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MAR 05 2015

Division of Occupational Safety & Health
Headquarters Office

Mr. Robert Nakamura
Research and Standards Health Unit
Department of Industrial Relations
Division of Occupational Safety & Health
1515 Clay Street, Suite 1901
OAKLAND, CA 94612

Re: Cal/OSHA Workplace Violence Prevention Standard for Healthcare Workers

Dear Mr. Robert Nakamura:

SoCalCOSH has carefully and thoroughly reviewed SEIU 121RN and SEIU Nurse Alliance of California's proposed revisions to the draft of the workplace violence regulation discussed on February 5, 2015, and would like to go on record in support of the entirety of those revisions. In addition to supporting all revisions proposed, we would like to highlight specific ones that we think are particularly important from our perspective as a grassroots, community based organization dedicated exclusively to occupational health and safety matters.

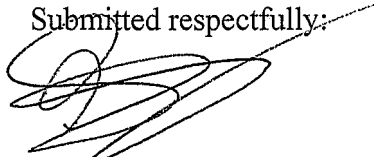
These are the specific issues we would like to weigh in on:

1. The typologies of workplace violence are mentioned, but not defined, in the draft of the regulation. We believe very strongly that including clear and concise definitions of the four commonly recognized typologies would help to clarify for people outside the health and safety community who may be unfamiliar with them. We ask that the four typologies be included in the final draft of this standard.
2. We find that there is a critical need to include very specific language on the section relating to the Workplace Violence Prevention Plan, stating that assessment and training should be unit specific. Right now, the Workplace Violence Prevention Plan is defined in the draft of the regulation as something that "shall be maintained and implemented at all times for all units, services and operations, and shall be specific to the hazards and connective measures for each unit, service or operation." Because the plan is for all units, services, and operations, assessment and training should also include "units." It follows that a plan for a unit, service, or operation would include assessment and training specific to them as well.

3. While we understand that the regulation will not be mandating a specific form, we believe that the Violent Incident Log's data elements as outlined in the draft of the regulation should be expanded so that it captures as much information as possible about specific workplace violence incidents. This will assist all involved in identifying trends and taking whatever connective steps are necessary in terms of prevention. Additionally, the Violent Incident Log should be specifically included in the records that the draft of the regulation requires employers keep.

We thank you and the entire Cal/OSHA team working very diligently on this, and for the opportunity to speak on this very important matter, on behalf of all workers, and in specific, workers in the healthcare industry.

Submitted respectfully:



Mr. Jorge Cabrera

Coordinator,

SoCalCOSH

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