TACTBOOK

COMMENTS ON PROPOSED §3343

Workplace Violence Prevention in General Industry
July 22, 2026 Revised Discussion Draft

SUBMITTED BY	ORGANIZATION	SUBMISSION DATE
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PRIMARY POSITION

TACTBook supports adoption of a strong, operational workplace violence prevention standard. The final rule should make clear that compliance is not satisfied by maintaining a written plan and delivering annual training. An effective program must identify hazards, activate a reliable response, investigate incidents and near misses, complete corrective actions, communicate learning to employees, and measure whether risk is actually being reduced.

Submitted via email to: rs@dir.ca.gov

Executive Summary

I submit these comments as a former registered nurse with critical-care and emergency experience, a clinical violence prevention consultant, founder of the nonprofit TACTBook, and designer of Clinical Violence Reduction Systems (CVRS). My work focuses on the operational space between policy and frontline performance: how workers recognize changing risk, obtain help, coordinate during an event, document what occurred, recover afterward, and receive evidence that their report produced meaningful change. TACTBook's work has included healthcare-system implementation, policy and governance development, interdisciplinary training design, legislative consultation, and international learning from United Kingdom violence-prevention and conflict/containment models.

The July 22 draft is materially stronger than a training-only approach. It recognizes employee participation, site-specific hazards, emergency response, post-incident investigation, corrective measures, and records access. Those features should be preserved. The recommendations below are informed by TACTBook's CVRS Governance & Operations Playbook and Professional Development & Education Guide, which are being used in active healthcare-client policy, governance, and implementation work; the NHS Violence Prevention and Reduction Standard; the Safewards conflict and containment model; California's healthcare violence-prevention standard; and OSHA and WHO systems guidance. The recommendations are intended to close implementation gaps that could otherwise allow technically compliant plans to remain operationally ineffective.

The continuing absence of a complete, operational general-industry standard remains concerning. California Labor Code section 6400 requires every employer to furnish safe and healthful employment, while federal law similarly requires employment free from recognized serious hazards. Workplace violence is a recognized occupational hazard. A specific standard is therefore not an unnecessary expansion of safety regulation; it is the practical architecture needed to make an existing protective duty consistent, preventive, and enforceable across workplaces that have historically received uneven attention.

Healthcare is arguably among the most complex environments occupational-safety regulators oversee: care cannot simply stop, risk changes rapidly, public access is continuous, staffing is constrained, privacy and civil-rights duties remain active, and workers must protect both themselves and the people they serve. TACTBook is currently applying the recommended system elements with healthcare clients and is seeing measurable implementation gains—such as clearer ownership, stronger reporting pathways, defined response roles, structured review, and traceable corrective actions—through low-cost process redesign, governance, education, and quality-control tools. In one smaller public-hospital setting, a comprehensive, multi-component system redesign is being implemented within a total engagement below six figures. These are applied results, not a claim that every outcome has already been causally attributed or independently studied. They nonetheless demonstrate that meaningful prevention can be operationally and financially attainable without an unaffordable technology buildout.

TACTBook recommends that the Division:

1. Replace categorical law-enforcement exemption with an equivalency standard or, at minimum, require documented workplace-violence prevention elements for exempt agencies.
2. Define active employee involvement as meaningful participation with documented employer response and feedback.
3. Require location- and operation-specific hazard assessments that include workflow, staffing, response access, historical data, near misses, and environmental conditions.
4. Require corrective-action ownership, interim controls, target dates, verification of completion, and communication back to affected employees.
5. Separate immediate post-incident stabilization from operational review and later follow-up; protect participation from becoming compulsory or punitive.
6. Expand incident data to capture precursors, contributors, response performance, interventions attempted, injuries, and the corrective-action link.

7. Strengthen training requirements with role-based, site-specific practice, response-team competency, and drills where hazards warrant them.
8. Require a closed-loop learning process so workers can see how incidents changed policy, staffing, workflow, environment, or training.
9. Preserve employer flexibility to select effective, proportionate controls; do not allow cost assumptions or technology-first mandates to displace lower-cost system improvements supported by hazard assessment and measured results.
10. Correct internal cross-references and publish implementation tools that reduce ambiguity without weakening the standard.

