



MEMORANDUM

To: Members of the House Labor and Industry Committee

From: Alexandra McMahon, Director of Government Relations

Date: May 3, 2024

Subject: Feedback on The Health Care Workplace Violence Prevention Act

I write to you on behalf of more than 700 organizational members of the Pennsylvania Homecare Association (PHA) to share some feedback related to House Bill 2247 the Health Care Workplace Violence Prevention Act. PHA is a statewide membership association representing homecare, home health, and hospice providers that serve Medicare and Medicaid beneficiaries in their homes to ensure that Pennsylvanians can age in place and live as independently as possible.

While PHA supports the intent of House Bill 2247, the Health Care Workplace Violence Prevention Act, aimed at combating workplace violence, we have some feedback regarding potential implications for home health care providers. These providers already comply with [OSHA's Guidelines for Preventing Workplace Violence for Health Care & Social Service Workers](#), which are designed to mitigate workplace violence risks for workers in healthcare, including home healthcare, and social services.

Under OSHA's guidelines, home health care agencies are mandated to have violence prevention programs in place, encompassing several key elements that ensure a safe work environment. These include:

1. **Management Commitment and Worker Involvement:** Active support and participation in violence prevention programs from management.
2. **Worksite Analysis:** Collaborative assessment of the workplace to identify violence hazards involving management, supervisors, and workers.
3. **Hazard Prevention and Control:** Measures taken by providers to prevent and control violence risks, including procedural adjustments, security enhancements, and training.
4. **Safety and Health Training:** Training for employees on recognizing and responding to potential violence, de-escalation techniques, and organizational policies.
5. **Recordkeeping and Program Evaluation:** Maintenance of incident records, near misses, and program evaluations for continuous improvement.

The duplication of federal and state standards poses challenges for home health care providers, leading to confusion, increased costs, inconsistencies, and regulatory redundancies. Compliance with multiple standards can strain resources, particularly for smaller providers with limited capacity.

PHA welcomes further discussions on integrating violence prevention efforts within the existing regulatory framework. Ensuring the safety of Pennsylvania's vulnerable populations remains a top priority for PHA, its members, and the community we serve.

Thank you for your attention to this matter, and we appreciate your efforts in addressing workplace violence prevention in the home health care setting.