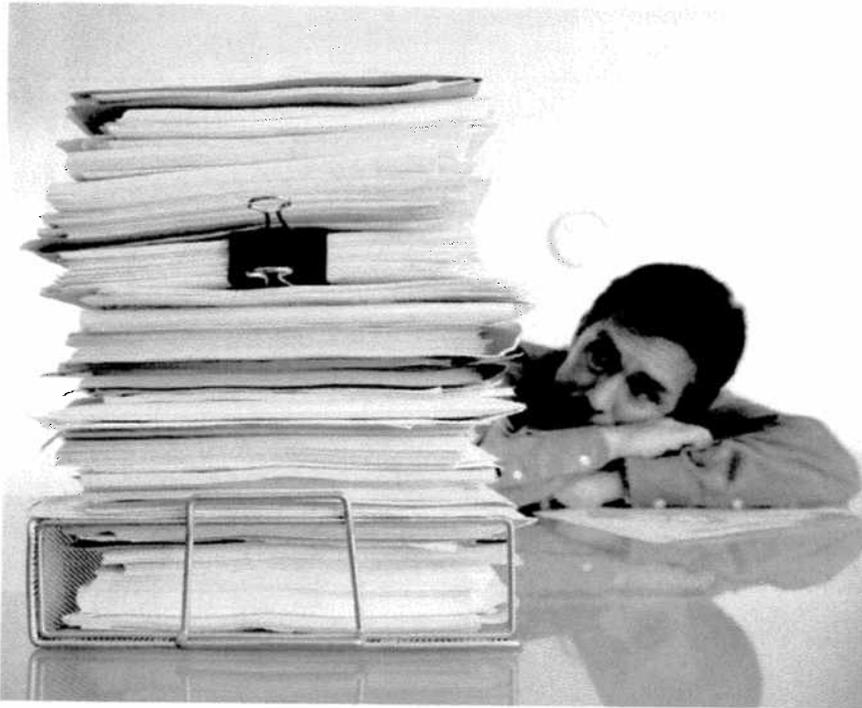


MIOSHA Proposed Ergonomics Standard in Michigan



**Draft Rule 17 (1-14-2009)
Appendix Final Draft 9 (10-28-2008)**

**A Business Community Briefing from the
National Federation of Independent Business**

NFIB[®]

MICHIGAN OSHA DRAFT #17
January 14, 2009

ERGONOMICS IN GENERAL INDUSTRY

GENERAL PROVISIONS

Section A

Scope and application.

(1) These rules establish the minimum requirements for all general industry employers that have employees with exposure to ergonomic hazards. These rules establish the minimum requirements for awareness training and the process for assessing and responding to ergonomic occupational risk factors.

(2) These rules do not apply to any of the following:

- (a) Construction.
- (b) Agriculture.
- (c) Mining.
- (d) Domestic employment.
- (e) Jurisdiction covered exclusively by the Federal Railroad

Administration.

Section B

Definitions.

(1) "Ergonomic hazards" means conditions where intervention may be necessary to prevent a musculoskeletal disorder. Such conditions can be identified by an assessment of ergonomic occupational risk factors and reports of signs and symptoms.

(2) "Ergonomics" means the practice of designing or modifying jobs, workplaces, equipment, work methods, and tools to match the capabilities of the worker.

(3) "Ergonomic occupational risk factors" means characteristics of a work situation that may contribute to a musculoskeletal disorder. These risk factors may be characteristics of the workplace, tasks, or individual work practices.

Section C

Training.

(1) All employees shall be given ergonomic awareness training that covers all of the following:

- (a) Ergonomic occupational risk factors.
- (b) Signs/symptoms that indicate an ergonomic hazard may be present.
- (c) Process for reporting that an ergonomic hazard may be present.
- (d) Process for assessing and responding to ergonomic occupational risk

factors.

(2) Records to document training shall be kept.

(3) An employer may accept previous training through documentation for (1)(a) and (b).

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(4) This rule will take effect 6 months after being filed with the Secretary of State.

See appendix for assistance.

Section D

Process for Assessing and Responding to Ergonomic Occupational Risk Factors.

