



*Advancing public policy to  
improve the health and safety  
of workers and the community.*

**CIHC Board:**

President, Edward Klinenberg, PhD, CIH  
Northrop Grumman Information Systems  
McClellan, CA

Vice President, Pamela Murcell, CIH  
KWA Safety & HAZMAT Consultants, Inc.  
El Dorado, CA

Treasurer, Joel Cohen, MPH, CIH  
The Cohen Group  
San Mateo, CA

Secretary, Samantha Chua, MS, CIH  
GenMark Diagnostics  
San Diego, CA

**Directors:**

Joel I. Berman, CIH, CSP, CAC, CIAQM  
Health Science Associates  
Los Alamitos, CA

Stephen Derman, FAIHA  
MediSHARE Environmental Health & Safety  
Services  
Cupertino, CA

Nola J. Kennedy, PhD, CIH  
California State University, Northridge  
Northridge, CA

Chris Laszcz-Davis, MS, CIH, FAIHA, AIC Fellow  
The Environmental Quality Organization, LLC  
Affiliated, Aluminium Consulting Engineers  
Lafayette, CA

Megan Canright, MPH, CIH  
Forensic Analytical Consulting Services  
San Diego, CA

Howard Spielman, PE, CIH, CSP, REHS  
Health Science Associates  
Los Alamitos, CA

Michael Sullivan, PhD, CIH, REA  
California State University, Northridge  
Northridge, CA

**Alternates:**

Ann Graham, CIH  
U.S. Navy  
San Diego, CA

Jaime Steadman-Lyde, CIH  
Health Science Associates  
Los Alamitos, CA

James L. Unmack, PE, CIH, CSP  
Unmack Corporation  
San Pedro, CA

**Special Advisors:**

Patricia Beach, MS, CIH  
Harris & Lee Environmental Sciences, LLC  
San Francisco, CA

Larry Gibbs, MEd, MPH, CIH  
Stanford University  
Palo Alto, CA

Deb Martin, MS, CIH  
Sustainability Accounting Standards Board  
San Francisco, CA

Vicki Wells, MS, CIH, CSP  
Director, Occupational Safety & Health  
San Francisco Department of Health  
San Francisco, CA

**Sacramento Advocacy:**

Catherine Barankin  
CIHC Legislative Office  
Sacramento, CA

December 21, 2015

Jon Wroten  
Department of Industrial Relations  
Office of Self Insurance Plans  
11050 Olson Drive, Suite 230  
Rancho Cordova, CA 95670  
OSIPRulemaking@dir.ca.gov

**Re: Proposed Rulemaking Changes, Workers' Compensation – Self-Insurance**

Dear Jon,

The California Industrial Hygiene Council (CIHC) respectfully submits the following comments regarding proposed rulemaking changes to Workers' Compensation – Self-Insurance. CIHC believes the regulatory process should be streamlined without unnecessary and unduly burdensome requirements. However, we don't support streamlining efforts such as section 15353 which create different levels of worker health and safety oversight dependent solely on workers' compensation coverage. We offer the following comments to the proposed rulemaking changes to integrate some assurance that risk will be effectively managed into the process:

1. General
  - a. If self-certification is going to be used for the Injury and Illness Prevention Program, a definition of "effective" needs to be provided. An example is included in the Division of Occupational Safety and Health (DOSH) Policy and Procedures (P&P) Manual C-45A.
  - b. The self-certification of the IIPP needs to occur periodically (e.g. no less than every three years) versus one-time.
2. Section 15353. Injury and Illness Prevention Program (IIPP).
  - a. Add. Individual private sector applicants in high hazard industries per DOSH P&P Manual C-19A shall have ongoing risk control and safety support under the general direction of a California Professional Engineer, a Certified Safety Professional, and/or a Certified Industrial Hygienist. The contact name and title of this person shall be identified in the application.
3. Section 15482. Private Group Application
  - a. Add. Identify the contact name and title of the California Professional Engineer, Certified Safety Professional, and/or Certified Industrial Hygienist who will be overseeing the group's risk control and safety services per section 15486.1.

Founded in 1990, CIHC represents the occupational and environmental health profession in California and is affiliated with the American Industrial Hygiene Association (AIHA), a 10,000 member national organization, as well as the International Occupational Hygiene Association (IOHA), which represents the global community of Occupational Hygiene organizations in over 34 countries. Please refer to [www.cihconline.com](http://www.cihconline.com) for further information about CIHC.

We appreciate the opportunity to comment. Should you have any questions, please contact me with any questions.

Regards,

Ed Klinenberg



Edward J. Klinenberg, Ph.D., CIH

President, CIHC

P: (916) 570-4032

[edward.klinenberg@ngc.com](mailto:edward.klinenberg@ngc.com)