Ergonomic Program Standard

Prepared By: The Risk Management Department
In Conjunction With: The Elk Grove Unified School District IIPP Committee

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ACKNOWLEDGEMENTS

**Board of Education**
Jeanette J. Amavisca  
Pollyanna Cooper-LeVangie  
Priscilla S. Cox  
Pamela A. Irey  
William H. Lugg, Jr.  
Chet Madison, Sr.  
Alfred Rowlett

**Superintendent**
Steven M. Ladd, Ed.D.

**Associate Superintendent, Finance & School Support**
Rich Fagan

**Risk Management**
Marlon Robbins, Risk Manager
Vanessa Ham, Loss Control Specialist  
Jennifer McCain, Loss Control Specialist

**Contributors:**

**IIPP District Committee 10-11:**

<table>
<thead>
<tr>
<th>Name</th>
<th>Position/Department</th>
</tr>
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<tbody>
<tr>
<td>Robin Judd</td>
<td>Pre-K through 6 Schools</td>
</tr>
<tr>
<td>Helena Korner</td>
<td>Adult Ed - EGACE</td>
</tr>
<tr>
<td>Tony Almeida</td>
<td>Custodial</td>
</tr>
<tr>
<td>Sylvia Avalos / Laura Hall</td>
<td>Curriculum &amp; Professional Learning</td>
</tr>
<tr>
<td>Barbara Bartholomew</td>
<td>Education Svcs &amp; Student Svcs</td>
</tr>
<tr>
<td>Dewella Foster</td>
<td>Elementary &amp; Secondary Ed Offices</td>
</tr>
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<td>Stacey Allison</td>
<td>Facilities</td>
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<tr>
<td>Pat Djubek / Eric Walle</td>
<td>Fiscal Services</td>
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<tr>
<td>Kimberly Mazza</td>
<td>Food &amp; Nutrition Services</td>
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<tr>
<td>Manuel Azevedo</td>
<td>Grounds Department</td>
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<tr>
<td>Michael Wong</td>
<td>Health Services</td>
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<tr>
<td>Michael Dazey</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Myrna Rulon/Shannon Bloodworth</td>
<td>Learning Support Services</td>
</tr>
<tr>
<td>Armando Orozco/Tina Haisch</td>
<td>Maintenance</td>
</tr>
<tr>
<td>Ellie Cervantes</td>
<td>Payroll</td>
</tr>
<tr>
<td>Elsa Renix / Ruth Prince</td>
<td>Police Services</td>
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<tr>
<td>Matthew Hyden</td>
<td>Printing Services</td>
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<td>Brad Bain</td>
<td>Purchasing</td>
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<tr>
<td>Chanel Urbiztonto</td>
<td>Research &amp; Evaluation</td>
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<td>Ray Pietersen</td>
<td>Science Department</td>
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<tr>
<td>Justine Fuller</td>
<td>Secondary Schools IIPP Coordinator</td>
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<td>Torreyana Johnson</td>
<td>Superintendent’s Office &amp; Communications</td>
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<td>Jennifer Ballerini</td>
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<td>Phil McCullagh</td>
<td>Field Intervention Nurse</td>
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<td>Murt Anderson</td>
<td>Management</td>
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<td>Kandy Tobiassen in LCCHS</td>
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<td>Shelly Loller in Fiscal Services</td>
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<tr>
<td>Isabelle Aguiniga in SS &amp; HS</td>
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*Names in italics indicate the collective work of their respective departments.*
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I. PURPOSE

The Elk Grove Unified School District has adopted this Program to minimize musculoskeletal disorders (MSD’s) through the assessment of work-related factors (which may pose a risk of musculoskeletal disorders), the implementation of administrative and engineering control measures, and employee training. The program meets all requirements of the California Code of Regulations, Title 8, Subchapter 7, Group 15, Article 106, Section 5110, Repetitive Motion Injuries. This program document is a “living” document. It is designed to “breathe” with changes to the organization and regulations, and is thus subject to periodic changes and updates.

The effectiveness of this program is contingent upon the collective efforts and fulfillment of the responsibilities of all stakeholders to the District in achieving its goals and objectives.