Foundational Principle

VIOLENCE IS A SYSTEMS RISK

Workplace violence prevention should operate like other mature safety systems: recognize hazards early; activate help through a known pathway; respond with trained roles and appropriate controls; document what occurred; investigate contributing conditions; support affected workers; implement and verify corrective action; and return learning to the frontline.

Training is essential, but training cannot compensate for unsafe staffing, poor environmental design, ineffective alarms, unclear authority, unavailable response resources, incomplete reporting, or corrective actions that remain open indefinitely. The final regulation should prevent employers from treating training as a substitute for system control. This position is consistent with OSHA's systems-of-safety approach, which combines worksite analysis, hazard prevention and control, training, recordkeeping, and program evaluation rather than relying on training alone (OSHA, 2015; OSHA, 2020).

At the same time, system control should not be confused with purchasing the most expensive available technology. In some settings, weapons-detection or other security technologies may be justified by a site-specific hazard assessment. They should not become presumptive statewide substitutes for effective operations, staffing design, communication, reporting, response, and corrective action. The regulation should remain performance-based: require employers to identify hazards, select feasible and proportionate controls, explain the basis for those controls, and measure whether they work.

The assumption that a functioning violence-prevention system is necessarily expensive is outdated. Many high-value controls are organizational: a usable reporting route, a clearly owned response pathway, brief role-based practice, structured incident review, a corrective-action tracker, feedback to workers, and periodic performance review. Once this architecture is established, maintenance becomes ordinary quality control rather than repeated crisis reconstruction. In TACTBook's applied healthcare work, these elements can be integrated into existing committees, education systems, reporting platforms, safety rounds, and leadership routines at comparatively low incremental cost.

Evidence and Practice Foundation

TACTBook Clinical Violence Reduction System (CVRS)

TACTBook's CVRS treats violence prevention as an operational safety system requiring alignment across five interdependent pillars: People, Process, Environment, Data, and Leadership. For every initiative, the framework requires three questions: What is being improved? Who owns it? How is it measured? The CVRS Governance & Operations Playbook further establishes scenario-based leadership, interdisciplinary governance, structured accountability, incident-to-action review, and continuous improvement through data (TACTBook, 2026a). The companion Professional Development & Education Guide links foundational education, role-based practice,

micro-huddles, interdisciplinary high-risk response, and governance learning rather than treating annual training as the program itself (TACTBook, 2026b).

These TACTBook materials are being used as operational references in current healthcare-client implementation and policy and governance development. They are cited here as practice-based frameworks developed through frontline clinical experience, systems consultation, and applied implementation—not as a substitute for independent peer-reviewed evidence.

Healthcare provides a demanding proof environment for this approach. The same core architecture—named accountability, worker participation, site-specific assessment, activation and response roles, consistent documentation, systems-based review, corrective-action closure, and measurement—can be adapted to other general-industry domains, including sectors that have been lightly regulated or treated as operationally untouchable. The controls will differ by hazard and setting; the system functions do not.

NHS Violence Prevention and Reduction Standard

The updated NHS Violence Prevention and Reduction Standard organizes organizational action across seven domains: leadership and accountability; governance and assurance; collaboration; data; workforce; interventions; and evaluation. It uses an evidence-based, risk-focused framework and a Plan–Do–Check–Act improvement cycle (NHS England, 2022; NHS England, 2024). CVRS adapts these international systems principles to U.S. clinical operations and regulatory conditions. The NHS model supports the central recommendation in these comments: a workplace violence plan must connect leadership, risk assessment, workforce capability, intervention, data, and evaluation.

