

ErgoRight Solutions Risk Assessment

Overview of Minnesota Ergonomic Statute

In 2023, the Minnesota Legislature passed Minnesota Statutes § 182.677, Ergonomics. This statute applies to all warehouse distribution center employers with 100 or more employees, meatpacking and poultry processing sites with 100 or more employees, and health care facilities.

To meet the standards of the Ergonomics Statute, each covered facility must have a written ergonomics program establishing the employer's plan to minimize the risk of its employees developing or aggravating musculoskeletal disorders. The program must include risk assessment, initial and ongoing employee training, early reporting procedures, a process for employees to propose solutions, procedures to ensure any plant modifications or major construction projects are consistent with program goals, and program evaluation on an annual and process-change basis. The required program items are detailed in Minn. Stat. 182.667, subdivision 2(a)-(b).

Covered Facilities

The MN Ergonomic Program applies to the following industries with identified North American Industrial Classification System (NAICS) codes:

- Healthcare Facilities
 - Hospitals (NAICS Code(s) 622110, 622210, 622310)
 - Outpatient Surgical Center (NAICS Code: 621493)
 - Nursing Homes (NAICS Code 623110)

- Warehouse Distribution Center—an employer with 100 or more employees in Minnesota and a North American Classification system code(s) of:
 - 493110, 423110, 423990, 424110 to 424990, 454110 or 492110

- Meatpacking Site—a meatpacking or poultry processing site with 100 or more employees in Minnesota and a North American Industrial Classification system code(s) of:
 - 311611 to 311615, except for NAICS code 311613

Proposed Work

On-Site Solutions Physical Therapy will carry out an Ergonomic Risk Assessment Review to help clients understand their level of compliance with MNOSHA's 2024 Ergonomic Program Standards for companies with the relevant NAICS codes and over 100 employees in Minnesota.

The Risk Assessment is based on:

- a review of relevant documentation related to a client's current safety and ergonomics programming, practices and policies;
- information gathered through a site visit to observe workstations and work activities;
- interviews with key safety stakeholders and production employees.

Based on information gathered, the OSSPT team will compile a written report that indicates where a client has met or not met MNOSHA standards, and which includes recommendations for mitigation of those areas that are not up to standard along with relevant suggestions for improved programming.

Implementation of Work

Step One: Request for Documentation and Records

Step Two: Document review and on-site visit scheduling.

Once documentation has been received and reviewed, our team will schedule a physical walk-through of your premises and a list of key employees to be interviewed. The scope of this visit will be determined after your initial information has been reviewed.

Step Three: Completion of physical walk through and interviews.

Step Four: Completion and delivery of Risk Assessment Report.

Step Five: Follow up meeting scheduled to review findings and answer questions.

Deliverable

The deliverable for this service will be a written Ergonomic Risk Assessment Report to be provided no later than 30 days after the site visit. A follow-up meeting to discuss Report findings will be scheduled after the client reviews their report.

Requested Documents and Records for Review

These documents may be provided in electronic or physical form.

Logs and Records

- OSHA 300 and 301 logs (for the past 5 years)
- Record of all employee visits to on-site medical or first aid personnel (5 years)
- Record of all employee MSK disorders (5 years)



Policies, Program or Process Descriptions

- Description of Injury Reporting process for your workplace
- Description of Early Signs and Symptoms Reporting process
- Charter/Mandates for Safety or Ergonomics Committees
- Any Symptom Survey/Ergonomic Discomfort Survey results
- Description of Process for Employees to make Ergonomic Recommendations/identify Ergonomic Issues

Ergonomic Training Materials

- Description of Training Process
- Training Records/Logs
- Training Materials

Other

- Any information related to an Annual Ergonomic Program Evaluation
- Any JHA Surveying pertaining to ergonomic risk

Meeting Minutes for the past 5 years (if applicable) for:

- Safety Committee Meetings
- Ergonomic Committee Meetings
- Kaizen or other continuous improvement events



Sample Page from Risk Assessment Report

Statute 182.677 Elements Subdivision 8: Availability of Records

<p>1</p>	<p>Not met</p>	<p>Required Element: The employer must ensure that the certification records required by Minn Stat 182.677 subd 7 (above) are up to date and available to the commissioner, employees and authorized employee representatives, if any, upon request.</p> <p>Comments: This element relates specifically to recordkeeping related to ergonomics training for new hires and for annual training for all employees.</p> <p>As stated above, the review of documents did not find any written process related to recordkeeping for ergonomic training.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> • When developing their training recordkeeping system, [client] should make sure they consider how and this information will be stored and updated to ensure timely compliance with any requests for these records.
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