

RE: Cal/OSHA Workplace Violence Prevention in General Industry Advisory Meeting-1/25/2018- EXTENDING DUE DATE FOR COMMENTS TO 3-30-18

Cindy Sato <CSato@cea-ca.org>

Fri 3/23/2018 11:40 PM

To: Grulich, Kevin@DIR <KGrulich@dir.ca.gov>;

Kevin,

Thank you for the opportunity to provide comments on the proposed Workplace Violence Prevention regulation.

We offer the following:

1. Continue to seek input from those industries who were not present at the Advisory Committee meetings, especially those industries that have a disproportionate number of incidents involving workplace violence.
2. Instead of "Threat of violence," please consider incorporating the definition of "Credible threat of violence" contained in Civil Code Section 527.8 (b)(2).
(2) "Credible threat of violence" is a knowing and willful statement or course of conduct that would place a reasonable person in fear for his or her safety, ~~or the safety of his or her immediate family,~~ and that serves no legitimate purpose."
3. The employer should be responsible for developing the Workplace Violence Prevention Plan. In addition, the employer should be responsible for implementing it, training employees on it and advising the Union representative of the nature of the plan upon request. If an incident occurs, it is the employer's role to implement the plan.
4. The language in (c)(8) is too broad. We offer the following, "Procedures to identify and evaluate **reasonably anticipated** workplace violence hazards..."
5. We have privacy concerns with some of the proposed recordkeeping requirements. In addition, to promote greater employer compliance, please consider making the proposed section more consistent with the requirements concerning retention of records, documentation of training, and access to records that are contained in CCR Section 3203, Injury and Illness Prevention Program.

Thank you for your consideration.

Cindy

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From: Graulich, Kevin@DIR [mailto:KGraulich@dir.ca.gov]
Sent: Friday, February 09, 2018 7:32 AM
To: Graulich, Kevin@DIR <KGraulich@dir.ca.gov>
Subject: Cal/OSHA Workplace Violence Prevention in General Industry Advisory Meeting-1/25/2018-
EXTENDING DUE DATE FOR COMMENTS TO 3-30-18

Good morning Stakeholders,

In an effort to ensure that everyone has adequate time to provide feedback on the discussion draft regarding workplace violence prevention, we are extending the due date for written comments to March 30th, 2018. If you have any questions, please do not hesitate to contact me.

Thank you all again for your interest and support.

Kevin Graulich

To All Interested Parties,

Cal/OSHA is planning to hold the second General Industry Workplace Violence Prevention Advisory Meeting as requested by Petition 542 granted by the Occupational Safety and Health Standards Board. The meeting will be held on Thursday January 25th, 2018 at the Elihu Harris State Building at 1515 Clay Street, 2nd floor, Room 1 in Oakland, from 10:00AM to 3PM. The agenda for the meeting and related handouts are posted on Cal/OSHA's website at:

<http://www.dir.ca.gov/dosh/doshreg/Workplace-Violence-in-General-Industry/>.

If you have questions regarding this meeting, please contact [Kevin Graulich](#) at 714-567-2868 or [Grace Delizo](#) at 619-278-3770.

Thank you for your interest in this project.

Please be advised: Due to the presence of courtrooms in the building, visitors are required to go through security screening including metal detection and inspection of belongings.

NOTICE TO PARTIES: Disability accommodation is available upon request. Any person with a disability requiring an accommodation, auxiliary aid or service, or a modification of policies or procedures to ensure effective communication and access to the programs of the Division of Occupational Safety and Health, should contact Ms. Tracy Kwon, Statewide Disability Accommodation Coordinator at 1-866-326-1616 (toll free). The Coordinator can also be reached through the California Relay Service, by dialing 711 or 1-800-735-2929 (TTY) or 1-800-855-3000 (TTY-Spanish).

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