Conflict and Containment Research

Bowers and colleagues distinguish conflict events from containment actions and demonstrate that staff relationships, communication, ward conditions, and organizational responses can influence both. In the Safewards cluster randomized controlled trial, a package of relationship- and communication-focused interventions reduced conflict and containment events on acute psychiatric wards (Bowers et al., 2015; Bowers, 2016 correction). The model is relevant beyond inpatient psychiatry as a systems insight: staff behavior, rules, environment, team response, and organizational conditions can either reduce or amplify escalation. Regulation should therefore require examination of system contributors rather than locating causation only in the person who committed violence or the worker who responded.

International and Federal Guidance

WHO/ILO/ICN/PSI framework guidance emphasizes comprehensive policy development involving employers, workers, unions, professional bodies, and other stakeholders, and recognizes that workplace violence requires coordinated prevention and management strategies (ILO/ICN/WHO/PSI, 2002). OSHA likewise states that a well-written and implemented program, combined with engineering controls, administrative and work-practice controls, and training, can reduce workplace violence risk (OSHA, n.d.; OSHA, 2015). These sources reinforce the need for employee participation, site-specific assessment, layered controls, and evaluation.

Detailed Comments and Proposed Revisions

1. Require equivalency for law-enforcement agencies

Draft provision: §3343(a)(1), Exception 4

The draft carries forward the statutory exemption for POST-compliant law-enforcement agencies. POST compliance and an Injury and Illness Prevention Program do not necessarily demonstrate an operational workplace violence prevention system addressing Type 3 violence, internal reporting, employee participation, post-incident support, hazard correction, or organizational learning. Law-enforcement personnel face substantial occupational violence exposure and should not lose core protections solely because their agency satisfies a separate training-compliance framework.

Recommendation

Replace the categorical exemption with an equivalency provision. An agency should qualify only if it maintains and implements requirements substantially equivalent to §3343, including confidential reporting, employee participation, hazard assessment, emergency procedures, post-incident response, corrective action, training, and record review. If statutory limits prevent that revision, Cal/OSHA should issue guidance describing the minimum §3203 elements expected of exempt agencies and when an Order to Take Special Action may be appropriate.

SUGGESTED LANGUAGE

“Exception 4 applies only where the agency has documented and implemented workplace violence prevention procedures that provide protections substantially equivalent to subsections (c) through (f), and all facilities are in compliance with section 3203.”

2. Establish governance, accountability, and executive oversight

Draft provision: §3343(c)(1)–(2)

Naming responsible persons is necessary but insufficient when duties are fragmented across human resources, safety, security, operations, legal, and labor relations. Without defined authority, escalation pathways, and executive oversight, an employer may list multiple names while no one owns completion of the program.

Recommendation

Require the Plan to identify a program owner, the authority of each responsible role, the process for resolving interdepartmental barriers, and the senior leader responsible for periodic review of program performance. Cal/OSHA guidance should include a responsibility matrix for small, medium, and complex employers.

SUGGESTED LANGUAGE

“Where multiple persons are responsible, the Plan shall describe each person’s authority, assigned duties, coordination requirements, and the process for escalating unresolved hazards or overdue corrective actions to a person with authority to act.”

3. Define active employee involvement as meaningful and closed-loop

Draft provision: §3343(c)(2)

The draft appropriately requires active involvement but does not specify how an employer demonstrates that participation affected the Plan. Employers could satisfy the provision by inviting comments without documenting what was raised, how it was evaluated, or why a recommendation was accepted or declined.

Recommendation

Require employers to use accessible participation mechanisms across shifts, roles, languages, remote locations, and bargaining units; document themes and recommendations; respond within a reasonable period; and communicate resulting decisions without identifying individual employees.

SUGGESTED LANGUAGE

"Active involvement shall include a reasonable opportunity to provide input before material decisions, documentation of recommendations and employer responses, and communication to affected employees regarding actions taken or the basis for declining a recommended action."

4. Strengthen multi-employer coordination

Draft provision: §3343(c)(3)

Reporting a shared-worksite incident and providing training are important, but effective coordination also requires agreement on alerting, scene authority, emergency communications, investigation ownership, record exchange, and corrective-action responsibility. Contract workers often experience gaps precisely where employer responsibilities intersect.

