



November 26, 2024

Tari Enos, Administrative Regulations Analyst
Department of Labor & Industries
Division of Occupational Safety & Health
7273 Linderson Way SW
Tumwater, WA 98501

RE: Division of Occupational Safety & Health (DOSH) Expedited Proposal (CR-105) – Workplace Violence in Health Care

The Washington Chapter of the Home Care Association of America (HCAOA), the leading trade association representing home care agencies across the country, appreciates the opportunity to provide feedback on the Department’s expedited proposal concerning workplace violence in healthcare.

Preventing and adequately addressing violence against home care workers is a major priority of each of our 124 member agencies in Washington state. The home care workforce works tirelessly every day to ensure that the most vulnerable in our state can access the care they need, and they deserve to be prioritized and protected.

However, given the gravity and importance of this issue, HCAOA objects to the expedited rulemaking process. After initial review of the rule, we have concerns about a lack of uniformity across comparable care settings, as well as discrepancies between underlying statute and the proposed rule.

We look forward to being a partner to the Department throughout the normal rulemaking process to ensure home care workers are safe, prioritized, and protected in the workplace.

Respectfully,

Jason Lee
Chief Executive Officer
Home Care Association of America (HCAOA)