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OSHA Enforcement and Rulemaking Update

April 17, 2024

ERIC J. CONN

CHAIR, CONN MACIEL CAREY'S NATIONAL OSHA PRACTICE

Eric J. Conn

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ERIC J. CONN is Chair of **Conn Maciel Carey LLP**'s national OSHA Practice, where he focuses on all aspects of occupational safety & health law:

- Practiced for 11 years alongside the 1st General Counsel of the OSH Review Commission
- Represents employers in inspections, investigations and enforcement actions involving OSHA, CSB, MSHA, & EPA
- Manages investigations of serious workplace accidents
- Handles all aspects of OSHA litigation, from citation contests and appeals to criminal investigations and prosecutions
- Curator of the award-winning OSHA Defense Report blog
- 1 of only 9 OSHA-specialist attorneys rated “Band 1” nationwide by Chambers USA



Agenda

1. OSHA Enforcement Trends and Developments
2. OSHA Rulemaking Update
 - Heat Illness
 - Worker Walkaround
 - Emergency Response
 - E-Recordkeeping
 - Cal/OSHA's new Workplace Violence Law (SB 556)



A collection of safety gear including brown leather work boots, a yellow hard hat, and yellow safety glasses. The boots are in the background, the hard hat is on the right, and the safety glasses are in the foreground. The text is overlaid on a white banner across the middle.

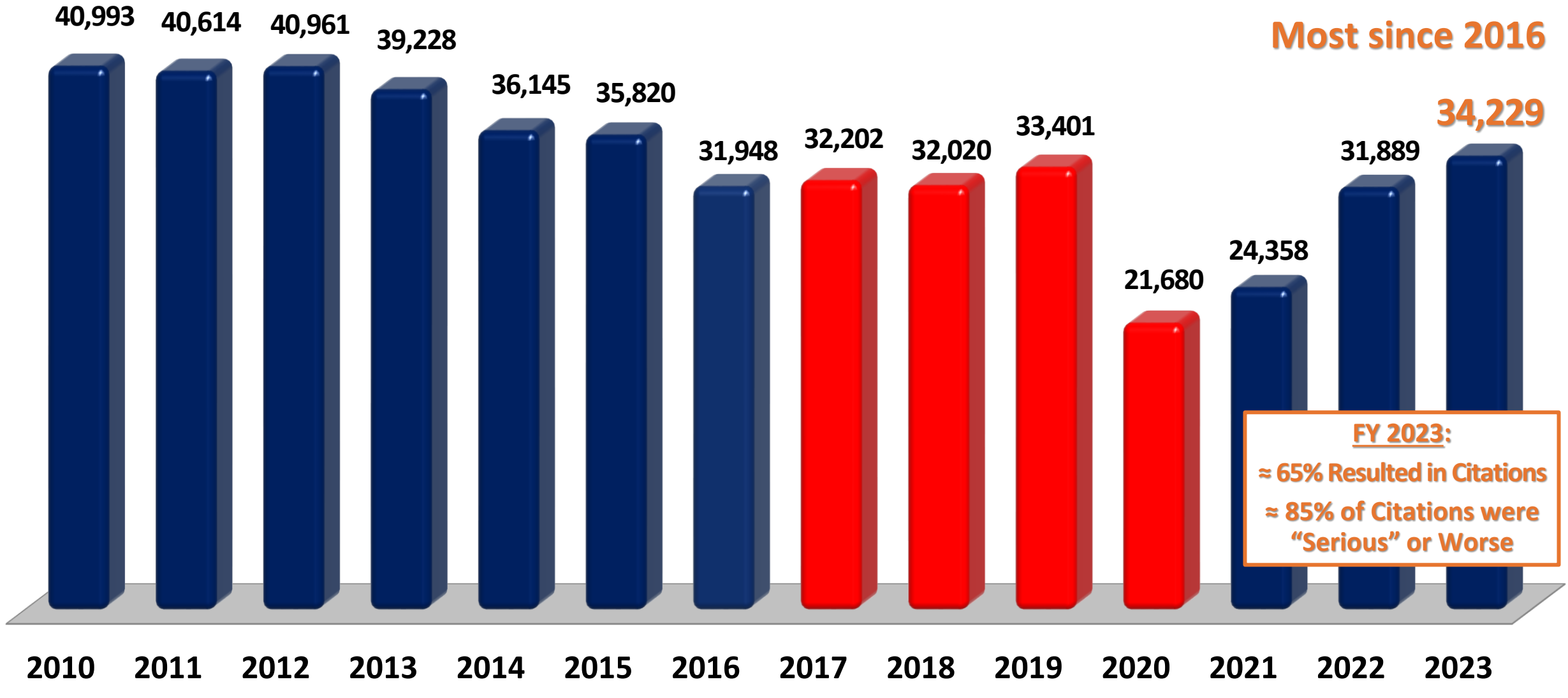
OSHA Enforcement Trends and Data

“Using All the Tools in OSHA’s Toolbox”

Remarks from Assistant Sec'y and the Solicitor

- Using “All the Tools in the Toolbox” Against “Low Road” Employers
 - **More Enforcement = More Deterrence**
 - Expanding the Severe Violator Enforcement Program (SVEP)
 - Instance By Instance and Anti-Grouping
 - More Proactive Enforcement Targeting
 - More criminal prosecutions (active criminal referral program)
 - Imminent Danger Notices (litigation or threat of litigation)
 - Greater use of Corporate-wide Settlement Agreements (CSAs)
 - OSHA has started to certify U Visas

Total Fed OSHA Inspections



2023 OSHA Citations

	2002	2008	2013	2019	2021	FY 2023
Serious	58,845	67,052	56,661	36,447	23,047	33,750
Repeat	1,867 2.4%	2,817 3.2%	3,193 4.0%	2,471 4.8%	1,789 5.7%	2,858 5.93%
Willful	331	517	355	404	383	605

