

**CHAPTER 11**  
**ERGONOMIC PROGRAM**  
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## CHAPTER 11

### ERGONOMIC PROGRAM

1. PURPOSE. The purpose of the Ergonomic Program is to establish departmental procedures for all employees performing various work activities, in an effort to minimize repetitive motion injuries (RMIs).
  
2. AUTHORITY. California Code of Regulations (CCR), Title 8, Section 5110, establishes regulations the Department must follow that are designed to minimize RMIs. This program must include worksite evaluations, measures to control exposures causing RMIs, and ergonomic training for employees.
  
3. POLICY. It is the policy of the Department to ensure appropriate administrative and engineering controls are implemented for the protection of all employees.
  
4. BACKGROUND. Proper ergonomics improves the health and productivity between the employee and the workplace or task. The goal is to reduce and eliminate discomfort and injury. Repetitive Motion Injuries largely affect the soft tissues (muscles, tendons, ligaments, nerves, discs, and blood vessels). Musculoskeletal disorders are generally caused by remaining in prolonged, static postures, by heavy lifting, or by frequent and repetitive stretching. Repetitive motion injuries develop because of repeated motions, excessive force, vibrations, exposure to cold, contact pressures, awkward positions, overexertion, and constant engagement in fixed-position activities, like typing on a keyboard.
  
5. RESPONSIBILITIES. The Office of Risk Management (ORM), Occupational Safety Unit (OSU), shall act as the program administrator for the Department's Ergonomic Program.
  - a. Program Administrator.
    - (1) Provide ergonomic evaluator training and materials to designated departmental personnel.
    - (2) Maintain and distribute departmental guidelines and policies.
    - (3) Maintain current information on local, state, and federal regulations.
    - (4) Advise management on ergonomic issues.

- (5) Assist commands with certifying employees as ergonomic evaluators.
- b. Division Safety Coordinators.
  - (1) Assist commands in correcting exposures that have caused RMIs.
  - (2) Provide ergonomic evaluator training to commands.
- c. Commanders.
  - (1) Ensure workplaces and equipment are safe, well maintained, and in compliance with regulations and departmental policies, programs, and practices.
  - (2) Ensure the workplace ergonomic practices and procedures are clearly communicated and understood by employees through effective communication and training programs. This can be accomplished during annual ergonomic training.
  - (3) Encourage employees to report ergonomic risks in the workplace.
  - (4) Correct or minimize exposures to RMIs as recommended by an ergonomic evaluator on a CHP 198, Workstation Evaluation Checklist.
- d. Supervisors.
  - (1) Plan, organize, and coordinate ergonomic training sessions.
  - (2) Evaluate employees' compliance with safe work practices.
  - (3) Investigate any potential ergonomic risks or reported injuries.
  - (4) Correct or minimize exposures to RMIs as recommended by an ergonomic evaluator on a CHP 198.
- e. Employees.
  - (1) Responsible for adhering to the requirements of the Department's Ergonomic Program.
  - (2) Maintain awareness of conditions affecting their health and safety as they relate to ergonomics.
  - (3) Participate in training programs, as required.
  - (4) Adhere to proper ergonomic practices in the workplace.

(5) Advise supervisors of potential ergonomic risks in the workplace.

(6) Report any RMI-related pain/discomfort to their immediate supervisor as soon as possible.

6. SYMPTOMS. The symptoms of RMIs may include some or all of the following: stiffness, fatigue, loss of function, decreased range of motion, swelling, numbness and tingling, pain to extremities, skin color changes, reduced grip strength, and neck and shoulder discomfort.

7. RISKS. Some of the exposures associated with RMIs are:

a. Continuous Use of Force or Repetition. Continuous lifting, moving, and bending can cause strain to the neck and back. Supervisors are encouraged to emphasize the proper method for lifting and avoiding injuries.

b. Sustained Awkward Posture and Repeated Bending/Reaching/Twisting. An employee working in a non-neutral position (working too low, reaching too far for an item or instrument, lack of access or clearance) is susceptible to injury. Maintaining non-neutral positions for long periods is less healthy than repeated movements of varied motions.

c. Localized Pressure. Sides of fingers, palms, wrists, forearms, elbows, hips, and knees are more susceptible to RMIs. These areas of the body, nerves, tendons, and blood vessels are close to the skin and underlying bones.

8. PREVENTION.

a. Workplace Evaluations. When a non-State Fund related workplace evaluation is requested by a supervisor or manager, departmental personnel, certified by the Department of General Services, shall conduct a workplace evaluation. The evaluation should include a discussion with the employee(s) about job duties, work habits, and methods for improving the work environment. The evaluation should be used to assist employees, supervisors, and management to reduce RMI exposure with an additional benefit of increased employee morale and productivity. The evaluation shall be recorded on the CHP 198 and retained in the employee's medical file until superseded by the next evaluation. If two or more RMIs are identified at a worksite resulting from identical work activities, pursuant to CCR, Title 8, Section 5110, (Annex A), the local command shall contact the ORM, OSU, for guidance in ensuring compliance with the required enhanced training and documentation.

b. Control of Exposures. Once identified and verified by a supervisor, any exposure that has or may cause RMIs shall be corrected, or if not correctable, mitigated to the extent feasible. Controlling exposures may include engineering controls such as workstation redesign, adjustable equipment, or administrative controls such as job rotation. Division safety coordinators may be contacted for assistance in designing and evaluating necessary controls.