(1) An employer shall establish and utilize an effective process that includes the following:

- (a) Employee involvement.
- (b) Assessment of ergonomic occupational risk factors.
- (c) Elimination, reduction, or control of ergonomic hazards where economically and technically feasible.

(2) This rule will take effect 6 months after being filed with the Secretary of State.

See appendix for assistance.

NOTE: Nothing in this act shall be construed to supercede or in any manner affect any workers' compensation law, or to enlarge or diminish or affect in any other manner the common law or statutory rights, duties, or liabilities of employers and employees under any law with respect to injuries, diseases, or death of employees arising out of, or in the course of, employment.

APPENDIX A
Ergonomic Risk Factor Descriptions and Examples
To Be Included In Required Awareness Training [Section C (1) (a)]
Non-Mandatory

1. Ergonomic risk factors are characteristics of a job that contribute to the creation of ergonomic hazards that may negatively impact job performance, including quality and productivity, as well as worker health. Section 'C' of the rule requires that awareness training covers what are risk factors and how to recognize them.

Risk factors are present at varying levels for different jobs and tasks. Generally, the greater the exposure is to a single risk factor or combination of risk factors, the greater the probability of a musculoskeletal disorder. The mere presence of a risk factor does not necessarily mean that an employee performing a job is at undue risk of injury.

2. For job assessment of ergonomic risk factors consider the following, as described in Table 1:
 - a. Awkward postures and motions
 - b. Forceful exertions
 - c. Repetition
 - d. Sustained exertions
 - e. Vibration
 - f. Contact stress
 - g. Cold temperature

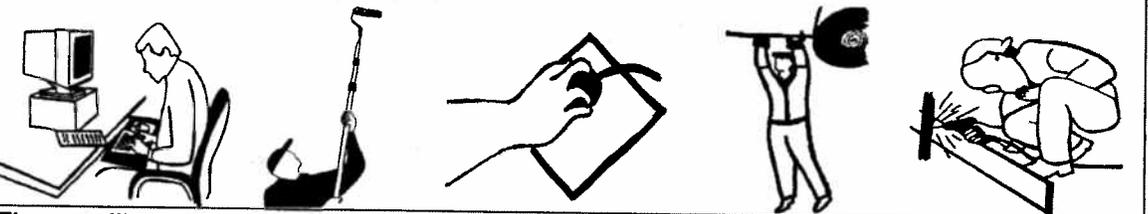
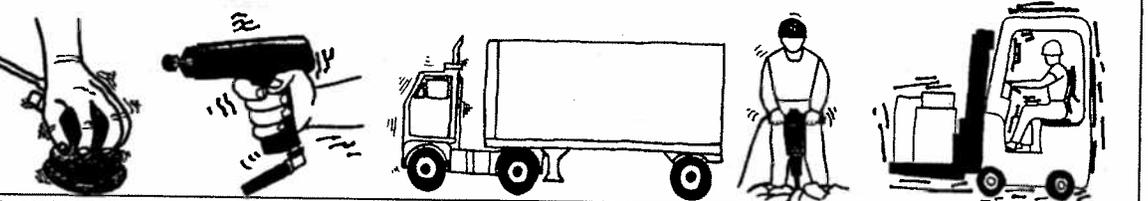
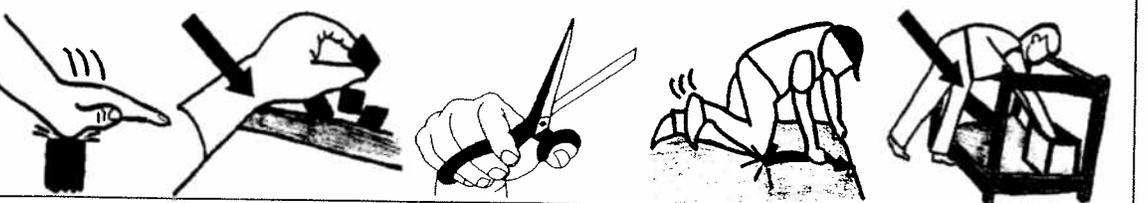
Risk factors may be evaluated by the following exposure properties:

- h. Duration
- i. Recovery
- j. Magnitude

Table 1

Risk Factor Descriptions With Examples and Exposure Properties

<p>a. Awkward Postures and Motions</p>	<p>Posture is the position your body is in that affects muscle groups and body parts involved in physical activity. Examples of awkward postures and motions include extended reaching, twisting, bending, kneeling, squatting, or working overhead.</p> 
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<p>b. Forceful Exertions</p>	<p>Force is the amount of physical effort required to perform a task such as heavy lifting, or to maintain control of equipment or tools. The amount of force required to complete the task depends on the type of grip; the size, shape and weight of an object; posture; and the type of activity. Examples include: tasks involving gripping, lifting, carrying, lowering, pushing, pulling, holding, assembling, connecting, using a hand tool, and maintaining control of a powered tool.</p> 
<p>c. Repetition</p>	<p>A motion or activity that is repeated over and over again during a specific time period (e.g. work cycle, shifts).</p> 
<p>d. Sustained Exertions</p>	<p>A body position that is maintained for an extended period of time.</p> 
<p>e. Vibration</p>	<p>The oscillatory motion of an object. Vibration can be described in terms of its frequency, acceleration, and direction of motion. Examples of exposure to vibration include: operating tools such as sanders, grinders, chippers, routers, drills, chain saws and other saws; jackhammers; or sitting/standing on vibrating surfaces such as driving a truck.</p> 
<p>f. Contact Stress</p>	<p>Resting or pressing body parts against a hard surface or sharp edge can result in compression of nerves, muscles, tendons, blood vessels and other tissues. Examples include: pounding with the palm of hand; tools digging into the palm of hand; tools digging into the sides of fingers; or resting the knee, elbow, forearm, or wrist on a hard surface or sharp edge.</p> 

<p>g. Cold Temperature</p>	<p>Exposure to low temperatures impacts the function of specific body parts, primarily hands and fingers. Examples of exposure to cold temperatures include: handling of frozen or refrigerated materials, cold environments, immersion of body parts in cold substances, or cold air exhaust.</p>  <p style="text-align: center;">Frozen Foods</p>
<p>h. Duration</p>	<p>The amount of time a person is exposed to one or more risk factors.</p>
<p>i. Recovery</p>	<p>Periods of reduced exposure to risk factors. These may be rest breaks, pauses in work activity, or motions and exertions that provide specific body parts the opportunity to recuperate.</p>
<p>j. Magnitude</p>	<p>The amount of each risk factor involved. Examples include: the amount of force applied, the angle/position of the back or the repetition rate.</p>

Appendix B
Signs and Symptoms - Descriptions and Reporting
To Be Included In Required Awareness Training [Section C (1) (b)]
Non-Mandatory

To assist with this requirement, here is some information on Signs/Symptoms:

- i. Exposure to ergonomic hazards over a period of time can lead to conditions affecting muscles, nerves, tendons, ligaments, joints, cartilage or spinal discs. Individuals with such conditions typically report one or more of the following symptoms:
 - warmth or heat
 - redness
 - swelling
 - aching
 - pain
 - burning
 - spasm
 - weakness
 - stiffness
 - numbness
 - tingling
 - loss of function/restricted movement
 - joint catching/locking/giving-out

- ii. Initially, the individual will most likely complain of minimal symptom(s) in a localized area. If the ergonomic hazard(s) causing or aggravating the condition is reduced or eliminated, the symptom(s) will often resolve. (Note: It is not uncommon for a combination of work-related and personal life-related activities to be contributing to the condition.)

- iii. Over time, if the condition is left untreated and/or the ergonomic hazard(s) causing or aggravating the condition is not addressed, then the number and/or severity of symptoms will often increase. As the condition worsens, more complicated interventions often become necessary to alleviate the symptoms.

- iv. Early reporting of signs and symptoms is important. For further assistance in reporting an ergonomic hazard, see Appendix D for web-site resources.

APPENDIX C
Process for Assessing and Responding to Ergonomic Risk Factors
Descriptions and Resources [Section D]
Non-Mandatory

“Is There An Ergonomic Hazard In My Work Place?”

