
Comments to Discussion Draft (May 13, 2025) for WPV Prevention in General Industry

From Gevork Kazanchyan <gkazanchyan@ceo.lacounty.gov>

Date Mon 6/30/2025 11:29 AM

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

CAUTION: [External Email]

This email originated from outside of our DIR organization. Do not click links or open attachments unless you recognize the sender and know the content is expected and is safe. If in doubt reach out and check with the sender by phone.

Good morning, Mr. Berg,

To streamline feedback from our LA County agencies, I polled our 38 departments and offered to consolidate and communicate to your agency. The only comments received was from our Department of Health Services. Below, I am *relaying verbatim* so that I don't color the comments from my interpretation:

"I have concerns about section (b)(9) on page 5 in which hostile work environment & required and excessive overtime are listed as workplace violence hazards. How can safety/security personnel determine/identify hostile work environment? What is excessive overtime? 30 hrs/wk? 40 hrs/wk? 50 hrs/wk? Doesn't some of the County departments have a lot of overtime?"

Also, please beware of (c)(6)(A) on page 6 in which employers needs to establish a procedure for violent incident reports to be made to a designated person who is not a direct supervisor for type 3 violence. Type 3 is employee to employee violence. The ways to 100% in compliance with this are:

- 1. The designated person is an individual who does not supervise anyone, or*
- 2. The report goes to an outside Department (such as DHR) or a vendor*

My question/suggestion is: Would it be ok for the report goes to a group of individuals (at least 2) in various parts of the Department even though one of them may inadvertently be the direct supervisor of the employee? At least the others are not the direct supervisor."

Kindly include Mr. Chi Fong (party below) in case of any response to the above:

Chi Fong : cfong@dhs.lacounty.gov

Also, our Department of Medical Examiner (formerly 'Coroner') is currently reviewing with internal SME's and will likely provide their written comments by the July 14th deadline.

Thank you and your team for this opportunity to convey our perspective.

Stay well and enjoy your week,

Gevork Kazanchyan

LOSS CONTROL & PREVENTION

(213) 351-6408

GKAZANCHYAN@CEO.LACOUNTY.GOV