Awareness of and compliance with all District safety rules and programs are considered conditions of employment. The District reserves the right to discipline employees, up to and including termination for failure to follow the guidelines of this program in accordance with established policies, procedures and negotiated agreements.

II. AUTHORITIES

California Code of Regulations, Title 8, Subchapter 7, Group 15, Article 106, Section 5110, Repetitive Motion Injuries.

III. DEFINITIONS

“MSD” Musculoskeletal Disorder disorders of the muscles, ligaments, bones, nerves, tendons and/or vascular system, alone or in combination that are caused by repeated movements. Musculoskeletal Disorders include the following:

→ Disorders of the muscles, nerves, tendons, ligaments, joints, cartilage, or spinal discs
→ Disorders that are not typically the result of any instantaneous or acute event (such as a slip, trip, or fall) but reflect a more gradual or chronic development (nevertheless, acute events such as slips and trips are very common causes of musculoskeletal problems such as low back pain)
→ Disorders diagnosed by a medical history, physical examination, or other medical tests that can range in severity from mild and intermittent to debilitating and chronic.
→ Disorders with several distinct features (such as carpal tunnel syndrome) as well as disorders defined primarily by the location of the pain (i.e., low back pain)
“Licensed Physician” A person with a M.D. or D.O. degree licensed and diagnosing within the scope of his or her practice. Diagnosis by any medical practitioner acknowledged according to the California Labor Code for the purposes of claims for workers’ compensation are included.

“Predominant Cause” The determination, based upon objective medical evidence that a medical condition has resulted from a work-related repetitive job, process or operation of identical work activity.

“Identical Work Activity” The same work-related repetitive motion task, such as but not limited to word processing, assembly or loading, performed by more than one employee.

“Workstation” The primary physical location of where an employee performs the bulk of his/her usual and customary duties. A workstation can be a desk for a clerical employee, or a warehouse floor for a warehouse worker.

IV. COVERED EMPLOYEES

All employees who work in a job, process, operation where a Musculoskeletal Disorder (MSD) has occurred to more than one employee under the following conditions are covered under the Ergonomic Standard:

1) Work related causation. The repetitive motion injuries (MSDs) were predominantly caused (i.e. 50% or more) by a repetitive job, process, or operation;

2) Relationship between MSDs at the workplace. The employees incurring the MSDs 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 MSDs were musculoskeletal injuries that a licensed physician objectively identified and diagnosed; and

4) Time requirements. The MSDs were reported by the employees to the employer in the last 12 months but not before July 3, 1997.

V. RESPONSIBILITIES

1) Risk Management has the following responsibilities:

   a. Maintaining a written program in compliance with current Federal and State regulations, including annual updates.

   b. Coordinate, implement, conduct and monitor any training required by the regulations.

   c. Providing all employees in the departments listed in section IV with information about this Program.

   d. Assisting employees and supervisors in implementing the requirements of Elk Grove Unified School District’s Standard.

   e. Assisting sites and departments in identifying and implementing feasible engineering controls.
f. Maintaining records as required under the regulations.
g. Conduct facility audits to assess exposure in the workplace and use of engineering and administrative controls in order to ensure their effectiveness.

2) The Human Resources Department is responsible for:
   a. Ensuring compliance with this standard and all safe work practices after notice from Risk Management that an unsafe act has occurred and directing the immediate supervisor (administrator of classified manager) to meet with the employee involved to initiate its counseling and progressive discipline programs in accordance with established District policy and procedure.

3) Department Managers or Supervisors will be responsible for:
   a. Informing their staff of the location and availability of this written program, training materials, and information supplied to the District by the U.S. Department of Labor or Cal/OSHA.
   b. Informing their staff of the equipment, operations or areas where there may be a concern.
   c. Providing and ensuring their staff use engineering controls and/or wear appropriate clothing to prevent problems.
   d. Provide materials and equipment to ensure fulfillment of their operational goals and objectives in a safe work environment.
   e. Ensuring Risk Management is notified of a need to evaluate work conditions under this standard.
   f. Maintaining records as required under the regulations.

