

U.S. Department of Labor Occupational Safety and Health Administration
17625 El Camino Real
Suite 400
Houston, TX 77058



05/09/2023

Texas Children's Hospital
and its successors
1919 S Braeswood
Houston, TX 77030

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. The OSHA publication "Employer Rights and Responsibilities Following an OSHA Inspection", is available by scanning the QR code below with your smartphone or barcode scanner.

English – OSHA 3000 Rev 2018



[OSHA 3000](#)

Spanish – OSHA 3195 Rev 2019



[OSHA 3195](#)

If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (281) 286-0583.

You will note that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

You may also request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The total time of this contest period is not interrupted by having an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing

conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



Mark R. Briggs
Area Director

Enclosures

NOTICE TO EMPLOYEES

The law gives you and your representative the opportunity to object to any abatement date set for a violation if you believe the date to be unreasonable. Any contest of the abatement dates of the citations referred to in paragraph 1 of this Settlement Agreement must be mailed to the address below within 15 working days (excluding weekends and Federal Holidays) of the receipt by the Employer of the original citations:

U.S. Department of Labor
Occupational Safety and Health Administration
17625 El Camino Real, Suite 400
Houston, TX 77058
(281) 286-0583 (281) 286-6352

U.S. Department of Labor
Occupational Safety and Health Administration
17625 El Camino Real
Suite 400
Houston, TX 77058



Citation and Notification of Penalty

To:
Texas Children's Hospital
and its successors
1919 S Braeswood
Houston, TX 77030

Inspection Number: 1635116
Inspection Date(s): 11/18/2022 - 05/03/2023
Issuance Date: 05/09/2023

Inspection Site:
6621 Fannin St
Houston, TX 77030

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

This Citation and Notification of Penalty (this Citation) describes violations of the Occupational Safety and Health Act of 1970. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the dates listed and pay the penalties proposed, unless within 15 working days (excluding weekends and Federal holidays) from your receipt of this Citation and Notification of Penalty **you either call to schedule an informal conference (see paragraph below) or** you mail a notice of contest to the U.S. Department of Labor Area Office at the address shown above. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Review Commission or a court.

Employer Rights and Responsibilities – The OSHA publication “Employer Rights and Responsibilities Following an OSHA Inspection”, is available by scanning the QR code below with your smartphone or barcode scanner. You may also access the document by clicking on the link or typing it into your browser to take you directly to OSHA's webpage.

English – OSHA 3000 Rev 2018



[OSHA 3000](#)

Spanish – OSHA 3195 Rev 2019



[OSHA 3195](#)

Posting - The law requires that a copy of this Citation and Notification of Penalty be posted immediately in a prominent place at or near the location of the violation(s) cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Citation must remain posted until the violation(s) cited herein has (have) been abated, or for 3 working days (excluding weekends and Federal holidays), whichever is longer.

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (281) 286-0583. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. The QR codes on the previous page link to the OSHA publication “Employer Rights and Responsibilities Following an OSHA Inspection”. Additional information concerning the Debt Collection Act of 1982 can be found in the Debt Collection Notice (the last two pages of this document). Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance.

You may also make your payment electronically. Scan the QR code below with your smartphone or barcode scanner to be directed to the pay.gov website. You may also go to the pay.gov website by clicking on the link.



[Pay.gov - OSHA Payments](#)

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will process the payments as if these restrictions or conditions do not exist.

Notification of Corrective Action – For each violation which you do not contest, you must provide *abatement certification* to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that *abatement documentation* is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director. For an electronic copy of the sample abatement certification letter, or to submit abatement electronically, scan the QR code below with your smartphone or barcode scanner to be taken to the OSHA abatement website.