- FY 2023 - 46,347 Total violations (the most total violations in many years)
- New Repeat policies under Obama/Biden increase % of Repeat violations every year
 - Treat facilities within the same corporate entity as a single workplace
 - Look back 5 years at OSHA record for prior violations to be the bases for Repeats
 - Proactive Targeting (follow-up inspections / selecting past violators for inspection)
- 2023 - Biden's OSHA shattered the record for most Willful violations in a year

OSHA's Penalty Authority Adjusts w/ Inflation

Classification	Historical	2016 (78% Increase)	2023 (7.8% Increase)	2024 (3.24% increase)
Other-than-Serious	\$7,000	\$12,471	\$15,625	\$16,131
Serious	\$7,000	\$12,471	\$15,625	\$16,131
Willful	\$70,000	\$124,709	\$156,259	\$161,323
Repeat	\$70,000	\$124,709	\$156,259	\$161,323
Failure to Abate	\$7,000 per day	\$12,471 per day	\$15,625 per day	\$16,131 per day

Trade Release



U.S. Department of Labor
Occupational Safety and Health Administration
Office of Communications
Washington, D.C.
www.osha.gov

For Immediate Release
January 11, 2024
Contact: Office of Communications
Phone: 202-693-1999

OSHA civil penalty amounts adjusted for 2024

WASHINGTON - The U.S. Department of Labor announced changes to Occupational Safety and Health Administration civil penalty amounts based on cost-of-living adjustments for 2024.

In 2015, Congress passed the Federal Civil Penalties Inflation Adjustment Act Improvements Act to advance the effectiveness of civil monetary penalties and to maintain their deterrent effect. Under the Act, agencies are required to publish "catch-up" rules that adjust the level of civil monetary penalties and make subsequent annual adjustments for inflation no later than January 15 of each year. This year, January 15 falls on a federal holiday. Therefore, new OSHA penalty amounts will become effective Jan. 16, 2024.

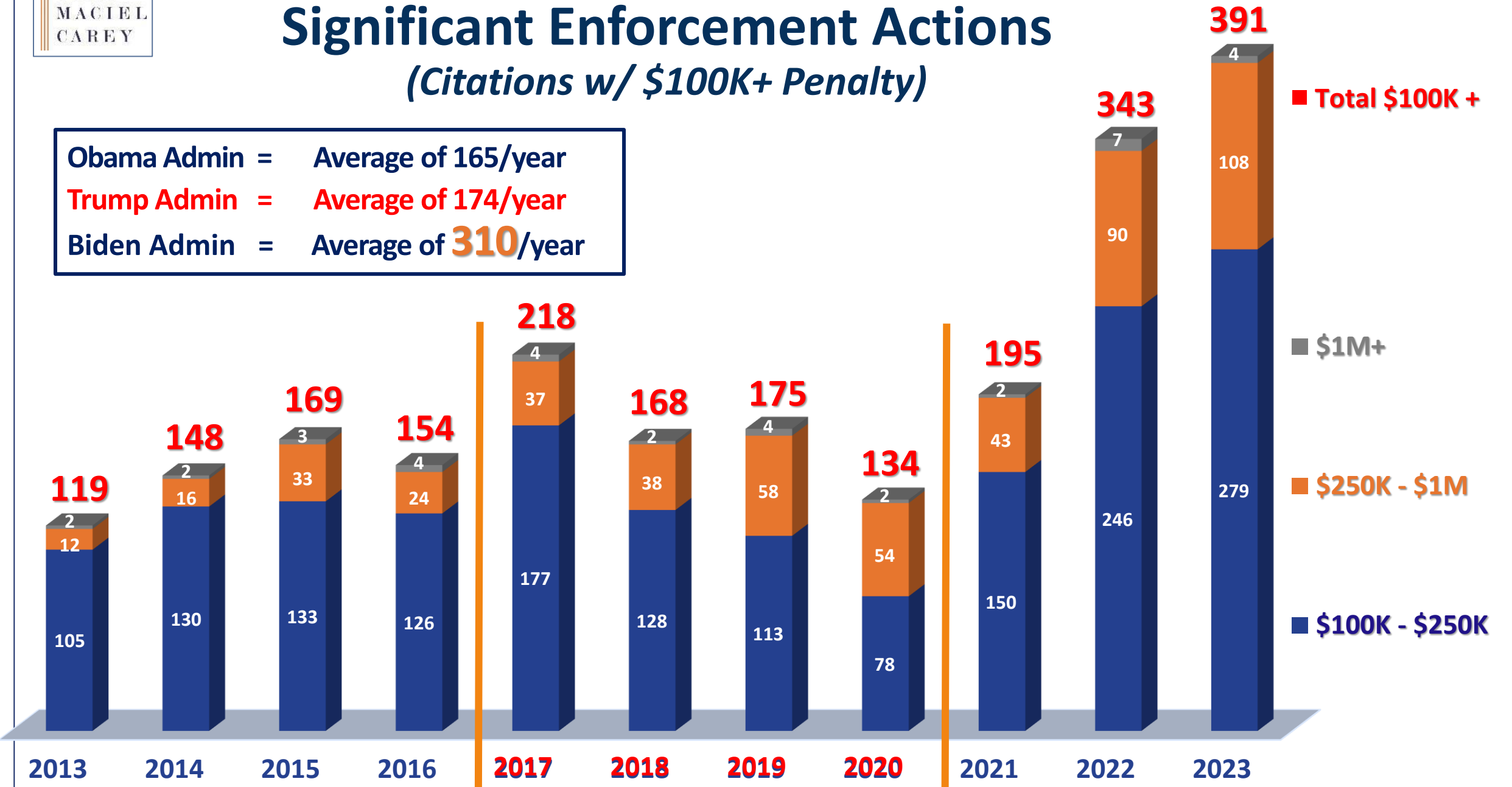
OSHA's maximum penalties for serious and other-than-serious violations will increase from \$15,625 per violation to \$16,131 per violation. The maximum penalty for willful or repeated violations will increase from \$156,259 per violation to \$161,323 per violation.

