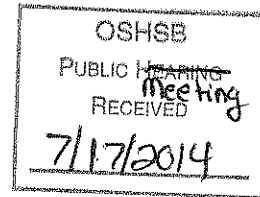


Meleah Hall
14850 Hwy 4 Suite A 172
Discovery Bay, CA 94505
July 17, 2014



Dave Thomas
Chair, Occupational Safety and Health Standards Board
2520 Venture Oaks Way, Suite 350
Sacramento, CA95833

Dear Mr. Thomas:

On behalf of the over 300,000 teachers who work in the state of California please take serious consideration to this request for the creation of workplace safety standards to reduce injuries in the educational setting. Often we hear about violence in the school setting yet the educator is often left out of the conversation. I am writing this letter not only on behalf of my fellow teachers but also on behalf of the other staff members who work directly with students. When any member of the educational instructional team is injured ultimately the student's educational experience is impacted.

Recently in a study conducted by the American Psychological Association after surveying nearly 3,000 teachers 80% of them reported some sort of workplace violence while 49% reported being physically assaulted. School districts are exempt from most documentation requirements that other agencies are required to report workplace illness and injury which I believe may be one reason why the violence and unsafe work environments have not improved. When creating the new Standards please consider the following recommendations.

- 1) **Employees Must be Actively Involved in the Creation of the Standards**
 - a) Teachers, paraprofessionals and other staff members who have the greatest exposure to workplace violence must be invited to the table in regards to communicating how the standards need to be amended.
- 2) **Research Based Task Force Created.** The amount of research on workplace violence against educators is surprisingly limited. Although there are 1,000s of articles about school violence little attention has been paid to violence against teachers. There should be annual reporting by school district of how many teachers and staff where physically assaulted in the workplace.
- 3) **The Standards should apply to employees in public, private, and non public schools.**

- 4) **A written IIPP must be made available to all workers and communicated in a staff meeting.**
- 5) **School districts need to be held to the same or higher standards as other industries in regards to reporting.**
 - a) Presently, school districts are exempt from most documentation requirements. All acts of violence should be investigated and a written record should be kept.
 - b) If a student or outsider including but not limited to relatives has a history of violence the employees need to be informed.
 - c) When documenting acts of violence against teachers school districts must delineate the type of educational setting the act of violence occurred.
- 6) **The workplace violence prevention program must specifically address the following special circumstances.**
 - a) Special Education teachers who work in a variety of classroom settings that have a higher incidence of violence.
 - b) Continuation and Community Day School Settings.
- 7) **General Safety Orders 3203 Sub Chapter 7 - Training**
 - a) In special education classroom settings with learning disabled students who have a history of violence against themselves or others school districts should be required to train staff before they enter the classroom environment for the safety of the students and staff.
 - b) In schools in urban setting who are exposed to possible gun violence there should be information mandating particular training.
 - c) Administrators, teachers and staff must be trained in what to do after an injury occurs and how to document the events that occurred for the investigation.
- 8) **General Safety Orders 3202 Sub Chapter 5 - Investigations**
 - a) When a brain injury occurs either due to trauma or chemical exposure that results in loss of consciousness and/or amnesia a strict protocol for conducting an investigation to include interviewing all participants. Calling law enforcement if a school security officer is not present and documenting that the injured worker reports not remembering what happened.
 - b) When there is an unlawful act against an employee law enforcement should be called to support with the investigation if bodily harm was incurred.

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All of the above recommendations are developed sadly because I myself and my fellow teachers have had to experience workplace violence that has resulted in tremendous hardships but mostly it has impacted the educational environment of our students. If you have any questions or concerns or would like clarification I can be reached at 510-815-8757.

Sincerely,

A handwritten signature in cursive script that reads "Meleah Hall". The signature is written in black ink and is positioned below the word "Sincerely,".

Meleah Hall