



Reply to the attention of:

APR 25 2012

Thomas J. Pritzker, CHB-CEO
Hyatt Corporation
Hyatt Center
71 South Wacker Drive
Chicago, IL 60606

Dear Mr. Pritzker:

This letter is to inform you of the findings related to the Occupational Safety and Health Administration's (OSHA) inspections that were conducted in response to complaints related to ergonomic risk factors at Hyatt Hotels in Illinois and Texas. This letter also responds to the January 17, 2012, letter from Rob Webb, Chief Human Resources Officer, Hyatt Hotels Corporation (Hyatt), requesting an Alliance with OSHA, and references a previous letter from OSHA to Mr. Webb from December 6, 2011.

OSHA Inspections Findings

The complaints alleged that housekeepers were exposed to conditions that can increase the risk of developing musculoskeletal disorders (MSDs). On-site evaluations were conducted on the routine tasks (general room cleaning, bathroom cleaning, and bed making) performed by the housekeepers.

OSHA identified the presence of ergonomic risk factors associated with housekeeping tasks, but the conditions do not meet the evidentiary threshold required to cite under the general duty clause. Consequently, a general duty clause citation for ergonomic hazards will not be issued as a result of these inspections. In general, OSHA observed tasks presenting risk factors such as: repeated heavy lifting and carrying, bending, twisting, elevated and extended reaches, pushing and pulling, and forceful gripping. A summary of the findings from our inspections followed by possible responsive actions are listed below for your consideration.

General Room Cleaning:

General room cleaning tasks that may present risk factors to workers include the following: pushing carts, moving items of varying weight such as linens and furniture, cleaning surfaces and windows, transferring soiled laundry and room trash, and vacuuming.

Bathroom Cleaning:

Bathroom cleaning includes the following tasks that may present risk factors: cleaning and drying the tub and shower walls, mirrors, the toilet and floor, removing and restocking bathroom linens, cleaning or replacing the shower curtains, and replenishing expendable supplies.

Making a Bed:

Bed making tasks that may present risk factors include the process of changing bed linens dependent upon room size, layout, type of bed(s) (e.g., king, double, roll-away, Murphy), the linens used, the bed making methods used at the particular hotel, and whether the room is occupied or is vacant due to a recent guest checkout. Observations indicate that servicing an occupied room is less physically demanding than servicing a recently vacated room.

Intervention Strategies to Address Housekeeping Stressors:

- Reduce the quantity and severity of elevated and extended reaches by providing long-handled or adjustable-length tools for dusting, mopping, and cleaning tasks, providing a lightweight step stool or ladder for elevated tasks, and placing expendable supplies on the sink counter instead of in the tub area;
- Minimize the force exerted to push and pull tools and supplies around the work space by providing motorized carts, lighter-weight vacuums with better hand grip design, performing scheduled maintenance on carts and vacuums, and organizing the work in a manner that minimizes travel distance between rooms;
- Reduce the quantity and severity of torso bending, lifting, and carrying by **minimizing placement of soiled linens on the floor, reducing the weight and distance that laundry is carried**, organizing the work in a manner that minimizes travel distance between rooms, modifying the bed making process to minimize mattress corner lifting (e.g., use fitted sheets, allow bed linens to extend to the side, and tuck all linens in one motion at the end of the process), and ensuring there is adequate clearance between beds, walls, and furniture to minimize awkward postures when lifting mattress corners;
- Minimize contact stress to workers' bodies by providing cushioning such as knee pads for kneeling tasks; and
- Reduce significant lifting tasks for housekeepers by designating worker teams or housemen to conduct deep room cleanings and other cleaning that requires the moving of furniture.

In addition, the bed making process should be evaluated to ensure minimum exposure to risk factors, and scheduling standards (credits) should be developed that fully consider hotel occupancy level variations.

Employees should be consulted on evaluations of potential risk factors and on interventional strategies.