Visit the [OSHA Penalties page](#) and read the [final rule](#) for more information.

Significant Enforcement Actions

(Citations w/ \$100K+ Penalty)

Obama Admin = Average of 165/year
 Trump Admin = Average of 174/year
 Biden Admin = Average of **310**/year



■ Total \$100K +

■ \$1M+

■ \$250K - \$1M

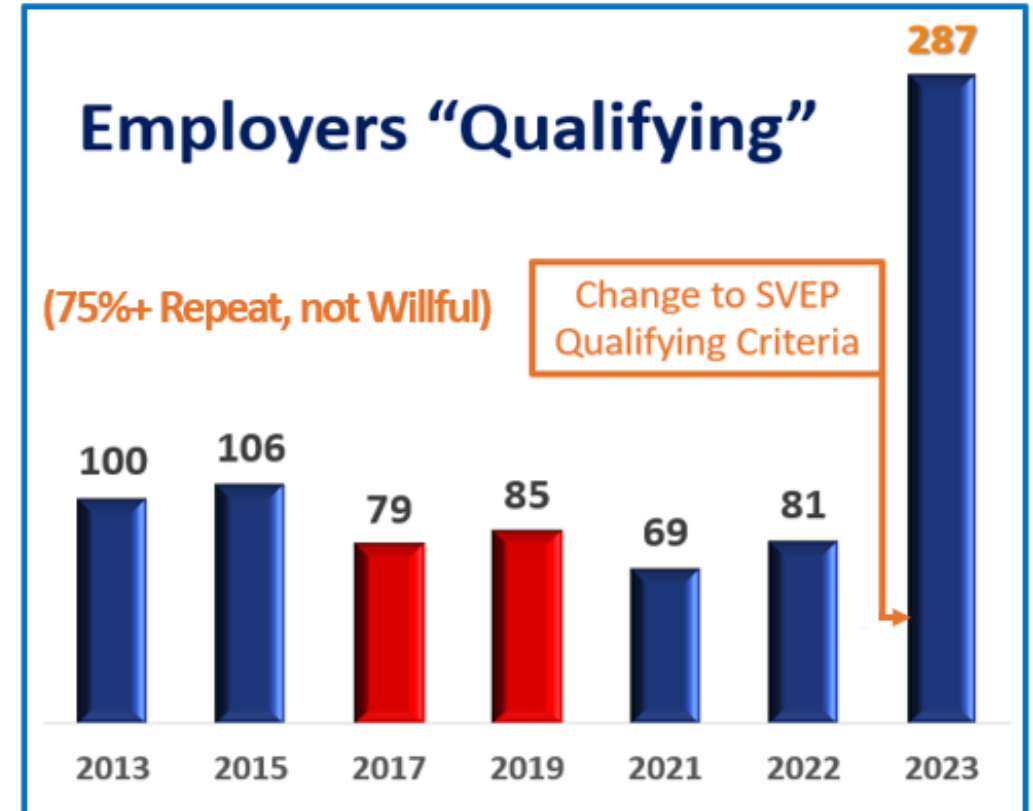
■ \$100K - \$250K

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Severe Violator Enforcement Program Expands

- Directs enforcement resources at employers that *demonstrate indifference to OSH Act obligations*
- 2010-2022 - “qualifying” criteria meant being cited w/:
 - *Egregious* (per instance) enforcement actions - 12%
 - **1+** Willful, Repeat, or FTA citations related to a *Fatality or Catastrophe* – **19%**
 - **2+** Willfuls or Repeats re: **High Emphasis Hazards** – **68%**
 - **3+** W,R, or FTA *Process Safety* citations – **1%**
- **FY23** - OSHA updated SVEP qualifying criteria, by dropping **High Emphasis Hazard Limitation**
- **Now** - **any 2+ “high gravity” Willful, Repeat, or FTA violations** in the same inspection **involving ANY hazards / standards**

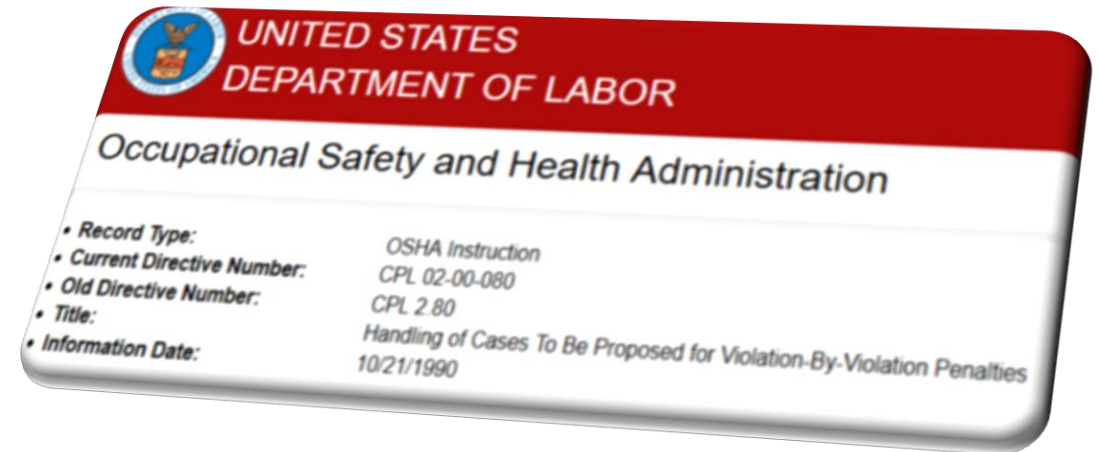


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- **Using “All the Tools in the Toolbox” Against “Low Road” Employers**
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OSHA's Instance-By-Instance Enforcement Policy

