

## **Non-Mandatory Appendix A to §1910.900: Ergonomics Program Elements**

Note: The elements of an ergonomics program contained here are consistent with and somewhat redundant of those contained in the mandatory part of this standard. The intent is that anything contained in this appendix that is not in the mandatory part of the standard is not mandatory.

### **Elements of a complete ergonomics program.**

A full “ergonomics” program normally consists of these six program elements:

- (a) Management Leadership and Employee Participation;
- (b) Hazard Information and Reporting;
- (c) Job Hazard Analysis and Control;
- (d) Training;
- (e) “MSD Management,” and
- (f) Program Evaluation.

### **MANAGEMENT LEADERSHIP AND EMPLOYEE PARTICIPATION**

#### **Basic obligation:**

Demonstrate management leadership of the ergonomics program. Employees (and their designated representatives) have ways to report “MSD signs” and “MSD symptoms;” get responses to reports; and be involved in developing, implementing and evaluating each element of the program. Policies or practices that discourage employees from participating in the program or from reporting MSDs signs or symptoms should not be present.

#### **Management leadership**

- (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 will be held accountable for meeting those responsibilities;
- (b) Provide those persons with the authority, resources, information and training necessary to meet their responsibilities;
- (c) Examine existing policies and practices to ensure that they encourage and do not discourage reporting and participation in the ergonomics program; and
- (d) Communicate periodically with employees about the program and their concerns about MSDs.

### **Ways for employees to participate in the ergonomics program**

Employees (and their designated representatives) are given:

- (a) A way to report MSD signs and symptoms;
- (b) Prompt responses to their reports;
- (c) Access to information about the ergonomics program; and
- (d) Ways to be involved in developing, implementing and evaluating each element of the ergonomics program.

## **HAZARD INFORMATION AND REPORTING**

### **Basic obligation**

Set up a way for employees to report MSD signs and symptoms and to get prompt responses. Evaluate employee reports of MSD signs and symptoms to determine whether a covered MSD has occurred. Periodically provide information to employees that explains how to identify and report MSD signs and symptoms.

### **Information to be provided to employees**

- (a) Common MSD hazards;
- (b) The signs and symptoms of MSDs, and the importance of reporting them early;
- (c) How to report MSD signs and symptoms; and
- (d) A summary of the requirements of this standard.

### **Setting up a reporting system**

- (a) Identify at least one person to receive and respond to employee reports, and to take the action this standard requires.
- (b) Promptly respond to employee reports of MSD signs or symptoms in accordance with this standard.

## **JOB HAZARD ANALYSIS AND CONTROL**

### **Basic obligation**

Analyze the problem job to identify the “ergonomic risk factors” that result in MSD hazards. Eliminate the MSD hazards, reduce them to the extent feasible, or materially reduce them using an incremental abatement process.

### **Problem job analysis**

- (a) Include in the job hazard analysis all of the employees in the problem job or those who represent the range of physical capabilities of employees in the job;
- (b) Ask the employees whether performing the job poses physical difficulties and, if so, which physical work activities or conditions of the job they associate with the difficulties;
- (c) Observe the employees performing the job to identify which physical work activities, workplace conditions and ergonomic risk factors are present;
- (d) Evaluate the ergonomic risk factors in the job to determine the MSD hazards

associated with the covered MSD. As necessary, evaluate the duration, frequency and magnitude of employee exposure to the risk factors.

**Hazard control steps to follow**

- (a) Ask employees in the problem job for recommendations about eliminating or materially reducing the MSD hazards;
- (b) Identify, assess and implement feasible controls (interim and/or permanent) to eliminate or materially reduce the MSD hazards. This includes prioritizing the control of hazards, where necessary;
- (c) Track progress in eliminating or materially reducing the MSD hazards. This includes consulting with employees in problem jobs about whether the implemented controls have eliminated or materially reduced the hazards; and
- (d) Identify and evaluate MSD hazards when change, design or purchase equipment or processes in problem jobs occurs.

**Kinds of controls to use**

- (a) Use any combination of “engineering,” “administrative” and/or “work practice controls” to eliminate or materially reduce MSD hazards. Engineering controls, where feasible, are the preferred method for eliminating or materially reducing MSD hazards. However, administrative and work practice controls also may be important in addressing MSD hazards.
- (b) “Personal protective equipment” (PPE) may be used to supplement engineering, work practice and administrative controls, but are usually not used alone where other controls are not feasible.

