CENTER FOR PUBLIC INTEREST LAW
CHILDREN'S ADVOCACY INSTITUTE

University of San Diego School of Law
5998 Alcalá Park
San Diego, CA 92110-2492
P: (619) 260-4806 / F: (619) 260-4753

1107 Ninth Street, Suite 880
Sacramento, CA 95814 / P: (916) 844-5646

1023 15th Street NW, Suite 401
Washington DC, 20005 / P: (917) 371-5191

www.cpil.org / www.caichildlaw.org

December 29, 2015

Amalia Neidhardt, Senior Engineer
Division of Occupational Safety and Health

re: Hotel Housekeeping Advisory Committee

Dear Ms. Neidhardt:

It has been almost four years since UNITE HERE filed Petition No. 526 (January 23, 2012), requesting that the Occupational Safety and Health Standards Board (OSB) adopt health and safety standards that will prevent injuries to hotel housekeepers in California. The Board granted the petition to the extent that it directed the Division of Occupational Safety and Health (DOSH) to convene an advisory committee to further study the issues underlying the petition. Four years, five advisory committee meetings, and multiple drafts later, the Board has yet to publish proposed standards, and hotel housekeepers continue to be injured while on the job because of employers' failure to consider the use of feasible, simple control measures that are common for injury prevention and are specifically recommended for housekeepers in Cal-OSHA's own 2005 publication, *Working Safer and Easier for Janitors, Housekeepers and Custodians*.[1]

Although we appreciate the efforts of DOSH and the advisory committee, this process — and the extent to which hotel industry opposition has stalled it — has become exceedingly frustrating, as several OSB members noted at the Board's November 2015 meeting.

The Center for Public Interest Law (CPIL) urges DOSH and OSB to meet the benchmarks in the timeline set forth by Steve Smith at OSB's November 2015 meeting. Specifically, we ask DOSH to finalize the draft standards and develop a supporting regulatory package for internal DIR review by April 1, 2016, and we ask OSB to publish proposed standards by mid-2016 for public hearing no later than late 2016. By that time, almost five years will have elapsed since the filing of the petition. Failure to make good faith efforts toward meeting these benchmarks will likely force the proponents of these standards to seek legislative assistance.

---

[1] See https://www.dir.ca.gtov/dosh/dosh_publications/janitors.pdf .

CPIL respectfully asks the Department, Division, and Board to expedite the drafting and proposal of safety standards that will truly prevent injury to hotel housekeepers in California.

Thank you for your consideration of these comments.

Sincerely,

Julianne D'Angelo Fellmeth
Administrative Director
Center for Public Interest Law

cc: Juliann Sum, Chief, DOSH
Eric Berg, Deputy Chief of Health, DOSH
Steve Smith, Co-Chair, Hotel Housekeeping Advisory Committee