- 1990 Directive: *“Handling of Cases to be Proposed for Violation-By-Violation Penalties”* established OSHA’s long-time Egregious (Per Instance) Enforcement Policy
- Violations are **Willful Plus** meet at least 1 of these criteria:
 - Violations resulted in fatality or catastrophe
 - Employer committed so many violations as to undermine an effective safety program
 - Extensive history of violations and/or persistently high injury rates
 - Conduct as a whole = clear bad faith
- 1/26/23 – New OSHA enforcement memo: *“Application of Instance-by-Instance Penalties”*
- Replaces Willful Plus threshold for Per Instance citations w/ much lower “High-gravity Serious” (high severity/greater probability) and some Other-than-Serious violations



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Proactive Enforcement Targeting



Site Specific Targeting



Combustible Dust NEP



Amputations NEP (LOTO and Machine Guarding)



Heat Illness NEP



Lead, Silica, and Hexavalent Chromium NEPs



Falls NEP



Primary Metals NEP



Chem Facility/Oil Refinery Process Safety Management NEP



Trenching/Excavations NEP



Warehousing and High Injury Rate Retail NEP



REPs/LEPs – Food Manufacturing, Grain, Forklifts, Etc.

Increase in National, Regional, and Local Emphasis Programs (47% of inspections in FY23)

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A collection of safety equipment including brown leather work boots, a yellow hard hat, and yellow safety glasses, arranged on a wooden surface. The background shows a window with blinds.

OSHA Rulemaking Overview

Biden's OSHA - Top 10 Rulemaking Priorities

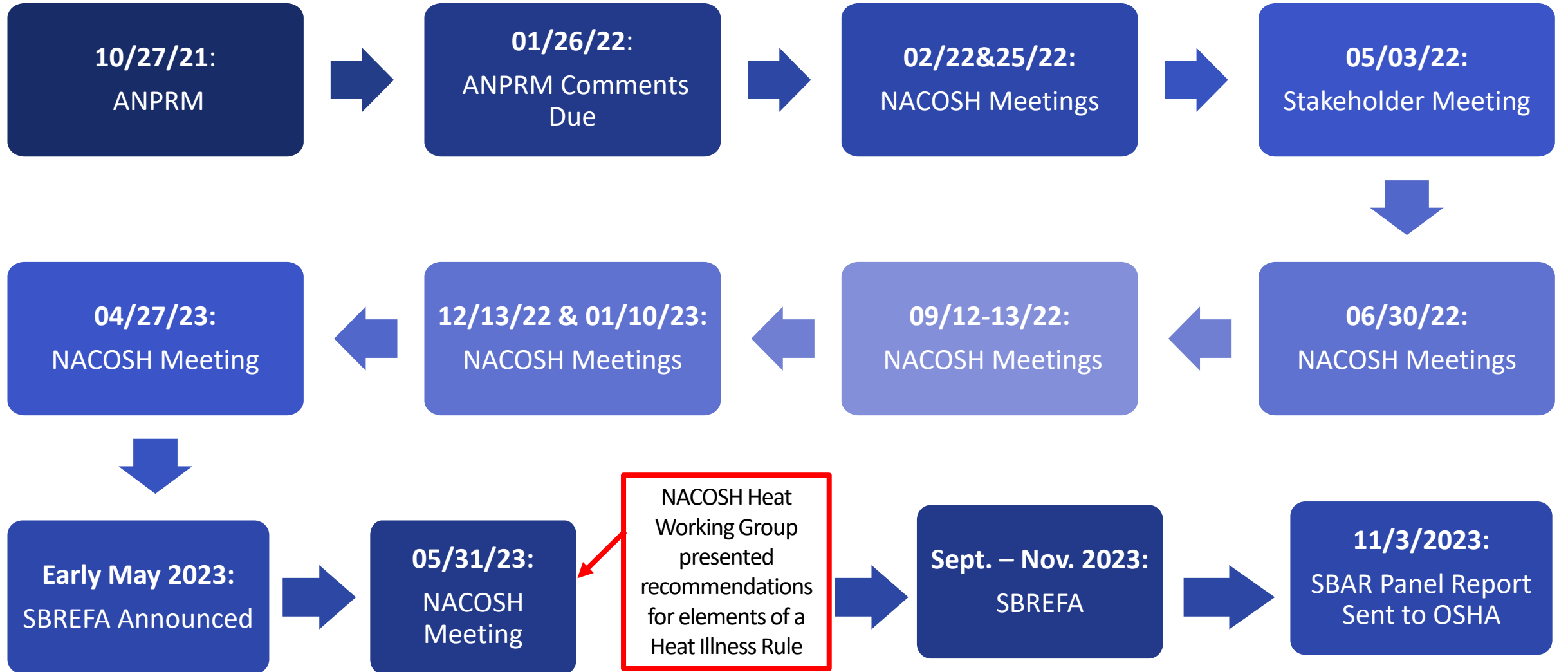
1. Heat Illness Prevention for Indoor and Outdoor Workplaces
2. Worker Walkaround Representative
3. Expanding E-Recordkeeping
4. Emergency Response
5. Update HazCom ('12 aligned w/ GHS Rev 3 ('09), now Rev 8)
6. Process Safety Management Reform
7. Infectious Diseases Rule for Healthcare
8. Workplace Violence in Healthcare
9. Update Lead Standard (Blood Lead Level)
10. Lockout / Tagout Modernization

