



July 20, 2016

Hon. Thomas Perez
U.S. Secretary of Labor
David Michaels, PhD
Assistant Secretary of Labor for Occupational Safety and Health
200 Constitution Ave., NW
Washington, DC 20210

Dear Secretary Perez and Assistant Secretary Michaels:

We write in support of petitions filed by labor unions representing millions of American workers, calling on the U.S. Occupational Safety and Health Administration (OSHA) to issue a comprehensive standard to prevent workplace violence in the health care and social assistance sectors.

Workplace violence is a serious and widespread problem in all sectors of the economy, as already recognized by OSHA. The agency estimates that two million workers each year report that they are victims of violent incidents in the workplace.

According to the Census of Fatal Occupational Injuries (CFOI) compiled by the U.S. Bureau of Labor Statistics (BLS), there were over 400 homicides in U.S. workplaces in 2014, accounting for 8.6 percent of all workplace fatalities due to traumatic incidents.

Workplace violence must be addressed anywhere and everywhere it occurs – and it occurs with alarming frequency in health care and social service settings.

- According to the BLS, the rate of injury for private sector health care and social assistance workers *increased* by 64 percent between 2005 and 2014.
- BLS also reports an extremely high rate of injuries from workplace violence in public settings in 2014: 154 injuries per 10,000 workers in public hospitals, and 228 injuries per 10,000 workers in public nursing homes.
- More than half (52 percent) of victims of workplace violence, as reported by BLS, are health care or social service workers.

With so many workers at risk, we strongly support the petitions filed by the AFL-CIO; American Federation of Teachers; American Federation of State, County and Municipal Employees; American Federation of Government Employees; Communications Workers of America; International Brotherhood of Teamsters; Service Employees International Union; the United Steelworkers and National Nurses United, calling for a uniform OSHA standard to prevent workplace violence.

Voluntary efforts by employers are not sufficient to address the scope of this problem. While OSHA has authority to address workplace violence (and other issues) under the General Duty clause of the Occupational Safety and Health Act, this has not resulted in the consistent enforcement of workplace protections across all regions of the country.

Like other hazards that cause illness, injury and death on the job, workplace violence can be addressed with rigorous programs that involve and empower workers in prevention efforts. A comprehensive workplace violence prevention program, for example, reduced rates of assault at Veterans Health Administration hospitals between 2004 and 2009. The states of California and Minnesota have recently passed legislation requiring health care employers to implement workplace violence prevention programs.

In accordance with best practices for occupational safety and health, a workplace violence prevention program should be implemented as part of a comprehensive safety system. At a minimum, a standard should include:

- **A written workplace violence prevention program;**
- **Hazard assessment and risk evaluation;**
- **Hazard correction;**
- **Planning for post-incident response;**
- **Incident reporting and record-keeping**, with special focus on incentives to report all incidents, rather than sweep problems under the rug;
- **Training for all employees**, including full-time, part-time and contract employees;
- **Protections against retaliation for whistleblowers** who report incidents of workplace violence, or practices and policies that could fail to prevent such incidents;
- **Full involvement of workers and their unions or other representatives** in planning, training, response and evaluation of prevention efforts.

On behalf of the National Council for Occupational Safety and Health and the undersigned member groups, we urge you to take prompt action on this urgent issue. Health care and social assistance workers deserve rigorous and consistent protection against the known hazard of workplace violence.

Sincerely,

Connecticut Council on Occupational Safety and Health (ConnectiCOSH)

Felty Justicia Worker Center (Houston COSH)

Maine Labor Group on Health

Massachusetts Coalition for Occupational Safety and Health (MassCOSH)

Mid-State Education and Service Foundation

National Council for Occupational Safety and Health (National COSH)

New Hampshire Coalition for Occupational Safety and Health (NHCOSH)

New Jersey Work Environment Council (NJWEC)

New York Committee for Occupational Safety and Health (NYCOSH)

NorthEast New York Coalition for Occupational Safety and Health (NENYCOSH)

Rhode Island Committee on Occupational Safety and Health (RICOSH)

South Florida Interfaith Worker Justice

Southern California Coalition for Occupational Safety and Health (SoCalCOSH)

Western Massachusetts Coalition for Workplace Safety and Health (WesternMassCOSH)

Western New York Council on Occupational Safety and Health (WNYCOSH)

Worksafe

Please respond to:

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