Observations Related to Other Tasks:

Employees assigned to laundry rooms or banquet facilities may be exposed to many of the same risk factors as housekeepers such as: bending, twisting, extended and elevated reaches, and lifting heavy loads. OSHA offers the following guidance to reduce risk factors: raise the laundry from the floor (e.g., by providing a table under the laundry chute), provide ice and laundry tubs with adjustable height capabilities, provide tub dumpers, minimize lifting during laundry sorting (e.g., by placing items in the proper receptacle during initial sorting), train employees to minimize the amount of laundry lifted at one time, rotate employees between lifting and non-lifting jobs, design water filling stations for glasses and ice containers used by banquet servers near waist height, and reduce repetitive, elevated reaching by providing lightweight stools or ladders for accessing upper shelves of banquet transport carts. Again, employees should be consulted when evaluating and addressing risk factors.

We have provided references to studies and publications at the end of this document which may be useful in your efforts to address these issues.

Recordkeeping:

We would also like to take this opportunity to make you aware of OSHA's recordkeeping requirements for job-related injuries or illnesses related to contracted or seasonal employees under direct supervision of Hyatt. If such employees are injured or become ill on the job, then those injuries and illnesses must be entered on Hyatt's OSHA 300 log, if they meet one or more of the general recording criteria, per 29 CFR 1904.7.

OSHA Alliance Program

With regards to Hyatt's proposal to form an OSHA - Hyatt Alliance, we are happy to discuss the possibility of a formal cooperative agreement. Through the Alliance Program, OSHA works with groups committed to worker safety and health to prevent workplace fatalities, injuries, and illnesses by developing compliance assistance tools and resources, sharing information with workers and employers, and educating workers and employers about their rights and responsibilities under the Occupational Safety and Health Act of 1970. OSHA believes that an Alliance could address ergonomic risk factor awareness in this industry, as well as the need for compliance assistance materials.

Alliances are also a forum for employers and workers to work together to identify and solve workplace safety and health issues. To achieve this, Alliances with employers and employer groups (e.g., trade associations) must also include worker representatives. Due to their vested interest in improved safety and health within your industry, OSHA requires that employee representatives, such as UNITE HERE, be invited to participate in Alliance discussions.

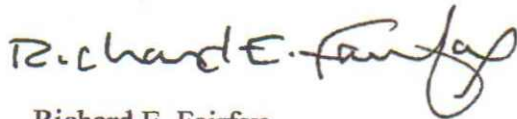
In your letter you also propose to conduct an ergonomics study as "the centerpiece of this Alliance." As previously stated in OSHA's December 6, 2011, letter to Rob Webb, OSHA suggests Hyatt contact the National Institute for Occupational Safety and Health (NIOSH) to pursue this study outside the auspices of an Alliance. NIOSH is the government agency

established to help assure safe and healthful working conditions for working men and women by providing research, information, education, and training in the field of occupational safety and health. Results from such a study could be used by the Alliance as the basis of additional compliance assistance and training materials.

In preparation for further discussions, I encourage you to review the OSHA Alliance Web page at <https://www.osha.gov/dcsp/alliances/index.html>, which provides a wealth of information regarding Alliance Program participation criteria and links to examples of products created and activities performed through Alliances. For more information regarding a potential Hyatt and OSHA Alliance, please contact OSHA's Directorate of Cooperative and State Programs, Office of Outreach Services and Alliances, at (202) 693-2340.

We hope you find this information helpful. If you have any questions regarding OSHA's summary of findings, please contact OSHA's Directorate of Enforcement Programs, Office of Health Enforcement, at (202) 693-2190.

Sincerely,



Richard E. Fairfax
Deputy Assistant Secretary

Enclosure

cc: Rob Webb
Hyatt Regency Chicago
Hyatt Regency McCormick Place
Hyatt Regency O'Hare
Park Hyatt Chicago
Hyatt Regency San Antonio
San Antonio Grand Hyatt
OSHA Chicago Regional Office
OSHA Dallas Regional Office

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Hotel Housekeepers: Practices to Improve Health and Safety Using Ergonomics,* The Institute for Ergonomics at Ohio State University.

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