c. Increased Employee Involvement. Supervisors should encourage discussion among employees to determine if there are ways to change work processes to eliminate or reduce potentially damaging repetitive motions. Supervisors should also encourage employees to contribute to the command's health and safety program by offering suggestions for improvement, as employees often suggest the best way to accomplish a task.

d. Duration and Frequency of Tasks. Duration is the length of time an employee takes to complete an assigned task. Frequency is how often the employee performs the task. Employees should regulate the duration and frequency of their workloads and perform stretching exercises in their work areas to avert the onset of RMIs.

e. Mobile Digital Computers. The use of mobile digital computers (MDC) inside the patrol vehicle for extended periods of time is discouraged. If using the MDC for report writing, officers should remove the MDC from the patrol vehicle and place it in an ergonomically appropriate location and position.

## 9. EMPLOYEE TRAINING.

a. Annual Training. California Code of Regulations, Title 8, Section 5110, requires impacted employees are provided annual ergonomic training. Impacted employees include all employees performing repetitive motion work activities. Training shall be provided to impacted employees annually and to all new employees during the Department's new employee orientation. Training for new employees shall be documented on the CHP 10, Supervisor's Report on Employee Orientation. This annual training shall be documented on the employee's CHP 712A, Injury and Illness Prevention Program Orientation and Review.

(1) The training plan shall include explanation of:

(a) The Department's Ergonomic Program.

(b) Exposures associated with RMIs.

(c) Symptoms and consequences of RMIs.

(d) The importance of reporting symptoms and injuries.

(e) Methods used by the Department to minimize RMIs.

(2) Training may be augmented with online ergonomic training.

b. Training Resource. Ergonomic training can be found on the CHP Intranet site under Training, Online training, All Uniformed/Non-Uniformed Employees (Required Annually), Ergonomic Training. Ergonomic training can also be found on the following web site: <https://www.safeatworkca.com/videos/office-ergonomics/>.

c. Publication Resource. The Easy Ergonomics for Desktop Computer Users handbook was developed by the California Department of Industrial Relations to provide employees with information to reduce personal injuries and occupational illnesses associated with computer use and is available on the following web site: [www.dir.ca.gov/dosh/dosh\\_publications/ComputerErgo.pdf](http://www.dir.ca.gov/dosh/dosh_publications/ComputerErgo.pdf).

10. PURCHASING ERGONOMIC EQUIPMENT. The procedure for purchasing equipment is outlined in Highway Patrol Manual 11.2, Materials Management Manual, Chapter 7, Purchases, and Chapter 8, Equipment.

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## ANNEX A

### CALIFORNIA CODE OF REGULATIONS, TITLE 8, SECTION 5110

#### **Section 5110** – Repetitive Motion Injuries

(a) Scope and application. This section shall apply to a job, process, operation where a repetitive motion injury (RMIs) has occurred to more than one employee under the following conditions:

- (1) Work related causation. The RMIs were predominantly caused (i.e. 50% or more) by a repetitive job, process, or operation;
- (2) Relationship between RMIs at the workplace. The employees incurring the RMIs were performing a job process, or operation of identical work activity. Identical work activity means that the employees were performing the same repetitive motion task, such as but not limited to word processing, assembly or, loading;
- (3) Medical requirements. The RMIs were musculoskeletal injuries that a licensed physician objectively identified and diagnosed; and
- (4) Time requirements. The RMIs were reported by the employees to the employer in the last 12 months but not before July 3, 1997.

(b) Program designed to minimize RMIs. Every employer subject to this section shall establish and implement a program designed to minimize RMIs. The program shall include a worksite evaluation, control of exposures which have caused RMIs and training of employees.

- (1) Worksite evaluation. Each job, process, or operation of identical work activity covered by this section or a representative number of such jobs, processes, or operations of identical work activities shall be evaluated for exposures which have caused RMIs.
- (2) Control of exposures which have caused RMIs. Any exposures that have caused RMIs shall, in a timely manner, be corrected or if not capable of being corrected have the exposures minimized to the extent feasible. The employer shall consider engineering controls, such as workstation redesign, adjustable fixtures or tool redesign, and administrative controls, such as job rotation, work pacing or work breaks.
- (3) Training. Employees shall be provided training that includes an explanation of:
  - (A) The employer's program;

## ANNEX A

### CALIFORNIA CODE OF REGULATIONS, TITLE 8, SECTION 5110 (*continued*)

- (B) The exposures which have been associated with RMIs;
- (C) The symptoms and consequences of injuries caused by repetitive motion;
- (D) The importance of reporting symptoms and injuries to the employer; and
- (E) Methods used by the employer to minimize RMIs.

(c) Satisfaction of an employer's obligation. Measures implemented by an employer under subsection (b)(1), (b)(2), or (b)(3) shall satisfy the employer's obligations under that respective subsection, unless it is shown that a measure known to but not taken by the employer is substantially certain to cause a greater reduction in such injuries and that this alternative measure would not impose additional unreasonable costs.

Note : Authority cited: Sections 142.3 and 6357. Labor Code. Reference: Sections 142.3 and 6357. *Pulaski v. Occupational Safety & Health Stds. Bd.* (1999) 75 Cal.App.4th 1315 [90 Cal. Rptr. 2d 54].