Agency	Agenda Stage of Rulemaking	Title	RIN
OSHA	Prerule Stage	Process Safety Management and Prevention of Major Chemical Accidents	1218-AC82
OSHA	Prerule Stage	Mechanical Power Presses Update	1218-AC98
OSHA	Prerule Stage	Prevention of Workplace Violence in Health Care and Social Assistance	1218-AD08
OSHA	Prerule Stage	Blood Lead Level for Medical Removal	1218-AD10
OSHA	Proposed Rule Stage	Heat Illness Prevention in Outdoor and Indoor Work Settings	1218-AD39
OSHA	Proposed Rule Stage	Infectious Diseases	1218-AC46
OSHA	Proposed Rule Stage	Amendments to the Cranes and Derricks in Construction Standard	1218-AC81
OSHA	Proposed Rule Stage	Communication Tower Safety	1218-AC90
OSHA	Proposed Rule Stage	Emergency Response	1218-AC91
OSHA	Proposed Rule Stage	Lock-Out/Tag-Out Update	1218-AD00
OSHA	Proposed Rule Stage	Tree Care Standard	1218-AD04
OSHA	Proposed Rule Stage	Welding in Construction Confined Spaces	1218-AD23
OSHA	Proposed Rule Stage	Personal Protective Equipment in Construction	1218-AD25
OSHA	Proposed Rule Stage	Powered Industrial Trucks Design Standard Update	1218-AD26
OSHA	Proposed Rule Stage	Walking Working Surfaces	1218-AD28
OSHA	Proposed Rule Stage	Occupational Exposure to Crystalline Silica: Revisions to Medical Surveillance Provisions for Medical Removal Protection	1218-AD31
OSHA	Final Rule Stage	Worker Walkaround Representative Designation Process	1218-AD45
OSHA	Final Rule Stage	Update to the Hazard Communication Standard	1218-AC93
OSHA	Final Rule Stage	Procedures for Handling of Retaliation Complaints Under the Whistleblower Protection Statutes	1218-AD30
OSHA	Final Rule Stage	Occupational Exposure to COVID-19 in Healthcare Settings	1218-AD36
OSHA	Final Rule Stage	Procedures for the Handling of Retaliation Complaints Under the Anti-Money Laundering Act	1218-AD37
OSHA	Final Rule Stage	Procedures for the Handling of Retaliation Complaints Under the Criminal Antitrust Anti-Retaliation Act	1218-AD38
OSHA	Final Rule Stage	Improve Tracking of Workplace Injuries and Illnesses	1218-AD40
OSHA	Final Rule Stage	Procedures for the Use of Administrative Subpoenas	1218-AD44

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Indoor and Outdoor Heat Illness Prevention Rulemaking

Heat Illness Rulemaking Update



Potential Program Requirements

1. Procedures to ID heat hazards, including *environmental monitoring* and *identification of work processes and external factors* that increase the likelihood of heat illness
2. Procedures to implement *engineering controls*
3. Procedures for *administrative controls*; e.g., *water, cool down rest breaks, acclimatization* for new/returning employees, and *supervision* of employees for heat illness symptoms
4. *High-heat* procedures
5. *Emergency response* procedures for when employees *exhibit symptoms* of heat illness
6. *Training* for employees and supervisors
7. Selection of a designated individual(s) to *oversee and implement* the HIIPP
8. Recordkeeping requirements; e.g., *environmental monitoring data*, records of *heat-related illness incidents*, records of *heat acclimatization for new/returning employees*

Fed/OSHA's Heat National Emphasis Program

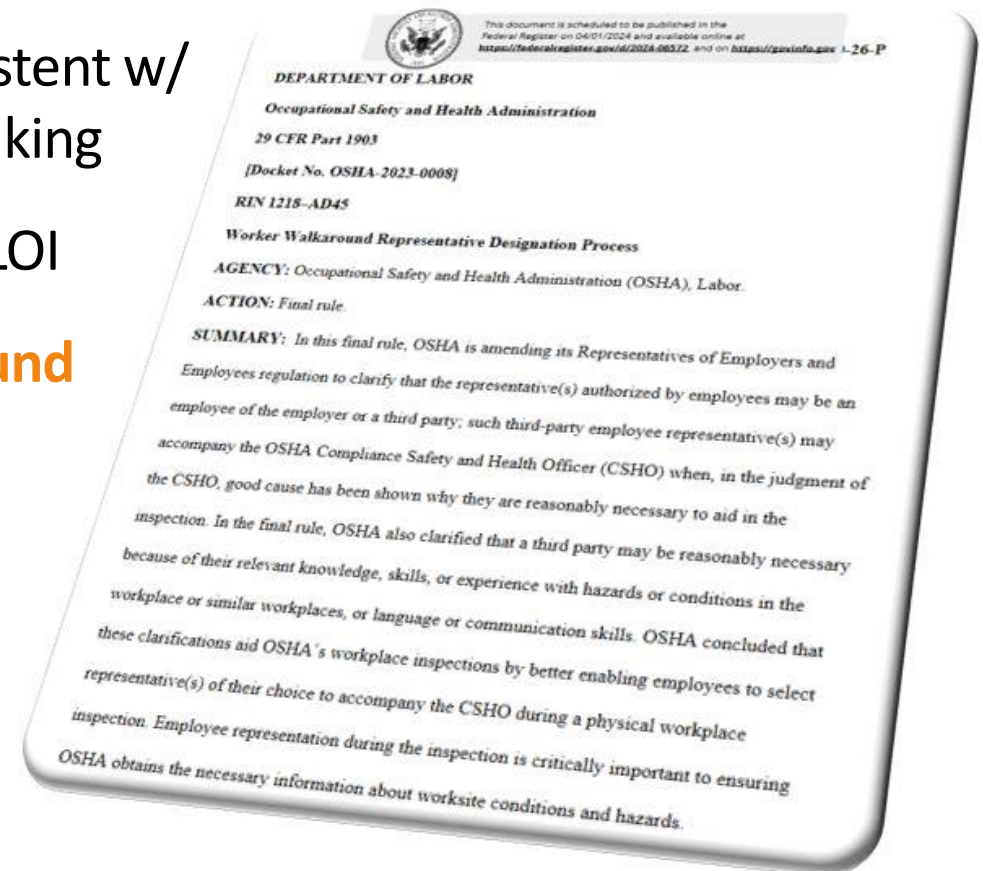
- 4/8/22 - OSHA launched enforcement NEP for Outdoor and Indoor Heat Hazards
- Focus enforcement on high hazard industries or activities in workplaces w/ prevalent heat hazards (e.g., outdoors in areas w/ a heat wave or indoors w/ radiant heat source)
- NEP directive: ***“each Region is expected to have a FY goal of increasing heat inspections by 100% above baseline average of FYs 17-21”***
- OSHA to initiate programmed inspections in outdoor and indoor work settings in ≈70 high-risk industries when the National Weather Service issues local area heat warning, alert, or advisory.

