



Real Solutions

Flexibility in OSHA's Ergonomics Proposal

One of OSHA's commitments in developing an ergonomics program standard was to avoid a one-size-fits-all approach. OSHA's proposal seeks to maximize flexibility and minimize compliance requirements for employers while at the same time mandating effective protection for workers. The agency wants to encourage employers to tailor ergonomics programs to fit their circumstances. That is one of the reasons OSHA decided the standard should focus on specific jobs rather than whole worksites.

The proposed standard is designed to provide employers with a broad array of options. For example, employers can:

- Continue their current effective ergonomics effort under the grandfather clause, provided they meet requirements for the basic obligations of the standard.
- Use the Quick Fix option to eliminate MSD hazards in lieu of implementing a full ergonomics program.
- Establish ergonomics programs only for those specific jobs where injuries occur–not the whole facility.
- Limit their efforts to the injured employee if they show that MSD hazards do not pose a problem for other employees in the same job.
- Reduce MSD hazards using any combination of engineering, work practice and administrative controls instead of engineering controls alone.
- Use an incremental abatement process-try one control to materially reduce the hazard and wait to see if that works. Add other controls one by one if needed.
- Discontinue major parts of their ergonomics program if no MSDs are reported in a problem job within 3 years after it is fixed.
- Opt not to keep records if they have 10 or fewer employees.
- Have a good working program to respond quickly to problems, but to be in compliance employers need not necessarily have eliminated all MSDs.
- Phase in compliance over 3 years.