Recommendation

Require the controlling and participating employers to identify, before an event where feasible, who activates emergency procedures, who leads the response, who communicates with affected employees, who investigates, and who owns corrective action. The controlling employer should coordinate without displacing each employer's independent duties.

SUGGESTED LANGUAGE

"Coordination methods shall identify responsibility for emergency activation, communication, response leadership, incident reporting, investigation, corrective action, and communication of lessons learned. Coordination shall not relieve any employer of its independent obligations under this section."

5. Protect reporting and require reliable feedback

Draft provision: §3343(c)(4) and (c)(6)

The draft improves alternate reporting for Type 3 violence involving supervisors. It should also address reporting barriers such as fear of discipline, normalization of aggression, uncertainty about thresholds, inaccessible reporting platforms, and lack of visible follow-through. Workers frequently stop reporting when prior reports appear to disappear into a process.

Recommendation

Require more than one reporting route, including an option outside the chain of command; allow reporting of incidents, threats, near misses, and safety concerns; establish acknowledgement and status communication; and prohibit policies that discipline a worker merely for making a good-faith safety report.

SUGGESTED LANGUAGE

"Procedures shall permit reports of incidents, threats, near misses, and workplace violence safety concerns through more than one accessible channel; provide acknowledgement of receipt; and provide the reporting employee or representative with status and outcome information to the extent permitted by law."

6. Make emergency procedures executable under real conditions

Draft provision: §3343(c)(7)

Alerting, evacuation or sheltering, and access to help are necessary but do not fully address how workers act when an incident unfolds. Plans can fail because alarms are not heard, employees do not know who is responding, roles conflict, communications are not redundant, or the response pathway has never been tested.

Recommendation

Require procedures to identify activation thresholds, role assignments, backup communications, accountability for isolated or mobile employees, coordination with security or law enforcement, and methods for testing the response. Drills or functional exercises should be proportionate to identified hazards and conducted without requiring workers to simulate traumatic acts.

SUGGESTED LANGUAGE

"Emergency procedures shall identify activation criteria, assigned and backup roles, primary and alternate communication methods, responder coordination, and methods to account for employees. Where warranted by identified hazards, the employer shall test the procedures through drills, exercises, or other effective means and correct identified deficiencies."

7. Require granular, site-specific hazard assessment

Draft provision: §3343(c)(9) and (b)(10)

The draft lists useful factors but may still produce a generic enterprise-level checklist. Risk varies by sublocation, shift, task, public interface, staffing pattern, response time, alarm coverage, workflow, and surrounding environment. An employer cannot correct a hazard it has aggregated out of view.

Recommendation

Require assessments at the work-area and operation level, including parking and transition areas, employer-controlled transportation, mobile or community work, and time-of-day differences. Assessments should use incident data, near misses, employee concerns, response data, environmental observations, and changes in operations.

SUGGESTED LANGUAGE

"Hazard identification and evaluation shall be specific to each work area, operation, task, shift, and relevant sublocation. It shall consider historical incidents and near misses; employee reports; staffing and isolation; response access and time; alarm availability and functionality; visibility and escape; public access; workflow; environmental design; and operational changes."

8. Create a corrective-action closure standard

Draft provision: §3343(c)(10)

The phrase “in a timely manner” does not ensure that hazards receive an owner, interim protection, completion date, or verification. A recommendation recorded after an incident is not a correction. The system is not closed until the action is implemented, tested where appropriate, and communicated.

Recommendation

Require documented prioritization based on severity and exposure; an accountable owner; an expected completion date; interim controls when correction is delayed; status tracking; verification; and communication to affected employees.

SUGGESTED LANGUAGE

“For each identified hazard, the employer shall document the risk addressed, corrective action, responsible person, target completion date, interim controls when needed, completion status, and method used to verify effectiveness. Affected employees shall be informed of completed or materially delayed corrective actions.”