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Worker Walkaround Representative Designation Process Rule

Worker Walkaround Representative Rulemaking

- Feb. 2013 - OSHA issued a LOI of 1903.8(c) granting unions a right to serve as employee OSHA inspection representatives when OSHA believes their involvement would make a positive contribution to a thorough and effective inspection.”
- Industry challenged the Letter, asserting it was so inconsistent w/ 1903.8(c) that it effectively rewrote the reg w/out rulemaking
- April 2017 – mid-challenge, Trump’s OSHA rescinded the LOI
- Jan. 2023 – Biden’s OSHA initiated the “**Worker Walkaround Representative Designation Process**” Rulemaking to amend 1903.8(c) to memorialize the 2013 LOI
- Aug. 30, 2023 - OSHA issued NPRM
- April 3, 2024 – Final Rule Published in the Fed Register
- May 31, 2024 – Effective Date of new Final Rule



Worker Walkaround Representative Rulemaking

Old Reg Text of 1903.8(c):

“Representatives authorized by employees **shall be employees of the employer**. However, if in the judgment of the CSHO, good cause has been shown why accompaniment by a 3rd party who is not an employee of the employer (**such as an IH or safety engineer**) is reasonably necessary to the conduct of an effective and thorough physical inspection of the workplace, such 3rd party may **accompany** the CSHO during the inspection.”

Proposed Reg Text of 1903.8(c):

Representative(s) authorized by employees **may be an employee of the employer or a 3rd party**. When the representative(s) authorized by employees is not an employee of the employer, they may accompany the CSHO in the inspection if, in the judgment of the CSHO, good cause has been shown why their **participation is reasonably necessary to the conduct of an effective and thorough physical inspection** of the workplace (e.g., **b/c of their relevant knowledge, skills, or experience w/ hazards or conditions in the workplace or similar workplaces, or language skills**).

Final New Reg Text of 1903.8(c):

Representative(s) authorized by employees **may be an employee of the employer or a 3rd party**. When the representative(s) authorized by employees is not an employee of the employer, they may accompany the CSHO during the inspection if, in the judgment of the CSHO, good cause has been shown why **accompaniment** by a third party is reasonably necessary to the conduct of an effective and thorough **physical inspection** of the workplace (including but not limited to **b/c of their relevant knowledge, skills, or experience w/ hazards or conditions in the workplace or similar workplaces, or language or communication skills**).

Who May Get To “Walkaround” Your Facility?

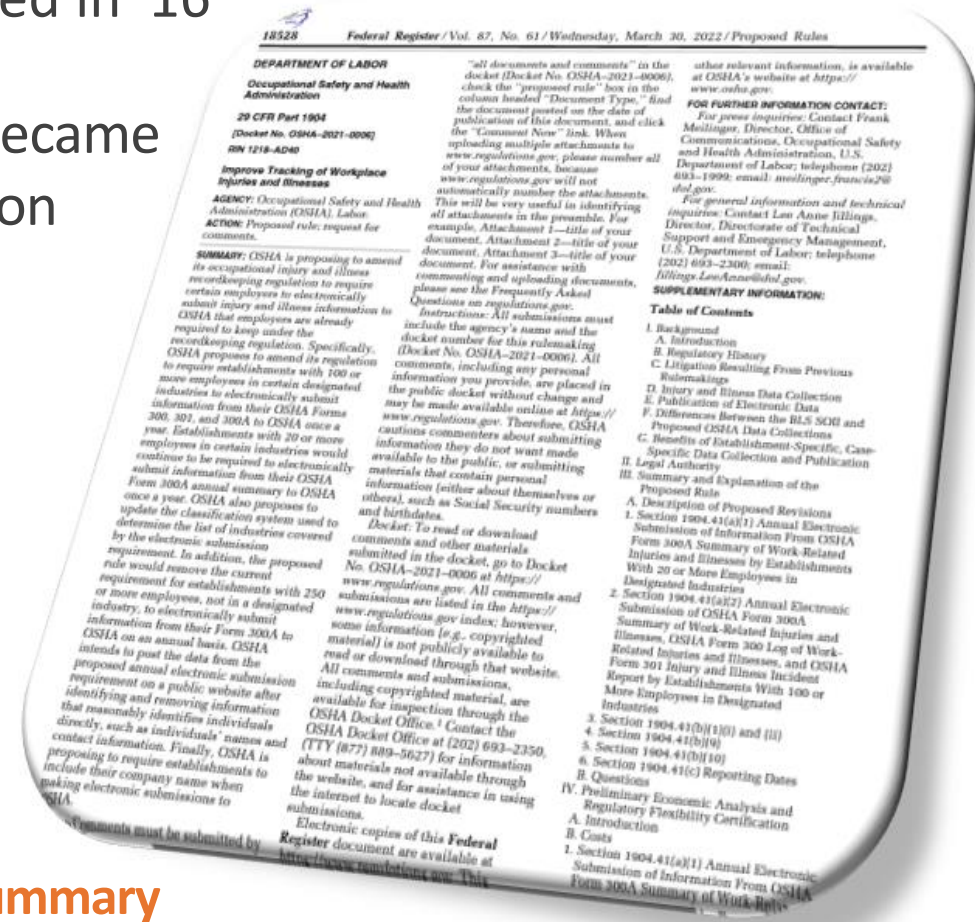
- **Union Representatives at non-union workplaces** accessing workplaces and employees for organizing, influencing bargaining, etc.
- **Plaintiffs’ Attorneys (or their “experts”)** piggyback on OSHA’s broad investigative/subpoena authority (access site, records and evidence, and participate in private employee interviews)
- **Disgruntled Former employees**
- **Attorneys and consultants** “experienced in interacting w/ gov’t officials,” or “w/ relevant cultural competencies”
- **Worker advocacy organizations**
- **Technical experts** with more expertise than OSHA has in-house
- **Competitors** accessing proprietary information
- **Customers**
- **Media**

