



July, 18<sup>th</sup>, 2022

**Kevin Graulich**  
Senior Safety Engineer  
State of California  
Department of Industrial Relations

**Re: Comments in response to draft version 3343**

Kevin,

I am a professional security consultant who specializes in workplace violence prevention. I have provided services to hundreds of public and private organizations throughout California. I have had an opportunity to review the draft proposal 3344 and offer the following feedback.

- Consider expanding the definition section to include “Dangerous Weapons”
- Consider being consistent in terminology, Place of Employment, Worksite and Workplace are used throughout the document
- Consider expanding the training section “e” to include specific requirements similar to 3342
- Consider including “Assessment Procedures” as part of the Workplace Violence Preventing Plan to evaluate the seriousness and credibility of reports involving threatening and concerning behavior. Behavioral Threat Assessment and Management programs are recognized among practitioners and researchers as being effective in reducing the threat and impact of workplace violence.

I applaud the Divisions efforts to provide clarity and guidance to California employers on efforts that can be taken to help improve workplace safety 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.

**Hector R. Alvarez, MSPsy, CTM**  
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