



February 2, 2009

Honorable Edward M. Kennedy  
Chairman  
Committee on Health, Education, Labor and Pensions  
SD-428 Dirksen SOB  
Washington, DC 20510

Dear Senator Kennedy:

The American Industrial Hygiene Association (AIHA) would like to elicit your support for Congress to request a Government Accountability Office (GAO) study on whether or not the National Institute for Occupational Safety and Health (NIOSH) should remain within the organizational structure of the Centers for Disease Control (CDC).

A GAO study is needed because of the ongoing changes that have taken place within NIOSH and CDC the past several years and the future challenges to both CDC and NIOSH.

In 2004, CDC announced it was planning to reorganize CDC's programs into four "coordinating centers" as part of the Agency's Futures Initiative. Under the plan, NIOSH would have been placed under one of these "centers". As a result of tremendous opposition, Congress recommended that CDC "maintain the status quo with respect to the direct reporting relationship of the NIOSH director to the CDC director" and that "CDC make no changes to NIOSH's current operating procedures and organizational structure".

While this effort was successful many concerns remain. In part, this is due to the fact that these efforts only addressed a short-term fix for NIOSH. Again in 2009, the NIOSH budget is facing a crisis. NIOSH research funding remains flat and an ever-increasing amount of the budget flows back to CDC for administrative costs. In addition, the Institute is without a permanent director when Dr. John Howard was not reappointed to another term last July.

There have been several recommendations regarding the organizational "home" for NIOSH. One suggestion was to move NIOSH to the Department of Labor. AIHA believes a better suggestion is to retain NIOSH within the Department of Health and Human Services but move it to the National Institutes of Health (NIH). NIH is the primary federal agency for conducting and supporting research that leads the way in improving people's health and saving lives. Disease prevention research within NIH is of the utmost importance to the millions of workers at risk in this country. NIH already has 27 Institutes and Centers under its umbrella and adding NIOSH would allow NIOSH research to take advantage of the many researchers used by NIH.

While AIHA believes moving NIOSH to NIH has merit, we are not sure anyone has thoroughly looked at what impact a possible move could, or would, have on occupational health and safety. Therefore, AIHA suggests that Congress request the Government Accountability Office (GAO)

to conduct a study to determine whether or not the National Institute for Occupational Safety and Health (NIOSH) should remain within the organizational structure of the Centers for Disease Control (CDC) and, if not, where should it be located. This study could look at the “pros and cons” of these alternatives and would provide NIOSH, CDC, stakeholders and others with the information and data on how best to address the issue of occupational health and safety in today’s workplace.

AIHA has privately discussed a GAO study with numerous stakeholders and individuals and there is interest in this suggestion. Such a study would provide a framework in which all the various views about the NIOSH organizational status could be considered. Now, there is no framework.

Before concluding, it might also be of help to provide you with a little more information on why NIOSH is so important.

Many are not aware that NIOSH is the only federal agency responsible for conducting research and making recommendations for the prevention of work-related injury and illness. Created in 1970, along with the Occupational Safety and Health Administration (OSHA), NIOSH is part of CDC in the Department of Health and Human Services. NIOSH is an agency established to help assure “safe and healthful working conditions for working men and women by providing research, information, education, and training in the field of occupational safety and health”.

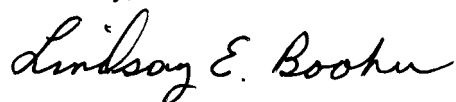
The NIOSH mission is multi-faceted. In addition to working with over 500 partners on the National Occupational Research Agenda, NIOSH supports training of occupational safety and health professionals and researchers through 16 regional Education and Research Centers and through training grants throughout the United States.

As the premier association of occupational and environmental health and safety professionals, AIHA members represent a cross-section of industry, private business, labor, academia, and government. AIHA’s nearly 10,000+ members rely on NIOSH research and training in our efforts to protect workers and their families. The future of NIOSH is of the utmost importance to AIHA, but more importantly to worker health and safety.

AIHA offers you our assistance in any way and urges you to seriously consider this suggestion.

Thank you for your continued efforts on behalf of the professionals in occupational health and safety and the workers we strive to protect.

Sincerely,



Lindsay E. Booher, CIH, CSP  
AIHA President

cc: Senator Michael B. Enzi  
Senator Patty Murray  
Senator Johnny Isakson  
Representative George Miller  
Representative Howard P. McKeon  
Representative Lynn C. Woolsey  
Representative Thomas E. Price