A collection of safety gear including a yellow hard hat, brown leather work boots, and safety glasses. The items are arranged on a wooden surface, with the hard hat in the foreground on the right and the boots in the background on the left. A white banner with orange text is overlaid across the center of the image.

Updates to E-Recordkeeping Rule

Biden's OSHA - Expanded E-Recordkeeping

- 3/30/22 – OSHA issued a Proposed Rule significantly expanding E-Recordkeeping requirements beyond what Obama's OSHA promulgated in '16
- Proposed Final Rule was finalized on July 21, 2023 and became **effective Jan. 1, 2024** – in time for March 2024 submission
- Under the final amended E-Recordkeeping Rule:
 - Workplaces w/ 20-249 employees in Appendix A industries will have to submit their 300A Annual Summary data
 - Workplaces w/ 250+ employees in any industry will also still have to submit their 300A Annual Summary data
 - **Workplaces w/ 100+ employees in Appendix B industries submit data from 300 Log, 301 Incident Report, and 300A Summary**



100+ Employees in These Industries

1111	Oilseed and grain farming.
1112	Vegetable and melon farming.
1113	Fruit and tree nut farming.
1114	Greenhouse, nursery, and floriculture production.
1119	Other crop farming.
1121	Cattle ranching and farming.
1122	Hog and pig farming.
1123	Poultry and egg production.
1129	Other animal production.
1141	Fishing.
1151	Support activities for crop production.
1152	Support activities for animal production.
1153	Support activities for forestry.
2213	Water, sewage and other systems.
2381	Foundation, structure, and building exterior contractors.
3111	Animal food manufacturing.
3113	Sugar and confectionery product manufacturing.
3114	Fruit and vegetable preserving and specialty food manufacturing.
3115	Dairy product manufacturing.
3116	Animal slaughtering and processing.
3117	Seafood product preparation and packaging.
3118	Bakeries and tortilla manufacturing.
3119	Other food manufacturing.
3121	Beverage manufacturing.
3161	Leather and hide tanning and finishing.
3162	Footwear manufacturing.
3211	Sawmills and wood preservation.

3212	Veneer, plywood, and engineered wood product manufacturing.
3219	Other wood product manufacturing.
3261	Plastics product manufacturing.
3262	Rubber product manufacturing.
3271	Clay product and refractory manufacturing.
3272	Glass and glass product manufacturing.
3273	Cement and concrete product manufacturing.
3279	Other nonmetallic mineral product manufacturing.
3312	Steel product manufacturing from purchased steel.
3314	Nonferrous metal production and processing.
3315	Foundries.
3321	Forging and stamping.
3323	Architectural and structural metals manufacturing.
3324	Boiler, tank, and shipping container manufacturing.
3325	Hardware manufacturing.
3326	Spring and wire product manufacturing.
3327	Machine shops; turned product; and screw, nut, and bolt manufacturing.
3328	Coating, engraving, heat treating, and allied activities.
3331	Agriculture, construction, and mining machinery manufacturing.
3335	Metalworking machinery manufacturing.
3361	Motor vehicle manufacturing.
3362	Motor vehicle body and trailer manufacturing.
3363	Motor vehicle parts manufacturing.
3366	Ship and boat building.
3371	Household and institutional furniture and kitchen cabinet manufacturing.

3372	Office furniture manufacturing.
4231	Motor vehicle and motor vehicle parts and supplies merchant wholesalers.
4233	Lumber and other construction materials merchant wholesalers.
4235	Metal and mineral merchant wholesalers.
4244	Grocery and related product merchant wholesalers.
4248	Beer, wine, and distilled alcoholic beverage merchant wholesalers.
4413	Automotive parts, accessories, and tire stores.
4422	Home furnishings stores.
4441	Building material and supplies dealers.
4442	Lawn and garden equipment and supplies stores.
4451	Grocery stores.
4522	Department stores.
4523	General merchandise stores, including warehouse clubs and supercenters.
4533	Used merchandise stores.
4543	Direct selling establishments.
4811	Scheduled air transportation.
4841	General freight trucking.
4842	Specialized freight trucking.
4851	Urban transit systems.
4852	Interurban and rural bus transportation.
4854	School and employee bus transportation.
4859	Other transit and ground passenger transportation.
4871	Scenic and sightseeing transportation, land.
4881	Support activities for air transportation.
4883	Support activities for water transportation.
4911	Postal Service.