4) The immediate supervisor (administrator or classified manager) is responsible for:
   a. Ensuring compliance with this standard by meeting with the employee involved and applying counseling and progressive discipline in accordance with established District policy and procedure.

5) Employees are responsible for:
   a. Notifying their supervisor and or Risk Management of the need to evaluate work conditions that may cause issue.
   b. Using engineering controls or wearing appropriate clothing to prevent issue in compliance with Safe Operating Procedures (SOPs), postings, instructions or training received.
   c. Maintain physical fitness in order to meet the physical demands of his/her job.
   d. Ensuring that their materials and equipment offer the least amount of resistance or strain in their use, and to use/maintain those materials and equipment properly.

6) District’s IIPP Committee is responsible for:
   a. Maintaining this program and conducting an annual review and update.
   b. Reviewing incidents and causes of issues related to this Program.
   c. Recommend strategies to reduce the occurrence of employee incidents and injuries.
VI. COMPONENTS OF STANDARD

Ergonomics is the science of fitting workplace conditions and equipment to the physical capabilities of the working population. Effective and successful "fits" assure high productivity, reduced incidence of illness and injury risks, and increased job satisfaction among employees. The scope of ergonomics is broad and impacts more than the affected employee. It impacts the employee’s department and ultimately the District’s ability to meet the educational needs of its students and their families.

1) RISK FACTORS ASSOCIATED WITH MSDs:
Risk factors (or exposures) are jobs requiring repetitive, forceful, or prolonged exertions of the hands; frequent or heavy lifting, pushing, pulling or carrying; and prolonged awkward postures. Vibration and environmental conditions may add risk to these work conditions. Jobs or working conditions presenting multiple risk factors will have a higher probability of causing a musculoskeletal problem. The level of risk depends on the intensity, frequency, and duration of the exposure to these conditions and the individual’s capacity to meet the force or other job demands which may be involved. Other risk factors include, but are not limited to the following: employee health; economic stability of employee families; outside hobbies and recreation; home computer use; and economic stability of the organization.

Exposures are identified through a variety of means, including but not limited to the following:
- Scheduled and unscheduled inspections of worksites and work processes by supervisors, IIPP Coordinators, and appropriate assigned personnel
- Submission of Request for Evaluation of Safety Condition forms
- Completion of the Job Hazard Analysis form
- Completion of a Job Analysis
- Requests for workstation evaluations
- Investigations on claims for workers’ compensation and MSD data by the District IIPP Committee

2) SYMPTOMS ASSOCIATED WITH MSDs:
Symptoms or subjective complaints may or may not be attributable to MSD’s. A variety of medical conditions may be the cause(s) of the same symptoms and complaints. A medical evaluation subsequent to the reporting of a symptom may diagnose a medical condition, or contributing factors, which may not demonstrate the symptoms stem from a work-related cause, yet exhibit the same symptoms. For this reason this program refers to symptoms “associated” with MSD’s such as the following:
- Diagnoses such as carpal tunnel syndrome, tendinitis, tenosynovitis, epicondylitis, cervical nerve impingement, thoracic outlet syndrome and low back pain
- Non-specific subjective complaints like "hand pain", “neck pain” or “back pain” which - while not a specific diagnosis - may be an indicator of a significant health problem if severe or persistent
Complaints of undue strain, localized fatigue, discomfort, or pain that does not go away after overnight rest and
Frequent visits to a licensed physician making references to physical aches and pains related to certain types of work tasks

3) REPORTING MSDs:
There are a number of ways to report suspected MSDs:
1. request an ergonomic evaluation of your work area
2. Contact the Risk Management Department and request for an ergonomic evaluation to be completed on your workstation
3. Contact the Field Intervention Nurse (FIN) or the Risk Management Department (which in turn will refer you to the FIN) and report the symptoms you are experiencing
4. File a claim for workers' compensation
5. Submit a completed Request for Evaluation of Safety Condition form. The form is available from your workplace IIPP Coordinator, or in Exchange under the IIPP folder

4) WORKSTATION EVALUATION:
A workstation is the primary location where an employee performs his/her job such as a desk, a car or bus, or place on an assembly line. Workstation evaluations are conducted upon request, or as part of the investigative process after filing a claim for workers’ compensation. Someone trained in ergonomics and how to conduct evaluations conducts the evaluation. The evaluation uses a standardized checklist, which ensures all aspects of a person's workstation are included, and all evaluations are based upon criteria, which is applied consistently.

