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improve the health and safety  
of workers and the community.*

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December 10, 2015

Amalia Neidhart  
CA Division of Occupational Safety and Health  
2424 Arden Way, Ste 445  
Sacramento, CA 95825

**Re: Hotel Housekeeping Musculoskeletal Injury Prevention Draft**

Dear Amalia,

The California Industrial Hygiene Council (CIHC) respectfully submits the following comment regarding the Hotel Housekeeping Musculoskeletal Injury Prevention draft language dated 3 Dec 2015. CIHC believes housekeepers in hotels and other lodging establishments should be protected from ergonomic risk factors and we applaud Cal/OSHA for its continued effort to prevent workplace musculoskeletal disorders (WMSDs). We also believe a well-executed workplace evaluation is a key element for success. Since a single, validated, worksite evaluation tool is not required in the draft, we recommend the following language be added to help ensure quality evaluations are performed:

*(c)(4)(F) The worksite evaluation shall be performed by a competent observer who understands housekeeping work procedures, potential injury risks to housekeepers, and the principles of risk assessment and control. Complex worksite evaluations may require the assistance of a qualified professional such as a certified industrial hygienist, certified safety professional, certified industrial ergonomist, or certified professional ergonomist.*

Note the proposed language incorporates terms already used in 8CCR3203, "Injury and Illness Prevention Program", Model Programs and California Labor Code, section 6401.7(l).

Founded in 1990, CIHC represents the occupational and environmental health profession in California and is affiliated with the American Industrial Hygiene Association (AIHA), a 10,000 member national organization, as well as the International Occupational Hygiene Association (IOHA), which represents the global community of Occupational Hygiene organizations in over 34 countries. Please refer to [www.cihconline.com](http://www.cihconline.com) for further information about CIHC.

We appreciate the opportunity to comment. Should you have any questions, please contact Nola J. Kennedy, Ph.D., CIH (818-677-2347) or me with any questions.

Regards,

Ed Klinenberg

A handwritten signature in black ink that reads "Edward J. Klinenberg". The signature is written in a cursive, flowing style.

Edward J. Klinenberg, Ph.D., CIH

President, CIHC

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