9. Replace a single immediate debrief with staged post-incident response

Draft provision: §3343(c)(11)

The requirement for a debrief “as soon as possible” is well-intended but may combine incompatible purposes. Immediately after an event, workers may need medical attention, psychological stabilization, relief from duty, family contact, or union/representative support—not a group operational analysis. A single early debrief also misses delayed injuries, cumulative stress, investigation findings, and whether corrective actions were completed.

Recommendation

Separate: (1) immediate stabilization and essential fact preservation; (2) a later operational review when participants can meaningfully contribute; and (3) follow-up to assess support needs and corrective-action progress. Participation in trauma-focused discussion or counseling should be voluntary and confidential. Operational review should be nonpunitive and should not compel clinical disclosure.

SUGGESTED LANGUAGE

“Post-incident procedures shall include: (1) immediate medical care, stabilization, relief, and preservation of essential information; (2) a timely nonpunitive operational review with involved employees and relevant responders when participants can meaningfully participate; and (3) follow-up sufficient to identify delayed effects, communicate findings, and review corrective-action progress. Participation in counseling or trauma-focused discussion shall be voluntary and confidential.”

10. Clarify the quality and accessibility of trauma support

Draft provision: §3343(c)(11)(C)

Merely offering an employee assistance program may satisfy the text while failing workers who distrust employer-linked services, cannot obtain timely appointments, need culturally or occupation-specific support, or fear employment consequences. Counseling is one option within a broader support system.

Recommendation

Require prompt, confidential access; communication about privacy and job-status boundaries; reasonable alternatives where the available program is inaccessible or inappropriate; and supervisor education on supportive, nonretaliatory response. Guidance should distinguish supportive contact, peer support, clinical treatment, and fitness-for-duty processes.

SUGGESTED LANGUAGE

"Support offered under this subsection shall be timely, confidential, accessible, and communicated in a manner that explains available options and applicable privacy limits. Where the employer's usual resource is unavailable or not reasonably accessible, the employer shall provide an effective alternative."

11. Require systems-based, nonblaming investigation

Draft provision: §3343(c)(11)(E)–(G)

Investigations often overfocus on the actions of the employee or the person who committed violence while underexamining staffing, environment, workflow, communications, training transfer, equipment, supervision, and prior warning information. This can produce individual blame without prevention.

Recommendation

Require evaluation across people, process, environment, data/communication, and leadership/governance factors. Employee conduct may be reviewed, but it should not substitute for evaluating system contributors and feasible controls. This recommendation reflects the TACTBook five-pillar CVRS framework and is consistent with Safewards research showing that staff relationships, communication, environmental conditions, and organizational responses can influence conflict and containment (TACTBook, 2026a; Bowers et al., 2015).

SUGGESTED LANGUAGE

"The investigation shall evaluate, as applicable, contributing factors involving people, work processes, staffing, environment and equipment, communication and data, supervision, and program governance. The investigation shall identify both immediate and underlying conditions and shall not rely solely on employee conduct as the cause of an incident."

12. Modernize the violent incident log for prevention

Draft provision: §3343(d)

The required log captures the event but not enough information to determine why risk escalated, whether help arrived, which interventions were attempted, or how the event changed the system. The log also lacks an explicit injury/severity field and a durable link to corrective action.

Recommendation

Add structured fields for: precise sublocation; precursor or behavioral safety indicators; primary and contributing hazards; staffing and isolation; help-request and response timing; alarm performance; preventive or de-escalation measures attempted; injury or exposure; medical care; work impact; report source; and the identifier/status of related corrective actions. Permit "unknown" and narrative context to reduce forced or stigmatizing labels.

SUGGESTED LANGUAGE

"The Log shall include, where known: sublocation; observed precursors or safety concerns; contributing environmental and work-practice conditions; assistance requested and response received; controls or interventions attempted; alarm or communication performance; employee injury or exposure; immediate protective actions; and the identifier and status of corrective actions arising from the investigation."

13. Correct the internal cross-reference

Draft provision: §3343(d)(3)(B)

The draft states that workplace violence types are defined in subsection (b)(6)(C). In the July 22 draft, subsection (b)(6) defines the Plan and subsection (b)(8)(C) contains the four workplace violence types. This should be corrected before formal rulemaking.