All employees who work at a desk or computer, even if for just a portion of the work day, should conduct an ergonomic Self-Assessment Process (Appendix C) whenever they begin working in a new workstation or a new position. Additionally, it is recommended that employees conduct this process annually.

Any employee who is concerned he/she may incur an MSD as a result of the performance of his/her duties, may request a Workstation Evaluation by contacting the Risk Management Department and completing an Ergonomic Evaluation Request Form (Appendix B). The employee should also notify his/her immediate supervisor. A representative from Risk Management will visit the employee’s workstation and conduct an evaluation of work processes, administrative and engineering controls. At the time of the evaluation, the representative may make suggestions to the employee regarding body mechanics and workstation adjustments. Based upon the level of exposure in incurring an MSD, the representative will recommend further adjustments and controls, including the purchase of equipment designed to minimize MSDs.

5) WORKSITE EVALUATION:
A Worksite Evaluation is the evaluation of all the workstations, which perform duties of a similar nature. The evaluation is conducted subsequent to the filing of two (2) claims for workers’ compensation within one (1) year at a worksite.
6) **CONTROLS:**
Any exposures which may have caused MSDs shall be corrected, or if not capable of being corrected have the exposures minimized to the extent feasible. There are two basic methods for minimizing the occurrence of MSD’s - engineering and administrative controls.

*Engineering Controls*: Measures designed to ensure the materials and equipment used by the employee are conducive to minimizing MSD’s. Examples of engineering controls include, but are not limited to the following:
- Articulating keyboard trays which allow the keyboard to be adjusted at the right height and distance so as to keep the arms and wrists in a neutral position.
- Insulated grips or gloves for hand tools and power tools to reduce vibration and grasp exertion.
- Broom handles designed to sweep underneath bus seats to minimize bending and stooping.

*Administrative Controls*: Measures designed to ensure work processes are conducive to minimizing MSD’s. Examples of administrative controls include, but are not limited to the following:
- Job task rotation
- Changes to job task performance methods
- Temporary Modified Duty

The District may also consider other control measures which would not impose additional unreasonable costs.

7) **EQUIPMENT:**
Risk Management will maintain an account from which equipment may be purchased upon recommendation from an ergonomic evaluation. The equipment is intended solely for the use of the individual who has received the ergonomic evaluation or has evidence of a medical condition consistent with this standard. The equipment is intended to address the specific work processes, and to mitigate the risk factors which cause MSDs. The type of equipment is determined on a case-by-case basis.

Purchased equipment will remain the property of the Risk Management Department and is to be returned to Risk Management upon the employee’s separation from employment or when there is no longer a need for the employee to use the equipment. Returned equipment will be available to be used by another employee needing such equipment.

Equipment is not provided for aesthetic reasons or to make people feel comfortable. Additional furniture and equipment for the employee, or a group of employees is not available through this program and should be addressed through the District budget process.

8) **PHYSICIAN RECOMMENDATION:**
A note from a physician prescribing equipment does not automatically mean such equipment will be provided. There must be a linkage between the equipment and the medical condition. The
equipment must be remedial and/or preventative to further deterioration of a diagnosed MSD condition.

Physician notes may be required to be accompanied by an evaluation report. In order to obtain the necessary medical information, the District may require a fitness-for-duty examination in accordance with Board Policy 4112.4, 4214.4, 4312.4. The report shall include a diagnosis, prognosis and treatment regimen. The physician shall note any performance restrictions resulting from the diagnosed medical condition. The type of equipment will be evaluated in terms of any alleviation of limitations imposed by the restrictions.

