

Manager/Supervisor Risk Management

#142– 4/11/13

A twice weekly e-mail training for YCPARMIA members

TOPIC: SAFETY – ERGONOMICS

The State requires that an employer formally implement a Repetitive Motion Injury (RMI) program if the employer has had two repetitive motion injuries in a twelve month period. This requirement applies to a “job, process, operation,” so arguably it potentially has an entity wide application.

The last few topics have dealt with unique exposures; most members’ workers are not exposed to confined spaces or dangerous machinery. The ergonomic /repetitive motion exposure is much broader; YCPARMIA’s loss history confirms that any worker, in any department, can suffer an ergonomic injury. Ergonomics, for the purpose of this training, is simply the physical interaction of a worker with their physical workplace; it commonly involves strain type issues resulting from the repetitive use of improperly designed workstations or body mechanics. An ergonomic injury is generally not a sudden event; it occurs over time from repetitive actions. In a perverse way it is self-inflicted, with the injured worker and their supervisors often ignoring warning signs.

As indicated above, Cal/OSHA has established ergonomic standards for California employers. In broad terms, the requirements in the State regulations are triggered when the employer has at least two employees diagnosed with a repetitive motion injury by a licensed physician within a twelve month period. Once triggered, the State requires that the employer must:

- Establish and implement an ergonomic program (while not required this should probably be a section added to the entity’s IIPP) that includes:
 - Worksite evaluations to evaluate each job, process, or operation for potential ergonomic exposures;
 - Implementation of control measures to prevent similar injuries; these would include re-engineered work stations and equipment, work practices, and work flow;
 - Training for all exposed employees and their supervisors who work at the same or similar jobs that have been identified as causing repetitive motion injuries. The training should address the program, signs, symptoms and risks associated with repetitive motion injuries, the importance of early reporting of symptoms, and the employer’s plans and controls for addressing identified problems.

Fortunately the regulations end with something of a disclaimer that solutions not impose “additional unreasonable cost.” Or course the costs associated with just about any workers’ compensation injury will be potentially more expensive than any potential solution.

A cursory review of YCPARMIA’s loss runs confirms that at least four of our members have had these RMI regulations triggered in the last twelve month period, and would therefore be expected by the State to have conducted evaluations, identified methods of addressing exposures and conducted training.

Next Topic: Safety – Ergonomics - continued