Recommendation

Change “subsection (b)(6)(C)” to “subsection (b)(8)(C).”

14. Require role-based, site-specific training and readiness

Draft provision: §3343(e)

Initial and annual training can become passive compliance education. Workers need to know not only what the Plan says, but how to recognize site-specific risk, activate help, communicate, evacuate or shelter, perform assigned roles, report concerns, and participate in learning. Supervisors and designated responders have additional responsibilities that general employee training will not cover.

Recommendation

Require training appropriate to role, exposure, work area, shift, literacy, language, and assigned emergency responsibility. Where employees are assigned response duties, employers should verify competency. Scenario discussion, drills, or practice should reflect actual hazards and avoid unsafe or traumatic simulation.

SUGGESTED LANGUAGE

“Training shall be specific to the employee’s work area, job duties, exposure, and assigned role under the Plan. Employees assigned supervisory, investigative, security, emergency-response, or corrective-action duties shall receive additional role-specific training, and the employer shall verify their ability to perform assigned functions through discussion, demonstration, exercise, or other effective means.”

15. Define meaningful interactivity

Draft provision: §3343(e)(1)(F)

Answering a question within one business day is helpful but does not by itself make training interactive. An employee may not know which questions to ask, and delayed answers do not test whether the worker can use the Plan.

Recommendation

Require at least one participatory component such as facilitated discussion, scenario-based decision-making, demonstration, or work-area exercise. Permit asynchronous delivery when combined with an accessible method for questions and applied participation.

SUGGESTED LANGUAGE

“Interactive training shall include an opportunity for employees to apply the Plan to workplace-specific hazards through facilitated questions, scenarios, demonstrations, exercises, or another effective participatory method.”

16. Require closed-loop learning and performance review

Draft provision: §3343(c)(12) and (f)

Annual review and record retention are important, but the draft does not specify the information employers should use to determine effectiveness. Counting completed training and incidents alone may conceal underreporting, repeat locations, delayed response, overdue corrective actions, or increasing severity.

Recommendation

Require review of both outcome and process measures, including reporting trends, repeat incidents and sublocations, injury severity, response performance, corrective-action aging and completion, employee participation, training completion and competency, and whether employees received feedback. Measures should be interpreted cautiously to avoid discouraging reporting; increased reporting may reflect improved trust.

SUGGESTED LANGUAGE

"The effectiveness review shall consider incident and near-miss trends; repeat hazards and locations; injuries and severity; response and communication performance; corrective-action completion and effectiveness; employee participation and reporting confidence; training and exercise findings; and other information necessary to determine whether the Plan is functioning as intended."

17. Balance access, privacy, and learning

Draft provision: §3343(f)(7)

Employee access to records is essential. At the same time, small workgroups and detailed narratives can permit re-identification even after obvious identifiers are removed. Over-redaction can also make records useless for prevention.

Recommendation

Issue guidance on minimum-necessary redaction, aggregation for small groups, protection of medical and sensitive personal information, and preservation of operational facts needed for hazard correction. Employers should maintain an unredacted version for lawful regulatory access and a prevention-focused version for employee access where appropriate.

18. Require effective controls without prescribing costly technology as the default

Draft provision: §3343(c)(9)–(10) and implementation guidance

The draft appropriately requires hazard identification and correction. Implementation guidance should avoid creating a de facto assumption that compliance requires high-cost security technology. Weapons-detection systems, extensive surveillance, and other engineered measures may be appropriate in particular environments, but they also carry cost, staffing, workflow, privacy, maintenance, false-positive, and operational consequences. A device purchase does not establish that a prevention system works.

Recommendation

Preserve a performance-based hierarchy in which employers select feasible controls responsive to documented hazards and evaluate their effectiveness. Guidance should expressly recognize low-cost administrative, work-practice, communication, governance, and learning-system controls when they materially reduce risk. Where expensive technology is selected, the employer should integrate it with trained roles, response procedures, maintenance, testing, incident review, and performance measurement rather than treating acquisition as compliance.