**The “incremental abatement process” for materially reducing MSD hazards**

- (a) When a covered MSD occurs, implement one or more controls that materially reduce the MSD hazards; and
- (b) If continued exposure to MSD hazards in the job prevents the injured employee’s condition from improving or another covered MSD occurs in that job, implement additional feasible controls to materially reduce the hazard further; and
- (c) Stop putting in further controls if the injured employee’s condition improves and no additional covered MSD occurs in the job.
- (d) If the employee’s condition does not improve or another covered MSD occurs, continue this incremental abatement process if other feasible controls are available.
- (e) If the point of “to the extent feasible” has been reached, then periodically look to see whether additional controls are now feasible and, if so, implement them promptly.

## TRAINING

### Basic obligation

Provide training to employees so they know about MSD hazards and the ergonomics program and measures for eliminating or materially reducing the hazards. Training should be provided initially, periodically, and at least every 3 years at no cost to employees.

### Employees to be trained

- (a) Employees in problem jobs;
- (b) Supervisors of employees in problem jobs; and
- (c) Persons involved in setting up and managing the ergonomics program, except for any outside consultant that may be used.

### Training topics to cover

<b>PROVIDE TRAINING FOR...</b>	<b>SO THAT THEY KNOW...</b>
(a) Employees in problem jobs and their supervisors	<ul style="list-style-type: none"> <li>(1) How to recognize MSD signs and symptoms;</li> <li>(2) How to report MSD signs and symptoms, and the importance of early reporting;</li> <li>(3) MSD hazards in their jobs and the measures they must follow to protect themselves from exposure to MSD hazards;</li> <li>(4) Job-specific controls implemented in their jobs;</li> <li>(5) The ergonomics program and their role in it; and</li> <li>(6) The requirements of this standard.</li> </ul>
(b) Persons involved in setting up and managing the ergonomics program	<ul style="list-style-type: none"> <li>(1) The subjects above;</li> <li>(2) How to set up and manage an ergonomics program;</li> <li>(3) How to identify and analyze MSD hazards and measures to eliminate or materially reduce the hazards; and</li> <li>(4) How to evaluate the effectiveness of ergonomics programs and controls.</li> </ul>

### Insuring that employees understand the training

Provide training and information in language that employees understand. Give employees an opportunity to ask questions and receive answers.

## When to train employees

IF YOU HAVE...	PROVIDE TRAINING AT THESE TIMES...
(a) Employees in problem jobs and their supervisors	(1) When a problem job is identified; (2) When initially assigned to a problem job; (3) Periodically as needed (e.g., when new hazards are identified in a problem job or changes are made to a problem job that may increase exposure to MSD hazards); and (4) At least every 3 years.
(b) Persons involved in setting up and managing the ergonomics program	(1) When they are initially assigned to setting up and managing the ergonomics program; (2) Periodically as needed (e.g., when evaluation reveals significant deficiencies in the program, when significant changes are made in the ergonomics program); and (3) At least every 3 years.

## MSD MANAGEMENT

### Basic obligation

Make MSD management available promptly whenever a covered MSD occurs. Provide MSD management at no cost to employees. Provide employees with the temporary “work restrictions” when required and when feasible and available.

### How to make MSD management available

- (a) Respond promptly to employees with covered MSDs to prevent their condition from getting worse;
- (b) Promptly determine whether temporary work restrictions or other measures are necessary;
- (c) When necessary, provide employees with prompt access to a “health care professional” (HCP) for evaluation, management and “follow-up;”
- (d) Provide the HCP with the information necessary for conducting MSD management; and
- (e) Obtain a written opinion from the HCP and ensure that the employee is also promptly provided with it.

**Information to provide to the health care professional**

- (a) A description of the employee's job and information about the MSD hazards in it;
- (b) A description of available work restrictions that are reasonably likely to fit the employee's capabilities during the recovery period;
- (c) Opportunities to conduct workplace walkthroughs.

**Temporary work restrictions**

- (a) *Work restrictions.* Provide temporary work restrictions, where necessary and available, to employees with covered MSDs. Where the employee has been referred to a HCP, follow the temporary work restriction recommendations in the HCP's written opinion;
- (b) *Follow-up.* Ensure that appropriate follow-up is provided during the recovery period; and

**PROGRAM EVALUATION****Basic obligation?**

Establish measures of performance and evaluate the ergonomics program periodically, and at least every 3 years, to ensure that it is in compliance with this standard.

**Evaluation steps**

- (a) Determine the values of the measures established for program evaluation;
- (b) Consult with employees in problem jobs to assess their views on the effectiveness of the program and to identify any significant deficiencies in the program;
- (c) Evaluate the elements of the program to ensure they are functioning properly; and
- (d) Evaluate the program to ensure it is eliminating or materially reducing MSD hazards.

**Deficiencies**

Promptly take action to correct those deficiencies so that the program is in compliance with this standard.