[Certification of Abatement](#)

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 05/09/2023. The conference will be held by telephone or at the OSHA office located at 17625

El Camino Real, Suite 400, Houston, TX 77058 on _____ at

_____. Employees and/or representatives of employees have a right to attend an informal conference.

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET



Certification of Abatement

Inspection Number: 1635116

Company Name: Texas Children's Hospital
Inspection Site: 6621 Fannin St, Houston, TX 77030
Issuance Date: 05/09/2023

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 17625 El Camino Real, Suite 400, Houston, TX 77058.**

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

Citation Number _____ and Item Number _____ was corrected on _____
By (Method of Abatement): _____

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review



U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1635116
Inspection Date(s): 11/18/2022 - 05/03/2023
Issuance Date: 05/09/2023

Citation and Notification of Penalty

Company Name: Texas Children's Hospital
Inspection Site: 6621 Fannin St, Houston, TX 77030

Citation 1 Item 1 Type of Violation: **Serious**

OSH ACT of 1970 Section (5)(a)(1): The employer did not furnish employment and a place of employment which were free from recognized hazards that were causing or likely to cause death or serious physical harm to employees in that employees were exposed to assaults from patients exhibiting violent behavior while admitted for treatment.

Nurses, Patient Care Assistants (PCAs), Security Officers, and Patient Sitters were exposed to the hazard of physical threats and assaults, such as being bitten, punched, kicked, scratched, and spit on by behavioral health patients exhibiting signs of aggression in departments such as the Pediatric Acute Care Unit during routine interactions, daily activities, and providing care. Assaults have resulted in injuries including sprains, contusions, lacerations, and concussions. There were 15 recordable incidents of workplace violence that occurred in 2022, where a patient exhibiting signs of aggression assaulted an employee.

a) On or about November 10, 2022, a security officer was dragged to the ground and kicked in the chest repeatedly while assisting a patient sitter with an aggressive patient.

Among other methods, feasible and acceptable means of abatement would be to:

1. Conduct a worksite hazard assessment to identify employees and departments at risk of patient-on-staff workplace violence. Analyze the OSHA 300 log data and de-escalation calls for trends.
2. Update, implement, and communicate worksite-specific workplace violence policies and procedures that include:
 - a. A workplace violence coordinator who is known to employees and managers.
 - b. Clear and consistent procedures for requesting assistance. Ensure employees are informed of and trained on the correct procedures.
 - c. Employee participation in meetings and identifying controls to address workplace violence

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 1635116
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Company Name: Texas Children's Hospital
Inspection Site: 6621 Fannin St, Houston, TX 77030

incidents.

- d. A system for tracking and investigating all workplace violence incidents, regardless of recordability. Conduct thorough incident investigations, including communicating with affected employees following an incident.
3. Ensure all staff have a reliable means to immediately communicate when they need assistance and all staff are trained on proper procedures to call for assistance.
 - a. Provide all employees in direct contact with aggressive behavioral health patients, such as sitters, with the Volte phones that nurses use to communicate regarding incidents.
 - b. Position panic buttons in patient rooms such that they decrease the potential for employee entrapment with a violent patient.
 - c. Rearrange the SMART panel tabs such that the de-escalation tab is on the first page and ensure employees are effectively trained on how to use the wall panels to decrease delays when requesting for assistance.
 4. Train all employees (including sitters) at risk of patient-on-staff workplace violence on methods, such as de-escalation techniques, and ways to protect themselves in situations where patients may become violent. Conduct the training frequently to ensure employees are confident in their ability to respond to an act of violence. Ensure employees have the knowledge and ability to effectively recognize behavioral warning signs that are likely to escalate and when to begin de-escalation procedures.
 5. Ensure that patients are assessed for aggression during admittance to the hospital in order to identify patients who may become aggressive. Ensure that behavioral controls such as chemical and physical restraints are readily available for use prior to the patient becoming aggressive and ensure security personnel can apply appropriate patient holds during attacks.
 6. Ensure that PPE such as hair nets, face shields, arm guards, and impact vests are freely and readily available for use.

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.



U.S. Department of Labor
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7. Evaluate and implement controls based on hazard assessment and analysis of workplace violence incidents and de-escalation calls. Evaluate and identify potential deficiencies with the current controls being used by staff. Implement engineering controls, such as cameras, to remotely monitor aggressive patients whenever possible, which will prevent an employee being in direct contact with a violent patient.
 8. Define the duties and tasks of each employee involved with any portion of the de-escalation process, including employees such as sitters and PCAs who may see the first signs of patient aggression. Ensure an employee who is authorized to apply order chemical or mechanical restraints is readily available.
 9. Ensure duties and tasks of those on the de-escalation team do not conflict with their ability to respond to an aggression incident. Ensure that there are sufficient staff available to respond during an incident.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 14, 2023
\$15,625.00