SUGGESTED LANGUAGE

“Controls shall be selected based on the hazards identified, the severity and frequency of exposure, feasibility, and demonstrated or reasonably expected effectiveness. No single technology shall be presumed sufficient. Employers shall integrate selected controls into the Plan and evaluate whether they reduce the identified risk.”

19. Publish practical tools without converting the rule into a checklist exercise

Draft provision: Implementation guidance

Employers—especially small employers—need examples that translate regulatory requirements into operational practice. Templates can help, but a generic template can also become a substitute for site-specific analysis.

Recommendation

Publish: a hazard-assessment tool; multi-employer coordination checklist; post-incident staged-response guide; corrective-action tracker; model incident-log fields/data dictionary; employee-participation examples; role-based training matrix; drill evaluation form; privacy/redaction guidance; and examples of leading and lagging measures. Each tool should state that completion does not establish effectiveness absent site-specific implementation.

Recommended Implementation Model

PHASE	REQUIRED SYSTEM FUNCTION
Recognize	Workers and supervisors identify hazards, changing conditions, precursor concerns, and environmental or workflow risks.
Activate	Employees can obtain help through accessible, redundant pathways without fear of retaliation.
Respond	Roles, authority, communication, evacuation/sheltering, security, and law-enforcement coordination function under real conditions.
Document	Incidents, threats, near misses, response performance, and contributing conditions are captured consistently and without blame.
Learn	Investigation identifies immediate and underlying system contributors; employees participate meaningfully.
Correct	Actions receive owners, dates, interim controls, verification, and closure.
Return	Findings and changes are communicated back to affected employees while privacy is protected.
Measure	Leadership reviews whether reporting, response, corrections, training, and outcomes demonstrate an effective Plan.

Conclusion

The July 22 draft moves California in the correct direction by treating workplace violence prevention as an ongoing employer responsibility rather than a single annual training obligation. The final regulation should preserve that systems orientation and strengthen the operational chain between employee concern, hazard recognition, emergency response, investigation, corrective action, communication, and measurable learning.

The broader regulatory gap is concerning because workers should not have to depend on a severe event or an individual General Duty Clause-style complaint before basic prevention architecture is examined. Cal/OSHA has both a protective mandate and an opportunity to establish clear expectations that help employers correct risk before enforcement becomes necessary. A specific standard also gives responsible employers a fairer and more predictable basis for investment than case-by-case enforcement alone.

This approach can reduce, rather than expand, long-term regulatory burden. When employers are required to name owners, assess hazards, document response performance, close corrective actions, and review measurable indicators, more deficiencies can be found and corrected through routine internal quality control. Over time, that should reduce reliance on complaint-driven discovery, repeated investigation of the same preventable failures, and intensive reconstruction of systems that were never established. This is a reasoned implementation inference that Cal/OSHA should test through pilot tools, stakeholder feedback, and enforcement data.

A Plan is effective only when workers can use it under pressure and can see that reporting changes the conditions of work. California has an opportunity to establish a standard that does more than produce documents: it can establish the minimum architecture of a functioning prevention system.

TACTBook would be pleased to serve as an expert consulting resource to the Division and Standards Board at any stage of this project. We are available to participate in stakeholder meetings, review operational language, assist with implementation guidance and model tools, contribute clinical and frontline systems expertise, and help test whether proposed requirements can be translated into safe, measurable, affordable practice across varied workplaces. We would also welcome the opportunity to share applied lessons from current healthcare-client CVRS implementation, policy and governance development, multidisciplinary training design, post-incident learning systems, and international violence-prevention and conflict/containment models. Our purpose is not to prescribe one commercial product. It is to help California define a durable system that employers can implement, maintain, measure, and continuously improve.

Thank you for the opportunity to comment.

Respectfully submitted,

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These comments are policy recommendations informed by occupational safety and violence-prevention practice. They are not legal advice and should be reviewed before submission for accuracy, organizational authorization, and any desired legal positioning.