VII. TRAINING

Training is conducted as part of the new-hire orientation process, when new exposures are introduced to an employee’s environment, and to employees at a worksite subsequent to two (2) accepted claims for workers’ compensation by employees at that worksite who perform similar duties. Training shall include the following subjects:

→ Ergonomic Program
→ Exposures associated with MSD’s
→ Symptoms and consequences of injuries caused by repetitive motion
→ Importance of reporting symptoms and injuries
→ Methods to minimize MSD’s

VIII. RECORDKEEPING

All medical information obtained under this policy will be treated in accordance with the Confidentiality of Medical Information Act (Civil Code Sections 56-56.37), and the General Industry Safety Orders, Section 3204. Medical information will be kept in separate files from Personnel records and shall be available for inspection by an employee upon request.

IX. REPORTING

“WHISTLEBLOWER” PROTECTION: California Labor Code Section 6310 prohibits employers from firing or discriminating against any worker because the worker has informed their employer, or filed a complaint with Cal/OSHA, about unsafe or unhealthy working conditions. Employees have a right to inform their employer or file a complaint with Cal/OSHA when unsafe conditions exist at their workplace, and this right is assured to them under the California Occupational Safety and Health Act of 1973.

To report an unsafe condition use the Injury & Illness Prevention Program (IIPP) form titled “Request for Evaluation of Unsafe Condition”. This form may be submitted anonymously if you prefer. You can
locate this form in any IIPP binder at any site or on the EGUSD District’s Public Exchange Folders in the IIPP folder.

X. CONTRACTORS

Contractors shall maintain and enforce an Injury and Illness Prevention Program as required by State law, and in signing any contractual agreement with the District, makes the following certification:

“CONTRACTOR is aware of the provisions of California Labor Code, Division 5, and of the California Code of Regulations, Title 8, and shall maintain an active comprehensive Injury and Illness Prevention Plan – including applicable standards (e.g. ergonomic, haz-com) - in accordance with such provisions before commencing the performance of the contractual agreement. The Injury and Illness Prevention Plan shall be available to EGUSD upon request.”
APPENDIX A: California Code of Regulations, Title 8, §5110


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

(1) Work related causation. The repetitive motion injuries (MSDs) were predominantly caused (i.e. 50% or more) by a repetitive job, process, or operation;

(2) Relationship between MSDs at the workplace. The employees incurring the MSDs 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 MSDs were musculoskeletal injuries that a licensed physician objectively identified and diagnosed; and

(4) Time requirements. The MSDs were reported by the employees to the employer in the last 12 months but not before July 3, 1997.

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

(2) Control of exposures which have caused MSDs. Any exposures that have caused MSDs 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 work station 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;

(B) The exposures which have been associated with MSDs;

(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 MSDs.

(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].
APPENDIX B: Ergonomic Evaluation Request Form

Ergonomic Evaluation Request Form

EGUSD Risk Management will provide a certified In-House Ergonomic Evaluator to evaluate an employee’s workstation. The evaluation will consist of an interview with the employee to determine how effectively the workstation enables the performance of job duties/tasks. The evaluator will make recommendations regarding work processes and workstation equipment. Please complete this Request form. Within about 2 working days of receipt in the Risk Management Department, you will be contacted to schedule an appointment for an evaluation. Please allow up to 90 minutes for the appointment.

Date:

Person requesting evaluation (please print):

Person evaluation is for (please print):

Position: Work Schedule:

Site: Room/Office:

Phone: Email:

Reason for request:

Physical concerns:

Brief description of job tasks:

Check all that may apply

\[\text{Computer} \quad \text{minutes per day} \quad \text{Data Lookup}\]

\[\text{Data Entry} \quad \text{Email}\]

\[\text{Phone} \quad \text{minutes per day} \quad \text{Answering calls} \quad \text{Placing Calls}\]

\[\text{10-Key} \quad \text{minutes per day} \quad \text{On Computer} \quad \text{On Adding Machine}\]

\[\text{Reading} \quad \text{minutes per day}\]

\[\text{Writing} \quad \text{minutes per day}\]

Manager/Administrator Authorization for Ergonomic Evaluation: the school site/department may be responsible for all or part of the cost of any equipment or adjustments needed.

Name Signature Title
APPENDIX C: Employee Self-Assessment Process

The following describes the process for employee ergonomic evaluations. All employees who work at a desk or computer, even if for just a portion of the work day, should conduct an ergonomic Self-Assessment Process.