4921	Couriers and express delivery services.
4931	Warehousing and storage.
5322	Consumer goods rental.
5621	Waste collection.
5622	Waste treatment and disposal.
6219	Other ambulatory health care services.
6221	General medical and surgical hospitals.
6222	Psychiatric and substance abuse hospitals.
6223	Specialty hospitals.
6231	Nursing care facilities.
6232	Residential intellectual and developmental disability, mental health, and substance abuse facilities.
6233	Continuing care retirement communities and assisted living facilities for the elderly.
6239	Other residential care facilities.
6243	Vocational rehabilitation services.
7111	Performing arts companies.
7112	Spectator sports.
7131	Amusement parks and arcades.
7211	Traveler accommodation.
7212	RV parks and recreational camps.
7223	Special food services.
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OSHA Injury and Illness Recordkeeping and Reporting Masterclass

01

OSHA Recordkeeping

- Scope of OSHA's Recordkeeping Authority
- OSHA Recordkeeping Forms
- Steps to Recordkeeping
- Recordkeeping Hypotheticals
- Summarize, Certify, Post and Maintain
- 5 Common Recordkeeping Mistakes

02

Significant Injury and Fatality Reporting

- Hospitalization, Amputation, Fatality Reqs
- Reporting Timing Issues
- Common Reporting Mistakes
- What Happens After You Report?

03

E-Recordkeeping

- Recordkeeping Data Submission Reqs
- How to Use OSHA's Injury Tracking App
- E-Recordkeeping Enforcement and Site-Specific Targeting Inspection

04

COVID-19 Recordkeeping and Reporting

Scan the QR code below for more info!



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California's New General Industry Workplace Violence Law (SB 556)

New Workplace Violence Law In California (SB 553)

- Signed by Gov. Newsom on September 20, 2023
- Virtually all California employers are required to establish, implement, and maintain an effective **Workplace Violence Prevention Program by July 1, 2024**
- **Exempt Workplaces** under Labor Code Sec. 6401.9:
 1. Facilities covered by and that comply w/ Cal/OSHA's Violence Prevention in Health Care std.;
 2. Facilities operated by the Calif. Dept. of Corrections and Rehabilitation;
 3. Law enforcement agencies;
 4. Teleworking employees; and
 5. Workplaces not publicly accessible w/ fewer than 10 employees present at any one time

SB 553 – Workplace Violence Definitions

- **“Workplace violence”** means any act of violence or threat of violence that occurs in a place of employment, including (but not limited to):
 1. A **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**
 2. Incident involving a **threat or use of a firearm or other dangerous weapon**, including common objects as weapons (regardless if employee sustains an injury)
- **“Threat of violence”** = any verbal or written statement, including texts, electronic or social media messages or posts, or any behavioral or physical conduct that **conveys or reasonably could be perceived to convey intent to cause or place someone in fear of physical harm**, and that serves no legitimate purpose

SB 553 – Workplace Violence Program Overview

- Establish, implement, and maintain a written site-specific Workplace Violence Prevention Plan
- Create and maintain records of:
 - Workplace violence incidents (broadly defined)
 - WPV hazard identification, evaluation, and correction
 - Workplace violence incidents (WPV Incident Log) and investigations of such incidents
- Extensive Interactive Training



California Workplace Violence Prevention Compliance Solutions

Workplace Violence Prevention Plan

We will develop a customized, compliant written Workplace Violence Prevention Plan along w/ all ancillary documents and sub-policies.

Gap Assessment of Related Policies

To ensure alignment, we will perform a Gap Assessment of existing, related policies that intersect with your new Workplace Violence Prevention Plan.

Workplace Violence Prevention Training

We will develop customized training materials and conduct initial interactive training for all affected employees and "train the trainer."

Attorney Consultation Hours

A block of Attorney Consultation Hours to use within a year to help you roll out your new program.

Discount Turnkey
or ad hoc Services
for Meat Institute
Members

Scan the QR code
below for more info!



the OSHA Defense report



■ ■ ■ 2024 OSHA Webinar series ■ ■ ■

2023 in Review and 2024 Forecast
Wednesday, January 17th

OSHA Recordkeeping, E-Recordkeeping and Reporting
Thursday, February 8th

OSH and Employment Law Compliance in ESG Programs
Thursday, March 21st

Preventing and Responding to Workplace Violence
Wednesday, April 24th

Mid-Year OSHA and MSHA Review
Tuesday, May 28th

Impact of EPA's TSCA Regs on OSHA Chemical Safety
Wednesday, June 12th

National and Local Enforcement Emphasis Programs
Thursday, July 18th

Process Safety Management and CalARP
Monday, August 5th

Unique Aspects of State OSH Plans
Thursday, September 19th

Whistleblower and Retaliation Complaints
Wednesday, September 25th

2nd Annual Cal/OSHA and Employment Law Summit
Tues., October 8th and Thurs., October 10th

OSHA Hazard Communication Standard Update
Tuesday, October 15th

Intersection of Artificial Intelligence and OSHA Law
Wednesday, November 13th

12 Ways to Improve Your OSHA Readiness
Wednesday, December 18th

the Cal/OSHA Defense Report



CONN
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CAREY

■ ■ ■ 2024 Cal/OSHA webinar series ■ ■ ■

California's Workplace Violence Prevention Law
Thursday, November 9th (2023)

Cal/OSHA Enforcement and Regulatory Update
Tuesday, December 12th (2023)

California's Indoor Heat Regulation
Tuesday, January 30th

Top Cal/OSHA Violations
Wednesday, February 21st

OSH and Employment Law Compliance in ESG Programs
Thursday, March 21st

Responding to Workplace Violence
Wednesday, April 24th

Mid-Year Review of Cal/OSHA Developments
Wednesday, May 22nd

Process Safety Management and CalARP
Monday, August 5th

Prepare for and Manage Cal/OSHA Inspections
Wednesday, August 21st

CMC's 2nd Annual Cal/OSHA and Employment Law Summit
Tuesday, October 8th and Thursday, October 10th

Artificial Intelligence and OSH/Employment Law
Wednesday, November 13th

2025 Cal/OSHA Enforcement and Regulatory Forecast
Thursday, December 5th

Check Out Our Blogs



the **OSHA** Defense report



the **Employer** Defense report



the **Cal/OSHA** Defense report



the **MSHA** Defense report



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Questions?

