

**U.S. Department of Labor**

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June 3, 2021

Tiffany Patterson  
EHS Program Manager  
American National Red Cross  
700 Spring Garden Street  
Philadelphia, PA 19123

Dear Ms. Patterson:

An inspection of the American National Red Cross Penn Jersey Blood Service Region Mobile Collections beginning on December 8, 2020 disclosed the following conditions, which are consistent with employee injuries and illnesses and may be caused by ergonomic risk factors in the workplace.

We have examined available information on the risk factors related to tasks performed by employees, as well as your efforts to address ergonomic hazards. Review of documents provided as well as interviews conducted as part of this inspection revealed that employee(s) working as collections staff are exposed to ergonomic hazards resulting in musculoskeletal disorders (MSDs), such as MSDs of the lower back, shoulders, knees, elbows, and lower legs. These injuries are associated with the job-specific tasks regularly performed in the workplace such as, but not limited to pushing and pulling carts, unloading and loading carts with supplies and equipment, and collecting blood from donors. Interviewed employees reported difficulty in lifting equipment, pushing carts, and frequently bending over at donor beds. In the interest of workplace safety and health, I recommend that you voluntarily take the necessary steps to materially reduce or eliminate your employees' exposure to the conditions listed above.

It is our understanding that the American National Red Cross has a Manual Material Handling Policy to address ergonomic hazards. Some of these hazards are addressed in the employee training video 45/45/45 Blood Drive Setup Process. However, our evaluation suggests the following actions be taken to expand upon the existing program:

- Develop and implement a thorough ergonomics program which includes both management and employee involvement. This includes feasible control strategies and/or measures that can help reduce risk and prevent the occurrence of work-related MSDs.
- Assign a person to carry-out an ergonomics program in the workplace.
- Ensure that the employees follow proper work methods, practices and techniques when performing the job-specific tasks involving repetitive lifting, lowering, pushing, pulling, holding, and carrying of various types of supplies and equipment.
- Ensure employees have proper assistance when setting up blood drive sites. Having staff available to assist one another, including two-person lifts when lifting heavy or bulky items, will reduce worker exposure to ergonomics injuries when lifting, pushing, and pulling for each drive.
- Ensure equipment, such as rolling carts used to transport materials and handles on boxes and equipment, are in good condition to prevent improper handling of heavy or bulky

items. Move carts as close as possible to tables and work areas before adding or removing supplies and equipment. This will decrease the distance that employees are required to carry supplies and equipment.

- Limit the stacking of carts to below shoulder-height and implement procedures on properly distributing weight on a cart. Utilize tables, or carts stacked to waist-height, when emptying or filling cases and boxes. Minimize lifting and lowering below knee-height as much as possible. If an employee must pack or unpack supplies on the floor, have foam padding available for kneeling.
- Regularly conduct workplace, job, and task analysis to identify specific ergonomic risk factors that may cause or contribute to increased risk of MSDs in the workplace. Determine steps to eliminate or materially reduce hazards through engineering and administrative controls. For example, implement procedures and train employees on adjusting the height of donor beds to minimize discomfort from leaning over the donor bed.
- Conduct a symptom survey to identify the number of employees who are experiencing symptoms of cumulative trauma disorders (often identified as strains, sprains, pain, etc.) and to better understand the scope of the problem in the workplace.
- Conduct job-specific ergonomics training for all levels of employees, including management, to address ergonomic risk factors associated with job-specific tasks and how to eliminate them.
- Periodically review the company's ergonomics training program and revise as necessary, incorporating input from the workers. Worker feedback is a crucial component of the review process.
- Develop a mechanism for early reporting of signs and symptoms of musculoskeletal disorders. Inform workers of the mechanism and the importance of early recognition and reporting of any work-related injuries. Encourage medical treatment when necessary.
- Conduct accident, injury, and near-miss investigations to determine the root causes of the incidents with a focus on eliminating hazards rather than assigning blame to either the company or the employee. This includes developing a log that provides details of the injury or near-miss such locations of incident, equipment used, and injured body part to determine trends and to implement proper controls.
- Develop a local ergonomics committee to help identify risk factors and possible solutions.
- Encourage the workers to stretch prior to and during the shift to improve muscle strength and flexibility, which may help prevent potential musculoskeletal disorders in the workplace. Encourage employees to exercise outside of work as well.

While some ergonomic related risk factors can be reduced or eliminated by implementing a single means of abatement, in most cases a process using certain components will provide an effective method of addressing the risk factors. If an ergonomic risk factor is to be addressed on an incremental basis to determine the effectiveness of a specific control strategy believed likely to provide a protective solution, it is important to track and evaluate the effectiveness of the results in a timely manner, and to timely implement additional control measures if initial controls fail to eliminate or materially reduce workers' exposures.

As with any change to address ergonomic problems, you should gather input from employees to determine which changes to implement and to troubleshoot any unforeseen problems with the changes. It is important that the American National Red Cross become more proactive in working with mobile collections in order to have more input into workplace design and in eliminating ergonomic risk factors related to jobs/tasks performed by employees.

You may voluntarily provide this Area Office with progress reports on your efforts to address these conditions. Under OSHA's current inspection protocol, we may return to your worksite in approximately one year 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.

If you have any questions, please feel free to call Liz Revelt at (215) 597- 5185.

Sincerely,

A handwritten signature in black ink, appearing to read 'T.D.', with a stylized flourish at the end.

Theresa Downs, CIH  
Area Director

The following 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  
<https://www.osha.gov/SLTC/ergonomics/index.html>
- OSHA's Safety and Health Program Guidelines
- National Institute of Occupational Safety and Health (NIOSH) free publication: Elements of Ergonomics Programs. Pub #97-117) <http://www.cdc.gov/niosh/docs/97-117/pdfs/97-117.pdf>
- California-OSHA's free publication: *Easy Ergonomics*  
[https://www.dir.ca.gov/dosh/dosh\\_publications/EasErg2.pdf](https://www.dir.ca.gov/dosh/dosh_publications/EasErg2.pdf)
- Universities/colleges with industrial engineering and/or ergonomics programs
- Your trade association