

## **Non-Mandatory Appendix E to §1910.900: Summary of the MSD/Ergonomics Program Standard**

### **Purpose:**

The purpose of this standard to reduce musculoskeletal disorders (MSDs) developed by workers whose jobs involve tasks that lead to MSDs. The principle behind ergonomics is that by fitting the job to the worker through work design, exposures to MSD hazards can be reduced to the point that the probability of developing an MSD is reduced. Where the job or specific tasks cannot be sufficiently redesigned to reduce that probability, rotation between jobs can reduce it. It is not foreseeable that MSDs will be eliminated.

### **Coverage:**

All employers who have a job with a covered MSD are required to abide by this standard.

### **Employer obligations:**

When a worker reports an MSD, the employer must determine whether the reported MSD is a covered MSD. A covered MSD is one that requires days away from work, restricted work, or medical treatment beyond first aid and the employee's job routinely involves, on one or more days a week, exposure to one or more relevant risk factors at or above the levels described in the Basic Screening Tool in Table 1.

If it is determined that a covered MSD has occurred, the employer must ensure that:

- (1) employees and their supervisors are informed about common MSD hazards, the signs and symptoms of MSDs, the importance of reporting them early, and how to report MSD signs and symptoms;
- (2) reporting of MSDs is facilitated and not discouraged and that those reporting MSDs receive appropriate MSD management;
- (3) MSD management is initiated promptly;
- (4) MSD hazards are identified, analyzed, and modified and that progress on each hazard is tracked for effectiveness;
- (5) the program is evaluated for its effectiveness;
- (6) corrective action is taken when deficiencies in the program are found; and
- (7) the employer must not have policies or practices that discourage employees from participating in the program or from reporting MSDs signs or symptoms.

### **Pre-existing programs:**

The employer may continue an existing program if it was in place prior to this standard taking effect, it has been evaluated consistent with this standard and found to be functioning properly, and the recordkeeping is consistent with this standard.

### **Quick Fix:**

A Quick Fix may be used to abate an MSD hazard quickly and completely. MSD management

must be made available, the fix must be implemented within 90 days, records kept, and MSD hazard information must be made available to involved employees. If an adequate quick fix is implemented, an MSD/Ergonomics program need not be implemented.

**Job Hazard Analysis and Control:**

The employer must eliminate the hazard or reduce it to the extent feasible by using any of a variety of controls. The employer may eliminate or materially reduce the MSD hazards in an incremental manner. That is, the employer may implement one or more controls that reduce the duration, frequency, and/or magnitude of the exposure to MSD hazards and wait to see if they have worked.

At this time there is one “safe harbor” (Appendix D) in which jobs meeting the criteria of the safe harbor materials are in compliance with the standard regardless of the injury and illness data.

**Training:**

The employer must provide training to employees in jobs that have a covered MSD, their supervisors or team leaders and other employees involved in setting up and managing the ergonomics program.

**MSD Management:**

Employees must be provided, at no cost, with prompt access to a Health Care Professional (HCP), evaluation and follow-up of a covered MSD, and any temporary work restrictions that the employer or the HCP determine to be necessary and available. Temporary work restrictions include limitations on the work activities of the employee in his or her current job, transfer of the employee to a temporary alternative duty job, or temporary removal from work.

**Program Evaluation:** The employer must evaluate the ergonomics program to make sure it is effective. The employer must ask employees what they think of it, check to see if hazards are being addressed, and make any necessary changes. The employer must evaluate the status and progress of the program using one or more activity measures and one or more outcome measures. Program deficiencies must be corrected.

**Recordkeeping:** Employers must keep written or electronic records of employee reports of MSDs, covered MSDs, MSD hazards, responses to such reports, job hazard analyses, hazard control measures, MSD/ergonomics program evaluations, and records of work restrictions and the HCP’s written opinions.

**The full MSD/Ergonomics Standard can be consulted for more complete information.**