February 24, 2015

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California Association for Health Services at Home (CAHSAH), representing over 500 home care businesses, including licensed home health agencies and hospices would like to thank the Department of Industrial relations and their staff for the opportunity to submit comments regarding health workforce safety regulations.

The latest draft requires that staff be trained every 90 days to review safety defense training. For hospice and home health, who have less than 1% of reported violence, this requirement is cumbersome and difficult to implement and coordinate with staff. It is not uncommon for care staff to not be in the office for weeks at a time because electronic health records are used. To require all staff to be present every 90 days could jeopardize the continuity of our patients care. A more appropriate method of training would be at a lower frequency and should be available online.

The training "90 day" training requirement mirrors our initial concern that one set of regulations would be developed that fails to meet the unique needs of the health settings. This requirement does not fit with how home health and hospice operate. To require safety training upon hire would be more appropriate and could include information on who to report safety issues and discharge patients, and how to report instances of violence, if any occur.

Lastly, all health workforce staff should be training on the elements of their employer's safety plan, how to report concerns, and events of violence.

We look forward to continuing our work on this issue and can be available to discuss this in greater detail. I can be reached at 916-651-5795 or via email at jgabales@cahsah.org

Best Regards,

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