Mark R. Briggs
Area Director

See pages 1 through 4 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

U.S. Department of Labor
Occupational Safety and Health Administration
17625 El Camino Real
Suite 400
Houston, TX 77058



INVOICE / DEBT COLLECTION NOTICE

Company Name: Texas Children's Hospital
Inspection Site: 6621 Fannin St, Houston, TX 77030
Issuance Date: 05/09/2023

Summary of Penalties for Inspection Number: 1635116

Citation 1 Item 1, Serious \$15,625.00

TOTAL PROPOSED PENALTIES: **\$15,625.00**

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance.

You may also make your payment electronically. Scan the QR code below with your smartphone or barcode scanner to be directed to the pay.gov website. You may also go to the pay.gov website by clicking on the link.



[Pay.gov - OSHA Payments](#)

Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

OSHA does not agree to any restrictions or conditions or endorsements put on any check, money order, or electronic payment for less than the full amount due, and will cash the check or money order as if these restrictions or conditions do not exist.

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the

amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts for violations of the Occupational Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Mark R. Briggs
Area Director

05/09/2023

Date



May 9, 2023

Chris Hart
Texas Children's Hospital
6621 Fannin St.
Suite AB2270
Houston, TX 77030

Dear Mr. Hart:

An inspection and evaluation of your site at 6621 Fannin Street, Houston, TX on 11/18/2022 disclosed the following workplace condition(s) which have been associated with the development of ergonomic related injuries in workers.

A review of your OSHA 300 logs for the calendar years 2020 to 2022 shows several injuries or illnesses that are consistent with exposure to ergonomic risk factors which were identified at your facility. Interviews were conducted over the course of several days.

Employees that are actively involved in patient care such as Nurses, Patient care assistants (PCA) and Technicians are experiencing various musculoskeletal disorders (MSDs). The MSD incident rate for 2021 and 2022 were estimated to be 23 and 15 respectively, which is above the Bureau of Labor Statics (BLS) MSD incident rate of 3.8 and 5.5 respectively for healthcare. These disorders include conditions such as low back pain, sciatica, rotator cuff injuries, epicondylitis. They may be caused by heavy lifts, repetitive lifting of awkward items, reaching while lifting, and poor body mechanics. In addition, awkward body postures such as frequent bending and twisting at the trunk, extended arm reaching, performing the job tasks away from the body, above the shoulder height during the process of patient care can exacerbate these risks. Regular exposure to the identified ergonomic risk factors and their combination can cause or contribute to increased risk of MSDs in the workplace.

After reviewing relevant facts pertaining to this case, the Occupational Safety and Health Administration does not feel it is appropriate to issue a citation currently. However, in the interest of workplace safety and health, I recommend you voluntarily take reasonable steps in addressing these issues. The following recommendations are actions which the Agency feels could be taken to address the identified problems which will likely enhance the safety of your employees.

General Controls:

General controls include an effectively written program, training, engineering, work practice, and administrative controls.

1. Ergonomic Program

Develop and implement a site-specific ergonomics program aimed at the reduction of risk and prevention of MSDs in the workplace. Periodically review your ergonomics training program and revise it when necessary, incorporating input from the employees. The program should include the following elements:

- Management commitment and employee participation.
 - Have an ergonomics team that is comprised of members of management and employees that meet at regular intervals to evaluate the effectiveness of the program.
- Worksite analysis.
 - Identification of potential problems related to physical activities in the workplace through observation, use of checklists, injury data analysis, or other analytical tools.
- Hazard prevention and control.
 - Address problems by selecting proper equipment and work practices.
- Safety and health training.
 - Training is necessary to ensure that employees and managers can recognize potential ergonomics issues in the workplace and understand measures that are available to minimize the risk of injury.
- Recordkeeping and program evaluation.
 - Evaluate the effectiveness of ergonomics efforts.

2. Training

Employees should be trained before they lift or reposition patients or perform other work that may involve risk of injury. Training should include:

- Policies and procedures that should be followed to avoid injury, including proper work practices and use of equipment.
- Recognition of signs and symptoms of ergonomic injuries and their early indications.
- The advantages of addressing early indications of MSDs before serious injury has developed.
- Procedures for reporting work-related injuries and illnesses.
- Charge nurses and supervisors should reinforce the safety program of the facility and help ensure the implementation of ergonomics recommendations.

