



August 16, 2026

Department of Industrial Relations
California Division of Occupational Safety and Health
1515 Clay Street, Room 1303, Oakland, CA 94612

ATTN: rs@dir.ca.gov

RE: JULY 22 WPV DISCUSSION DRAFT

I am a nationally recognized security expert who specializes in workplace violence prevention. My professional career and academic journey have focused on developing and supporting threat assessment and violence prevention programs. I have been closely following the development of the 3343 general industry workplace violence prevention standard and would like to offer the following feedback.

While the standard has incorporated many changes and additions during development, there is very little information on behavioral threat assessment. In fact, the term is not mentioned once in the draft standard.

Under the Plan section, Item 4: “*Effective procedures for the employer to accept, **evaluate**, and respond to reports of workplace violence*” is as close as the standard gets.

Strongly consider developing a Cal/OSHA guidance document that provides structure for behavioral threat assessment. This could be especially helpful to smaller organizations who may not have access to this recognized industry standard.

The Division’s efforts should be applauded for leading the nation in developing a general industry standard. There is still much work to be done to improve our workplaces against threats of violence. Please feel free to contact me with any questions. If I can be of any assistance, do not hesitate to reach out.

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