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The Q&A responses contained in this document were provided by the presenter of the webinar.

Q: In addition to creating a prevention plan regarding training, is the legislature also seeking prevention feedback from employees to put corrective measures into place?

A: Correct. SB 553 states that your plan must include “effective procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan, including, but not limited to, through their participation in identifying, evaluating, and correcting workplace violence hazards, in designing and implementing training, and in reporting and investigating workplace violence incidents.

Q: How long will it take Cal/OSHA to develop guidelines for the WPPP?

A: The timeline outlined in the bill text states that “the division shall propose, no later than December 31, 2025, and the standards board shall adopt, no later than December 31, 2026, standards regarding the plan required by this section.”

Q: Is it recommended to get feedback for the plan from staff as well as a committee? What questions do you recommend we include on the survey?

A: SB 553 suggests that an employer should obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan through their participation in identifying, evaluating, and correcting workplace violence hazards, in designing and implementing training, and in reporting and investigating workplace violence incidents. The text does not define what “participation” means, which is where you should be able to have some flexibility in determining ways to get employees to participate (such as safety committees, staff meetings, surveys, etc.).

Q: How is SB553 different from SB1299 relating to hospitals?

A: According to the bill text, “Health care facilities, service categories, and operations covered by Section 3342 of Title 8 of the California Code of Regulations” are exempt from the Workplace Violence Prevention Plan section of SB 553. As such, hospitals should follow Section 3342 for implementation of a Violence Prevention plan.



Q: Will Keenan SafeSchools be sufficient to satisfy the training requirement?

A: Employee training as required by SB 553 must be provided on all of the following, most of which are unique and specific to each employer's plan, policies, and hazards that have been identified. The items in bold below are unique/specific to your WVPP; most notably item #4 below which has the potential to include multiple individual training topics within that element.

1. **The employer's plan, how to obtain a copy of the employer's plan at no cost, and how to participate in development and implementation of the employer's plan.**
2. The definitions and requirements of this section.
3. **How to report workplace violence incidents or concerns to the employer or law enforcement without fear of reprisal.**
4. **Workplace violence hazards specific to the employees' jobs, the corrective measures the employer has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.**
5. The violent incident log required and **how to obtain copies of records of workplace violence hazard identifications, evaluation, and corrections created, training records, and violent incident logs.**
6. An opportunity for interactive questions and answers with a person knowledgeable about the employer's plan.
7. Additional training shall be provided when a **new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan.** The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

Depending on the specific hazards you have identified, you may be able to utilize specific topics/trainings within KSS/KSP/KSC to satisfy some portions of your overall training plan.

Q: How is harassment defined when committed by a former employee toward a current employee?

A: Employee on past-employee violence is one of the four types of violence defined in the plan and is categorized as "Type 3 violence," which means workplace violence against an employee by a present or former employee, supervisor, or manager. If the harassment to a current employee from a former employee meets the definition of workplace violence, then it could be considered part of SB 553's WVPP requirements. SB 553 states that "workplace violence" means any act of violence or threat of violence that occurs in a place of employment. "Threat of violence" means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose. It goes on to explain that workplace violence includes, but is not limited to:



- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

Q: How is violence defined? We have had teachers who claim to have been “assaulted” by preschoolers with special needs in the midst of a tantrum.

A: SB 553 states that “workplace violence” means any act of violence or threat of violence that occurs in a place of employment. “Threat of violence” means any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose. It goes on to explain that workplace violence includes, but is not limited to:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