3. Engineering Controls

Manual lifting of patients should be minimized in all cases and eliminated when feasible. Consider the use of the following:

- Powered sit-to-stand or standing assist devices. These can be used when transferring patients who are partially dependent, have some weight-bearing capacity, are cooperative, can sit up on the edge of the bed with or without assistance.





- Portable lift device (sling type). It can be a universal/ hammock sling or a band/ leg sling. These can be used when lifting patients who are totally dependent, are partial- or non-weight bearing, are very heavy, or have other physical limitations.

- Variable position Geri and Cardiac chairs. These can be used to repositioning partial- or no weight-bearing patients who are cooperative.



- Ambulation assist device. These can be used for patients who are weight bearing and cooperative and who need extra security and assistance when ambulating.

- Use scales with ramp to accommodate wheelchairs; portable-powered lift devices with built-in scales; and beds with built-in scales.

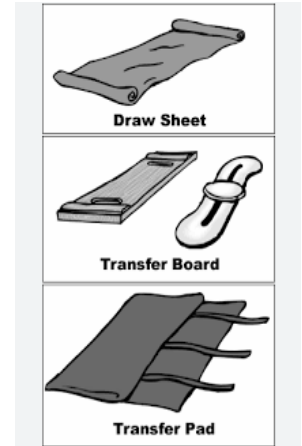


- Use shower and toileting chairs during bathtub and toileting activities.

4. Administrative and Work Practice Controls

Prohibit manual lifts where possible. If a lift is not available, require that heavy lifts are conducted by two people to limit force exertion.

- During lateral transfers, use devices to reduce friction force when transferring a patient such as a draw sheet or transfer cot with handles to be used in combination with slippery sheets, low friction mattress covers, or slide boards.



- Use a Gait belts/transfer belts with handles when transferring patients from a bed to chair, or chair to chair. It is also useful when repositioning residents in chairs or supporting residents during ambulation.

- Medical management of early symptoms and injuries reported by staff.
- Identify activities that may put employees at an elevated risk for musculoskeletal disorders. Such activities include but are not limited to:
 - Bending to make a bed or feed a patient.
 - Lifting food trays above shoulder level or below knee level.
 - Collecting waste, pushing heavy carts.
 - Bending to remove items from a deep cart.
 - Lifting and carrying when receiving and stocking supplies.
 - Bending and manually cranking an adjustable bed.

While some hazards may be materially reduced or eliminated by implementing a single means of abatement, in most cases a process using the well-established elements of a safety and health program, will provide the most effective method of addressing these ergonomic risk factors. These components include accurate injury and illness recognition and record keeping, work place analysis of jobs and tasks sufficient to assess the hazards and propose steps for their abatement, development of engineering, administrative and work practice controls or actions to materially reduce the hazards, and education and training of workers and management such that they can recognize and report hazards at their earliest stages, and fully understand and comply with proposed work practices and abatement techniques. Additionally, the commitment of both management and employees are important to the success of a program, as is a process to continually evaluate the effectiveness of your interventions.

You may voluntarily provide this Area Office with progress reports on your efforts to address these ergonomic conditions in your workplace. OSHA may return to your worksite to further examine the conditions noted above.

Attached is a list of available resources that may be of assistance to you in preventing work-related injuries and illnesses in your workplace.

- OSHA 's Internet web page on ergonomics.
- OSHA 's Safety and Health Program Guidelines.
- Free consultation, including onsite visits, from OSHA 's 24(d) on site consultation: OSHCON Texas Department of Insurance, 1-800-687-7080.
- Free publications on ergonomics from the National Institute of Occupational Safety and Health (1-800-35-NIOSH or <http://cdc.gov/niosh/homepage.html>).
- Elements of Ergonomics Program. Pub #97-117)
- Universities/ colleges with industrial engineering and/or ergonomics programs
- Loss control services from your insurance carrier may be available.

In the interest of workplace safety and health, however, I recommend that you take the following steps voluntarily to eliminate or reduce your employees' exposure to the hazards described above.

Sincerely,



Mark R. Briggs
Area Director