



Ergonomics

Real People Real Problems Real Solutions

Ergonomics—Who's Covered?

OSHA's ergonomics proposal focuses on jobs in general industry where the problem of work-related musculoskeletal disorders is severe and solutions to fix those jobs are well understood. Agriculture, construction and maritime jobs are to be covered in future rulemaking.

The proposal calls for ergonomics programs for individual jobs rather than entire workplaces. Jobs involving manual handling or manufacturing production are automatically covered. About 28 percent of general industry workers are employed in these jobs, but 60 percent of the work-related musculoskeletal disorders (MSD) occur among them. Other jobs where MSDs occur are also covered by the proposed rule.

Employers with manual handling or manufacturing production jobs would need to establish a basic ergonomics program for workers in these jobs. A basic program calls for someone to be responsible for the ergonomics program, provision of information to employees and a reporting system for employees to report signs and symptoms of MSDs with prompt response to reports. About 1.6 million employers would need to implement basic programs initially.

Covered Jobs

Manual handling jobs include activities such as handling patients; sorting, handling and delivering packages; handling baggage; manually picking and placing items in a warehouse; handling and delivering beverages; bagging and stocking in grocery stores; and collecting garbage.

Manufacturing jobs include working on an assembly line, doing piecework on an assembly line, inspecting products; cutting and packing meat, poultry and fish; operating or loading and unloading machines; baking in a commercial bakery; making cabinets; building tires; and manufacturing apparel.

Other jobs with MSDs are jobs where a covered MSD occurs after the final standard is effective.

If a covered musculoskeletal disorder occurs, an employer would need to implement either a full ergonomics program for that job or a Quick Fix. Quick Fix is appropriate if the job can be fixed in 90 days. In addition to the basic program, full programs include job hazard analysis and control, training, MSD management, program evaluation and recordkeeping. The proposal includes a grandfather clause for employers that have already developed, implemented and evaluated ergonomics programs that meet the basic obligations of the final standard.



Covered MSDs

A covered MSD is an OSHA recordable MSD that is directly related to the physical work activities of the job the employee performs. An MSD is recordable when it is diagnosed by a health care professional, when an employee reports an objective MSD sign or when an employee has an MSD symptom, plus medical treatment, days away from work, restricted work or job transfer/rotation. MSD signs include decreased grip strength or range of motion, deformity or loss of function. MSD symptoms include numbness, tingling, pain, burning and cramping.

Covered MSDs also must be directly related to the physical work activities the injured employee performs **AND** specifically connected to the physical work activities that form a core or a significant part of the employee's job.

Covered MSDs in Manufacturing and Manual Handling Jobs

Because of the high rate and concentration of MSDs in manufacturing and manual handling jobs, employers with these jobs must take action to fix jobs not only when a covered MSD occurs but also at an earlier point: when an employee reports an MSD symptom that persists for at least 7 days after it is reported and the employer has been provided with knowledge from an objective source that MSD hazards exist in the job. Sources might include insurance companies, consultants, health care professionals and persons who are involved in managing the ergonomics program. As with other covered MSDs, the symptoms reported must also be directly related to the physical work activities the injured employee performs **AND** be specifically connected to the physical work activities that form a core or a significant part of the employee's job.

Single MSD Trigger

Using one work-related MSD to trigger the full standard is an objective approach that reflects the current practice of many employers with effective ergonomics programs. It reduces the burden on employers by limiting the number of jobs that must be addressed at one time and minimizes costs for employers who have isolated or limited problems.

OSHA considered a variety of triggers involving multiple MSDs or longer periods of time. However, the agency found these alternatives not sufficiently protective for workers. Many preventable MSDs would occur before employers would need to take action. Multiple-year or multiple-MSD triggers could result in a 30-year phase-in of the standard for small businesses. Further, employers would still incur expenses to provide work restriction protection for injured employees to give them time off work to recover.

Some stakeholders encouraged OSHA to propose a more protective trigger such as implementing ergonomics programs based on reported signs and symptoms of MSDs or job hazard analyses. However such a trigger may be more difficult to implement and more burdensome for employers. Therefore, OSHA is using actual injuries to trigger the requirements of the standard for the 75 percent of general industry employers without manual handling or manufacturing production jobs.