Ergonomic hazards are determined by evaluating the presence of risk factors and exposure properties. See Table 1 for a description of risk factors and exposure properties. The presence of an ergonomic hazard can be made apparent by many different methods including an ergonomic risk factor assessment.

“How Do I Assess Ergonomic Hazards?”

There are various quantitative “scoring” systems available to make conducting ergonomic risk factor assessments simpler and more consistent. Ultimately the determination of the presence of an ergonomic hazard is a judgment. The employer should choose assessment processes that fit the task or work procedure being evaluated. To determine how simple or complex an assessment process is needed, the employer should consider factors such as: type and complexity of operation, number of affected employees, and workplace musculoskeletal injury incidence history.

In an effort to assist in the requirements of Section D of the rule which reads as follows:

Section D

Process for Assessing and Responding to Ergonomic Occupational Risk Factors.

(1) An employer shall establish and utilize an effective process that includes the following:

(a) Employee involvement.

To assist with this requirement, some examples of employee involvement may include:

- i. Suggestion box.
- ii. Employees involved in accident reviews.
- iii. Joint Labor and Management Health and Safety Committee.
- iv. Union assistance.
- v. Employee job self-assessment.
- vi. Proactive sign and symptom reporting.
- vii. Routine safety talks.
- viii. Peer observation and intervention program.
- ix. Employee wellness program

(b) Assessment of ergonomic occupational risk factors.

To assist with this requirement, note the following suggestions:

- i. Depending on the nature of your operations and work practices, ergonomic assessments range from simple to in-depth processes.
- ii. Simple processes may include employee job self-assessment, health and safety committee review, contacting your workmen’s compensation/disability insurance company and/or safety consultants.
- iii. In-depth processes may include using publicly and commercially available assessment tools (for example lifting equations).
- iv. For further assistance in assessment of ergonomic occupational risk factors, see the web-sites listed in Appendix D.

Examples of Simple Assessment Tools

Example #1 OSHA's eTool Computer Work Stations
<http://www.osha.gov/SLTC/etools/computerworkstations/index.html>

This checklist can help you create a safe and comfortable computer workstation. You can also use it in conjunction with the [purchasing guide checklist](#).

A "no" response indicates that a problem may exist. Refer to the appropriate section of the OSHA eTool for assistance and ideas about how to analyze and control the problem.

WORKING POSTURES CHECKLIST

The workstation is designed or arranged for doing computer tasks so it allows your	Yes	No
1. Head and neck to be upright, or in-line with the torso (not bent down/back). If "no" refer to <u>Monitors, Chairs and Work Surfaces</u> listed below.		
2. Head, neck, and trunk to face forward (not twisted). If "no" refer to <u>Monitors or Chairs</u> listed below.		
3. Trunk to be perpendicular to floor (may lean back into backrest but not forward). If "no" refer to <u>Chairs or Monitors</u> listed below.		
4. Shoulders and upper arms to be in-line with the torso, generally about perpendicular to the floor and relaxed (not elevated or stretched forward). If "no" refer to <u>Chairs</u> listed below.		
5. Upper arms and elbows to be close to the body (not extended outward). If "no" refer to <u>Chairs, Work Surfaces, Keyboards, and Pointers</u> listed below.		
6. Forearms, wrists, and hands to be straight and in-line (forearm at about 90 degrees to the upper arm). If "no" refer to <u>Chairs, Keyboards, Pointers</u> listed below.		
7. Wrists and hands to be straight (not bent up/down or sideways toward the little finger). If "no" refer to <u>Keyboards, or Pointers</u> listed below		
8. Thighs to be parallel to the floor and the lower legs to be perpendicular to floor (thighs may be slightly elevated above knees). If "no" refer to <u>Chairs or Work Surfaces</u> listed below.		
9. Feet rest flat on the floor or are supported by a stable footrest. If "no" refer to <u>Chairs, Work Surfaces</u> listed below.		