1) Print the Easy Ergonomics Checklist. (Appendix D)
2) Open the Easy Ergonomics for Desktop Computer Users (Appendix E) and begin with page 2.
3) When you reach page 9, begin using the Checklist there to ensure that your desk is properly adjusted to fit you.
5) Review the Office Ergonomics Training Handout (Appendix F) and the Stretches (Appendix G) and begin incorporating mini-breaks (10-30 seconds every 90 minutes) into your work day
## APPENDIX D: Easy Ergonomics Checklist

### CHECKLIST

Instructions:
Answer the questions below to determine problems that might cause MSDs. If you answer “NO,” turn to the page indicated for improvement options. If you run out of improvement options and you still have problems, contact your immediate supervisor.

<table>
<thead>
<tr>
<th>GOAL</th>
<th>pp. 9-33</th>
<th>YES</th>
<th>NO</th>
<th>If NO, see page</th>
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<tbody>
<tr>
<td><strong>WHEN SITTING</strong></td>
<td></td>
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<tr>
<td>1a-b</td>
<td>Is the chair height adjusted so that your feet rest comfortably flat on the floor or footrest, with your knees just slightly lower than the hips?</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Look at the depth of the seat pan. Is there a small gap (2 to 4 inches) between the back of your legs and the front edge of the seat pan?</td>
<td>10</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Does the curve of the back of the chair fit into your low back?</td>
<td>11</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Does the back of the chair tilt back?</td>
<td>12</td>
<td></td>
<td></td>
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<tr>
<td>5</td>
<td>With your shoulders relaxed, are the armrests slightly below your elbows, and do your arms hang comfortably at your sides?</td>
<td>13</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Can you get your chair close enough to your keying, mousing, or writing surfaces without reaching?</td>
<td>15</td>
<td></td>
<td></td>
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<tr>
<td><strong>WHEN KEYING</strong></td>
<td></td>
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<tr>
<td>7a-d</td>
<td>With your shoulders relaxed and your fingers curved, is the home row of keys at the same height as your elbows or slightly below your elbows?</td>
<td>17</td>
<td></td>
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<tr>
<td><strong>WHEN POSITIONING THE CURSOR WITH A POINTING DEVICE</strong></td>
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<tr>
<td>8</td>
<td>Is the pointing device positioned close to the keyboard?</td>
<td>20</td>
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<td><strong>WHEN ORGANIZING THE WORK SPACE</strong></td>
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<tr>
<td>9a-c</td>
<td>Are you able to use your work surface and equipment without over-reaching or using awkward postures?</td>
<td>23</td>
<td></td>
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<tr>
<td><strong>WHEN VIEWING THE MONITOR</strong></td>
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<tr>
<td>10a</td>
<td>Is it in front of you and the top line of print is at or just below eye level or even lower if you wear bifocal, trifocal, or progressive lenses; AND are you able to scan the screen from top to bottom using only eye movements, not head movements?</td>
<td>27</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10b</td>
<td>Can you sit against the back and read the monitor screen from a comfortable distance, without experiencing eye fatigue, blurred vision, or headaches?</td>
<td>28</td>
<td></td>
<td></td>
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<tr>
<td>10c</td>
<td>Is the monitor screen free of glare?</td>
<td>29</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>WHEN READING THE DOCUMENT</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11a-d</td>
<td>Is the document off the flat work surface and at the same distance as the monitor screen?</td>
<td>31</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>WHEN USING NEW SOFTWARE PROGRAMS AND OPERATING SYSTEMS</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td>Have you been trained on the software programs and operating system you are using?</td>
<td>33</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX E: Easy Ergonomics for Desktop Computer Users

http://www.dir.ca.gov/dosh/dosh_publications/computerergo.pdf
APPENDIX F: Risk Management Training Program

All IIPP Training Programs are available for viewing and/or printing at:
http://www.egusd.net/riskmanagement/IIPP.html
APPENDIX G: Risk Management Employee Informational Brochure

All Employee Information Brochures are available at:
http://www.egusd.net/riskmanagement/IIPP.html