



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

August 10, 2016

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

Dear Lyn,

The California Industrial Hygiene Council (CIHC) respectfully submits the following comments regarding the latest proposed rulemaking changes to Workers' Compensation – Self-Insurance. CIHC continues to believe the regulatory process should be streamlined without unnecessary and unduly burdensome requirements. We also believe self-certification of the Injury and Illness Prevention Plan effectiveness is best evaluated by a designated competent person as defined by Cal/OSHA. Please consider adding the following verbiage to the proposed rulemaking.

15201. Definitions

Add. Competent Person. A person who is capable of identifying existing and predictable hazards to employees in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees, and who has authority to take prompt corrective measures to eliminate these conditions.

15353. Injury and Illness Prevention Program

(a) Change "...person within their organization...." to "...competent person within their organization..."

15486.1. Group Self-Insurer Injury and Illness Prevention Program

(a) Change "...person within their organization...." to "...competent person within their organization..."

Founded in 1990, the 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 for further information about CIHC.

We appreciate the opportunity to comment. Please contact me with any questions

Regards,

Ed Klinenberg

A handwritten signature in black ink, appearing to read "Edward J. Klinenberg". The signature is fluid and cursive, with a prominent initial "E" and "K".

Edward J. Klinenberg, Ph.D., CIH

President, CIHC

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