Possible Solutions Options, Go To These Sites:

- Chairs..... http://www.osha.gov/SLTC/etools/computerworkstations/components_chair.html
- Monitorshttp://www.osha.gov/SLTC/etools/computerworkstations/components_monitors.html
- Pointershttp://www.osha.gov/SLTC/etools/computerworkstations/components_pointers.html
- Keyboardshttp://www.osha.gov/SLTC/etools/computerworkstations/components_keyboards.html
- Work surfaceshttp://www.osha.gov/SLTC/etools/computerworkstations/components_desk.html

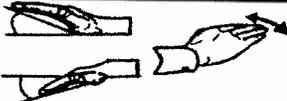
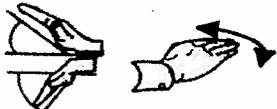
Example #2

DOW Chemical Company's Personnel Assessment Tool

The following example is a part of the Dow Chemical Company's Ergonomic Evaluation Card* addressing the hand/wrist and torso.

This assessment tool is used by employees as a self assessment. Using the guide, one can give some measure to each job assessment and the risk factor of posture/awkward posture, repetition, force, and duration. (See Table 1, Appendix A)

The scoring system allows an employee and supervisors to determine the appropriate action to take based on company instruction and policy.

POSTURE (P)		1		2		5				
Hands/Wrist										
Torso										
REPETITION (R)	Computer 	<30 Words or Clicks/Min		 ~30-75 Words or Clicks/Min		 >75 Words or Clicks/Min				
	Other	< 3x/min		~4-9x/min		> 10x/min				
FORCE (F)	Stand	<7 kg (15 lb)		~7-25 kg (15-50 lb)		~> 25 kg (50 lb)				
	Sit	<2 kg (5 lb)		2-5 kg (5-10 lb)		> 5 kg (10 lb)				
DURATION (D)			< 15 min			15-60 min			>60 min	

Total TASK Time (T)

- >3 hrs/day = 10
- 2-3 hrs/day = 5
- < 2 hrs/day = 1

ENVIRONMENT

- Poor lighting
- Vibration
- Extreme temperatures
- Other _____

TOTAL

	Posture	Repetition	Force	Duration	P x R x F x D + T	Discomfort	
Hands/Wrist						Y	N
Torso						Y	N

If discomfort is noted, or any body part total >25, take action to reduce score.
 If discomfort lasts >2-3 days, contact Health Services, or if
 any body part ≥ 110, take immediate action & notify your EH&S contact.

*Copyright The Dow Chemical Company, 1997

(c) Elimination, reduction, or control of ergonomic hazards where economically and technically feasible.

To assist with this requirement, note the following suggestions:

- i. Examine the results of the assessments completed and identify opportunities to address the risk factors.
- ii. **Engineering controls** could include but are not limited to examples such as lift assists, redesigning workstation layout, or workflow redesign.
- iii. **Administrative controls** could include but are not limited to examples such as job rotation, job enlargement, job work-rest cycle, training, and focused re-training.
- iv. For further assistance in elimination, reduction, or control of ergonomic hazards see the web-sites listed in Appendix D.

Examples of Controls

Industry	Tasks	Example of Risk Factor(s)	Example of Engineering Controls	Example of Administrative Controls
		[Requirements of Rule Section D(b)]	[Requirements of Rule Section D(c)]	
Health Care	Transferring Patients	Force and Awkward Posture	Use mechanical lift assists	Use multiple employees
Manufacturing	Pallet Loading	Force and Awkward Posture	Lift table or automatic palletizer	Reinforcement of safe lifting procedures
Office	Data Entry/ Word Processing	Contact Stress and Awkward Posture	Adjustable keyboard tray	Stretch breaks

(2) Employers with an effective ergonomic program established and documented by the effective date of these rules are exempt from the rules in this section.

APPENDIX D
Resource
Non-Mandatory

For further assistance in training; occupational risk factors; signs/symptoms; reporting;
assessing and responding to occupational risk factors; recordkeeping;
and an effective ergonomic program
contact MIOSHA, OSHA, or NIOSH, your union, or industry association.

<p>MIOSHA Michigan Occupational Safety and Health Administration Consultation Education & Training Division (CET)..... www.michigan.gov/cet Phone: 517.322.1856</p>
<p>OSHA Federal Occupational Safety and Health Administration... http://www.osha.gov/SLTC/ergonomics</p>
<p>NIOSH National Institute of Occupational Safety and Health http://www.cdc.gov/niosh/topics/ergonomics</p>