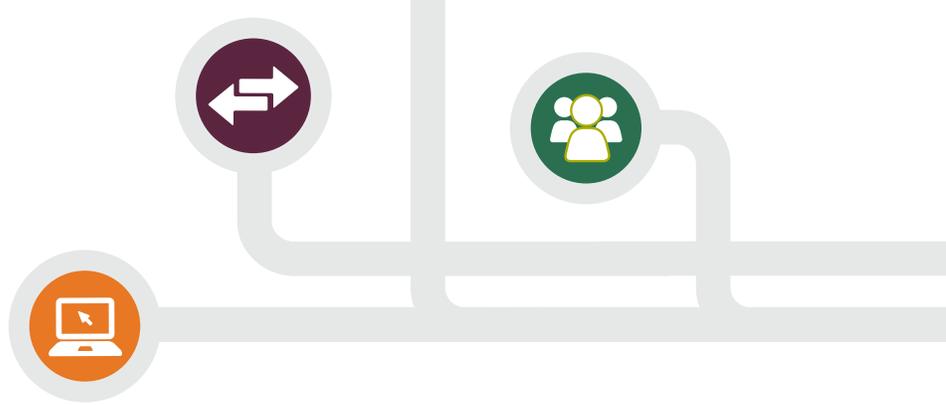
Physical force from a student towards an employee is considered a Type 2 workplace violence as outlined above, which would require the employer to investigate and respond with elements of control and training for those employees.

Q: When you don’t know who perpetrated the violence, is “unknown” an acceptable answer?

A: The violence incident log does consider this in their various classifications of who committed the violence. The classification options include “...a client or customer, family or friend of a client or customer, stranger with criminal intent, coworker, supervisor or manager, partner or spouse, parent or relative, or other perpetrator.”

Q: Do you have a sample plan that can be shared?

A: Yes! Requests for our WVPP template framework can be made here: ww2.keenan.com/wbn-sb553-optin



Q: Is it recommended to have a centralized group to finalize the agency's response steps to each violence classification?

A: SB 553 does not give any specifics regarding how to finalize an agency's response, other than requiring a names/title of the person responsible for implementing in the plan.

Q: Is law enforcement exempt from SB 553?

A: SB 553 states that the following employers, employees, and places of employment are exempt from this section:

(A) Health care facilities, service categories, and operations covered by Section 3342 of Title 8 of the California Code of Regulations.

(B) Employers that comply with Section 3342 of Title 8 of the California Code of Regulations.

(C) Facilities operated by the Department of Corrections and Rehabilitation, if the facilities are in compliance with Section 3203 of Title 8 of the California Code of Regulations.

(D) Employers that are law enforcement agencies that are a "department or participating department," as defined in Section 1001 of Title 11 of the California Code of Regulations and that have received confirmation of compliance with the Commission on Peace Officer Standards and Training (POST) Program from the POST Executive Director in accordance with Section 1010 of Title 11 of the California Code of Regulations. However, an employer shall be exempt pursuant to this subparagraph only if all facilities operated by the agency are in compliance with Section 3203 of Title 8 of the California Code of Regulations.

(E) Employees teleworking from a location of the employee's choice, which is not under the control of the employer.

(F) Places of employment where there are less than 10 employees working at the place at any given time and that are not accessible to the public, if the places are in compliance with Section 3203 of Title 8 of the California Code of Regulations.

Q: Are the board of trustees and vice presidents considered their own occupation groups that also need to be addressed?

A: SB 553 states that a WVPP must "be specific to the hazards and corrective measures for each work area and operation." It also states that employees must be trained on "workplace violence hazards specific to the employees' jobs, the corrective measures the employer has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm."



Q: How do we apply these control layers to working with students who display violent behaviors, often due to a disability?

A: Employers are required to implement controls and trainings to protect employees from violence (SB 553) and any other form of injuries (as part of your Injury and Illness Prevention Plan) caused by students, including students with disabilities. Injuries caused by students with disabilities require more specialized training and selection of appropriate control measures, which should be done in close connection with your Special Education department.

Q: Can you explain CPTED?

