

**U.S. Department of Labor**

Occupational Safety and Health Administration  
Parsippany Area Office  
6 Upper Pond Road  
2nd Floor  
Parsippany, NJ 07054



July 28, 2021

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

Re: Inspections 1513430, 1531846, and 1533406

Dear Ms. Patterson:

Inspections of the American National Red Cross Penn/Jersey Blood Service Region Mobile and Fixed Collections locations including the Northern New Jersey area were conducted beginning on February 5, 2021. Our inspection was based on a complaint and it included a review of your OSHA recordkeeping logs from 2017 to 2020, employee and management interviews and workplace observation. Based on our review we identified the following conditions exist, which are consistent with employee injuries and illnesses and may be caused by ergonomic risk factors in the workplace.

The review of documents provided by the American National Red Cross as part of these inspections revealed that employees including but not limited to Donor Collections Assistants (DCAs), Mobile Unit Assistants (MUAs), and Collections Specialists (CSs) are exposed to ergonomic hazards resulting in musculoskeletal disorders (MSDs), such as MSDs of the lower back, shoulders, knees, elbows, and lower legs. These incidents may be caused by forceful exertions, repetitive movements and awkward body postures including frequent bending and twisting of the trunk, stooping and extended arm reaching when performing the job-specific manual materials handling tasks involving frequent lifting, lowering, pulling pushing, holding and carrying of containers with various products needed for the day to day operations of a blood drive collection. Furthermore, interviewed employees reported difficulty in lifting equipment, pushing carts, and frequently bending over at donor beds. Although employees receive training regarding lifting techniques, there has been no job-specific training on ergonomic risk factors, and no training on signs and symptoms of cumulative trauma disorders. 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.

MSDs cases from 2017 through 2020 occurred at the following frequency:

	Mobile NJ Total Cases			Mobile Draws NJ MSDs total		
	# cases	Days away	Job transfer	# cases	Days away	Days Job transfer
2017	9	250	278	6	72	181
2018	8	11	235	3	0	182
2019	13	13	208	1	0	24
2020	9	120	243	3	UNK	UNK

Year	Industry NAICS Code 62199	TCIR	DART	MSD DART
2017	US Bureau of Labor Statistics (BLS)	4.1	1.8	0.13
	ARC Mobile Sites Penn-NJ area	13.6	3.9	1.02
2018	US Bureau of Labor Statistics (BLS)	3.7	1.6	0.21
	ARC Mobile Sites Penn-NJ area	11.4	3.5	0.70
2019	US Bureau of Labor Statistics (BLS)	--	1.6	0.18
	ARC Mobile Sites Penn-NJ area	12.2	6.8	0.35
2020	US Bureau of Labor Statistics (BLS)	Not Available	Not Available	Not Available
	ARC Mobile Sites Penn-NJ area	15.7	4.6	1.43

NAICS code 62199

TCIR – Total Cases Injury Rate

DART – Days Away Restricted and Transferred

While some ergonomic-related risk factors can be reduced or eliminated by implementing a single means of abatement, in most cases a process using components such as the following will provide the most effective method of addressing these ergonomic risk factors. These components include accurate injury and illness record keeping, medical management and treatment for employees suffering work related injuries, work place analysis of jobs and tasks to assess the hazards and the steps to abate them, engineering, administrative and work practice controls or actions to materially reduce or eliminate the hazards, and education and training of workers and management. 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

implement additional control measures if initial controls fail to eliminate or materially reduce employee 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. In addition to the specific recommendations listed, it is important that the American National Red Cross proactively works with mobile collections employees in order to have more input into workplace design and in eliminating ergonomic risk factors related to jobs/tasks performed by employees.

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 power point presentation 45-45-45 Playbook. We have examined available information on the risk factors related to tasks performed by employees, as well as your efforts to address ergonomic hazards. The evaluation indicates that the following actions be taken:

- 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 that the employees follow manufacturer's recommendations for handling and transporting heavy equipment such as the MCS machine.
- 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.
- 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.
- Develop and implement a procedure to handle wheeled equipment when used on ramps so as to reduce struck by injuries when unloading trucks.
- Assign a person to implement the ergonomics program aimed at reducing the risk and preventing MSDs 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 all equipment such as rolling carts and stair climbers, among other, used to transport materials, including handles on boxes and equipment are in good working condition to prevent improper handling of heavy or bulky items.

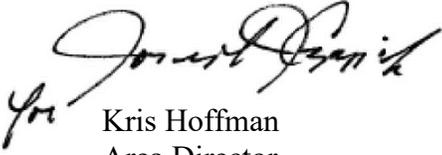
- Regularly conduct workplace, job and task analysis to identify job-specific ergonomic risk factors that may cause or contribute to increased risk of MSDs in the workplace.
- Conduct a symptom survey to identify the number of employees who are experiencing symptoms of cumulative trauma disorders (often identified as strains, sprains, pain, etc.) 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 identify 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.
- 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 as the location 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.

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 examine the conditions noted above and controls adopted to address these hazards.

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 the Parsippany Area Director, Kris Hoffman at (973) 263-1003.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kris Hoffman". The signature is written in black ink and is positioned above the printed name and title.

Kris Hoffman  
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
- Trade associations