MSD has been reported.

- Promptly determine whether MSD or its signs or symptoms is an MSD incident. Employers may request assistance of a health care professional to make that determination.
 - An MSD incident means an MSD is work-related, and requires days away from work, restricted work, or medical treatment beyond first aid, or the signs or symptoms last for seven (7) or more consecutive days after reporting.
- Determine whether the MSD incident meets the standard's "Action Trigger."

Action Trigger

Employers must review the worker's job to determine whether it routinely involves exposure to one or more of the five ergonomic risk factors on one or more days a week.

The standard includes a "Basic Screening Tool"-- a two-page checklist that identifies the five risk factors that could lead to an MSD hazard. These risk factors are:

- Repetition e.g., repeating the same motions every few seconds for 2 hours at a time, or using a device (such as a keyboard and/or mouse) steadily for more than 4 hours daily.
- Force e.g., lifting more than 75 pounds at any one time, or pushing/pulling with more than 20 pounds of initial force (such as pushing a 65 pound box across a tile floor for more than two hours per day).
- Awkward Postures e.g., repeatedly raising or working with the hands above the head for more than two hours a day, or working with the back, neck or wrists bent for more than two hours total per day.
- Contact Stress e.g., using the hand or knee as a hammer more than ten times art hour for more than two hours total per day.
- *Vibration* e.g., using tools or equipment that typically have high vibration levels (such as chainsaws, jack hammers, percussive tools) for more than 30 minutes per day or tools with moderate vibration levels (such as jig saws, grinders, etc.) for more than two hours per day.

Employer's responsibilities if job meets "Action Trigger"

Employers can use a "Quick Fix" option, and not implement a complete program, for problems that can be resolved in 90 days in a job where only one MSD has occurred, and where no more than two MSDS have been reported in the preceding 18 months. If the problem cannot be corrected in 90 days, employers must develop and implement a full ergonomics program for that job and others just like it with the following elements:

Management Leadership and Employee Participation

- Assign and communicate responsibilities for setting up and managing the ergonomics program.
- Provide designated persons with authority, resources and information necessary to meet responsibilities.
- Ensure company policies and practices encourage employee participation in the program, as well as early reporting of MSDs, their signs and symptoms and hazards.
- Have ways for employees to report MSDs and promptly respond to those reports.
- Ensure employees are included in the development, implementation and evaluation of company's ergonomics program.

Job Hazard Analysis and Control

- Include all employees who perform the same job where an MSD exists, and observe employees performing the job.
- Use one or more of the job hazard analysis tools provided in the standard (Appendix D), or any other reasonable method appropriate to the job and relevant to risk factors being addressed.
- Fix problem jobs to control hazards or reduce them to the extent feasible.

Training

- Provide initial training for employees, supervisors and team leaders within 90 days after employee's job meets the Action Trigger.
- Provide initial training to each employee involved in setting up and managing an ergonomics program within 45 days after an employee's job has met the Action Trigger. Training will include MSD signs, symptoms and hazards, reporting MSDs, the ergonomics program, and how to implement and evaluate controls used to address hazards.
- Provide follow-up training every three years.

MSD Management

 Provide, at no cost to employee, access to a health care professional, evaluation and follow-up of an MSD incident, and any temporary work restrictions determined to be necessary.

Work Restriction Protection (WRP)

WRP must be provided to employees who receive temporary work restrictions. This includes maintaining 100% of earnings and full benefits for employees who require limitations on their work activities or temporary alternate duty. Employees removed from work will receive 90% of earnings and 100% of benefits. WRP benefits last until either: (1) the employee is safely able to return to work; or (2) a health care professional determines the employee

can never return to the former job; or (3) 90 calendar days have passed, whichever comes first.

 Standard allows for an employee to receive a second opinion from his/her own health care professional about the need for work restrictions, and a dispute resolution process.

Program Evaluation

- Evaluate the ergonomics program at least every three years.
- Correct any deficiencies found in the program.
- Involve employees in the evaluation.

Recordkeeping

- Employers with 11 or more employees (including part-time or temporary) must keep written or electronic records for three years or until replaced by updated records.
- Grandfather Clause Employers who currently have ergonomics programs in place may continue to implement their program instead of complying with this standard, provided the following criteria are met:
 - Program is written and was implemented before November 14, 2000.
 - Program elements include management leadership, employee participation and job hazard analysis and control, training, and program evaluation.
 - An MSD management policy must be implemented by January 16, 2002.

When is the standard effective?

• Standard is effective on Jan. 16, 2001

What are the specific compliance dates?

Employers must begin to distribute information on the standard to employees and begin receiving and responding to reports of injuries not later than October 14, 2001. Employers must also meet the following time frames for specific requirements of the standard:

- Determination of Action Trigger within seven calendar days after employee has experienced an MSD.
- *MSD Management* within seven calendar days after the determined job meets the Action Trigger.
- Management Leadership and Employee Participation within 30 calendar days after job meets Action Trigger.
- Train employees involved in setting up and managing ergonomics program within 45 calendar days after job meets Action Trigger.
- Train current employees, supervisors or team leaders within 90 calendar days after job meets Action Trigger.
- Job Hazard Analysis within 60 calendar days after job meets Action Trigger.
- Implement Initial Controls within 90 calendar days after job meets Action Trigger.
- Program Evaluation within three years after job meets Action Trigger.
- Implement Permanent Controls Not later than January 18, 2005.