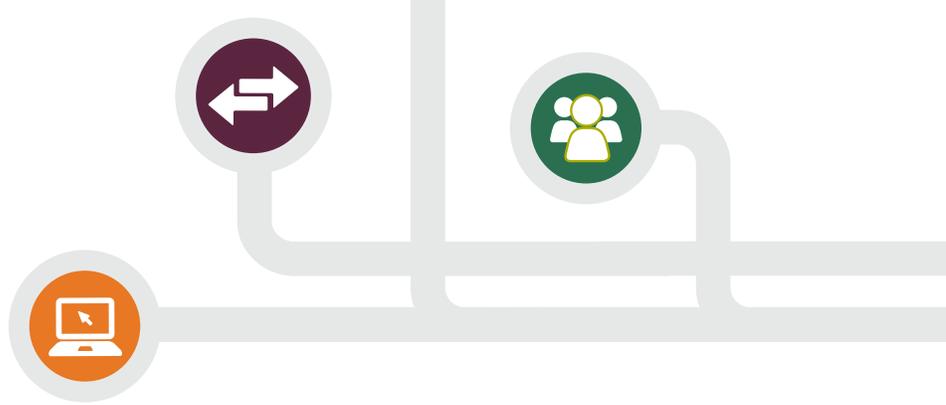
A: CPTED (Crime Prevention Through Environmental Design) strategies rely upon the ability to influence offender decisions before they commit a criminal act. Research into criminal behavior shows that the decision to offend or not to offend is more influenced by cues to the perceived risk of being caught than by cues to reward or ease of entry. Certainty of being caught is the main deterrence for criminals, not the severity of the punishment. By raising the certainty of being captured, criminal actions will decrease. Consistent with this research, CPTED based strategies emphasize enhancing the perceived risk of detection and apprehension by altering the physical environment to do so.

CPTED is built upon four basic principles:

- Natural surveillance
- Access control
- Territorial reinforcement
- Maintenance

Q: Will there be funds from the state to implement the plan?

A: The bill text states that “no reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because the only costs that may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.”



Q: Regarding WVPP requirements that a worksite assessment needs to be done, how do we complete that? Is there a form?

A: The bill requires employers to develop “procedures to identify and evaluate workplace violence hazards, including, but not limited to, scheduled periodic inspections to identify unsafe conditions and work practices and employee reports and concerns. Inspections shall be conducted when the plan is first established, after each workplace violence incident, and whenever the employer is made aware of a new or previously unrecognized hazard.” It also states that your plan must have “effective procedures to obtain the active involvement of employees and authorized employee representatives in developing and implementing the plan, including, but not limited to, through their participation in identifying, evaluating, and correcting workplace violence hazards, in designing and implementing training, and in reporting and investigating workplace violence incidents.” Employees should participate in the procedures that you create, including any inspection/evaluation forms you may want to use. Keenan’s IMReady team can provide additional support and assist with the creation of custom inspection forms.

Q: Does SB 553 provide funding to college police?

A: SB 553 does not address funding of college police.

Q: We have instructors who teach in prisons. Do we need to address this in our WVPP or does the prison’s plan attach?

A: Employers are required to share their respective WVPP with one another when they have employees working on another employer’s site/location. Part of the employer’s WVPP shall include methods the employer will use to coordinate implementation of the plan with other employers to ensure that those employers and employees understand their respective roles, as provided in the plan.

Q: Since Cal/OSHA has 2 years to clarify, is there a penalty if we get some of our plan wrong?

A: SB 553 does have a provision/section that essentially tells OSHA to enforce SB 553 under OSHA’s existing citation procedures they have in place, even though SB 553 does not yet have supporting OSHA regulations. Specifically, it states the following: “The division shall enforce this section by the issuance of a citation alleging a violation of this section and a notice of civil penalty in a manner consistent with Section 6317. Any person who receives a citation and penalty may appeal the citation and penalty to the appeals board in a manner consistent with Section 6319.”



Q: What do you suggest for covering multiple occupations within one plan? Or do we need to have different plans for different occupations?

A: SB 553 requires one WVPP, which should encompass all employee/occupation violence exposures within that plan.

Q: The information seems to focus on the physical prevention pieces that should be focused on with the plan. What about the Workplace Violence Prevention that focuses on prevention of targeted violence and awareness?

A: Employee training is a key element of SB 553 and could certainly address employee awareness, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.

Q: I understand that the plan should be in place by July 1. Does all training have to be completed for all work groups by July 1 as well? What are the requirements for ongoing training after the first implementation?

A: Employers shall provide employees with “initial” training when the plan is first established (which is required by 7/1/24), and annually thereafter.

Q: My school district has about 45 different job descriptions. It would be very difficult to develop a plan for all the different employee types. Can I group employee by categories? For example, indoor work vs. outdoor work.

A: SB 553 requires that you address violence hazards that are “specific to the employees’ jobs”. Grouping employees by occupation and site will depend on whether the workplace violence hazards are similar in kind.

