
WVPP - Written Comment to the May 13th, 2025 Draft

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To Berg, Eric@DIR <EBerg@dir.ca.gov>

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Dear Deputy Chief Eric Berg,

Thank you for the opportunity to provide public comment on California's Workplace Violence Prevention Plan (WVPP). As someone working directly in K–12 school safety, I was excited about SB 553 and its potential to help prevent workplace violence.

After a year of implementation and review of the May 13, 2025, Revised Discussion Draft, I've become concerned that the plan emphasizes compliance and post-incident response, leaving little room for prevention.

The employee feedback I've received so far has emphasized the violent incident log as the most critical element of the plan, along with questions about what the employer is doing to keep them safe. Even after a year of this law being in place, many employees still struggle to see where they fit into the plan or how it applies to them.

Upon re-reading SB 553 and the Revised Discussion Draft, it becomes clear that this plan focuses on the employer's role in employee safety.

Employer Responsibilities

- The employer is named as the one responsible for the plan
- Engineering controls are physical safety measures
- Work practice controls are implemented through policies
- Workplace violence hazards are fixed and corrected by the employer
- Alerting employees to active emergencies
- Workplace hazard inspections
- Effective procedures to communicate with employees
- Training requirements
- Post-incident response and investigation
- Responding to workplace violence includes tactics that the employer will implement for employee safety
- Logs and recordkeeping

Meanwhile, **employee roles** are more limited:

- Assisting in the plan development
- Participating in employer-led training
- Reporting hazards or violent incidents

While this employer-centric model is necessary as part of an overall employee safety plan, it was already the solution before SB-553.

A review of three U.S. Secret Service publications — *The Safe School Initiative* (2002), *Protecting America's Schools* (2019), and *Mass Attacks in Public Spaces* (2016–2020) — reveals key patterns relevant to workplace violence prevention:

In schools:

- 83% (2002) and 77% (2019) of school attackers had their intentions known by at least one person who did not report it.
- 94% (2019) displayed observable concerning behaviors in school.
- Most were current or former students, and their behaviors were visible and reportable.

Mass Attacks in Public Spaces:

- 46% exhibited a change in behavior before an attack
- 64% exhibited behaviors or shared communications that were so concerning, they should have been met with an immediate response.
- 39% of bystanders expressed concern to friends/family instead of the authorities.

Early observation, staff awareness, and understanding not just **how** but **what** to report are critical. Prevention is possible—but only if employees are trained and engaged in the process.

Creating an **Employee Violence Prevention Plan (EVPP)** would highlight the employee's role in violence prevention and shift our culture from surviving an attack to preventing it. This new emphasis could:

Employee Violence Prevention Plan:

- Rename the plan to emphasize the employee's role in violence prevention.
- Build a strong culture of reporting, with an emphasis on process, not just fear-free protections.
- Concerning behavior management.

Train employees to:

- Recognize threatening and concerning behaviors. Knowing **how to report** is only valuable if we know **what to report**.
- Recognize behavior changes that may signal intent.
- Understand the pathway to violence and indicators of imminence.
- Emphasize the process of observation and the importance of a single point of reporting system, not just fear-free reporting protections.
- Apply communication and de-escalation strategies.

Recommended Employer strategies:

- Support with violence management strategies that focus on concerning behaviors.
- Normalize early action as a prevention and employee support tool.

State-Level Support:

- **Fund local Behavioral Threat Assessment (BTA) capacity**, especially in schools and high-risk sectors.
- Shift from siloed post-incident investigations to **real-time collaboration**, similar to the approach taken under **SB 906 (2022)**, which mandates that law enforcement shall conduct threat investigations and firearm registry review after a homicidal threat is made in a school.
- Push for new laws that **bridge the information gap** between employers and law enforcement. How can an employer develop a safety plan if public agencies hold critical information that the employer cannot access?
- Work with the **California State Threat Assessment Center (STAC)** to emphasize early warning and intervention strategies over reactive measures like restraining orders or termination, which often come too late to stop violence.
- Engage with our **State Fusion Center's Physical Vulnerability Assessment teams** to help businesses apply the listed security measures. Simply listing physical controls without considering how people interact with them can lead to workplace violence and new vulnerabilities.

I appreciate the effort behind the WVPP. This formalized process is a necessary step forward in strengthening workplace safety. I hope that future iterations of the plan will place greater emphasis on violence prevention and how businesses can be proactive.

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