Q: Who needs to adopt or accept the SB553 plan?

A: SB 553 does not address any specific adoption or acceptance requirements. SB 553 applies to all employees in the workplace except as otherwise excluded/exempt as mentioned above.

Q: With one point of entry, how does that affect ingress and egress requirements?

A: Any alterations to designated exits/egress routes should be done in conjunction with the DSA and/or the local fire department.



Q: Once our plan is developed, what is the approval or review process outside of our own organization, if any?

A: SB 553 does not address any specific approval requirements but does require the plan to be reviewed and updated as follows:

- Annually
- When a deficiency is observed or becomes apparent
- After a workplace violence incident

Q: Will Cal/OSHA start enforcing SB 553 before they get their regulation passed?

A: SB 553 does have a provision/section that essentially tells OSHA to enforce SB 553 under OSHA's existing citation procedures they have in place, even though SB 553 does not yet have supporting OSHA regulations (not until 12/2026). Specifically, it states the following: "The division shall enforce this section by the issuance of a citation alleging a violation of this section and a notice of civil penalty in a manner consistent with Section 6317. Any person who receives a citation and penalty may appeal the citation and penalty to the appeals board in a manner consistent with Section 6319."

Q: How long should the Workplace Violence Prevention Plan be? Do you recommend putting it within the IIPP or having a standalone plan?

A: There is no length requirement defined in SB 553. Employers have the option to include it in their IIPP or make it a standalone plan. The best option is likely the one that will make the development, implementation, review and updating the plan the most effective.

Q: Will surveys suffice for employee feedback?

A: SB 553 does not define which methods of getting the active involvement of employee and their representatives are acceptable or not. Having multiple methods to gain involvement is likely preferred than having a single method.

Q: Do the employee input gathering sessions require a record keeping component for ensuring employee engagement?

A: SB 553 does not define how to measure engagement or the active involvement of employees or their representatives.



Q: Should schools encompass this plan within our comprehensive school safety plan or prepare a separate plan?

A: SB 553 requires that a WVPP either be a standalone plan or part of your IIPP.

Q: Can we use Safety Committee for the employee engagement portion?

A: A safety committee could be one method of gaining the active involvement of employees and their representatives.

Q: Our Fire Department (which is one part of a larger umbrella of services) developed a workplace violence plan specific for their department two years ago. They worked with consultants who specialize in these plans for Fire Departments. Do we need to reinvent the plan for that department?

A: You could potentially use elements of previously developed violence prevention plans as part of your process/resources when developing your WVPP that meets the requirements outlined in SB 553.

Q: If a draft WVPP outlines the factors that pose a higher risk for violence in the workplace (i.e., exchange of money, working alone, working at night, performing public safety functions), would the hazard prevention requirements be fulfilled if we address each of the risk factors? Do we have to expand the prevention section to identify each building, department, or even each job title?

A: SB 553 requires that employers address violence exposures specific to employees' jobs/occupations. The items outlined in the webinar/template are just examples and your plan should not be limited to those examples if your employees face other exposures not already included.

Q: Who do you recommend should train the employees?

A: Training must allow for employees to have an "opportunity for interactive questions and answers with a person knowledgeable about the employer's plan."

Q: Does this only cover when an employee is involved in the scenario? What about student-to-student violence?

A: Student exposures to violence are not specifically addressed by SB 553, unless those students are also employees. Employees that face an exposure caused by a student-on-student scenario would likely need to be addressed in your plan. The plan should address effective procedures to respond to actual or potential workplace violence emergencies, where they are not directed at specific employees.



Q: What is the agency's responsibility for contractors and/or vendors working on their property?

A: Employers and required to share their respective WVPP with one another when they have employees working on another employer's site/location.

Q: How are employers allowing for training Q&A with online training platforms that are compliant with SB553?

A: Training must allow for employees to have an "opportunity for interactive questions and answers with a person knowledgeable about the employer's plan."

Q: How is this going to work with clinic students and work experience students that are covered as employees by labor code when they are on another site location with an outside employer?

A: Employers and required to share their respective WVPP with one another when they have employees working on another employer's site/location.

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